

10 CFR 50, Appendix E, Section V

August 26, 2014

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Subject: **Docket Nos. 50-206, 50-361, 50-362, and 72-41**  
**Revision to Emergency Plan Implementing Procedures**  
**San Onofre Nuclear Generating Station (SONGS), Units 1, 2, 3, and**  
**the Independent Spent Fuel Storage Installation**

Dear Sir or Madam:

Pursuant to 10 CFR 50, Appendix E, Section V, Attachment 1 of this letter provides a copy of the following revised Emergency Plan Implementing Procedures:

<u>Procedure</u>	<u>Rev</u>	<u>Effective Date</u>
SO123-VIII-CR, Revision 3, Emergency Response Organization (ERO) Control Room Position Checklists	3	07/31/2014
SO123-VIII-OSC, Revision 1, Emergency Response Organization (ERO) Operations Support Center Position Checklists	1	07/31/2014
SO123-VIII-0.100, Maintenance and Control of Emergency Planning Documents	18 EC 1	08/18/2014
SO123-VIII-0.302, Onsite Emergency Siren System Test	8	08/18/2014

Attachment 2 of this letter provides an updated index listing titles, revisions, and editorial corrections (ECs) of the SONGS Emergency Plan Implementing Procedures, as of August 21, 2014. A bar in the right margin indicates items changed since our previous submittal.

Attachment 3 lists the current Emergency Plan Manuals, Orders, and Training Procedures that are referenced in the Emergency Plan. There have been no changes to this index since our previous submittal.

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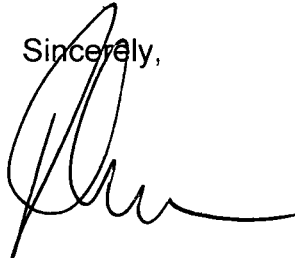
AK45  
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Attachment 4 provides the report and analysis summary of the Emergency Plan Implementing Procedures changes.

There are no commitments contained in this letter or its attachments.

If you have any questions, please contact Ms. Kelli A. Gallion, Emergency Planning Manager, at (949) 368-7756.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Gallion', written over the word 'Sincerely,'.

Attachments: 1. Revised Emergency Plan Implementing Procedures  
2. SONGS Emergency Plan Implementing Procedures (EIPs) Index  
3. SONGS Emergency Plan Referenced Manuals, Orders, and Training Procedures Index  
4. Reports and Analysis Summaries of SONGS Emergency Plan Implementing Procedures Changes.

cc: Emergency Response Coordinator, NRC Region IV (2 copies of Attachment 1)  
M. Dapas, Regional Administrator, NRC Region IV  
J. E. Whitten, NRC Region IV, Nuclear Material Safety Branch Chief  
T. J. Wengert, NRC Project Manager, SONGS Units 2 and 3  
M. Vaaler, NRC Project Manager, San Onofre Unit 1  
W. C. Allen, NRC Project Manager, San Onofre ISFSI  
G. G. Warnick, NRC Senior Resident Inspector, SONGS Units 2 and 3

## **Attachment 1**

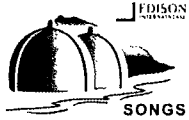
### **Revised Emergency Plan Implementing Procedures**

**SO123-VIII-CR, Revision 3, Emergency Response Organization (ERO)  
Control Room Position Checklists**

**SO123-VIII-OSC, Revision 1, Emergency Response Organization (ERO)  
Operations Support Center Position Checklists**

**SO123-VIII-0.100, Revision 18 EC 1, Maintenance and Control  
of Emergency Planning Documents**

**SO123-VIII-0.302, Revision 8, Onsite Emergency Siren System Test**



## Emergency Response Organization (ERO) Control Room Position Checklists

**SO123-VIII-CR  
REV: 3**

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Procedure Usage Requirements		Sections
Information Use	<ul style="list-style-type: none"> <li>The user may complete the task from memory. However, the user is responsible for performing the activity according to the procedure.</li> <li>Information use documents that contain a specific process order are performed in the given order unless otherwise specified within the document.</li> </ul>	Attachment 3
Reference Use	<ul style="list-style-type: none"> <li>Review and understand the procedure before performing any steps, including the prerequisite section.</li> <li>Have a copy or applicable pages/sections open at the work site.</li> <li>Use Placekeeping method according to SO123-XV-HU-3.</li> <li>If any portion of the document is performed from memory, do so in the sequence specified. Perform each step as written, except when an approved process specifically allows deviation.</li> <li>Refer to the procedure or instruction at least once to ensure completion of the task in accordance with the requirements.</li> <li>Review the document at the completion of the task to verify that all appropriate steps are performed and documented.</li> </ul>	All Except Attachment 3

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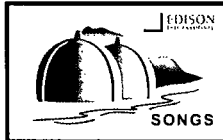
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### QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / 50.54(q) APPLIES / RX DNA

Procedure Type
EPIP

Procedure Owner
Kelli Gallion



## Emergency Response Organization (ERO) Control Room Position Checklists

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### NOTE

The Shift Communicator may perform the Operations Leader Checklist as assigned by the Shift Manager (SM).

## 1.0 RESPONSIBILITIES

1.1 **VERIFY** Level of Use requirements on the first page of this procedure.

1.2 The responsibilities of the CR ERO personnel are as follows:

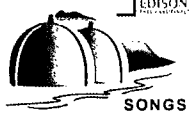
### 1.2.1 Shift Communicator

- Performs all E-Plan required notifications until relieved by TSC or EOF Staff. After transferring duties, is responsible for general communication and administrative duties in TSC.
- Initiates communications with the NRC via the ENS line and maintains a communication link upon request until relieved by TSC staff.

### 1.2.2 Operations Leader

- Provides the interface between the Control Room and the TSC and OSC via the Ivory Phone.
- Activates the sirens and performs the Public Address Announcements that are required for Assembly and Evacuation
- Report any abnormalities to the Shift Manager (SM immediately and provide assistance in formulating a plan for appropriate corrective action.

## REFERENCE USE



## Emergency Response Organization (ERO) Control Room Position Checklists

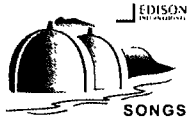
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### 2.0 ACRONYMS

2.1	<u>ARM:</u>	Area Radiation Monitor
2.2	<u>AWS:</u>	Administration Warehouse & Supply/Shop
2.3	<u>CAL OES:</u>	California Office of Emergency Services
2.4	<u>CAPR:</u>	Corrective Action to Prevent Reoccurrence
2.5	<u>CED:</u>	Corporate Emergency Director
2.6	<u>CEDE:</u>	Committed Effective Dose Equivalent
2.7	<u>CDE:</u>	Committed Dose Equivalent
2.8	<u>CFMS</u>	Critical Function Monitoring System
2.9	<u>CR:</u>	Control Room
2.10	<u>DAC:</u>	Derived Airborne Concentration
2.11	<u>DACS</u>	Dose Assessment Computer System
2.12	<u>EAL:</u>	Emergency Action Level
2.13	<u>EAN:</u>	Emergency Advisor, Notifications
2.14	<u>EC:</u>	Emergency Coordinator
2.15	<u>ENF:</u>	Event Notification Form
2.16	<u>EOC:</u>	Emergency Operations Center
2.17	<u>EOF:</u>	Emergency Operations Facility
2.18	<u>EP:</u>	Emergency Plan
2.19	<u>EPC:</u>	Emergency Planning Coordinator
2.20	<u>EPIP:</u>	Emergency Plan Implementing Procedure

### REFERENCE USE




## Emergency Response Organization (ERO) Control Room Position Checklists

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2.21	<u>ERF</u> :	Emergency Response Facility
2.22	<u>ERO</u> :	Emergency Response Organization
2.23	<u>ERTD</u> :	Emergency Response Telephone Directory
2.24	<u>ISFSI</u> :	Independent Spent Fuel Storage Installation
2.25	<u>KI</u> :	Potassium Iodide
2.26	<u>NIA</u> :	North Industrial Area
2.27	<u>NRC</u> :	Nuclear Regulatory Commission
2.28	<u>OSLD</u> :	Optically Stimulated Luminescent Dosimeter
2.29	<u>OCA</u> :	Owner Controlled Area
2.30	<u>PA</u> :	Protected Area
2.31	<u>PAPA</u> :	Protected Area Personnel Accountability
2.32	<u>PAR</u> :	Protective Action Recommendation
2.33	<u>PAZ</u> :	Protective Action Zone
2.34	<u>RP</u> :	Radiation Protection
2.35	<u>SAMG</u> :	Severe Accident Management Guideline
2.36	<u>SC</u> :	Shift Communicator
2.37	<u>SCBA</u> :	Self-Contained Breathing Apparatus
2.38	<u>SCE</u> :	Southern California Edison
2.39	<u>SCP</u> :	Safeguards Contingency Plan
2.40	<u>SED</u> :	Station Emergency Director
2.41	<u>SM</u> :	Shift Manager

### REFERENCE USE

	<b>Emergency Response Organization (ERO) Control Room Position Checklists</b>	<b>SO123-VIII-CR REV: 3</b>
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2.42 SONGS: San Onofre Nuclear Generating Station

2.43 SRO: Senior Reactor Operator

2.44 TSC: Technical Support Center

2.45 VNF: Verbal Notification Form

2.46 YPS: Yellow Phone System


### 3.0 PROCEDURE

3.1 **OBTAIN** a copy of the applicable ERO position checklist. This checklist may be found in each ERO Position Book or may be obtained from this procedure.

### 4.0 RETENTION OF RECORDS

4.1 **COLLECT** all paperwork generated in response to the emergency event (e.g., logs, procedures, attachments, forms and checklists) **AND DELIVER** to either the TSC Manager, EOF Emergency Planning Coordinator or OSC Emergency Planning Coordinator.



	<b>Emergency Response Organization (ERO) Control Room Position Checklists</b>	<b>SO123-VIII-CR REV: 3</b>
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### POSITION CHECKLIST

#### NOTE

1. This checklist may be performed concurrently with the Operations Leader Checklist by the Operations Leader.
2. Steps may be performed in any order or concurrently.

#### 1.0 Initial Actions

1.1 **ENSURE** the following is contained in the position notebook:

- SO123-VIII-30.7, Emergency Notifications
- EP(123) 5, Turnover Status
- EP(123) 6, Emergency Response Log Book
- EP(123) 10, Event Notification Form
- EP(123) 11, Verbal Notification Form
- EP(123) ERO-1, Notification of Departure From License Conditions

1.2 **ESTABLISH AND MAINTAIN** a log of all decisions and actions required by EPIPs, **AND IDENTIFY** items requiring feedback.

1.3 **REPORT** to EC prepared to initiate notifications when directed or upon awareness that abnormal conditions may lead to one of the following:

- Initial Event Declaration
- Event Reclassification
- Upgrade in PAR including additional PAZ(s)
- Start of radiological release
- Stop of radiological release

## 2.0 Continuing Actions

- 2.1 **ENSURE** notifications are initiated as soon as possible and NO later than the times indicated below before turnover of EC duties to the TSC (event declaration/reclassification, PAR upgrade, start or stop of radiological release sets time 0):



NOTIFICATION TIME LIMITS		
TIME LIMIT	NOTIFICATION	RESPONSIBILITY
EDT + 10 minutes	Notify or recall ERO members	EAN
EDT + 15 minutes	EP(123) 11, Verbal to Local & State	EAN
As soon as possible but within 1 hour of EDT	Red Phone verbal to NRC	OPS
EDT + 30 minutes	EP(123) 10, ENF to Local & State	EAN
EDT + 90 minutes and every 60 minutes thereafter	EP(123) 10, ENF Follow-up	EAN


(EDT = Event Declaration Time)

### NOTE

A change in classification, start, or stop, of a radiological release, OR PAR upgrade requires notification to offsite agencies within 15 minutes of change. Notifications for any prior events are superseded, even if the affected units are not the same for the prior and current events.

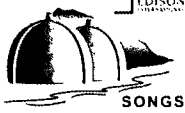
## 2.2 10 Minute ERO Recall / Notification and 15-Minute Verbal Notification

- 2.2.1 IF ERO recall or notification is required to be performed, THEN INITIATE ERO recall or notification using EC-approved EP(123) 11, Verbal Notification Form (VNF), and SO123-VIII-30.7, Emergency Notifications, Section for Emergency Recall Activation.
- 2.2.2 **PERFORM** Blue Phone verbal notification using the approved VNF.
- 2.2.2.1 IF CAL OES does NOT respond to Blue Phone as expected, THEN CONTACT them using the alternate number (listed on the VNF).
- 2.2.3 **PERFORM** YPS verbal notification (dial 91 to call all stations) using the approved VNF.
- 2.2.3.1 WHEN performing the roll call in Section 4.0 of the VNF, if the person from each staffed station states their name, THEN check 'yes'; otherwise check 'no'.
- 2.2.3.2 IF offsite agencies do NOT respond as expected, OR there are Yellow Phone System problems, THEN REFER to Section 3.0.

 EDISON SONGS	<b>Emergency Response Organization (ERO) Control Room Position Checklists</b>	<b>SO123-VIII-CR REV: 3</b>
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- 2.2.3.3 IF a change in classification, change in PAR, start of a release, or stop of a release occurs before reading of the verbal notification, **AND IF** reading of UPDATED verbal message can start within 15 minutes of initial event declaration, THEN the notifications may be combined into one. Otherwise **COMPLETE** verbal notification **EXCEPT** for the roll call portion of the VNF, AND standby for a new set of notifications.
- 2.2.4 IF assigned to perform Operations Leader duties, THEN IMPLEMENT Attachment 2, Section 2.0, PA/Siren Coordination.
- 2.2.5 **REPORT** verbal notification status to the EC.
- 2.3 30-Minute Printed Message
- 2.3.1 **ENTER** the EC approved ENF data into the computer, including EC Name in "Approved By" block.
- 2.3.2 **PRINT** message.
- 2.3.3 IF time permits, THEN OBTAIN signed approval of the printed message by the EC.
- 2.3.4 **FAX** ENF to all YPS stations using the dedicated YPS fax machine (press "Batch Tx", then "Start".)
- 2.3.5 **FAX** ENF to the California Office of Emergency Services (CAL OES) using a standard fax machine to the number listed on the VNF.
- 2.3.6 **RECORD** fax start time on VNF, Section 6.0, OR ENTER N/A in fax time if no message is faxed.
- 2.3.7 **ENSURE** ENF message was received by offsite agencies (obtain fax confirmation printout or dedicated YPS transmission report).
- 2.3.8 **FAX** completed Verbal Notification Form to TSC and EOF.
- 2.3.9 **MARK** printed messages **NOT** transmitted as "Superseded" AND FILE them for documentation purposes.
- 2.3.10 **REPORT** printed message status to the EC.


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## 2.4 NRC Notification within One Hour

- 2.4.1 **OBTAIN** NRC Form 361, Reactor Plant Event Notification Worksheet, from the EC. **COMPLETE** the form and **INITIATE** notification to NRC within one hour.
- 2.4.2 **MAINTAIN** an open communication channel if requested by the NRC.
- 2.4.3 **ENSURE** the NRC is provided follow-up notification information, reclassification, and other pertinent information.
- 2.4.4 IF a subsequent notification per 10CFR50.72 is required, THEN **ENSURE** the 10CFR50.72 report is made to the NRC Headquarters Operations Officer and **NOT** the NRC Communicator.


## 2.5 90 -Minute Follow-Up Verbal and Printed Notifications

- 2.5.1 **PREPARE** VNF (Sections 2 and 5 only; no EC approval or roll call is required for follow-up Notifications).
  - 2.5.1.1 **CONSIDER** use of ERO recall system, using SO123-VIII-30.7, Attachment 2, Section C, "Modified Message:" to keep ERO informed of current status.
  - 2.5.1.2 **CHECK** box "Is in progress since" AND **ENSURE** event classification and declaration times are the same as the previous ENF.
- 2.5.2 **COMPLETE** ENF.
  - 2.5.2.1 **CHECK** box "Is in progress" AND **ENSURE** event classification and declaration times are the same as the previous ENF.
  - 2.5.2.2 **PROVIDE** updated plant status AND **OBTAIN** EC approval on ENF.
- 2.5.3 **ENTER** ENF data into computer.
- 2.5.4 **PRINT** message.
- 2.5.5 **OBTAIN** approval of printed message by the EC.
- 2.5.6 **PERFORM** Blue and Yellow Phone verbal notification using VNF Sections 2 and 5.
- 2.5.7 **FAX** ENF to all YPS stations and to CAL OES.
- 2.5.8 **RECORD** completion time on VNF, Section 6.0.
- 2.5.9 **FAX** completed VNF to TSC and EOF.

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- 2.5.10 **CONTINUE** follow-up Notifications every 60 minutes until the event is reclassified, PAR upgraded, start or stop of a radiological release, or event closed-out.
- 2.5.11 **REPORT** printed message status to the EC.
- 2.5.12 **PERFORM** closeout Notifications when directed by the EC per SO123-VIII-30.7, Section for Close-Out Notifications.
- 2.6 Turnover
  - 2.6.1 WHEN notified by the SM that EC turnover to the TSC (SED) is complete, THEN **TRANSFER** responsibility for event and follow-up notifications to TSC EAN.
  - 2.6.2 Upon activation of the TSC, **CONTACT** the TSC Red Phone Communicator and **TRANSFER** NRC communication duties to the TSC Red Phone Communicator.
  - 2.6.3 IF ERO has NOT been recalled, THEN when oncoming Shift Communicator arrives at the Control Room:
    - 2.6.3.1 **CONDUCT** turnover with oncoming Shift Communicator in accordance with Form EP(123) 5.
    - 2.6.3.2 **RECORD** completion of turnover in Shift Communicator Log
- 3.0 **Yellow Phone System Problems**
  - 3.1 IF Station 23 USMC Dispatch; Station 27 O/C COMM CTR, Station 29 State Parks, or Station 46 SD County, do **NOT** answer the YPS all-call (91), THEN **MAKE** one attempt to **CONTACT** them using an individual YPS call, followed by an alternate number call within 15-minutes of event declaration time.
  - 3.2 IF other expected agencies do **NOT** answer the YPS all call (91), THEN **MAKE** one attempt to **CONTACT** them using an individual YPS call followed by an alternate number call prior to faxing the 30-minute printed message.
  - 3.3 IF EOCs are not activated, **OR** primary **AND** alternate notification methods are **NOT** successful, THEN **REQUEST** Station 27/28 Orange County **NOTIFY** the non-responding stations **AND** follow up with Station 27/28 Orange County to **CONFIRM** non-responding stations were contacted prior to faxing the 30-minute printed message.
  - 3.4 IF nearest YPS is **NOT** working or is inaccessible (i.e., equipment malfunction or uninhabitable atmosphere), THEN emergency notifications could be completed using the YPS at other Emergency Response Facilities (e.g., TSC) **OR** from a safe location using the alternate telephone and fax numbers.
    - 3.4.1 **REFER** to Verbal Notification Form (VNF), EP(123)11, for alternate telephone and fax numbers.

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3.4.2 **CONTACT** Telecom Control Center (TCC) at PAX 7-51200, for equipment malfunction when time permits.

3.5 IF Yellow Phone Voice Circuit is completely inoperable, THEN:

3.5.1 Using the alternate number found in the VNF or ERTD, **CONTACT** Orange County (Station 27).

3.5.1.1 **READ** the VNF information **AND INFORM** them the Yellow Phone is inoperable.

3.5.1.1.1 **REQUEST** Orange County to:

- Relay the VNF information to the cities of Dana Point, San Juan Capistrano and San Clemente.
- **INFORM** the jurisdictions that further updates will be through the Yellow Phone Bridge Line (949-368-3800, access code 0852).

3.5.2 Using the alternate number found in the VNF or ERTD; **CONTACT** the San Diego County EOC (Station 46), USMC Command Center (Station 23), State Parks Dispatch (Station 29), Edison Generation Operations (Station 42);

3.5.2.1 **READ** the VNF information **AND**,

3.5.2.2 **INFORM** them the Yellow Phone is inoperable.

3.5.2.3 **INFORM** the jurisdictions that further updates will be through the Yellow Phone Bridge Line (949-368-3800, access code 0852).

3.5.2.4 **REQUEST** assistance for offsite notifications from another facility Communicator or from Edison Generation Operations (Station 42).


3.5.3 IF there are YPS system problems, THEN **CONTACT** Telecom Control Center (TCC) at PAX 51200.

3.5.4 IF all stations report no message receipt, THEN **FAX** printed message from another fax machine.

**NOTE**

The following steps will tie an outside phone call directly into YPS. The station must maintain an open line.

3.6 IF a YPS voice circuit fails, THEN **CONTACT** affected station **AND DIRECT** them to dial (949) 368-3880 followed by Access Code 0852 to connect to YPS verbal circuit.

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- 3.7

IF more than three backup lines are needed, THEN **CONTACT** affected station AND **DIRECT** them to dial (949) 368-3800 followed by Access Code 0852 to YPS verbal circuit.
- 3.7.1

IF there are YPS system problems, THEN **CONTACT** Telecom Control Center (TCC) at PAX 51200.



## Emergency Response Organization (ERO) Control Room Position Checklists

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Operations Leader Instruction/Checklist

Attachment 2

### NOTE

This checklist may be performed concurrently with the Shift Communicator Checklist by the Shift Communicator

### POSITION CHECKLIST

#### Operations Leader Supplemental Position Instructions Table of Contents

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20.0	Deviation From License Conditions.....	27
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22.0	Event Closeout .....	28

### NOTE

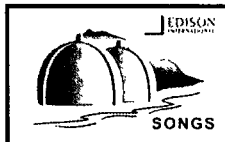
1. Sections 12.0 through 22.0 provide supplemental instructions for performing the Operations Leader duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.

#### 1.0 Initial Actions

##### 1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 3, Emergency Exposure Authorization
- EP(123) 5, Turnover Status
- EP(123) 6, Emergency Response Log Book
- EP(123) ERO-7, PA/Siren Coordination
- EP(123) 294, Personnel Accountability
- EP(123) 4-G, Dispatch Checklist





## Emergency Response Organization (ERO) Control Room Position Checklists

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Operations Leader Instruction/Checklist

Attachment 2

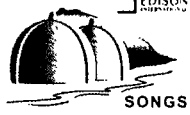
- 1.2 **MAINTAIN** a log of decisions and actions required by EIPs, including Ivory Phone communications and decisions.
- 1.3 At Alert Declaration, or higher, **DIRECT** those Operators who may be dispatched to the field to sign on to a REP **AND OBTAIN** dosimetry.

### 2.0 PA/Siren Coordination





- 2.1 **IMMEDIATELY** (within 15 minutes of event declaration) **PERFORM** PA/Siren Coordination per steps 2.3 through 2.7 before continuing with this checklist. [NN 201507385]
- 2.2 **IF** PA/Siren is being coordinated from outside the Control Room, **THEN PERFORM** only steps in section 2.5 **WHEN** given direction from the TSC to sound Units 2/3 sirens.
- 2.3 **PREPARE** Site Public Address System message, with input from the EC and **IF** time permits, a peer check, using Form EP(123) ERO-7, PA/Siren Coordination, page 1 for events that are **NOT** Code Red or Code Blue (page 2 for Code Red Security Events or page 3 for Code Blue Security Events).
- 2.4 **ANNOUNCE** message ONCE over Site Public Address System.
- 2.5 **SOUND** Units 2/3 sirens as follows (N/A for Notification of Unusual Event [NOUE]):
  - 2.5.1 **ACTIVATE** PAX 'tone generator' and emergency evacuation sirens as follows:
    - 2.5.1.1 On a Control Room PAX phone, **PICK UP** the hand set.
    - 2.5.1.2 **PRESS AND RELEASE** the Red 'Shift' button.
    - 2.5.1.3 **PRESS AND RELEASE** the Red 'Siren All' button.
    - 2.5.1.4 **LISTEN** on the hand set for 'ringing' followed by a 'beep'.
    - 2.5.1.5 After about three seconds of silence (start delay), **LISTEN** on the hand set for the siren tone, **THEN HANG UP** the hand set.
  - 2.5.2 **PRESS** Emergency Evacuation Siren start pushbutton (HS-7890-1) on CR 57.
  - 2.5.3 After a 60-second run, **PRESS** Emergency Evacuation Siren stop pushbutton on CR 57.
  - 2.5.4 **IF** PAX 'tone generator' siren does **NOT** time out and stop after 60 seconds, **THEN PRESS** the Green Siren Kill/Reset button for three seconds **AND RELEASE**.
  - 2.5.5 **ENSURE** all sirens are secured.



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Operations Leader Instruction/Checklist	Attachment 2
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- 2.6 **REPEAT** Site Public Address System announcement from Form EP(123) ERO-7, PA/Siren Coordination, two times.
- 2.7 IF the PAR includes "Evacuate State Beach," **THEN MAKE** the following announcement twice, using Perimeter Public Address handset in SM's office:
- 2.7.1 For a Code Red Security event:
- "Attention on the beach. Attention on the beach. A Security response is in progress, evacuate the beach immediately. A Security response is in progress, evacuate the beach immediately."**
- 2.7.2 For all other events/situations:
- "May I have your attention? An emergency condition exists at the San Onofre Nuclear Generating Station. Please leave the area in a safe and orderly manner."**
-  2.8 For any ongoing security event, **PROVIDE** periodic follow-up announcements on the Site Public Address System (approx. every 15 minutes) to ensure personnel safety.
- 2.9 For any ongoing non-security event, **PROVIDE** periodic follow-up announcements on the Site Public Address System for event conditions OR when conditions change.
- 2.10 IF assigned to perform Shift Communicator duties, **THEN REPORT** verbal notification and PA/Siren status to the EC **AND IMPLEMENT** Attachment 1, Shift Communicator Checklist, Step for 30-Minute Printed Message (Step 2.3).
- 3.0 **Dispatching and Tracking Operators and Emergency Teams**
- 3.1 **ENSURE** Control Room personnel are aware of the need to track and protect in-plant Operators and Emergency Teams during Team Briefs.
- 3.2 IF the OSC is **NOT** activated, **THEN COORDINATE** Operators and Emergency Teams Dispatch using EP(123) 4-G.

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3.3 WHEN the OSC is activated, THEN:

- 3.3.1 **INFORM** in-plant Operators and Emergency Teams to report to the OSC when task assignments are complete.
- 3.3.2 **CONTACT** the Operations Coordinator to ensure copies of EP(123) 4-G for Operators and Emergency Teams currently dispatched from the Control Room are retrieved.
- 3.3.3 **DIRECT** Operations personnel **NOT** needed in the Control Room to report to the OSC Operations Coordinator for support of event mitigation efforts from the OSC under the direction of the Emergency Group Leader. At least two Operators should remain in the Control Room to support Control Room activities.
  - 3.3.3.1 For security events, **DIRECT** Operators to report to the Control Room.

4.0 Continuing Actions


- 4.1 **ASSIST** with event classification (SO123-VIII-1, Recognition and Classification of Emergencies).
- 4.2 **DIAGNOSE** plant conditions.
- 4.3 **ADVISE** the Shift Manager, including PARs per SO123-VIII-10.3.
- 4.4 **MONITOR** Critical Parameter/Safety Function indications to assure the plant response is appropriate.
- 4.5 For security events, **DIRECT** Control Room Staff to report to the Control Room.

5.0 Ivory Phone Command and Control

- 5.1 **MAINTAIN** Ivory Phone as a command and control network.

6.0 Accountability

- 6.1 **EDIT** the operations "24-Hour Manning Sheet" to ensure an accurate list of all on-shift operators.
  - 6.1.1 **IDENTIFY** which operators are in the Control Room area.
  - 6.1.2 **CONTACT** all operators who are outside the Control Room area.
  - 6.1.3 IF PAPA system is out of service, THEN COMPLETE form EP(123) 294 for Operations Personnel in the PA.

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## 7.0 **Exposure Control**

- 7.1 IF a Site Area Emergency (SAE) is declared, OR site assembly or evacuation is ordered, THEN **PROHIBIT** eating, drinking and smoking in the Control Rooms until clearance has been given by RP.
- 7.2 IF a release occurs OR radiation levels increase above normal, THEN **ISSUE** dosimetry (electronic or pocket ion chambers) from the Control Room Emergency Kit to Control Room Personnel.


## 8.0 **Evacuation**

### 8.1 Evacuation Hazards

- 8.1.1 IF hazards are present, THEN **INITIATE** actions for a local area evacuation per SO23-13-1.
- 8.1.2 IF any hazards affect major portions of the Protected Area(s), Owner Controlled Area, ISFSI or NIA, THEN **CONTACT** SM or SED, AND **RECOMMEND** a site assembly or evacuation.
- 8.1.3 IF any hazards affect a major portion of the Mesa Area, THEN **CONTACT** EC AND **RECOMMEND** a Mesa Area assembly or evacuation.

### 8.2 Control Room Evacuation

- 8.2.1 **EVALUATE AND PERFORM** a local area evacuation per SO23-13-2, Shutdown from Outside the Control Room.

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### 8.3 Site Assembly and Evacuation

8.3.1 IF a site assembly is required, THEN ENSURE the following steps are performed:

8.3.1.1 **PERFORM** PA/Siren coordination to assemble non-emergency response personnel.

8.3.1.2 IF the TSC has **NOT** been activated, THEN PROVIDE Assembly Area Coordinators plant information appropriate to the event using Assembly Area Briefing script located in the Units 2/3 Operations Leader notebook.

8.3.1.3 **PERFORM** PA/Siren coordination to periodically update all site personnel on plant status.

8.3.1.4 IF a site evacuation is required, THEN PERFORM PA/Siren coordination to evacuate non-emergency response personnel.

### 8.4 Re-Entry Into Evacuated Areas

8.4.1 WHEN requested by EC/SED, THEN PROVIDE plant data and operations assistance required to support re-entry into evacuated areas.

### 8.5 Emergency Exposure Authorization

8.5.1 IF a need for a lifesaving or plant saving emergency exposure is identified, AND OSC or TSC are **NOT** activated, THEN PERFORM the following:

8.5.1.1 **INFORM** EC/SED of the need for an emergency exposure has been identified and volunteers are being located.


8.5.1.2 **OBTAIN** volunteers considering the following criteria:

- Declared pregnant women should not be selected
- All considerations being equal, the individual should be over age 45


8.5.1.3 **DISTRIBUTE** Form EP(123) 3, Emergency Exposure Authorization, to volunteers.

8.5.1.4 **ENSURE** volunteers read and understand the sections on emergency exposure guidelines and effects of acute radiation exposures.

8.5.1.5 **COMPLETE** Sections 5, 6, and 7 on Form EP(123) 3, Emergency Exposure Authorization.

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- 8.5.2     IF a need for a lifesaving or plant saving emergency exposure is identified, **AND** OSC is activated, **THEN**:
  - 8.5.2.1     **REQUEST** OSC to brief volunteers.
  - 8.5.2.2     **OBTAIN** EC/SED authorization for emergency exposure.
  - 8.5.2.3     **DISPATCH** resources.
- 8.6     Event Reclassification
  - 8.6.1     **REVIEW** SO123-VIII-1.
    - 8.6.1.1     WHEN plant conditions change which may affect event classification. **THEN MAKE** recommendations to TSC Emergency Advisor, Operations.
  - 8.6.2     IF emergency is reclassified, **THEN INFORM** Control Room personnel and in-plant operators.
- 8.7     Recovery Initiation
  - 8.7.1     WHEN requested by EC/SED, **THEN PROVIDE** a list of damaged plant equipment which would prevent operations being resumed with normal station organization.
    - 8.7.1.1     **CONTACT** OSC Operations Coordinator for input.
    - 8.7.1.2     **RECOMMEND** Operations personnel and equipment necessary for a recovery organization.

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## 9.0 Deviation From License Conditions

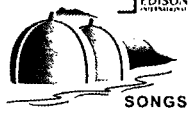
- 9.1 **IMPLEMENT** actions which will intentionally deviate from license conditions WHEN all of the following conditions have been met:
- Immediate intentional action is necessary to avert adverse consequences to public health and safety.
  - **NO** adequate or equivalent protective action that is consistent with the license is apparent.
  - The action is reasonable (an unreasonable action would be one which exposes personnel or equipment to greater peril than the adverse consequences which the action is intended to avert).
  - The deviation from license is only to extent necessary to meet the emergency.
  - There is **NOT** time for an amendment of the license to be approved by NRC.
  - The deviation is approved by a Unit 2/3 SRO (preferably SM).

## 10.0 Turnover

- 10.1 WHEN oncoming Units 2/3 Operations Leader arrives at the Control Room, THEN CONDUCT turnover with oncoming Units 2/3 Operations Leader in accordance with Form EP(123) 5, Turnover Status.

## 11.0 Event Closeout

- 11.1 WHEN plant conditions change which may allow or affect event closeout, THEN INFORM TSC Emergency Advisor, Operations.

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### SUPPLEMENTAL POSITION INSTRUCTION


#### NOTE

1. Sections 0 through 22.0 provide supplemental instructions for performing the Operations Leader duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.
3. The following steps are an enhancement to the position checklist. Placekeeping is not required.

#### 12.0 Continuing Actions

- 12.1 **EVACUATE** personnel from hazardous areas (see Section 16.0).
- 12.2 **NOTIFY** EC of NIA and/or the ISFSI changing conditions and make recommendations in accordance with SO123-VIII-1.
- 12.3 **USE** the Ivory Phone to provide plant status to other emergency facilities on the circuit (see Section 13.0).
- 12.4 **MAINTAIN** a log of decisions and actions required by EIPs including but not limited to:
  - Documentation of conditions, events, and communications.
  - Complete an adequate record of actions and decisions made to minimize misunderstanding and to identify items requiring follow-up actions.
- 12.5 **RETAIN** operators needed for immediate in-plant response **AND** DIRECT Operators to report to the Operations Support Center (OSC).
- 12.6 For security events, **DIRECT** Operators to report to the Control Room.
- 12.7 **TRACK** location of on-shift operators (see Section 3.0).
- 12.8 WHEN OSC Operations Coordinator is ready, THEN **TRANSFER** tracking of location of on-shift operators (see Section 3.0).




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**NOTE**

Sending operators from the Control Room should be the exception to dispatching from the OSC.

- 12.9 WHEN sending operators from the Control Room to the field, THEN **INFORM** OSC Operations Coordinator (see Section 3.0).
- 12.10 **CONTACT** Radiation Protection (RP) for in-plant radiological conditions AND **INFORM** them of changes in plant conditions which may affect radiological conditions (see Section 15.0).
- 12.11 IF a Site Area Emergency (SAE) or General Emergency (GE) is declared, THEN **PROHIBIT** eating, drinking and smoking in the Control Room until clearance has been given by RP (see Section 15.0).
- 12.11.1 IF emergency exposure authorization is required prior to Technical Support Center (TSC) or OSC activation, THEN **OBTAIN** volunteers and complete the form (see Section 17.0).
- 12.11.2 **BRIEF** Operations personnel assigned to NIA and ISFSI approximately every 30 minutes or as conditions warrant. Include the following:
- Plant Status
  - Emergency Response Priorities (i.e., repair activities)
  - Onsite protective actions and Offsite PARs made by the EC
- 12.12 **REVIEW** this procedure periodically during emergency response and following each reclassification.



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### 13.0 **Ivory Phone Command and Control**

#### 13.1 **MAINTAIN** Ivory Phone as a command and control network.

- 13.1.1 **INFORM** personnel of emergency conditions, plant status, on-going work related to the emergency, **AND PROVIDE** periodic updates.
- 13.1.2 **ENSURE** formal communication techniques are used when passing information over Ivory Phone circuit.
- 13.1.3 **MINIMIZE** incoming questions by providing frequent information updates on the status of the emergency over the Ivory Phone circuit.
- 13.1.4 **MINIMIZE** Ivory Phone traffic by directing lengthy and unrelated communications to alternate phone lines.
- 13.1.5 **RELAY** requests for assistance to Emergency Response Facilities (ERF).
- 13.1.6 **ESTABLISH AND MAINTAIN** a log of significant Ivory Phone communications, and items requiring feedback.


### 14.0 **Accountability**

#### 14.1 **EDIT** the operations 24-Hour Manning Sheet to ensure an accurate list of all on-shift operators.

- 14.1.1 **IDENTIFY** which operators are in the Control Room area.
- 14.1.2 **CONTACT** all operators who are outside the Control Room area and do the following:
  - **DETERMINE** their location.
  - **ENTER** their location on the 24-Hour Manning Sheet or log.

#### 14.2 **WHEN** the OSC Operations Coordinator position is staffed, **THEN PROVIDE** the following information for all operators to OSC Operations Coordinator for accountability and tracking.

- Name
- Current location
- Work activities in progress

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## 15.0 Exposure Control

### NOTE


Site assembly followed by site evacuation is mandatory for all non-emergency response personnel at a Site Area Emergency or higher classification, unless assembly or evacuation exposes personnel to a greater hazard.

- 15.1 IF a SAE is declared, OR site assembly or evacuation is ordered, THEN PROHIBIT eating, drinking and smoking in the Control Rooms until clearance has been given by RP.
- 15.2 IF a release occurs OR radiation levels increase above normal, THEN ISSUE dosimetry (electronic or pocket ion chambers) from the Control Room Emergency Kit, to Control Room Personnel.

## 16.0 Evacuation

### 16.1 Evacuation Hazards

- 16.1.1 IF any of the following hazards are present, THEN INITIATE actions for a local area evacuation per SO23-13-1.
- High radiation alarms or unexpected high radiation levels on Area Radiation Monitors (ARMs), building or containment ventilation monitors, portable radiation monitors, or continuous air monitors
  - Spills of radioactive material which may result in excessive personnel exposure
  - Fire Protection System Actuation
  - Toxic/flammable gases or heavy smoke reported
  - Chemical hazards to personnel
  - High pressure steam or water leaks
  - Security hazards which threaten personnel or equipment safety
  - Local report of fire or smoke
  - Any other condition which may present a hazard to plant personnel
- 16.1.2 IF any hazards listed in Step 16.1.1 affect major portions of the Protected Area(s), Owner Controlled Area, ISFSI or NIA, THEN CONTACT SM or SED, AND RECOMMEND a site assembly or evacuation.
- 16.1.3 IF any hazards listed Step 16.1.1 affect a major portion of the Mesa Area, THEN CONTACT EC AND RECOMMEND a Mesa Area assembly or evacuation.

 <div>EDISON ENERGY SERVICES</div> <div>SONGS</div>	<b>Emergency Response Organization (ERO) Control Room Position Checklists</b>	<b>SO123-VIII-CR REV: 3</b>
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16.2 Local Area Evacuation

16.2.1 **PERFORM** a local area evacuation per SO23-13-1, Local Area Evacuation.

16.3 Control Room Evacuation

16.3.1 **PERFORM** a local area evacuation per SO23-13-2, Shutdown From Outside The Control Room.

16.4 Site Assembly and Evacuation

**NOTE**

Site assembly followed by site evacuation is mandatory for all non-emergency response personnel at a Site Area Emergency or higher classification, unless assembly or evacuation exposes personnel to a greater hazard.

16.4.1 IF a site assembly is required, THEN ENSURE the following steps are performed:

16.4.1.1 **PERFORM** PA/Siren coordination to assemble non-emergency response personnel.


16.4.1.2 IF the TSC has **NOT** been activated, THEN PROVIDE Assembly Area Coordinators plant information appropriate to the event using Assembly Area Briefing script located in the Units 2/3 Operations Leader notebook.

16.4.1.3 **PERFORM** PA/Siren coordination to periodically update all site personnel on plant status.

16.4.1.3.1 IF a site evacuation is required, THEN PERFORM PA/Siren coordination to evacuate non-emergency response personnel.

16.5 Re-Entry Into Evacuated Areas

16.5.1 WHEN requested by EC/SED, THEN PROVIDE plant data and operations assistance required to support re-entry into evacuated areas.

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## 17.0 **Emergency Exposure Authorization**

17.1 **IF** a need for a lifesaving or plant saving emergency exposure is identified, **AND** OSC or TSC are **NOT** activated, **THEN PERFORM** the following:

17.1.1 **INFORM** EC/SM of the need for an emergency exposure has been identified and volunteers are being located.

17.1.2 **OBTAIN** volunteers considering the following criteria:

- Declared pregnant women should **NOT** be selected
- All considerations being equal, the individual should be over age 45

17.1.3 **DISTRIBUTE** Form EP(123) 3 to volunteers.

17.1.4 **ENSURE** volunteers read and understand the sections on emergency exposure guidelines and effects of acute radiation exposures.

17.1.5 **COMPLETE** Sections 5, 6, and 7 on Form EP(123) 3.

17.2 **IF** a need for a lifesaving or plant saving emergency exposure is identified, **AND** OSC is activated, **THEN**:

17.2.1 **REQUEST** OSC to brief volunteers.

17.2.2 **OBTAIN** EC/SED authorization for emergency exposure.


17.2.3 **DISPATCH** resources.

## 18.0 **Event Reclassification**

18.1 **REVIEW** SO123-VIII-1.

18.2 **WHEN** plant conditions change which may affect event classification, **THEN MAKE** recommendations to TSC Emergency Advisor, Operations.

18.3 **IF** emergency is reclassified, **THEN INFORM** Control Room personnel and in-plant operators.

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## 19.0 **Recovery Initiation**

19.1 **WHEN** requested by EC/SED, **THEN PROVIDE** a list of damaged plant equipment which would prevent operations being resumed with normal station organization.

19.1.1 **CONTACT** OSC Operations Coordinator for input.

19.1.2 **RECOMMEND** Operations personnel and equipment necessary for a recovery organization.


## 20.0 **Deviation From License Conditions**

### **NOTE**

1. Deviations from Units 2/3 license conditions or Technical Specifications to protect public health and safety requires a 10CFR50.54(x) declaration and approval per 10CFR50.54(y) by a SRO (preferably the SM).
2. Deviations from license conditions for the ISFSI per 10CFR72.32(d) requires approval by an SRO (preferably the SM).
3. Temporary suspension of security measures at Units 2/3 or ISFSI during imminent severe weather, or other hazardous conditions, when immediately needed to protect the personal health and safety of Security Officers, and no other immediately apparent action consistent with the SONGS license conditions and technical specifications can provide adequate or equivalent protection, is authorized by the SM with input from the Security Shift Commander or Security Manager. Suspended security measures shall be restored as soon as practical.

20.1 **WHEN** all of the following conditions have been met, **THEN IMPLEMENT** actions which will intentionally deviate from license conditions:

- Immediate intentional action is necessary to avert adverse consequences to public health and safety.
- **NO** adequate or equivalent protective action that is consistent with the license is apparent.
- The action is reasonable (an unreasonable action would be one which exposes personnel or equipment to greater peril than the adverse consequences which the action is intended to avert).
- The deviation from license is only to extent necessary to meet the emergency.
- There is **NOT** time for an amendment of the license to be approved by NRC.
- The deviation is approved by a Unit 2/3 SRO (preferably SM).

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## 21.0 Turnover

21.1 WHEN oncoming Units 2/3 Operations Leader arrives at the Control Room, THEN:


21.1.1 **CONDUCT** turnover with oncoming Units 2/3 Operations Leader in accordance with Form EP(123) 5.

21.1.2 **RECORD** completion of turnover in Operations Leader Log.

21.1.3 **REPORT** completion of turnover to other ERFs via Ivory Phone.

## 22.0 Event Closeout

22.1 WHEN plant conditions change which may allow or affect event closeout, THEN INFORM TSC Emergency Advisor, Operations.

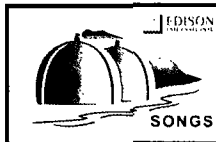
	<b>Emergency Response Organization (ERO) Control Room Position Checklists</b>	<b>SO123-VIII-CR REV: 3</b>
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Notification tracking 10 CFR 50.54(q): 202633694-0005

Author: L Kent

NN, Order, or Other Action	Description of Change	Reviewer(s)	Step, Section, Attachment or Page
202633694	Update Operations Leader Checklist attachment to include a bullet for capturing work activities in progress for personnel accountability and tracking in turnover to OSC Operations Coordinator when staffed.	Alvarado Sischo Seward Janke Kent Houser	Attachment 2 Step 15.2 third bullet
202744877	Add steps to verify the sirens have stopped or stop them.		Attachment 2 Steps 2.5.1.7 and 2.5.1.8
CA 202861523-0008	Update Ops Leader Checklist for use of EP(123) 4-G and coordination of emergency teams and add form for Notebook check.  Combine Dispatch and Tracking to include all teams.	Trillo Janke Sischo Kent Houser	Attachment 2 Step 1.1 bullet and Section 3.0
202870249	Combine Ops Leader Supplemental information for Operator Dispatch and Tracking with Continuing Actions and move to Initial Actions.		Attachment 2 Section 3.0





## Emergency Response Organization (ERO) Control Room Position Checklists

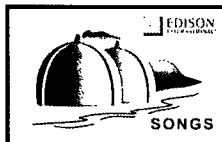
**SO123-VIII-CR  
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### Summary of Changes

### Attachment 3

NN, Order, or Other Action	Description of Change	Reviewer(s)	Step, Section, Attachment or Page
Comments	Revise verbiage from "GO TO" to "IMPLEMENT"	Janke Kent Sischo	Attachment 1 Step 2.2.4 Attachment 2 Step 2.10
	Move step regarding ERO recall or notification to applicable location.		Attachment 1 Step 2.2.1
	Spell out VNF acronym.		Attachment 1 Step 2.3.8
	Delete Step to retrieve approved EC.		Attachment 1 old Step 2.8.1, 2.9.2
	Correct grammar.		Attachment 1 Steps 2.5.9, 2.6.2
	Clarify to whom verbal notification is provided.		Attachment 1 Steps 2.2.5, 2.3.8
	Move PA/Siren Coordination continuing section (Section 11.0) to applicable section.		Attachment 2 Section 2.0
	Clarify who should obtain dosimetry and sign on to REP.		Attachment 2 Step 1.3
	Remove reference to Control Room "Lunch Room".		Attachment 2 Step 4.5
	Remove term "auxiliary" in reference to Operators.		Attachment 2 Steps 13.5, 13.6



## Emergency Response Organization (ERO) Control Room Position Checklists

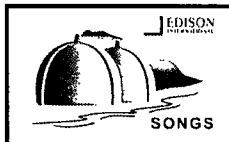
**SO123-VIII-CR  
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### Summary of Changes

### Attachment 3

NN, Order, or Other Action	Description of Change	Reviewer(s)	Step, Section, Attachment or Page
Betterment (cont'd on next page)	Update Procedure Owner	Sischo Seward Kent Janke Houser	Page 1
	Move steps to more appropriate location within the checklist based on timeframe of activity performance.		Previous Attachment 1 Steps 2.1 thru 2.5
	Follow up information placed in more appropriate location within Checklist based on timeframe of activity performance.		Attachment 1 Sections 2.2, 2.3
	Delete Step and acronym regarding ERDS.		Step 2.21 and Attachment 1 Step 2.5
	Reword step for clarity and provide better guidance regarding timeframe requirements.		Attachment 1 Step 2.1
	Add row for EDT + 10 minutes.		Attachment 1 Table at Step 2.1
	Add NOTE to clarify actions regarding classification change or PAR upgrade criteria.		NOTE Prior to Step 2.2
	Revise Step to include 10 minute recall / notification.		Attachment 1 Step 2.2
	Reword step to clarify actions regarding ERO recall or notification.		Attachment 1 Step 2.2.1
	Clarify action to perform with Verbal Notification Form.		Attachment 1 Step 2.2.2
	Describe actions when CAL OES does not respond.		Attachment 1 Step 2.2.2.1
	Add Steps to classify action regarding performance of VNF and clarify YPS activities within 10- and 15-minute timeframe.		Attachment 1 Section 2.2.3
	Add actions to take when asked to perform Ops Leader duties		Attachment 1 Step 2.2.4
	Remove / provide clarification as to when to use SO123-VIII-30.7.		Attachment 1 Steps 2.2, 2.2.1, 2.3, 2.5, 2.5.1.1, 2.5.1.2



## Emergency Response Organization (ERO) Control Room Position Checklists

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### Summary of Changes

### Attachment 3

NN, Order, or Other Action	Description of Change	Reviewer(s)	Step, Section, Attachment or Page
Betterment (Cont'd)	Include instructions for completion of NRC initial notification Form 361 and subsequent notifications.	Sischo Seward Kent Janke Houser	Attachment 1 Section 2.4
	Provide clarification for 90-minute follow-up Verbal.		Attachment 1 Section 2.5
	Update YPS Problems section for clarification of activities to perform and contact information.		Attachment 1 Steps 3.1 through 3.4.2
	Clarify pages of use on EP(123) ERO-7 form.		Attachment 2 Step 2.3
	Add step to include activities when asked to perform Shift Communicator duties and delete redundant steps.		Attachment 2, Step 2.10
	Remove self-evident term "Shift Commander".		Attachment 1 Step 2.6.1
	Reword Step for clarity and follow-on action.		Attachment 1 Step 2.6.3
Form	Update EP(123) 4-G.	Sischo	EP(123) 4-G

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## ONSITE EMERGENCY SIREN SYSTEM TEST

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REFERENCE USE  
QA PROGRAM AFFECTING  
50.59 DNA/72.48 DNA

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## ONSITE EMERGENCY SIREN SYSTEM TEST

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### 1.0 OBJECTIVE

- 1.1 Verify proper operation of the Onsite Emergency Siren System (OESS) to ensure adequate notification to all SONGS personnel in accordance with the Emergency Plan and SO123-VIII-0.201.

### 2.0 REFERENCES

#### 2.1 NRC Commitment

- 2.1.1 SONGS Emergency Plan

#### 2.2 Procedures

- 2.2.1 SO123-VIII-0.201, Emergency Plan Equipment Surveillance Program (EPESP)
- 2.2.2 SO123-VIII-TSC, Emergency Response Organization (ERO) Technical Support Center Position Checklist
- 2.2.3 SO123-VIII-CR, Emergency Response Organization (ERO) Control Room Position Checklist
- 2.2.4 SO123-XV-HU-3, Written Instruction Use and Adherence

### 3.0 PREREQUISITES

- 3.1 Verify this document is current by using one of the methods described in SO123-XV-HU-3.
- 3.2 Verify level of use requirements on the first page of this document.

#### **4.0 PRECAUTIONS**

- 4.1 Ensure the siren test date does not impact scheduled Operational evolutions by coordinating with the Maintenance Work Control and the Units 2/3 Shift Manager.
- 4.2 To preclude inadvertent personnel response and heightened public concern resulting from an unannounced test, it is imperative that all company and public agencies be notified in advance of the test.

#### **5.0 CHECKLIST(S)**

- 5.1 None

#### **6.0 PROCEDURE**

- 6.1 The Test Coordinator shall work with Work Control, Radiation Protection (RP) and Operations groups to establish a test date and time.
  - 6.1.1 The test should be scheduled during drills, weekends, or back shifts to minimize impact on site activities.
  - 6.1.2 Containment testing should be scheduled during periods of low containment work activity.
  - 6.1.2 Affected personnel shall be notified prior to or during the shift of the scheduled test.
  - 6.1.3 Inform the Operations, Maintenance Work Control, and the Shift Manager of the impending test.
  - 6.1.3 Several test dates may be necessary to fully accomplish required OESS equipment testing.
- 6.2 Siren activation during scheduled Emergency Plan Drills may be used to monitor OESS equipment per the applicable Attachments.
  - 6.2.1 All drill siren activations may be used for equipment monitoring in order to complete the surveillance.
  - 6.2.2 Siren activations may be modified to last 1 to 3 minutes, allowing personnel time to walkdown the sirens.

- 6.3 The Test Coordinator shall work with affected supervisors when scheduling personnel to monitor OESS equipment during the test.
- 6.3.1 Equipment testing shall not interfere with normal duties.
- 6.3.2 Normally, Fire Watch personnel shall be scheduled to monitor OESS equipment during the test.
- 6.3.3 Radiation Protection or Fire Watch personnel may be scheduled to monitor OESS equipment within containment. |
- 6.3.4 Affected supervisors shall be provided with a list of OESS equipment to be tested, location drawings, as well as instructions to tell work groups inside containment about the impending test when walking down equipment locations.
- 6.4 Prior to the start of the scheduled test, the Test Coordinator shall establish contact with the affected groups to ensure their readiness for test execution.
- 6.4.1 The Test Coordinator shall verify with the respective supervisors that the OESS equipment monitoring personnel have received a pre-job brief and understand their test responsibilities.
- 6.4.1.1 The affected supervisors will have previously walked down the assignments for their respective personnel.
- 6.4.2 The Test Coordinator shall provide detailed information to the oncoming Operations personnel regarding their participation.
- 6.5 Testing of equipment shall be accomplished as follows:
- 6.5.1 The following equipment shall be tested in accordance with the indicated frequency and attachment:
- Site Public Address System (PA) Siren Tone Generator, Annual - Attachment 1
  - Units 2/3 Buildings and Grounds OESS, Annual - Attachment 2
  - Units 2/3 Containment OESS, Refueling - Attachment 3
  - Units 2/3 Thunderbolt Sirens, Annual - Attachment 4
- 6.5.2 For Attachment 2, the Test Coordinator shall coordinate required breaker alignments with Operations personnel to facilitate the testing of OESS equipment.
- 6.5.3 The Test Coordinator shall direct all PA announcements and siren activation throughout the test when not scheduled during an Emergency Plan drill.
- 6.5.4 Discrepancies shall be noted in the "Remarks" section and reported to the Manager, Emergency Preparedness Planning. |
- 6.5.5 The Test Coordinator shall submit a Nuclear Notification for all OESS equipment deficiencies.

## **7.0 RECORDS**

- 7.1 Transmit completed attachments to Records Management-SONGS for retention following review by the Manager, Emergency Preparedness Planning. |
- 7.1.1 Attachments may not be fully completed on a single test date. Each attachment shall be retained by the Test Coordinator until all OESS equipment for that attachment has been tested.
  - .1 Attachments 1 through 4 shall be sent to Records Management-SONGS on an annual basis within three months of the end of the calendar year. |
  - 7.1.2 A copy of the Documentation Control Data Transmittal, and all completed Attachments shall be retained for a period of one year by the Test Coordinator.



## PA SIREN TONE GENERATOR TEST

### 1.0 INSTRUCTIONS

PERFORMED BY  
INITIALS

**NOTE**

SO123-VIII-CR and SO123-VIII-TSC provide controls for announcements and siren activation.

- 1.1 Verify this revision is current by methods described in Section 3.0, Prerequisites.
- 1.2 The PA Siren Tone Generator shall be monitored during siren activations for a scheduled Emergency Plan Drill.
- 1.3 Audibility of PA announcements and the Siren Tone Generator, shall be recorded by drill participants on their comment form provided by Emergency Planning.
- 1.4 Gather all test data from Drill Controllers after drill termination.
- 1.5 Transcribe all test data from applicable drill documents to this Attachment, including Location Evaluated, Drill Participant's Name, Drill Assignment, and Test Date.
- 1.6 Initial the "EQUIP STATS" column of the worksheet to indicate a satisfactory equipment test.
  - 1.6.1 Record a number from the "REMARKS" section instead of initials to indicate equipment problems.
  - 1.6.2 Record any additional comments in the "REMARKS" section.

PERFORMED BY: \_\_\_\_\_  
Test Coordinator

\_\_\_\_\_  
Date

REVIEWED BY: \_\_\_\_\_  
Manager, Emergency Preparedness Planning

\_\_\_\_\_  
Date

## PA SIREN TONE GENERATOR TEST (Continued)

### PA SIREN TONE GENERATOR TEST LOCATIONS

LOCATION EVALUATED PLANT AREA	DRILL ASSIGNMENT	DRILL PARTICIPANT'S NAME	EQUIP STATS	TEST DATE

**NOTE:** A minimum of 3 separate locations must be evaluated during the test.

Remarks:

Note 1. No Activation

Note 2. Garbled Sound

Note 3. Volume Too Low

Note 4. Inaccessible Area

Note 5. Equipment Damaged

Note 6. Other:

Note 7. Other:

## UNITS 2/3 BUILDINGS AND GROUNDS OESS TEST

### 1.0 INSTRUCTIONS

PERFORMED BY  
INITIALS

- 1.1 Verify this revision is current by methods described in Section 3.0, Prerequisites. \_\_\_\_\_
- 1.2 When completing any part of this attachment during a scheduled Emergency Plan Drill, use Section 2.0 and mark Steps in 1.3 and 1.6 "N/A".
- 1.3 Request a plant operator to perform the following alignment. |
- 1.3.1 Open breaker BQ-13 for panel 2/3 L211-1 (MCC 2/3 BQ). \_\_\_\_\_ |
- 1.3.2 Open breaker BQ-26 for panel 2/3 L211-4 (MCC 2/3 BQ). \_\_\_\_\_ |
- 1.3.3 Open breaker MCC1 BKR11 (located in the AWS). \_\_\_\_\_ |
- 1.4 Establish contact with the Test Coordinator and verify all monitors are in position, then coordinate performing the following steps with Operations. |
- 1.4.1 Make the following announcement on the PA System using "Page All" **AND** on the Perimeter Public Address System (PPAS): |
- .1 "Attention all personnel, attention all personnel: This is a test of the Emergency Siren System. No response is required. All personnel continue with your normal activities." |
- 1.4.2 Request a plant operator to press the start button for the Emergency Siren system. |
- .1 Direct the Operator to press the "STOP" button at the required time to deactivate the sirens. |
- 1.4.3 Make the following announcement on the PA System using "Page All" **AND** on the Perimeter Public Address System: |
- .1 "Attention all personnel, attention all personnel: This completes the test of the Emergency Siren System. Continue with your normal activities." |
- 1.5 Repeat Step 1.4 to complete monitoring all pre-designated sirens.
- 1.6 Request an Operator to perform the following alignment. |
- |   | PERF BY<br><u>INITIS</u> | VERI BY<br><u>INITIS</u> |
|---|--------------------------|--------------------------|
| 1.6.1 Close breaker BQ-13 on pnl 2/3 L211-1 (MCC 2/3 BQ). | _____                    | _____                    |
| 1.6.2 Close breaker BQ-26 on pnl 2/3 L211-4 (MCC 2/3 BQ). | _____                    | _____                    |
| 1.6.3 Close breaker MCC1 BKR11 (located in the AWS).      | _____                    | _____                    |

## UNITS 2/3 BUILDINGS AND GROUNDS OESS TEST (CONTINUED)

### 2.0 DRILL INSTRUCTIONS

#### **NOTE**

SO123-VIII-CR and SO123-VII-TSC provide controls for announcements and siren activation.

- 2.1 When completing this attachment at a time other than a scheduled Emergency Plan Drill, use Section 1.0 and mark Section 2.0 "N/A".
- 2.2 Record the date of the scheduled Emergency Plan Drill below.
  - 2.2.1 Emergency Plan Drill Date \_\_\_\_\_
  - 2.2.2 Verify sirens will sound for 1 to 3 minutes for the test as previously planned.
- 2.3 Coordinate with the Test Coordinator prior to the drill date and provide approximate siren activation times in accordance with drill scenario.

### 3.0 DATA COLLECTION

- 3.1 Gather all test data from the TestCoordinator.
- 3.2 Transcribe all test data from the Monitor's work sheets on to a clean Attachment.
- 3.3 Initial the "EQUIP STATS" column of the worksheet to indicate a satisfactory equipment test.
  - 3.3.1 Record a number from the "REMARKS" section instead of initials to indicate equipment problems.
  - 3.3.2 Record any additional comments in the "REMARKS" section.

**PERFORMED BY:** \_\_\_\_\_  
Test Coordinator Date

**REVIEWED BY:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning Date

## UNITS 2/3 BUILDINGS AND GROUNDS OESS TEST (CONTINUED)

### UNIT 2/3 OESS COMMON EQUIPMENT LOCATIONS

WYLE #	PLANT AREA	ELEV.	SIREN NO.	SIREN LOCATION	EQUIP STATS	TEST DATE
S201	Water Intake	9'	2AH1BV01	Pump Room T2-106		
S202	Water Intake	9'	3AH1BV01	Pump Room T3-106		
S203	Control Area	9'	OAR1BV01	Cable Riser Gallery 110		
S204	Control Area	9'	OAR1BV02	Cable Riser Gallery 111A		
S205	Control Area	9'	OAR1BV03	Cable Riser Gallery 111B		
S206	Control Area	9'	OAR1BV04	Cable Riser Gallery 112		
S207	Control Area	9'	OAR1BV05	Corridor 101		
S208	Control Area	30'	OAR2BV01	Cable Riser Gallery 236		
S209	Control Area	30'	OAR2BV02	U2 Elect Cabinet Area 229		
S210	Control Area	30'	OAR2BV03	U3 Elect Cabinet Area 227		
S211	Control Area	30'	OAR2BV04	Cable Riser Gallery 224		
S212	Control Area	30'	OAR2BV05	Corridor 234		
S213	Control Area	30'	OAR2BV06	Lobby 201		
S214	Control Area	30'	OAR2BV07	Corridor 221		
S215	Control Area	50'	OAR3BV01	West Corridor 303D		
S216	Control Area	50'	OAR3BV02	Cable Riser Gallery 315		
S217	Control Area	50'	OAR3BV03	Cable Riser Gallery 305		
S218	Control Area	50'	OAR3BV04	Lobby 301		
S219	Control Area	70'	OAR4BV01	Cable Riser Gallery 423		
S220	Control Area	70'	OAR4BV02	Corridor 417		
S221	Control Area	70'	OAR4BV03	Men's Re-Use Area 459		
S222	Control Area	70'	OAR4BV04	Cable Riser Gallery 449		
S223	Control Area	70'	OAR4BV05	Corridor 442		
S224	Radwaste	9'	OAP1BV01	Corridor 103A		
S225	Radwaste	9'	OAP1BV02	Corridor 103L		
S226	Radwaste	24'	OAP2BV01	Corridor 204A		
S227	Radwaste	24'	OAP2BV02	Radioactive Pipeway 206D		
S228	Radwaste	37'	OAP3BV01	Corridor 303		
S229	Radwaste	37'	OAP3BV02	Corridor 334		
S230	Radwaste	37'	OAP3BV03	Corridor 332		
S231	Radwaste	50'	OAP4BV01	Corridor 402		
S232	Radwaste	50'	OAP4BV02	Corridor 411		
S233	Radwaste	50'	OAP4BV03	Elect Equip Raceway 405A		
S234	Radwaste	50'	OAP4BV04	Rad. Pipe Chase 341B		
S235	Radwaste	63'6"	OAP5BV01	Corridor 501		
S236	Radwaste	63'6"	OAP5BV02	Corridor 522		

Remarks:

Note 1.	No Activation
Note 2.	Garbled Sound
Note 3.	Volume Too Low
Note 4.	Inaccessible Area
Note 5.	Equipment Damaged
Note 6.	Other:
Note 7.	Other:

**UNITS 2/3 BUILDINGS AND GROUNDS OESS TEST (CONTINUED)**  
**UNIT 2 OESS EQUIPMENT LOCATIONS**

WYLE NO.	PLANT AREA	ELEV.	SIREN NO.	SIREN LOCATION	EQUIP STATS	TEST DATE
S237	D/G Building	30'	2AD1BV01	D/G Room 103 (Train A)		
S238	D/G Building	30'	2AD1BV02	D/G Room 107 (Train B)		
S239	Tk. Building	30'	2AJ1BV01	Pump Room		
S240	Tray Gallery	11'6"	2AU1BV01	11'6" Elect Tray Gallery		
S241	Tray Gallery	9'6"	2AU1BV02	9'6" Elect Tray Gallery		
S242	Safety Equip	30'	2AN3BV01	Elect Tunnel 103		
S251	Fuel Handling	63'6"	2AC4BV01	Personnel Monitor Area 409		
S252	Fuel Handling	63'6"	2AE4BV02	Operating Floor 406		
S253	Penetration	63'6"	2AC4BV03	Elect. Penetration 406		
S254	Penetration	45'	2AC3BV01	Elect. Penetration 306		
S255	Fuel Handling	30'	2AE2BV01	Vestibule 203		
S256	Penetration	9'	2AC1BV01	Corridor 112		
S257	Penetration	30'	2AC2BV01	Piping Penetration 208		
S258	Safety Equip	8'	2AN2BV01	At Stairway #1		
S259	Safety Equip	8'	2AN2BV02	Heat Exchanger Room 025		
S260	Safety Equip	8'	2AN2BV03	Piping Room 024		
S261	Safety Equip	-5'	2AN1BV02	Piping Room 010		
S262	Safety Equip	-15'	2AN1BV01	At Bottom of Stairway #1		

**UNIT 3 OESS EQUIPMENT LOCATIONS**

WYLE NO.	PLANT AREA	ELEV.	SIREN NO.	SIREN LOCATION	EQUIP STATS	TEST DATE
S309	Fuel Handling	63'6"	3AC4BV01	Personnel Monitor Area 409		
S310	Fuel Handling	63'6"	3AE4BV02	Operating Floor 406		
S311	Penetration	63'6"	3AC4BV03	Elect Penetration Area 406		
S312	Penetration	45'	3AC3BV01	Elect Penetration Area 306		
S313	Fuel Handling	30'	3AE2BV01	Vestibule 203		
S314	Penetration	9'	3AC1BV01	Corridor 112		
S315	Penetration	30'	3AC2BV01	Pipe Penetration Area 208		
S316	Safety Equip	8'	3AN2BV01	Piping Room 024		
S317	Safety Equip	8'	3AN2BV02	Heat Exchanger Room 025		
S318	Safety Equip	8'	3AN2BV03	At Stairway #1		
S319	Safety Equip	-5'	3AN1BV01	Piping Room 010		
S320	Safety Equip	-15'	3AN1BV02	At Bottom of Stairway #1		
S321	Tank Building	30'	3AJ1BV01	Pump Room		
S322	Tray Gallery	11'6"	3AU1BV01	11'6" Elect Tray Gallery		
S323	Tray Gallery	9'6"	3AU1BV02	9'6" Elect Tray Gallery		
S324	Safety Equip	30'	3AN3BV01	Elect. Tunnel 103		
S325	D/G Building	30'	3AD1BV01	D/G Room 103 (Train A)		
S326	D/G Building	30'	3AD1BV02	D/G Room 107 (Train B)		

Remarks:

Note 1.	No Activation
Note 2.	Garbled Sound
Note 3.	Volume Too Low
Note 4.	Inaccessible Area
Note 5.	Equipment Damaged
Note 6.	Other:
Note 7.	Other:

## UNITS 2/3 CONTAINMENT OESS TEST

### 1.0 INSTRUCTIONS

PERFORMED BY  
INITIALS

- 1.1 Verify this revision is current by methods described in Section 3.0, Prerequisites. \_\_\_\_\_
- 1.2 Notify Containment Coordinator or Containment Work Manager prior to starting the test. \_\_\_\_\_
- 1.3 Verify physical signage is posted at the containment control point entrance to inform workers of siren/beacon test. \_\_\_\_\_
- 1.4 Establish contact with the Test Coordinator and verify all monitors are in position, then coordinate performing the following steps with Operations. |
- 1.4.1 Make the following announcement on the PA System:
- .1 "Attention all personnel, attention all personnel: There will be a test of the Unit-\_\_ Containment Siren System. No response is required. All personnel continue with your normal activities."
- 1.4.2 When test personnel are in place, press the "START" button for the Containment Siren System.
- .1 When component operability is verified, press the "STOP" button at the required time to deactivate the sirens.
- 1.4.3 Make the following announcement on the PA System:
- .1 "Attention all personnel, attention all personnel: This completes the test of the Containment Siren System. Continue with your normal activities."
- 1.5 Repeat Step 1.4 until all containment OESS equipment monitoring is completed.
- 1.6 Request test personnel to verify that sirens are silenced and beacons are not flashing. \_\_\_\_\_
- 1.7 Gather all test data from the TestCoordinator. |
- 1.8 Transcribe all test data from the Monitor's work sheets on to a clean Attachment.
- 1.9 Initial the "EQUIP STATS" column of the worksheet to indicate a satisfactory equipment test.
- 1.9.1 Record a number from the "REMARKS" section instead of initials to indicate equipment problems.
- 1.9.2 Record any additional comments in the "REMARKS" section.
- 1.10 Notify Containment Coordinator or Containment Work Manager that the test is complete. \_\_\_\_\_

PERFORMED BY: \_\_\_\_\_  
Test Coordinator Date

REVIEWED BY: \_\_\_\_\_  
Manager, Emergency Preparedness Planning Date |

## UNITS 2/3 CONTAINMENT OESS TEST (CONTINUED)

### UNIT 2 CONTAINMENT OESS EQUIPMENT LOCATIONS

WYLE NO.	PLANT AREA	ELEV.	SIREN NO.	SIREN LOCATION	EQUIP STATS	TEST DATE
S243	Containment	15'	2AB2BV01	At West Stairway		
S244	Containment	15'	2AB2BV02	By Elevator Lobby		
S245	Containment	30'	2AB3BV01	At West Stairway		
S246	Containment	30'	2AB3BV02	At Elevator Lobby		
S247	Containment	45'	2AB4BV01	At West Stairway		
S248	Containment	45'	2AB4BV02	By Elevator Lobby		
S249	Containment	63'6"	2AB5BV01	SW Corner SG Structure #2		
S250	Containment	63'6"	2AB5BV02	By Elevator Lobby		

PLANT AREA	ELEV.	SONGS BEACON NO.	BEACON LOCATION (ROOM NAME AND NUMBER)	EQUIP STATS	TEST DATE
Unit-2 Containment	15'	EL001T	Room 105		
Unit-2 Containment	15'	EL002T	Room 106		
Unit-2 Containment	15'	EL003T	Room 103		
Unit-2 Containment	15'	EL004T	Room 102		
Unit-2 Containment	15'	EL005T	Room 103		
Unit-2 Containment	30'	EL006T	Room 204		
Unit-2 Containment	30'	EL007T	Room 106 (Gen Room #2)		
Unit-2 Containment	30'	EL008T	Room 205		
Unit-2 Containment	30'	EL009T	Room 102 (Gen Room #1)		
Unit-2 Containment	30'	EL010T	Room 202		
Unit-2 Containment	45'	EL011T	Room 304		
Unit-2 Containment	45'	EL012T	Room 106		
Unit-2 Containment	45'	EL013T	Room 303		
Unit-2 Containment	45'	EL014T	Room 305		
Unit-2 Containment	45'	EL015T	Room 102 (Gen Room #1)		
Unit-2 Containment	45'	EL016T	Room 302		
Unit-2 Containment	63'6"	EL017T	Room 404		
Unit-2 Containment	63'6"	EL018T	Room 402		
Unit-2 Containment	63'6"	EL019T	Room 402		

Remarks:

- |         |                   |
|---------|-------------------|
| Note 1. | No Activation     |
| Note 2. | Volume Too Low    |
| Note 3. | Inaccessible Area |
| Note 4. | Equipment Damaged |
| Note 5. | Other:            |
| Note 6. | Other:            |



**UNITS 2/3 CONTAINMENT OESS TEST (CONTINUED)**  
**UNIT 3 CONTAINMENT OESS EQUIPMENT LOCATIONS**

WYLE NO.	PLANT AREA	ELEV.	SIREN NO.	SIREN LOCATION	EQUIP STATS	TEST DATE
S301	Containment	15'	3AB2BV01	At West Stairway		
S302	Containment	15'	3AB2BV02	By Elevator Lobby		
S303	Containment	30'	3AB3BV01	At West Stairway		
S304	Containment	30'	3AB3BV02	At Elevator Lobby		
S305	Containment	45'	3AB4BV01	At West Stairway		
S306	Containment	45'	3AB4BV02	By Elevator Lobby		
S307	Containment	63'6"	3AB5BV01	SW Corner SG Structure #2		
S308	Containment	63'6"	3AB5BV02	By Elevator Lobby		

PLANT AREA	ELEV.	SONGS BEACON NO.	BEACON LOCATION (ROOM NAME AND NUMBER)	EQUIP STATS	TEST DATE
Unit-3 Containment	15'	EL001T	Room 105		
Unit-3 Containment	15'	EL002T	Room 106		
Unit-3 Containment	15'	EL003T	Room 103		
Unit-3 Containment	15'	EL004T	Room 108		
Unit-3 Containment	15'	EL005T	Room 103		
Unit-3 Containment	30'	EL006T	Room 204		
Unit-3 Containment	30'	EL007T	Room 106		
Unit-3 Containment	30'	EL008T	Room 205		
Unit-3 Containment	30'	EL009T	Room 102		
Unit-3 Containment	30'	EL010T	Room 202		
Unit-3 Containment	45'	EL011T	Room 304		
Unit-3 Containment	45'	EL012T	Room 106		
Unit-3 Containment	45'	EL013T	Room 303		
Unit-3 Containment	45'	EL014T	Room 302		
Unit-3 Containment	45'	EL015T	Room 201		
Unit-3 Containment	45'	EL016T	Room 302		
Unit-3 Containment	63'6"	EL017T	Room 404		
Unit-3 Containment	63'6"	EL018T	Room 402		
Unit-3 Containment	63'6"	EL019T	Room 402		

Remarks:

Note 1.	No Activation
Note 2.	Volume Too Low
Note 3.	Inaccessible Area
Note 4.	Equipment Damaged
Note 5.	Other:
Note 6.	Other:

## UNITS 2/3 THUNDERBOLT SIREN TEST

### 1.0 INSTRUCTIONS

PERFORMED BY  
INITIALS

**NOTE**

SO123-VIII-CR and SO123-VIII-TSC provide controls for announcements and siren activation.

- 1.1 Verify this revision is current by methods described in Section 3.0, Prerequisites. \_\_\_\_\_
- 1.2 The Thunderbolt sirens shall be monitored during the initial siren activation for a scheduled Emergency Plan Drill.
- 1.3 Record the date of the scheduled Emergency Plan Drill below.
  - 1.3.1 Emergency Plan Drill Date \_\_\_\_\_
- 1.4 Coordinate with the Test Coordinator prior to the drill date and provide approximate siren activation times in accordance with drill scenario. |
- 1.5 Gather all test data from the TestCoordinator. |
- 1.6 Transcribe all test data from the Monitor's work sheets on to a clean Attachment.
- 1.7 Initial the "EQUIP STATS" column of the worksheet to indicate a satisfactory equipment test.
  - 1.7.1 Record a number from the "REMARKS" section instead of initials to indicate equipment problems.
  - 1.7.2 Record any additional comments in the "REMARKS" section.

PERFORMED BY: \_\_\_\_\_  
Test Coordinator Date

REVIEWED BY: \_\_\_\_\_  
Manager, Emergency Preparedness Planning Date |

## UNITS 2/3 THUNDERBOLT SIREN TEST (CONTINUED)

### THUNDERBOLT TEST LOCATIONS

PLANT AREA	ELEV.	THUNDERBOLT SIREN NO.	SIREN LOCATION (ROOM NAME AND NUMBER)	EQUIP STATS	TEST DATE
Unit-2 Fuel Bldg	114'	MO-33	Fuel Bldg Roof SE Corner		
Control Building	85'	MO-34	Cont Bldg Roof NW Corner		
Reservoir Area	100'	MO-35	Near Meteorological Tower		

Remarks:

Note 1. No Activation

Note 2. Garbled Sound

Note 3. Volume Too Low

Note 4. Inaccessible Area

Note 5. Equipment Damaged

Note 6. Other:

Note 7. Other:

## SUMMARY OF CHANGES

Notification tracking 10 CFR 50.54(q): 202693242 Task 3

<b>NN, Order, or Other Action</b>	<b>Description of Change</b>	<b>Reviewer</b>	<b>Step, Section, Attachment or Page</b>
202693242	Add steps to open/close breaker for Reservoir Sirens.  Revise sections to be proscriptive of location of breakers.  Revise steps to include "Page All" for PPAS as part of test.	Hughes Sischo Seward Sheek	Att 2 Steps 1.3.3 and 1.6.3  Att 2 Section 1.3 and 1.4  Att 2 Steps 1.4.1 and 1.4.3
SO123-XV-109	Update Prerequisites to standard verbiage.  Update references.	Sischo Seward Sheek	Step 3.1  Section 2.0, Attachments 1, 2, and 4
Decommissioning	Update position titles.	Sischo Seward Sheek	Throughout



## Emergency Response Organization (ERO) Operations Support Center Position Checklists

**SO123-VIII-OSC  
REV: 1**

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Procedure Usage Requirements		Sections
Information Use	<ul style="list-style-type: none"> <li>The user may complete the task from memory. However, the user is responsible for performing the activity according to the procedure.</li> <li>Information use documents that contain a specific process order are performed in the given order unless otherwise specified within the document.</li> </ul>	Attachment 10
Reference Use	<ul style="list-style-type: none"> <li>Review and understand the procedure before performing any steps, including the prerequisite section.</li> <li>Have a copy or applicable pages/sections open at the work site.</li> <li>Use Placekeeping method according to SO123-XV-HU-3.</li> <li>If any portion of the document is performed from memory, do so in the sequence specified. Perform each step as written, except when an approved process specifically allows deviation.</li> <li>Refer to the procedure or instruction at least once to ensure completion of the task in accordance with the requirements.</li> <li>Review the document at the completion of the task to verify that all appropriate steps are performed and documented.</li> </ul>	All except Attachment 10

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### ATTACHMENT

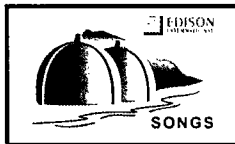
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### QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / 50.54(q) APPLIES / RX DNA

Procedure Type
EPIP

Procedure Owner
Kelli Gallion



## Emergency Response Organization (ERO) Operations Support Center Position Checklists

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### 1.0 **RESPONSIBILITIES**

1.1 **VERIFY** Level of Use requirements on the first page of this procedure.

1.2 **WHEN** an emergency has been declared and ERF staffing is required, **THEN** each ERO member shall follow their position specific checklist after arriving at their Emergency Response Facility (ERF).

1.3 The responsibilities of OSC ERO personnel are as follows:

#### 1.3.1 Emergency Group Leader:

- Functional supervisor of OSC
- Coordinates emergency response team activities.
- Advises the Station Emergency Director for emergency repairs.

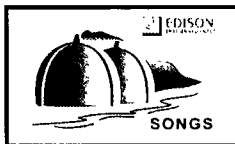
#### 1.3.2 OSC Radiation Protection Coordinator

- Coordinates Radiation Protection activities from the OSC.
- Acts as liaison between the OSC and in-plant field teams. Maintains plant radiological status board.
- Evaluates radiological conditions associated for in-plant field teams performing assessment and repair and develops Radiation Exposure Permits that specify radiological controls.
- Maintain radio contact with the onsite response teams and keeps the Emergency Group Leader (EGL) informed of the radiological conditions.
- Support RP Leader with primary duty of providing briefings and debriefings to teams on radiological conditions and required radiological controls

#### 1.3.3 OSC Radiation Protection Technicians

- Provides Radiation Protection support for emergency response teams in the plant for damage assessment, control and repair of equipment, and injury or lifesaving tasks.

## REFERENCE USE



## Emergency Response Organization (ERO) Operations Support Center Position Checklists

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### 1.3.4 OSC Chemistry Coordinator

- Provides data on chemistry of reactor coolant system and other plant systems.
- Makes recommendations on maintaining chemical control of systems.
- Operates Multi-Channel Analyzer (MCA) and provides analysis results to the EOF RP Leader.

### 1.3.5 OSC Security Coordinator

- Coordinates security activities from the OSC.

### 1.3.6 OSC Maintenance Coordinator

- Coordinates maintenance and repair activities from the OSC.
- Provide briefings and debriefings to mitigating field teams.

### 1.3.7 OSC Operations Coordinator

- Coordinates Operations activities from the OSC.
- Keeps OSC informed of plant conditions via the Ivory Phone and maintains Plant Status board/priority board.

### 1.3.8 OSC Emergency Planning Coordinator

- Advises and assists the Emergency Group Leader with coordination of emergency response teams, and all Emergency Plan requirements.
- Maintains status board tracking for all teams in field.
- Provides Records Management support to the OSC.


### 1.3.9 OSC Emergency Services Coordinator

- Coordinates firefighting, first aid and rescue activities.
- Provides for the response to hazardous materials incidents for the protection of life, environment and property.

### 1.3.10 OSC Mechanical Maintenance Technician

- Provides mechanical support for emergency response teams in the plant for damage assessment, control and repair of equipment.

## REFERENCE USE

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>  Page 4 of 82
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#### 1.3.11 OSC I&C Technicians

- Provides instrumentation and control support for emergency response teams in the performance of damage assessment and in the control and repair of equipment.

#### 1.3.12 OSC Electrical Technicians

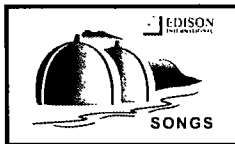
- Provides electrical support for emergency response teams in the plant for damage assessment, control and repair of equipment.

## 2.0 **ACRONYMS**

2.1	<u>AOI</u> :	Abnormal Operating Instructions
2.2	<u>ARM</u> :	Area Radiation Monitor
2.3	<u>AWS</u> :	Administration Warehouse & Supply/Shop
2.4	<u>CAL OES</u> :	California Office of Emergency Services
2.5	<u>CAPR</u> :	Corrective Action to Prevent Reoccurrence
2.6	<u>CAS</u> :	Central Alarm Station
2.7	<u>CED</u> :	Corporate Emergency Director
2.8	<u>CEDE</u> :	Committed Effective Dose Equivalent
2.9	<u>CDE</u> :	Committed Dose Equivalent
2.10	<u>CR</u> :	Control Room
2.11	<u>DAC</u> :	Derived Airborne Concentration
2.12	<u>EAB</u> :	Exclusion Area Boundary
2.13	<u>EAL</u> :	Emergency Action Level
2.14	<u>EAN</u> :	Emergency Advisor, Notifications
2.15	<u>EC</u> :	Emergency Coordinator

## REFERENCE USE





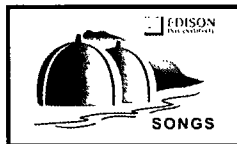
## Emergency Response Organization (ERO) Operations Support Center Position Checklists

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2.16	<u>EDT:</u>	Event Declaration Time
2.17	<u>ENF:</u>	Event Notification Form
2.18	<u>EOC:</u>	Emergency Operations Center
2.19	<u>EOF:</u>	Emergency Operations Facility
2.20	<u>EP:</u>	Emergency Plan
2.21	<u>EPC:</u>	Emergency Planning Coordinator
2.22	<u>EPIP:</u>	Emergency Plan Implementing Procedure
2.23	<u>ERDS:</u>	Emergency Response Data System
2.24	<u>ERF:</u>	Emergency Response Facility
2.25	<u>ERO:</u>	Emergency Response Organization
2.26	<u>ERTD:</u>	Emergency Response Telephone Directory
2.27	<u>ERP:</u>	Emergency Response Personnel
2.28	<u>HDP:</u>	Hardened Defense Position
2.29	<u>IHPS:</u>	Integrated Health Physics System
2.30	<u>ISFSI:</u>	Independent Spent Fuel Storage Installation
2.31	<u>KI:</u>	Potassium Iodide
2.32	<u>NRC:</u>	Nuclear Regulatory Commission
2.33	<u>OCA:</u>	Owner Controlled Area
2.34	<u>ODAC:</u>	Offsite Dose Assessment Center
2.35	<u>OSLD</u>	Optically Stimulated Luminescent Dosimeter
2.36	<u>OSSC:</u>	Onsite Security Commander

## REFERENCE USE



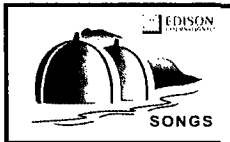
## Emergency Response Organization (ERO) Operations Support Center Position Checklists

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2.37	<u>PA</u> :	Protected Area
2.38	<u>PAPA</u> :	Protected Area Personnel Accountability
2.39	<u>PAR</u> :	Protective Action Recommendation
2.40	<u>PAZ</u> :	Protective Action Zone
2.41	<u>PED</u> :	Personal Electronic Dosimetry
2.42	<u>REPCET</u> :	Representative Core Exit Temperature
2.43	<u>RP</u> :	Radiation Protection
2.44	<u>SAMG</u> :	Severe Accident Management Guideline
2.45	<u>SAS</u> :	Secondary Alarm Station
2.46	<u>SC</u> :	Shift Communicator
2.47	<u>SCBA</u> :	Self-Contained Breathing Apparatus
2.48	<u>SCE</u> :	Southern California Edison
2.49	<u>SCP</u> :	Safeguards Contingency Plan
2.50	<u>SED</u> :	Station Emergency Director
2.51	<u>SL</u> :	Security Leader
2.52	<u>SM</u> :	Shift Manager
2.53	<u>SONGS</u> :	San Onofre Nuclear Generating Station
2.54	<u>SPF</u> :	Security Processing Facility
2.55	<u>SRO</u> :	Senior Reactor Operator
2.56	<u>SSPF</u> :	South Security Processing Facility

### REFERENCE USE




## Emergency Response Organization (ERO) Operations Support Center Position Checklists

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- 2.57 TEDE: Total Effective Dose Equivalent
- 2.58 TSC: Technical Support Center
- 2.59 VA: Vital Area
- 2.60 VNF: Verbal Notification Form
- 2.61 YPS: Yellow Phone System

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>  Page 8 of 82
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### 3.0 **PROCEDURE**

3.1 **OBTAIN** a copy of the applicable ERO position checklist. This checklist may be found in the first tab of each ERO Position Book.

### 3.2 **ACTIVATION AND OPERATION OF THE OSC**

3.2.1 Upon declaration of a Notification of Unusual Event (NOUE) (if activation is directed by Emergency Coordinator), or an ALERT or higher classification, OSC personnel shall report to the OSC. ERO positions assigned a Positional Instruction Checklist, as defined below, shall obtain their checklist when reporting to the OSC and follow instructions contained within.

3.2.2 The Emergency Group Leader may declare the OSC activated when the following minimum staff positions have been filled:

- OSC Emergency Group Leader
- OSC Radiation Protection Coordinator
- OSC Radiation Protection Technicians
- OSC Chemistry Coordinator
- OSC Security Coordinator
- OSC Maintenance Coordinator
- OSC Operations Coordinator
- OSC Emergency Planning Coordinator
- OSC Emergency Services Coordinator
- 5 RP Technicians
- 1 Mechanical Maintenance Technician
- 1 I&C Technician
- 1 Electrician

### 4.0 **RETENTION OF RECORDS**

4.1 **COLLECT** all paperwork generated in response to the emergency event (e.g., logs, procedures, attachments, forms and checklists) **AND DELIVER** to either the TSC Manager, EOF Emergency Planning Coordinator, or OSC Emergency Planning Coordinator.

## REFERENCE USE

### **POSITION CHECKLIST**

#### Emergency Group Leader Supplemental Position Instructions Table of Contents

Section Number	Title	Page
2.0	OSC/ALT OSC ACTIVATION.....	12
3.0	SITE ASSEMBLY AND EVACUATION .....	13
4.0	SUSPENSION OF NORMAL WORK PRACTICES .....	14
5.0	TEAM DISPATCH .....	14
6.0	CONTINUING ACTIONS.....	15
7.0	EGL TURNOVER.....	15
8.0	EVENT CLOSEOUT.....	15

#### **NOTE**

1. Sections 2.0 through 8.0 provide supplemental instructions for performing the EGL duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.


#### 1.0 **INITIAL ACTIONS**

1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) EOF-5, Reporting Of Accidents
- EP(123) ERO-6, Assembly Area Briefing Script
- EP(123) OSC-2, OSC Relocation Checklist
- EP(123) OSC-3, Team Dispatch Instructions

1.2 **ASSUME** the position of Emergency Group Leader.

- 1.2.1 **LOG** into the Protected Area Personnel Accountability (PAPA) system.
- 1.2.2 **SIGN IN** on the OSC Staffing Board.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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OSC Emergency Group Leader Checklist		Attachment 1

1.2.3 **VERIFY** communications devices function.

- Telephone
- Public Address (PA) System

1.3 **ACTIVATE** the facility.

1.3.1 **VERIFY** minimum staffing prior to declaring the OSC activated.

- OSC Radiation Protection Coordinator
- OSC Chemistry Coordinator
- OSC Security Coordinator
- OSC Maintenance Coordinator
- OSC Operations Coordinator
- OSC Emergency Planning Coordinator
- OSC Emergency Services Coordinator
- 5 RP Technicians
- 1 Mechanical Maintenance Technician
- 1 I&C Technician
- 1 Electrician

1.3.2 **ANNOUNCE** that the OSC is activated to the OSC personnel.

1.4 **VERIFY** all other OSC positions are being filled.


1.5 **PERFORM** an initial brief; include priorities, status **AND INFORM** personnel of the following expectations:

1.5.1 IF you have priority information and a brief is in progress, THEN interrupt the brief and share the information.

1.5.2 **ENSURE** details for the team mission are decided upon prior to team briefing. **CLARIFY** team missions with the OSC Maintenance Coordinator.

1.6 **MAINTAIN** a log of activities.

1.7 **ENSURE** equipment repair and restoration priorities established by the TSC are being followed.

 EDISON S <small>ONGS</small>	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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	<b>OSC Emergency Group Leader Checklist</b>	

1.8 **COORDINATE** OSC tasks.

1.8.1 **INITIATE** the Team Dispatch/Tracking Forms.

1.8.2 **ENSURE** OSC Coordinators assemble repair and survey teams, perform team briefings, and track team progress as instructed.

1.8.2.1 **ENSURE** periodic communication with the Team Leaders in the field is accomplished.

1.9 **RESOLVE** resource allocation conflicts.

1.9.1 **KEEP** the Maintenance Coordinator informed of OSC operations and problems.

1.9.2 **ENSURE** the Maintenance Coordinator is aware of all repair team dispatches.



1.10 **PROVIDE** periodic plant status facility briefings with OSC personnel (approximately every 30-60 minutes) or following significant changes in plant status.


1.11 Continuously **ACCOUNT** for OSC personnel.

1.12 **COORDINATE AND DIRECT** activities for facility relocation per EP(123) OSC-2, Relocation Checklist.

1.13 **CONDUCT** shift turnover.

1.14 Upon event termination, **ENSURE** all items have been returned to a state of readiness.

- **COMPLETE** all checklist items.
- **FACILITATE** post-event critique.
- **RETURN** the workstation to its original condition.
- **RETURN** all position notebooks to their storage location.
- **RETURN** any emergency response equipment to its original location.
- **COLLECT** all the OSC paperwork including team dispatch Form, EP(123) OSC-3, Team Dispatch Instructions.
- **PROVIDE** all paperwork to the Emergency Planning Coordinator in the OSC.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>  Page 12 of 82
OSC Emergency Group Leader Checklist	Attachment 1	

### **SUPPLEMENTAL POSITION INSTRUCTION**


#### **NOTE**

1. Sections 2.0 through 8.0 provide supplemental instructions for performing the EGL duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.
3. The following steps are an enhancement to the position checklist. Placekeeping is not required.

#### **2.0 OSC/ALT OSC ACTIVATION**

- 2.1 REPORT to SED AND SIGN-IN on minimum staffing board.**
- 2.2 REVIEW staffing requirements AND MAINTAIN a log of decisions and actions.**
- 2.3 DETERMINE the status of ongoing mitigation efforts in the plant.**
- 2.4 DIRECT an OSC Operations Coordinator to complete a dispatch checklist for emergency responders who are in the plant.**
- 2.5 ENSURE OSC has adequate personnel and equipment resources.**
  - 2.5.1 IF a Chemistry Supervisor is NOT present, THEN DESIGNATE a Chemistry Technician or other available personnel to review the Chemistry Coordinator procedure steps.**
  - 2.5.2 ENSURE minimum staffing levels are met for the OSC as soon as possible.**
  - 2.5.3 IF emergency conditions require the call-out of additional personnel, THEN DIRECT the Administrative Leader (EOF) or responsible Coordinator to contact the desired personnel.**
  - 2.5.4 The OSC may be activated if the OSC Emergency Services Coordinator is at the incident scene.**
- 2.6 IF the TSC and OSC have been relocated to Building E-50, THEN:**
  - 2.6.1 ASSEMBLE OSC personnel in Building E-50 Learning Center.**
  - 2.6.2 ENSURE OSC Leaders obtain ERO Leader Notebooks from bookcase located in Building E-50 Hallway.**
  - 2.6.3 ESTABLISH communications with the EOF.**



	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
		Page 13 of 82
	OSC Emergency Group Leader Checklist	

2.6.4 **COORDINATE** with the SED to establish / prioritize Response Teams.

2.6.5 **COORDINATE** with the Security Director to safely dispatch Response Teams from Building E-50 to the Owner-Controlled Area or Protected Area.



2.7 **DECLARE** the OSC activated after minimum staffing levels have been met. This should be accomplished within 90 minutes of notification time for Alert or higher classification.

2.7.1 **DIRECT** the Operations Coordinator to announce OSC activation over the Ivory Phone circuit.



2.8 **CONDUCT** OSC briefings approximately every 30 minutes or as conditions warrant.

2.8.1 **ENSURE** TSC and OSC priorities for event mitigation are in alignment, documented on the Plant Priorities white board and disseminated to OSC staff during briefings.


2.9 **REVIEW** this checklist periodically during emergency response, recovery, and following each reclassification.

### 3.0 **SITE ASSEMBLY AND EVACUATION**

3.1 IF any of the hazards listed below Step 3.2 affect major portions of the Protected Area or Owner Controlled Area, THEN CONTACT the SED AND RECOMMEND a Site Assembly or Site Evacuation.


3.2 IF any of the hazards listed below affect a major portion of the Mesa area, THEN CONTACT the SED AND RECOMMEND a Mesa Area Assembly or Evacuation:

- High radiation alarms or unexpected high radiation levels on Area Radiation Monitors (ARMs), building or containment ventilation monitors, portable radiation monitors, or continuous air monitors
- Spills of radioactive material which may result in excessive personnel exposure
- Fire Protection System Actuation
- Toxic/flammable gases or heavy smoke reported
- Chemical hazards to personnel
- High pressure steam or water leaks
- Security hazards which threaten personnel or equipment safety
- Local report of fire or smoke
- Any other condition which may present a hazard to plant personnel

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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OSC Emergency Group Leader Checklist	<b>Attachment 1</b>
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- 3.3 IF the local area is the OSC, **THEN DIRECT** OSC personnel to proceed to an alternate OSC location.
- 3.3.1 Options for relocation of the OSC include the K buildings, the Outage Control Center, and E-50.
- 3.3.2 **IMPLEMENT** EP(123) OSC-2, OSC Relocation Checklist.
- 4.0 **SUSPENSION OF NORMAL WORK PRACTICES**
- 4.1 Deviation from Maintenance Procedures
- 4.1.1 IF Maintenance procedures detract from emergency response efforts or increase the hazard to plant personnel or the public, **THEN MODIFY OR WAIVE** Maintenance procedures or steps.
- 4.1.1.1 **IDENTIFY** to the SRO Operations Supervisor or the SED the waiving or modification of specific maintenance controls.
- 4.1.1.2 Prior to approving a deviation from a Maintenance procedure or steps, **ENSURE** the team leader understands what is being bypassed, and what the associated risks are to personnel and equipment.
- 4.2 Plant Saving/Damage Control Actions
- 4.2.1 **REQUEST** the OSC Operations Coordinator to determine whether the action is plant saving/damage control or a Shift Superintendent (Shift Manager) Accelerated Maintenance (SSAM) action.
- 4.2.2 IF the task is plant saving/damage control, **THEN WORK** with the Operations Coordinator to determine the necessary actions to expedite mitigation efforts.
- 4.2.3 IF the task is a SSAM action, **THEN USE** the SSAM process.
- 4.2.4 IF the event does **NOT** fit the criteria for plant saving/damage control or SSAM, **THEN USE** the normal work processes.
- 4.3 Waiver of Security/Safeguards Procedures
- 4.3.1 IF Security/Safeguards procedures are hampering medical, fire and/or rescue efforts, **THEN OBTAIN** a waiver of Security/Safeguards procedures using 10CFR50.54(x) from the SED.
- 5.0 **TEAM DISPATCH**
- 5.1 **DISPATCH** teams per Form EP(123) OSC-3, Team Dispatch Instructions.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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	<b>OSC Emergency Group Leader Checklist</b>	

6.0 **CONTINUING ACTIONS**



6.1 **PROVIDE** OSC briefings (approx. every 30-min.)

6.2 **EXERCISE** Command and Control of the OSC.

6.3 **REVIEW** this checklist periodically.

7.0 **EGL TURNOVER**

7.1 WHEN the oncoming Emergency Group Leader arrives at the OSC, THEN:

7.1.1 **CONDUCT** turnover with the oncoming EGL per Form EP(123) 5, Turnover Status.

7.1.2 **RECORD** completion of the turnover in the EGL log.

7.1.3 **REPORT** completion of turnover to the SED.

8.0 **EVENT CLOSEOUT**

8.1 WHEN requested by the SED, THEN **RECOMMEND** additional Maintenance personnel and equipment necessary for a recovery organization.

8.2 **RESTORE** emergency equipment to designated locations **AND** **COLLECT** facility paperwork.

### **POSITION CHECKLIST**

#### OSC Radiation Protection Coordinator Supplemental Position Instructions Table of Contents

Section Number	Title	Page
3.0	ACTIVATION .....	22
4.0	TOXIC GAS EVENT .....	25
5.0	EVACUATION .....	26
6.0	SITE AREA EMERGENCY/SITE ASSEMBLY .....	28
7.0	RE-ENTRY INTO EVACUATED AREAS .....	29
8.0	PROTECTIVE ACTION RECOMMENDATIONS .....	29
9.0	EVENT CLASSIFICATION .....	29
10.0	EXPOSURE CONTROL .....	29
11.0	RESPONSE TEAMS .....	31
12.0	FIRE .....	36
13.0	SUSPENSION OF RADIATION PROTECTION MEASURES .....	36
14.0	TURNOVER .....	36

#### **NOTE**

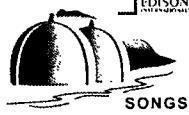
1. Sections 3.0 through 14.0 provide supplemental instructions for performing the OSC Radiation Protection Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.

#### **1.0 INITIAL ACTIONS**

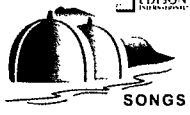
##### **1.1 ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) ERO-9, Response Team Guidelines
- EP(123) OSC-2 OSC, Relocation Checklist
- EP(123) OSC-5, Radiation Protection Team Tracking
- EP(123) OSC-8, Dosimetry and Respirator Issue
- EP(123) OSC-9, Contaminated Injury Radiological Information


##### **1.2 LOG** into the Protected Area Personnel Accountability (PAPA) system.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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OSC Radiation Protection Coordinator Checklist		<b>Attachment 2</b>

- 1.3 **ASSUME** the position of OSC Radiation Protection Coordinator.
  - 1.3.1 **SIGN IN** on the OSC Staffing Board.
  - 1.3.2 **TURN** on the OSC P.C. radio and monitor.
    - 1.3.2.1 At USER NAME, **ENTER** (in CAPS) OSC. At PASSWORD, **ENTER** guest (in lowercase).
  - 1.3.3 **VERIFY** communications devices function.
  - 1.3.4 **ESTABLISH AND MAINTAIN** a log using Form EP(123) 6, Log Book.
- 1.4 **ACTIVATE** the OSC radiological control functions.
  - 1.4.1 **ENSURE** the personnel decontamination facilities and equipment are in a state of readiness.
  - 1.4.2 **ENSURE** RP related equipment and tools located in the Emergency lockers in the OSC staging area are in a state of readiness.
    - SCBA bottles (adequate pressure)
    - All battery powered equipment (i.e, flashlights, meters, friskers, etc.)
    - Radio base stations and portable radios
  - 1.4.3 **ENSURE** adequate personnel are present from the RP Department to initially activate the OSC.
  - 1.4.4 **REPORT** readiness or problems to the Emergency Group Leader.
  - 1.4.5 **ASSIGN** technicians to **PERFORM** habitability surveys of the TSC and OSC periodically. These should include: checking the current CAM reading, checking the current general area dose rate, and surveying for loose surface contamination at the TSC entrance.
  - 1.4.6 **REPORT** the status of TSC/OSC habitability to the OSC Supervisor and the TSC Radiation Protection Leader.
  - 1.4.7 **ASSIGN** technicians to periodically **VERIFY** the habitability of the Control Room.
  - 1.4.8 **REPORT** the status of Control Room habitability to the TSC Radiation Protection Leader.
- 1.5 **MAINTAIN** communications between the TSC and OSC
- 1.6 **MAINTAIN** contact with response teams.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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OSC Radiation Protection Coordinator Checklist		<b>Attachment 2</b>

- 1.7 **REPORT** equipment malfunctions to the OSC Emergency Planning Coordinator.
- 1.8 **RECORD** all survey data received from Response Teams.
- 1.9 **MAINTAIN** concise and professional communications.
- 1.10 **ENSURE** the most current plant radiological survey data is readily available. This data can be obtained from IHPS and the U 2/3 70' RP Control Point Routine Survey Definitions (RSD) book(s).
- 1.11 **ENSURE** the most current component locator book(s) is available. This book(s) can be used to help locate plant components.
- 1.12 **ENSURE** a Plant Radiation Monitoring System locator is available. This information can be used to help determine any changes in radiological conditions in various areas of the plant prior to field team dispatch.
- 1.13 **LOOK** forward in the drill or actual emergency scenario to identify actions necessary to mitigate the emergency.
- 2.0 **CONTINUING ACTIONS**
- 2.1 **MAINTAIN** radio contact with the response teams using frequency EP-A.
- 2.2 **MAINTAIN** Form EP(123) OSC-5, Radiation Protection Team Tracking.
- 2.3 **RECORD** all survey data received from Response Teams.
- 2.4 **INSTRUCT** teams **AND** **MAINTAIN** concise and professional communications. **REPEAT** back critical information to ensure accuracy.

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- 2.5 **COORDINATE** with other OSC Coordinators in assembly of dispatch team for repair and survey, team briefings, and tracking of team progress.
- 2.5.1 **COORDINATE** RP support of operators dispatched from the Control Room.
- 2.5.2 **CONDUCT** briefings/debriefings.
- 2.5.2.1 **PROVIDE** radiological information to personnel leaving the TSC/OSC.
- Backout conditions
  - Protective clothing requirements
  - Respirator requirements
  - Radiological areas to avoid
- 2.5.3 **EVALUATE** tasks **AND SELECT** team personnel.
- 2.5.3.1 **REVIEW** missions to determine RP coverage, protective equipment requirements, remaining exposure, LHRA entries, etc.
- 2.5.3.2 **VERIFY** team members are qualified for missions that require respiratory protection.
- 2.5.3.3 **ASSEMBLE AND DISPATCH** teams to acquire samples when directed.
- 2.5.3.4 **CONTROL** movement of RP survey teams through the team leader.
- 2.5.4 **COMPLETE** the dispatching section of the Team Dispatch Form.
- 2.5.5 **PROVIDE** a copy of the Team Dispatch/Tracking Form to the Team Leader.
- 2.5.6 **POST** a copy of EP(123) 4-G, Dispatch Checklist on the Team Tracking Status Board.
- 2.5.7 **INSTRUCT** the Team Leader to pick up and test a radio from the OSC or obtain a cell phone.
- 2.5.8 **INSTRUCT** the Team Leader to report arrival time at the designated location.
- 2.5.9 **NOTIFY** the Emergency Group Leader an RP Technician has been assigned to an operations team for a particular task.
- 2.5.10 **INSTRUCT** the Team Leader to report work status.
- 2.5.11 **ESTABLISH** communications with team leaders and keep them informed of changing plant conditions while the team is in the plant.




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- 2.5.12 **CONTACT** team leaders approximately every 30 minutes for status of work and team safety.
- 2.5.13 **OBTAIN AND TRACK** doses of all personnel dispatched into the plant.
- 2.5.14 **FILE** the completed Team Dispatch Form with the Emergency Planning Coordinator.
- 2.6 **ENSURE** personnel assigned to dosimetry issue maintain exposure and dose-tracking records of response teams dispatched from the OSC, and all personnel assigned to Emergency Response Facilities.
- 2.7 **ENSURE** personnel utilize current Radiological Qualification Report for exposure tracking and respiratory qualifications of response personnel.
- 2.8 **ENSURE** personnel who may receive exposures in excess of 10 CFR 20 limits have been authorized.
- 2.9 **IF** personnel exceed normal administrative limits, **THEN NOTIFY** the RP Coordinator.
- 2.10 **ASSIST** in keeping the status board current.
- 2.11 **ENSURE** that the OSC Radio is staffed **AND ASSIST** with radio communications.
- 2.12 **PERFORM** the following for Response Team activities in areas of increased radiological hazards.
  - 2.12.1 For Response Teams that require emergency exposure authorization, **PERFORM** the following:
    - 2.12.1.1 **SUPERVISE** planning Response Teams requiring emergency exposure authorization.
    - 2.12.1.2 **MAINTAIN** direct supervision and oversight of planned Radiation Protection controls for the teams.
    - 2.12.1.3 **ATTEND** briefing and debriefing for the teams.
    - 2.12.1.4 **MAINTAIN** responsibility for the teams' communications.
- 2.13 **MAINTAIN** continuous accountability of all RP personnel assigned to the OSC.
- 2.14 **COORDINATE** activities for facility relocation EP(123) OSC-2, OSC Relocation Checklist.
- 2.15 Upon event termination, **ENSURE** all items have been returned to a state of readiness.
  - 2.15.1 **COMPLETE** all checklist items.
  - 2.15.2 **RETURN** the workstation to its original condition.



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- 2.15.3    **RETURN** all position notebooks to their storage location.
- 2.15.4    **RETURN** any emergency response equipment to its original location.
- 2.15.5    **PROVIDE** all paperwork to the Emergency Group Leader.

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### **SUPPLEMENTAL POSITION INSTRUCTION**

#### **NOTE**

1. Sections 3.0 through 14.0 provide supplemental instructions for performing the OSC Radiation Protection Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.
3. The following steps are an enhancement to the position checklist. Placekeeping is not required.


### **3.0 ACTIVATION**

- 3.1 **DIRECT** RP personnel assigned to the OSC to log into the Protected Area Personnel Accountability (PAPA).
- 3.2 **DIRECT** RP Field Team personnel to log on to the Integrated Health Physics System (IHPS) Emergency Response activity.
- 3.3 **DISPATCH** RP Technician(s) qualified to provide high radiation job coverage for Control Room dispatched Operations and in-plant emergency teams.
  - 3.3.1 IF radiological conditions do **NOT** warrant RP coverage, THEN **RECALL** RP Technician(s) for other functions.
  - 3.3.2 IF the RP Technician(s) is recalled, THEN **INFORM** the Operations Leader or Shift Manager (SM).
- 3.4 IF the Technical Support Center (TSC) RP Leader has **NOT** arrived at the TSC, THEN **ENSURE** Steps 3.5 through 3.8 are performed, OTHERWISE **GO TO** Step 3.9.
- 3.5 **REPORT** to the SM/Station Emergency Director (SED).
- 3.6 Radiological Airborne Release
  - 3.6.1 IF a radiological airborne release occurs, THEN **PERFORM** the following:
    - 3.6.1.1 **PERFORM** dose assessment in accordance with SO123-VIII-40.100.
    - 3.6.1.2 **DISPATCH** an RP Offsite Monitoring Team to collect data to characterize the plume.

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- 3.6.1.3 **IF** field monitoring results do **NOT** match the calculated dose projections, **THEN** **REFINE** the dose projections, by performing a calculation using field monitoring results, or account for the differences.
- 3.6.1.4 **PROVIDE** EAB dose projections to the SM/SED for event classification and protective action recommendations.
- 3.6.1.5 **PROVIDE** Site Assembly Area dose projections to the SM/SED for onsite protective actions.
- 3.6.1.6 **INFORM** the Emergency Response Organization of wind direction and radiological plume conditions. This information may be relayed via the Ivory Phone Talker.
- 3.6.2 **PROVIDE** initial and periodic updates of radiological information to the Emergency Response Organization.
- 3.6.2.1 **ENSURE** the Operations Leader receives this information. This information may be relayed via the Ivory Phone Talker.
- 3.6.2.2 **PROVIDE** radiological information to the Security Leader (SL) for oncoming workers.
- 3.6.3 **REVIEW** Category A of SO123-VIII-1, Recognition and Classification of Emergencies **AND INFORM** the SM/SED when conditions change which may affect the event classification.
- 3.6.4 **IF** a Site Evacuation is required, **THEN INFORM** the SM/SED, Security Leader, and Administrative Leader of the safest evacuation route based upon available radiological data.
- 3.6.5 **IDENTIFY**, to the Security Leader, parking lots which are known or likely to have vehicle contamination for the purpose of closing down the parking lots and preventing the use of the vehicles for evacuation.
- 3.6.6 **IF** RP protective measures (e.g., access control, protective clothing, contamination control, etc.) cause or could cause an increased hazard to personnel or the public, **THEN** **MODIFY OR WAIVE** Radiation Protection procedures with the concurrence of the SM/SED.

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3.7 WHEN an RP Leader arrives at the TSC, THEN:

3.7.1 **CONDUCT** turnover with the oncoming Radiation Protection Leader in accordance with Form EP(123) 5, Turnover Status.

3.7.2 **RECORD** completion of the turnover in the OSC RP Coordinator Log.

3.7.3 **REPORT** completion of turnover to the SED and OSC Emergency Planning Coordinators.

3.8 IF directed by the SM/SED, THEN PERFORM the pre-planned alternate method for monitoring containment radiation levels (Reference SO123-VII-20.9.5, Alternate Pre-Planned Methods for Radiation Monitors).



3.9 **REPORT** to the Emergency Group Leader.

3.9.1 **ENSURE** the following required tasks are covered before assigning personnel to other tasks:

3.9.1.1 **PERFORM** dose assessment. This task will be performed by the RP Coordinator until recall personnel arrive.

3.9.1.2 **PERFORM** onsite (owner-controlled area) and offsite radiological surveys in accordance with (IAW) assignments.

3.9.1.3 **ENSURE** the following radiation protection tasks are performed IAW assignment:

- Access control
- Job coverage
- Personnel monitoring
- Dosimetry issue
- In-plant surveys

3.9.1.4 **ESTABLISH** radio communication with in-field teams.

3.9.2 Personnel who do **NOT** have current Emergency Response Organization training may be used during drills or actual events; however, they shall be assembled and evacuated in a simulated or actual site evacuation.

3.10 **DISPATCH** personnel in accordance with Section 11.0, Response Teams.

3.11 MAINTAIN a log of decisions and actions required by Emergency Plan Implementing Procedures (EPIPs).

3.11.1 **DOCUMENT** conditions, events, and communications wherever appropriate to ensure a complete and adequate record, to minimize misunderstanding, and to identify items requiring followup actions.

#### 4.0 **TOXIC GAS EVENT**

4.1 **WHEN** notified of a toxic gas event, **THEN COMPLETE** the following:

##### **CAUTION**

1. **SCBA cylinders must be changed out before they go empty to avoid life-threatening situations to the wearer and maintain the Control Room habitability staffing commitment. The rate at which change out will be required depends upon each individual's air consumption rate. The SCBA low pressure alarm and pressure gauge should be used to aide in determining when to change out the cylinders. Too frequent change out could result in depleting the Control Room Air Reserves faster than the design bases.**
2. **Refilling of the empty SCBA cylinders must take place within four hours to permit the Control Room air reserves to support habitability for greater than the six hour design.**




4.1.2 **WHEN** notified of a toxic gas event, **THEN** within 30 minutes **ASSIGN AND DISPATCH** a sufficient number of SCBA-qualified RP personnel to ensure SCBA cylinders are changed out to maintain Control Room habitability staffing commitments.

4.1.3 **REMOVE** the empty cylinders to a location personnel can retrieve them for refilling without donning a SCBA.



4.1.4 **WITHIN** two hours of notification of a toxic gas event, **CALL** in sufficient RP Personnel to refill SCBA cylinders and shuttle cylinders between the SCBA refilling station and Protected Area.


4.1.5 **ENSURE** RP Personnel are informed to whom and where they are to report to be briefed on the toxic gas situation and the cylinder retrieval location. Maximize the transport of full and empty cylinders between the Protected Area and the SCBA refilling stations to maintain the Control Room air reserves.

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## 5.0 **EVACUATION**


### 5.1 Evacuation Hazards

- 5.1.1 IF any of the hazards listed below exist, **THEN INITIATE** a Local Area Evacuation by contacting the Emergency Group Leader and recommending a Local Area Evacuation.
- High radiation alarms or unexpected high radiation levels on Area Radiation Monitors (ARMs), building or containment ventilation monitors, portable radiation monitors, or continuous air monitors
  - Spills of radioactive material which may result in excessive personnel exposure
  - Fire in any occupied area
  - Toxic/flammable gases or heavy smoke reported
  - Chemical hazards to personnel
  - High pressure steam or water leaks
  - Security hazards which threaten personnel or equipment safety
- 5.1.1.1 **ADVISE** the Radiation Protection Leader of your recommendation.
- 5.1.2 IF dose rates outside the Protected Area (PA) or at Site Assembly Areas exceed 5 mrem/hr Deep Dose Equivalent (DDE), contamination levels exceed 1000 dpm/100 cm<sup>2</sup>, OR airborne radioactivity exceeds 0.3 of a Derived Air Concentration (DAC), **THEN CONTACT** the Emergency Group Leader and recommend Site Evacuation of Non-Emergency Response Personnel.
- 5.1.2.1 **ADVISE** the Radiation Protection Leader of your recommendation.
- 5.1.3 IF any of the hazards listed in Step 5.1.1 affect major portions of the Protected Area or Owner Controlled Area, **THEN CONTACT** the Emergency Group Leader **AND RECOMMEND** a Site Assembly or Evacuation.
- 5.1.4 IF any of the hazards listed in Step 5.1.1 affect a major portion of the Mesa Area, **THEN CONTACT** the Emergency Group Leader **AND RECOMMEND** a Mesa Area Assembly or Evacuation.
- 5.1.4.1 **ADVISE** the Radiation Protection Leader of all recommendations.
- 5.1.5 **DISPATCH** technicians to the affected area to assess radiological hazards, monitor personnel or assist with emergency response (fire, medical, etc.).

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## 5.2 Local Area Evacuation


- 5.2.1 IF conditions may exceed 5 mrem/hr DDE, contamination levels exceed 1000 dpm/100 cm<sup>2</sup>, OR IF airborne radioactivity exceeds 0.3 DAC at the OSC or security guard posts, THEN CONTACT the Emergency Group Leader to consider an evacuation of the affected locations to alternate response locations.
- 5.2.2 IF evacuation is **NOT** feasible, THEN INSTITUTE contamination controls **AND ISSUE** Self-Reading Dosimeters (SRDs)/electronic dosimeters to affected personnel.
- 5.2.3 IF the local area is the OSC, THEN:
  - 5.2.3.1 **CONSULT** with the RP Leader **AND DESIGNATE** the evacuation route/protective gear needed for transition to the alternate OSC.
  - 5.2.3.2 IF there are radiological concerns, THEN DISPATCH RP technicians to the evacuation route to assess radiological hazards and assist with the evacuation.
  - 5.2.3.3 **ESTABLISH AND POST** step-off pads and frisking stations at the alternate OSC entrance(s).
  - 5.2.3.4 **INFORM** response teams of the new OSC location.
  - 5.2.3.5 **TAKE** with you materials and equipment necessary to perform RP emergency response functions (e.g., procedures, forms, Protective Clothing, Respiratory Protective Equipment, Survey Instruments, etc.) at the alternate facility.
  - 5.2.3.6 **KEEP** all evacuees together, as much as possible.

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## 6.0 **SITE AREA EMERGENCY/SITE ASSEMBLY**

- 6.1 **IF** a Site Area Emergency is declared **OR** Site Assembly is directed **AND IF** an unplanned radiological release occurs or is imminent, **THEN ASSIGN** technicians to monitor each of the following areas:
- 6.1.1 Site Assembly Areas - **PROVIDE** radiological controls/guidance to assembled personnel at Site Assembly Areas (AWS Cafeteria, T-20Building, and W-48 Building).
  - 6.1.2 Parking Lots - **MONITOR** for vehicle contamination prior to evacuation, if a radiological release has occurred.
  - 6.1.3 Security Processing Facilities (SPF and SSPF) - **PROVIDE** radiological controls/guidance to personnel entering the Protected Area.
  - 6.1.4 Local Assembly Areas - As identified by the RP Leader, **PROVIDE** radiological controls/guidance to personnel if possible contamination occurs.
- 6.2 **PROHIBIT** eating, drinking or smoking in the Assembly Areas until cleared by RP surveys.
- 6.3 **IF** dose rates outside the Protected Area (PA) exceed 5 mrem/hr DDE, contamination levels exceed 1000 dpm/100 cm<sup>2</sup>, **OR IF** airborne radioactivity exceeds 0.3 DAC, **THEN CONTACT** the RP Leader **AND RECOMMEND** site evacuation of non-emergency response personnel.
- 6.4 **CONSIDER** sending contaminated personnel to one of the personnel decontamination facilities at Units 2/3 or EOF Medical Room, if staffed.
- 6.5 **IF** personnel and/or vehicles evacuated from SONGS are suspected or known to be contaminated, **THEN INFORM** the RP Leader.
- 6.6 **IF** contamination controls interfere with the safety of personnel during a site evacuation, **THEN CONTACT** the TSC RP Leader.



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## 7.0 **RE-ENTRY INTO EVACUATED AREAS**

- 7.1 WHEN requested by personnel directing re-entry, THEN PROVIDE RP considerations and personnel to support re-entry efforts.
- 7.2 **DIRECT** food and water supplies inside the evacuated area be surveyed for contamination prior to consumption.

## 8.0 **PROTECTIVE ACTION RECOMMENDATIONS**

- 8.1 **PROVIDE** any information which may aid the TSC RP Leader in making offsite Protective Action Recommendations.

## 9.0 **EVENT CLASSIFICATION**

- 9.1 **ENSURE** all RP personnel are aware of any reclassification.
- 9.2 IF significant radiological changes occur, THEN ENSURE all Response Teams in the affected areas are aware of the changes.
- 9.3 **ENSURE** the TSC RP Leader is promptly informed of any field survey data which could indicate the need to classify or reclassify an emergency.


## 10.0 **EXPOSURE CONTROL**

### 10.1 Administrative Controls

- 10.1.1 IF a Site Area Emergency is declared, a radioactive release occurs, or a significant increase in radioactive release occurs, THEN PROHIBIT eating or drinking in the OSC.
- 10.1.1.1 IF radiological conditions permit, THEN RESTORE eating or drinking.


### 10.2 Administrative Limits

- 10.2.1 Prior to dispatching teams to (potential) radiation areas, **CHECK** Response Team members' remaining exposure.
- 10.2.2 The OSC RP Coordinator may authorize annual exposures of 4000 mrem Total Effective Dose Equivalent (TEDE).
- 10.2.2.1 **NOTIFY** the TSC RP Leader/designee of all authorizations.

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### 10.3 Emergency Exposure Authorization

- 10.3.1 As time permits, **DISTRIBUTE** Form EP(123) 3, Emergency Exposure Authorization, to volunteers.
- 10.3.2 **ENSURE** volunteers read and understand the sections on emergency exposure guidelines and the effects of acute radiation exposures.
- 10.3.3 IF a task to protect valuable property, save lives, or protect a large population would result in an exposure greater than 5 rem TEDE, THEN **INFORM** the Radiation Protection Leader, SED, or SM that the task will result in greater than 5 rem TEDE and emergency exposure authorization will be required.
- 10.3.4 IF authorization is given, THEN **OBTAIN** volunteers. Consider the following:
- Declared pregnant women (as certified by the individual) should **NOT** be selected.
  - Other considerations being equal, the individual should be over age 45.
- 10.3.5 **BRIEF** the individual on the following (IF practical, **HAVE** RP brief the individual on radiological conditions and dose information):
- Specific job
  - Radiological conditions
  - Protective measures
  - Anticipated acute dose
  - Exposure **NOT** to exceed 10 rem TEDE for protection of valuable property
- 10.3.6 In order to minimize internal exposure, **CONSIDER** the use of Potassium Iodide (in accordance with Section 11.7) and respiratory protection.
- 10.3.7 **OBTAIN** the following signatures on the Emergency Exposure Authorization, Form EP(123) 3, Emergency Exposure Authorization:
- Individual signs volunteer section and briefer section
  - Individual who briefed the volunteer
  - SM/SED
- 10.3.7.1 The SM/SED approval may be verbal. Following verbal approval, **FORWARD** the form to the SM/SED (either in the Control Room or TSC) for signature.

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## 11.0 **RESPONSE TEAMS**

### 11.1 Task Tracking and Team Briefing:



11.1.1 For tasks that take less than ten minutes, are **NOT** within a hazardous area, and are **NOT** a mitigation effort, tracking should be by logbook entry.



11.1.2 For tasks that take greater than ten minutes, are **NOT** within a hazardous area, and are **NOT** a mitigation effort, **COMPLETE** Section 1 and 2 of the Dispatch Checklist, Form EP(123) 4-G, Dispatch Checklist.

### 11.2 Response Team Dispatch

11.2.1 **WHEN** the Emergency Group Leader has authorized a response team to be assembled, **THEN**:

11.2.1.1 **OBTAIN** Form EP(123) 4-G for teams performing Radiation Protection functions.

11.2.1.2 **COMPLETE** job scope information in Section 1 and team member names in Section 2.

11.2.1.3 For all response teams, **PERFORM** the following:

11.2.1.3.1 **USE** Form EP(123) OSC-4, Response Team Guidelines, when dispatching teams.

11.2.1.3.2 **UTILIZE** SRD correction factors to determine dose limits. Correction factors are obtained from the TSC RP Leader.

11.2.1.3.3 **IF** the Response Team members may be exposed to a radioactive plume and the SRD correction factor is **NOT** available, **THEN USE** an SRD correction factor of five to determine dose limits.

11.2.1.3.4 **LIST** dose limits in Form EP(123) 4-G, Section 2, Team Personnel.


11.2.1.4 **ENSURE** Response Teams dispatched outside the Protected Area are issued TLDs.

11.2.1.5 For all teams, **RECORD** required Radiation Protection equipment needed in the Radiological Protective & Monitoring Equipment portion of Section 4, Form EP(123) 4-G, Dispatch Checklist.


11.2.1.5.1 **DIRECT** team personnel to obtain the required instruments and equipment from emergency kits or normal issue locations.

11.2.1.5.2 **ENSURE** the survey instruments are response checked prior to use.

11.2.1.5.3 **OBTAIN** additional instrumentation and equipment.

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- 11.2.1.6 **BRIEF** all teams on the radiological conditions and controls required **AND COMPLETE** the Radiation Protection Briefing portion of Section 4, Form EP(123) 4-G.
- 11.2.1.6.1 **OBTAIN** information on radiological releases and area radiation monitor readings from the TSC.
- 11.2.1.6.2 IF there is a potential for significant personnel exposure, THEN CONSIDER developing a specific exposure control plan following the guidelines in SO123-VII-20.10, Radiological Work Planning.
- 11.2.1.7 IF the team will perform a Radiation Protection function, THEN COMPLETE Form EP(123) 4-G Section 3, Craft Briefing, **OBTAIN** Emergency Group Leader approval, **DISPATCH** the Response Team, **AND RECORD** in Form EP(123) 4-G, Section 5.
- 11.2.1.7.1 **DISTRIBUTE** the checklist in accordance with copy distribution on Form EP(123) 4-G.
- 11.2.1.8 IF the team will **NOT** be performing Radiation Protection functions, THEN PROVIDE Form EP(123) 4-G to the responsible organization to complete Section 3, Craft Briefing.
- 11.2.2 WHEN the team returns to the OSC, THEN:
- 11.2.2.1 IF the team performed a Radiation Protection function, THEN DEBRIEF the team **AND RECORD** pertinent information on Form EP(123) 4-G, Section 6, Debrief.
- 11.2.2.2 **INFORM** the RP Coordinator and the EPC of the team return.
- 11.2.2.2.1 **RETRIEVE** the copies of Form EP(123) 4-G from the RP Coordinator and the EPC.
- 11.2.2.3 **PROVIDE** the completed Form EP(123) 4-G to the OSC Emergency Planning Coordinator.
- 11.3 Team Tracking
- 11.3.1 **PROVIDE** the Response Teams accompanied by RP support with general guidance and direction while in the field.
- 11.3.2 **MAINTAIN** radio or telephone contact with dispatched Response Teams.
- 11.3.3 **ENSURE** all radiological data is recorded and all significant data are reported to the RP Leader.

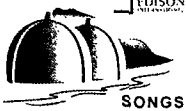
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#### 11.4 Rapid Dispatch of OSC Teams

- 11.4.1 **ENSURE** an RP Technician is included in the Response Team IAW briefing/situation.
- 11.4.1.1 **PROVIDE** a radio and a general purpose dose rate instrument, IAW briefing/situation.
- 11.4.1.2 **INSTRUCT** the RP Technician to limit personnel exposure to 4000 mrem TEDE until informed of new dose limitations.
- 11.4.2 WHEN the Emergency Group Leader dispatches the team, THEN:
- 11.4.2.1 **ASSIST** the Emergency Group Leader in the completion of Form EP(123) 4-G, Dispatch Checklist.
- 11.4.2.2 **AUTHORIZE** dose extensions for response team members in accordance with Step 10.2.
- 11.4.2.3 **BRIEF** the team on radiological conditions via telephone, radio, or in person.
- 11.4.2.3.1 **INFORM** the Rapid Deployment Team of any changes to their dose limits.

#### 11.5 Monitoring Emergency Response Facilities

- 11.5.1 **ENSURE** the OSC, TSC, and Control Rooms are regularly surveyed for contamination, airborne radioactivity, and radiation.
- 11.5.2 **ENSURE** the TSC air envelope is continuously monitored for airborne radioiodine, using installed systems or portable monitors.
- 11.5.2.1 IF the primary method of monitoring fails, THEN PROVIDE backup monitoring AND NOTIFY the Maintenance Coordinator in the OSC.
- 11.5.3 **ENSURE** a frisker or other alarming detector is placed in the TSC and OSC with the alarm set to provide occupants with early warning of radiological problems.
- 11.5.4 IF an unplanned radiological release occurs or is imminent, THEN PERFORM surveys to monitor for contamination outside of radiologically controlled areas.
- 11.5.4.1 IF resources are **NOT** available to perform these surveys, or if contamination is detected outside radiologically controlled areas, THEN POST step-off pads for the entrances to the OSC, TSC, and Control Rooms (CRs).

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11.5.4.2 **MONITOR** the OSC, TSC, and CR radiation and airborne radioactivity continuously using a frisker.

11.5.4.2.1 IF the frisker indicates rising radiation levels or if the frisker alarms, THEN **PERFORM** radiation and airborne radioactivity surveys.

11.5.4.3 **PERFORM** periodic radiation and airborne radioactivity surveys. Frequency should be based upon plant and radiological conditions.



11.5.4.4 **PERFORM** contamination surveys every 30 minutes or determine the frequency based upon plant and radiological conditions.

11.5.4.5 Contamination controls may be relaxed WHEN areas outside the RCA are determined to be free of contamination.

11.5.5 **NOTIFY** the TSC RP Leader of any changes in the radiological environment.

#### 11.6 Contaminated Injury

11.6.1 IF an injury occurs in a radiologically controlled area, THEN **DISPATCH** RP Technician(s) to the scene of the injury.

11.6.2 **DIRECT** RP personnel to coordinate actions with the Fire Department/Fire Brigade Incident Commander at the scene.

11.6.3 IF the individual is suspected or known to be contaminated, THEN:


11.6.3.1 **ASSIGN** an RP Technician to accompany the ambulance to the hospital, or to the SCE Medical Facility, if staffed.

11.6.3.2 **ASSIGN** additional RP Technicians to follow the ambulance as backup crew.

11.6.3.3 **PROVIDE** the backup crew with additional instructions, briefings and procedures, as time permits.

11.6.3.4 **DOCUMENT** contamination levels on persons transported offsite in accordance with the RP procedure (SO123-VII-20.9.4, Attachment 6) or on Form EP(123) OSC-9, Contaminated Injury Radiological Information.

11.6.3.5 **ENSURE** survey results of the contaminated individual(s) is forwarded to the receiving facility.


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## 11.7 Use of Potassium Iodide (KI)

### **WARNING**

**DO NOT administer KI to individuals who are known or suspected to be allergic to KI or have a history of thyroid disease, without authorization of a physician.**

- 11.7.1 IF emergency response personnel have been **OR** will be exposed to a Thyroid CDE in excess of 10 rem, **THEN CONSIDER** the use of KI for emergency personnel.
- 11.7.1.1 IF KI is required, **THEN COORDINATE** with the TSC Radiation Protection Leader, EOF Radiation Protection Leader, and/or the SM, for distribution.
- 11.7.1.2 IF the EOF RP Leader position is **NOT** yet staffed, **THEN** the TSC RP Leader may authorize issuance of KI to EOF and/or offsite personnel.
- 11.7.2 Before issuing KI, the potential for the recipient to be allergic to KI should be assessed.
- 11.7.2.1 IF time permits, **THEN SEEK** the council of the designated or alternate Edison Physician to assess the potential for the recipient to be allergic.
- 11.7.2.2 IF time does **NOT** permit, **THEN** the potential for an allergy to KI should be assessed by the OSC RP Coordinator or designee.
- 11.7.2.3 **ASK** the recipient if he/she is aware of an existing allergy to potassium or iodine.
- 11.7.2.4 **ASK** the recipient if he/she is allergic to shellfish. An existing allergy to shellfish, which are high in natural iodine, is a potential indicator of an existing allergy to iodine.
- 11.7.3 Before administering subsequent doses of KI, **REFER** the recipient to a physician for a follow up assessment of an allergic reaction.
- 11.7.3.1 For maximum thyroid blocking, **CONTINUE** administration of KI for 7-10 days following an actual uptake of radioiodine.
- 11.7.3.2 **NO** more than 10 total doses of KI (130 mg each) shall be authorized.
- 11.7.4 **ENSURE** the data listed below is documented on Form EP(123) ERO-3, Authorization to Issue Potassium Iodide, for each individual authorized to be issued KI:
  - Name and Personnel Number or social security number of authorized recipient.
  - Calculation of avoided CDE Thyroid dose which justifies the prescription of KI.

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11.7.5 **OBTAIN** KI tablets from Emergency Kits **AND DISPENSE NO** more than one tablet of KI per individual per day.

11.7.5.1 Owner Controlled Area (OCA) Field Monitoring Teams Emergency Kits contain KI. Monitoring Team members may be instructed on the issuance of KI while dispatched.

## 12.0 **FIRE**

12.1 **DISPATCH** an RP Technician to the fire location to perform necessary surveys and control contamination.

12.2 **DIRECT** the RP Technician to coordinate actions with the Emergency Services Incident Commander at the scene.

## 13.0 **SUSPENSION OF RADIATION PROTECTION MEASURES**

13.1 **IDENTIFY** the need to waive or modify RP protective measures (e.g., access control, protective clothing, contamination control, etc.) to facilitate emergency response or decrease the hazard to personnel or the public.

13.2 **REQUEST** the TSC RP Leader to approve waiving or modifying identified RP protective measures.

## 14.0 **TURNOVER**


14.1 **WHEN** the oncoming RP Coordinator arrives at the OSC, **THEN**:

14.1.1 **CONDUCT** turnover with the oncoming RP Coordinator in accordance with Form EP(123) 5, Turnover Status.

14.1.2 **RECORD** completion of the turnover in the RP Coordinator Log.

14.1.3 **REPORT** completion of the turnover to the Emergency Planning Coordinator.



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### POSITION CHECKLIST


#### NOTE


Steps may be performed in any order or concurrently.

#### 1.0 INITIAL ACTIONS


- 1.1 WHEN ready to perform your ERO duties, THEN SIGN-ON to the OSC minimum staffing board
- 1.2 **LOG** into the Protected Area Personnel Accountability (PAPA) system.
- 1.3 **TEST** all portable radiation monitoring equipment used in the OSC.
- 1.4 **SET UP AND CHECK** air and dose rate monitoring equipment in the OSC.
- 1.5 **PERFORM** initial habitability surveys for OSC and TSC. **NOTIFY** TSC RP Leader and OSC RP Coordinator of results.

#### 2.0 CONTINUING ACTIONS

- 2.1 IF an unplanned radiological release occurs or is imminent, THEN PERFORM surveys to monitor for contamination of the OSC **AND UPDATE** the OSC survey maps.
- 2.2 IF there is a change in radiological conditions, THEN NOTIFY the RP Coordinator immediately.
- 2.3 IF contamination greater than 1000dpm/100cm<sup>2</sup> is detected outside the radiological controlled area, THEN POST step-off pads for the entrances to the OSC, TSC, and CR.
- 2.4 **MONITOR** the OSC radiation and airborne radioactivity using a frisker.
- 2.5 IF the frisker indicates rising radiation levels **OR IF** the frisker alarms, THEN NOTIFY RP Coordinator **OR PERFORM** radiation and airborne radioactivity surveys.
  - 2.5.1 **PERFORM** radiation airborne surveys.
- 2.6 Immediately **REPORT** the results to the RP Coordinator.
- 2.7 **PERFORM** radiation and airborne radioactivity surveys at the frequency specified by the RP Coordinator.
-  2.8 **PERFORM** contamination surveys every 30 minutes or as directed by the RP Coordinator.
- 2.9 IF evacuation is **NOT** feasible, THEN INSTITUTE contamination controls **AND ISSUE** SRDs/electronic dosimeters to affected personnel, as directed by the RP Coordinator.

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2.10    **ASSIST** the RP Coordinator.

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#### NOTE

1. Sections 8.0 through 13.0 provide supplemental instructions for performing the OSC Chemistry Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.

#### 1.0 INITIAL ACTIONS

1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) 4-G, Dispatch Checklist

1.2 WHEN ready to perform your ERO duties, THEN **SIGN-ON** to the OSC minimum staffing board


1.3 **LOG** into the Protected Area Personnel Accountability (PAPA) system.

1.4 **ESTABLISH** a log using Form EP(123) 6, Log Book.

1.5 **ENSURE** Count Room MCA is energized and calibrated. IF **NOT** calibrated, THEN **PERFORM** calibration. IF Count Room MCA is **NOT** available, THEN **UTILIZE** the MCA in the North Industrial Area (NIA).

1.6 **INFORM** Emergency Group Leader (EGL) of any malfunctions.

1.7 **REPORT** to the EGL in the OSC and the Technical Leader in the Technical Support Center (TSC).

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## 2.0 **ACTIVATION**

2.1 **INFORM** TSC and Control Room of current and forecasted sampling and analysis activities, including any available sample results.

2.2 **DISPATCH** technicians using Form EP(123) 4-G, Dispatch Checklist.

2.3 IF additional chemistry technicians are required, THEN **CALL** in additional personnel.

2.3.1 IF no chemistry technicians are available, THEN **PERFORM** requested sampling and analysis, when qualified.

2.4 **DIRECT** personnel who may be dispatched to:

- **OBTAIN** dosimetry
- **SIGN ONTO** the Emergency Response Radiation Exposure Permit
- **OBTAIN** IHPS personnel summary sheets
- **BADGE** into the Protected Area Personnel Accountability (PAPA) system

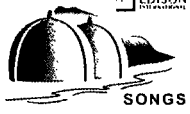
2.4.1 **REMIND** personnel to badge back into the system upon returning from field assignments when they used another card reader.

2.5 IF sampling requests were received prior to OSC activation, THEN **VERIFY** the requests with the affected Control Room Supervisor or Operations Leader. IF any of these requests are still in progress, THEN **DOCUMENT** the team dispatch on Form EP(123) 4-G, Dispatch Checklist.

## 3.0 **EVACUATION**

3.1 IF any of the hazards listed below affect a major portion of the Mesa Area, THEN **CONTACT** the EGL AND **RECOMMEND** a Mesa Area assembly or evacuation.

- High radiation alarms or unexpected high radiation levels on Area Radiation Monitors (ARMs), building or containment ventilation monitors, portable radiation monitors, or continuous air monitors
- Spills of radioactive material which may result in excessive personnel exposure
- Fire in any occupied area
- Toxic/flammable gases or heavy smoke reported
- Chemical hazards to personnel
- High pressure steam or water leaks
- Security hazards which threaten personnel or equipment safety

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### 3.2 Evacuation Hazards

- 3.2.1 IF any of the hazards listed below Step 3.1 exist, THEN CONTACT the EGL AND RECOMMEND a Local Area Evacuation.
- 3.2.2 IF any of the hazards listed below Step 3.1 affect major portions of the Protected Area or Owner Controlled Area, THEN CONTACT the EGL AND RECOMMEND a Site Assembly or Evacuation.

### 3.3 Local Area Evacuation

- 3.3.1 IF the local area is the OSC, THEN PROCEED to the alternate OSC as directed by the EGL and Radiation Protection.
- 3.3.2 **TAKE** with you the materials and equipment necessary to perform emergency response functions at the alternate facility.

### 3.4 Re-Entry Into Evacuated Areas

- 3.4.1 WHEN requested by personnel directing re-entry, THEN PROVIDE personnel to support Emergency Services needs.

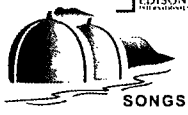
## 4.0 EMERGENCY RESPONSE COORDINATION

### 4.1 Sample Requests

- 4.1.1 IF conflicting sampling requests are received, THEN REQUEST the EGL and the TSC Technical Leader (when the TSC is activated) to establish sampling priorities.
- 4.1.2 **PREPARE** Form EP(123) 4-G, Dispatch Checklists, in accordance with Section 10.2, Response Teams.
- 4.1.3 **ENSURE** Chemistry Technicians observe proper practices while performing sampling and analysis.
- 4.1.4 **PROVIDE** the sample results to the TSC Technical Leader.


### 4.2 Response Teams


- 4.2.1 WHEN directed by the EGL to assemble a response team, THEN:
- 4.2.1.1 **OBTAIN** form AND DISPATCH using Form EP(123) 4-G, Dispatch Checklist.
- 4.2.1.2 **COMPLETE** sections 1 and 2.
- 4.2.1.3 **BRIEF** the team AND COMPLETE Section 3, Craft Briefing, of the checklist.

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- 4.2.1.4 IF heavy smoke and/or visual obstruction is anticipated, THEN **DIRECT** the team to use life lines.
- 4.2.1.5 WHEN radiological conditions are present, THEN **COMPLETE** Section 4, RP Briefing.
- 4.2.2 WHEN the team is assembled, THEN **OBTAIN** EGL approval and dispatch the response team. **RECORD** time in Section 5 on the checklist.
- 4.2.3 **DISTRIBUTE** the checklist per the copy distribution on the form.
- 4.2.4 **NOTIFY** ERO members in the field of changing radiological conditions.
- 4.2.5 WHEN the team returns to the OSC, THEN:
- 4.2.5.1 **DEBRIEF** the team AND **RECORD** pertinent information in Section 6, Debrief, of the checklist.
- 4.2.5.2 **INFORM** the RP Coordinator and the EPC of the team return.
- 4.2.5.3 **RETRIEVE** the copies of the checklist provided to the RP Coordinator and the EPC.
- 4.2.5.4 **PROVIDE** the completed checklist to the OSC Emergency Planning Coordinator.

## 5.0 POST-ACCIDENT SAMPLING

- 5.1 **EVALUATE** all applicable methods of post-accident parameter sampling AND **COORDINATE** with Radiation Protection to ensure that personnel are properly protected.
- 5.2 **PROVIDE** Sample Results to the TSC Technical Leader, as requested.
- 5.3 Count Room Coordination
  - 5.3.1 **COORDINATE** delivery to the Count Room for all samples requiring onsite analysis.
  - 5.3.2 **ENSURE** samples are clearly identified prior to analysis.
  - 5.3.3  **DIRECT** qualified personnel to count environmental samples with a Multi-Channel Analyzer for a minimum of 300 seconds. **DISPATCH** using Section 4.2.
  - 5.3.4 IF analysis of environmental samples is required and the Multi-Channel Analyzer is **NOT** available due to a risk of cross contamination, high background or excessive analysis times, THEN **CONTACT** the EOF RP Leader to arrange for analysis of samples in the EOF counting room or shipment offsite for analysis.
- 5.4 **ENSURE** a record of all samples is maintained by the Count Room technician and each sample is clearly labeled for later identification and retained.

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## 5.5 Sample Storage and Moving

5.5.1 Samples may be stored in the Counting Room, in the RCS Sample Room, or moved to alternate locations in the Rad Waste Building for exposure control.

5.5.2 **MARK** each sample for later identification.

5.5.3 **MOVE OR SHIP** samples according to applicable Radiation Protection procedures.

## 6.0 TURNOVER

6.1 WHEN a relief Chemistry Coordinator arrives at the OSC, THEN:

6.1.1 **CONDUCT** turnover with the oncoming Chemistry Coordinator per Form EP(123) 5, Turnover Status.


6.1.2 **RECORD** completion of the turnover in the Chemistry Coordinator Log.

6.1.3 **REPORT** completion of the turnover to the Emergency Planning Coordinator

## 7.0 RECOVERY

### 7.1 Recovery Initiation

7.1.1 WHEN requested by the TSC Technical Leader, THEN **RECOMMEND** additional Chemistry personnel and equipment necessary for a recovery organization

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### **SUPPLEMENTAL POSITION INSTRUCTION**

#### **NOTE**

1. Sections 8.0 through 13.0 provide supplemental instructions for performing the OSC Chemistry Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.
3. The following steps are an enhancement to the position checklist. Placekeeping is not required.

#### **8.0 ACTIVATION**

8.1 **INFORM** TSC and Control Room of current and forecasted sampling and analysis activities, including any available sample results.

8.2 **ESTABLISH** sampling priorities with input from EGL and TSC.

8.3 **DISPATCH** technicians using Form EP(123) 4-G, Dispatch Checklist.

8.4 **CONDUCT** turnover with the oncoming Chemistry Coordinator per Form EP(123) 5, Turnover Status.

8.5 IF additional chemistry technicians are required, THEN CALL in additional personnel.

8.5.1 IF no chemistry technicians are available, THEN PERFORM requested sampling and analysis, when qualified.


8.6 **DIRECT** personnel who may be dispatched to:

- **SIGN ONTO** the Emergency Response Radiation Exposure Permit
- **OBTAIN** dosimetry
- **OBTAIN** IHPS personnel summary sheets
- **BADGE** into the Protected Area Personnel Accountability (PAPA) system


8.7 **MAINTAIN** communications with the TSC Technical Leader to provide required chemistry information **AND ACCEPT** requests for sampling.

8.8 IF sampling requests were received prior to OSC activation, THEN VERIFY the requests with the affected Control Room Supervisor or Operations Leader. IF any of these requests are still in progress, **DOCUMENT** the team dispatch on Form EP(123) 4-G, Dispatch Checklist.



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- 8.9 **DIRECT** Chemistry personnel assigned to the OSC to badge into the PAPA system upon arrival. **REMIND** personnel to badge back into the system upon returning from field assignments when they used another card reader.
- 8.10 **MAINTAIN** a log of all decisions and actions required by Emergency Plan Implementing Procedures (EPIPs). **PROVIDE** documentation of conditions, events, and communications wherever appropriate to ensure a complete and adequate record, to minimize misunderstanding, and to identify items requiring follow-up actions.
- 9.0 **EVACUATION**
- 9.1 Evacuation Hazards
- 9.1.1 IF any of the hazards listed below Step 9.1.3 exist, **THEN INITIATE** a Local Area Evacuation **OR CONTACT** the EGL **AND RECOMMEND** a Local Area Evacuation.
- 9.1.2 IF any of the hazards listed below Step 9.1.3 affect major portions of the Protected Area or Owner Controlled Area, **THEN CONTACT** the EGL **AND RECOMMEND** a Site Assembly or Evacuation.
- 9.1.3 IF any of the hazards listed below affect a major portion of the Mesa Area, **THEN CONTACT** the EGL **AND RECOMMEND** a Mesa Area assembly or evacuation.
- High radiation alarms or unexpected high radiation levels on Area Radiation Monitors (ARMs), building or containment ventilation monitors, portable radiation monitors, or continuous air monitors
  - Spills of radioactive material which may result in excessive personnel exposure
  - Fire in any occupied area
  - Toxic/flammable gases or heavy smoke reported
  - Chemical hazards to personnel
  - High pressure steam or water leaks
  - Security hazards which threaten personnel or equipment safety
- 9.2 Local Area Evacuation
- 9.2.1 IF the local area is the OSC, **THEN PROCEED** to the alternate OSC as directed by the EGL and Radiation Protection.
- 9.2.2 **TAKE** with you the materials and equipment necessary to perform emergency response functions at the alternate facility.

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## OSC Chemistry Coordinator Checklist

### 9.3 Re-Entry Into Evacuated Areas

- 9.3.1 WHEN requested by personnel directing re-entry, THEN **PROVIDE** personnel to support Emergency Services needs.


### 10.0 EMERGENCY RESPONSE COORDINATION

#### 10.1 Sample Requests

- 10.1.1 IF conflicting sampling requests are received, THEN **REQUEST** the EGL and the TSC Technical Leader (when the TSC is activated) to establish sampling priorities.
- 10.1.2 **PREPARE** Form EP(123) 4-G, Dispatch Checklists, in accordance with Section 10.2, Response Teams.
- 10.1.3 **ENSURE** Chemistry Technicians observe proper practices while performing sampling and analysis.
- 10.1.4 **PROVIDE** the sample results to the TSC Technical Leader, as requested.

#### 10.2 Response Teams

- 10.2.1 WHEN directed by the EGL to assemble a response team, THEN:
- 10.2.1.1 **OBTAIN** Form EP(123) 4-G, Dispatch Checklist.
- 10.2.1.2 **COMPLETE** Sections 1 and 2.
- 10.2.1.3 **BRIEF** the team AND **COMPLETE** Section 3, Craft Briefing, of the checklist.
- 10.2.1.4 IF heavy smoke and/or visual obstruction is anticipated, THEN **DIRECT** the team to use life lines.
- 10.2.1.5 WHEN radiological conditions are present, THEN **COMPLETE** Section 4, RP Briefing.
- 10.2.2 WHEN the team is assembled, THEN **OBTAIN** EGL approval and dispatch the response team. **RECORD** time in Section 5 on the checklist.
- 10.2.2.1 **DISTRIBUTE** the checklist per the copy distribution on the form.
- 10.2.2.2 **NOTIFY** ERO members in the field of changing radiological conditions.
- 10.2.3 WHEN the team returns to the OSC, THEN:
- 10.2.3.1 **DEBRIEF** the team AND **RECORD** pertinent information in Section 6, Debrief, of the checklist.

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10.2.3.2 **INFORM** the RP Coordinator and the EPC of the team return.

10.2.3.3 **RETRIEVE** the copies of the checklist provided to the RP Coordinator and the EPC.

10.2.3.4 **PROVIDE** the completed checklist to the OSC Emergency Planning Coordinator.

#### 11.0 **POST-ACCIDENT SAMPLING**

11.1 **EVALUATE** all applicable methods of post-accident parameter sampling **AND** **COORDINATE** with Radiation Protection to ensure that personnel are properly protected.

11.2 **PROVIDE** Sample Results to the TSC Technical Leader, as requested.

#### 11.3 Count Room Coordination

11.3.1 **COORDINATE** delivery to the Count Room for all samples requiring onsite analysis. The Count Room technician should be dispatched and tracked using the In-House dispatch process.

11.3.2 **IF** analysis of environmental samples is required and the Multi-Channel Analyzer is **NOT** available due to a risk of cross contamination, high background or excessive analysis times, **THEN** **CONTACT** the EOF RP Leader to arrange for analysis of samples in the EOF counting room or shipment offsite for analysis.

11.3.3 **ENSURE** a record of all samples is maintained by the Count Room technician and each sample is clearly labeled for later identification.

#### 11.4 Sample Storage and Moving

11.4.1 Samples may be stored in the Counting Room, in the RCS Sample Room, or moved to alternate locations in the Rad Waste Building for exposure control.

11.4.2 **MARK** each sample for later identification.

11.4.3 **MOVE OR SHIP** samples according to applicable Radiation Protection procedures.

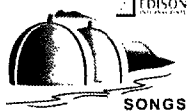
#### 12.0 **TURNOVER**

12.1 **WHEN** a relief Chemistry Coordinator arrives at the OSC, **THEN**:

12.1.1 **CONDUCT** turnover with the oncoming Chemistry Coordinator per Form EP(123) 5, Turnover Status.

12.1.2 **RECORD** completion of the turnover in the Chemistry Coordinator Log.


12.1.3 **REPORT** completion of the turnover to the Emergency Planning Coordinator.

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### 13.0 **RECOVERY**

#### 13.1 Recovery Initiation

- 13.1.1 WHEN requested by the TSC Technical Leader, THEN **RECOMMEND** additional Chemistry personnel and equipment necessary for a recovery organization.

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#### **NOTE**

1. Sections 16.0 through 29.0 provide supplemental instructions for performing the OSC Security Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.

#### 1.0 **INITIAL ACTIONS**


##### 1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) 294, Personnel Accountability
- EP(123) 4-G, Dispatch Checklist
- EP(123) OSC-6, Site Evacuation
- EP(123) ERO-10, Emergency Information

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- 1.2 **WHEN** ready to perform your ERO duties, **THEN SIGN-ON** to the OSC minimum staffing board
- 1.3 **LOG** into the Protected Area Personnel Accountability (PAPA) system.
- 1.4 **REPORT** to OSC Emergency Group Leader (EGL).
- 1.5 **ESTABLISH AND MAINTAIN** a log using Form EP(123) 6.
- 1.6 **INFORM** EGL that ten (10) sets of security keys to Vital Area (VA) portals are available.
- 1.7 **IF** security keys are requested, **THEN ISSUE** keys **AND LOG** person's name, badge number, key set number, time issued, and time of return in Logbook/Key Log Report.
- 1.8 **REPORT** your arrival and PAX number in OSC to the Security Leader in TSC, Security Director in EOF, Central Alarm Station (CAS) Supervisor, and Secondary Alarm Station (SAS) Operator.
- 1.9 **OBTAIN** current SONGS Security Post Assignment roster.
- 1.10 For a Non-Security Alert or higher emergency class, **IMPLEMENT** Site Evacuation preparation steps in accordance with Form EP(123) OSC-6, Site Evacuation, Section 1.0.
- 1.11 **INFORM** Radiation Protection (RP) Coordinator of exact locations of security personnel assigned to stationary posts **AND UPDATE** the RP Coordinator of any changes
- 1.12 **NOTIFY** Security ERO members in the field of changing radiological conditions. [NN 202065874]
- 1.13 **VERIFY** EOF Security Liaison is assigned and implementing EOF Security Liaison Duties.
- 2.0 **CONTINUING ACTIONS**
- 2.1 **WHEN** directed by the Security Leader, **THEN INITIATE** recall of off-shift security personnel in accordance with existing Security instructions.
- 2.2 **PROVIDE** information on Form EP(123) ERO-10, Emergency Information, to staff at SPFs, North Access Gate, and Mesa Access Gate to update information status board as changes occur.
- 2.3 **IF** there is a suspected bomb or other explosive device, **THEN ADVISE** security officers to direct personnel in immediate area to restrict radio transmissions, cellular phones, etc., for a minimum radius of 300 feet.
- 2.4 **PROVIDE** documentation of conditions, events, and communications to ensure a complete and adequate record, to minimize misunderstanding and to identify items requiring follow-up actions.

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- 2.5 **CONTACT** SPF(s) and EOF Security post to determine IF any arriving ERO have declared alcohol consumption in the past five hours. IF so, **THEN ADVISE** the Security Leader of emergency response personnel (ERP) who have declared alcohol consumption within the last five hours are waiting entry into PA or EOF.
- 2.6 **REPORT** all security response actions to Security Leader in event Security Contingency Plan (SCP) is implemented in response to a security event.
- 2.7 IF emergency is reclassified, **THEN ENSURE** all security personnel are notified of reclassification, **AND REPEAT** Step 16.1 of this checklist.
- 2.8 Upon initial classification, event reclassification, or event close-out, **REVIEW** each subsection (17.0, 18.0, etc.) of this checklist to ensure all required steps are performed.
- 3.0 **PROTECTED AREA PERSONNEL ACCOUNTABILITY (PAPA) PROCESS**
- 3.1 For Alert or higher emergency classes or when directed by the Security Leader, **CALL** CAS at PAX 89123 **AND HAVE** them initiate the Emergency Accountability system.
- 3.2 IF a person is unable to badge in to an ERF card reader **THEN** manually **RECORD** that person's information on Form EP(123) 294, Personnel Accountability.
- 3.3 IF available, **THEN REQUEST** an in-house dispatch of an OSC team member (preferably a Security Officer) to go to CAS to obtain an updated Emergency Accountability Report.
- 3.4 **ENSURE** personnel permanently exiting OSC log out of PAPA-ERF system or accountability form.
- 3.5 **OBTAIN** list of Operations watch standers from Operations Coordinator **AND LOG** all on Form EP(123) 294, Personnel Accountability.
- 3.6 WHEN the Emergency Accountability system is unavailable or inoperable for Alert or higher emergency classes or when directed by the Security Leader, **THEN PROVIDE** all OSC Coordinators with Form EP(123) 294, Personnel Accountability, to initiate backup accountability of their personnel.
- 4.0 **SITE EVACUATION**
- 4.1 WHEN a declared Security Event is in progress, **THEN INFORM** EGL Security personnel will **NOT** be able to support these activities.
- 4.2 IF a Site Evacuation has been ordered, **THEN PERFORM** the following steps:
  - 4.2.1 **OBTAIN** status of emergency conditions from the Security Leader, contaminated areas, and direction of site evacuation.
  - 4.2.2 **NOTIFY** OCA Supervisor of Site Evacuation order, evacuation route, and to initiate activation steps of Form EP(123) OSC-6, Site Evacuation, Section 2.0.

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- 4.2.3 **REPORT** to the Security Leader when activation steps of Form EP(123) OSC-6, Site Evacuation, Section 2.0 have been completed.
- 4.2.4 **REPORT** start of Site Evacuation to the Security Leader.
- 4.2.5 **REPORT** completion of Site Evacuation to the Security Leader.
- 4.3 **DIRECT** security search teams or in-place personnel to sweep PA, OCA, and Mesa Area to ensure complete evacuation of site, **RETRIEVE** Safeguards Information material left unattended, **AND** promptly **IDENTIFY** discovered injured personnel to the Security Leader.
  - 4.3.1 **ENSURE** security sweep teams are dispatched in accordance with Section 10.0, Security Team Dispatch.
  - 4.3.2 **REPORT** results of sweeps to the Security Leader.
  - 4.3.3 **DIRECT** Security sweep teams to turn in Safeguards Information to other Security personnel.
- 4.4 **PROVIDE** security support for re-entry efforts **AND COORDINATE** with the Security Leader.
- 5.0 **MUTUAL AID**
- 5.1 **IF** off-site emergency vehicles or equipment are responding to SONGS, **THEN:**
  - 5.1.1 **ENSURE** off-site responders are aware of any known radiological, chemical or biological hazards associated with response as provided by Emergency Services Coordinator.
  - 5.1.2 **ENSURE** unimpeded entry of properly identified emergency response personnel and equipment per SO123-IV-5.4, Protected Area/Vital Area Emergency Vehicle/Personnel Access.
  - 5.1.3 **ENSURE** emergency vehicles are directed to designated (PA) entry points.
  - 5.1.4 **NOTIFY** EGL and security personnel of their arrival and destination.



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## 6.0 **LOCAL AREA HAZARDS/LOCAL EVACUATION**

6.1 IF safety hazards exist (Fire, Smoke, Fumes, Radiological, etc.) which threaten personnel or equipment safety, THEN **CONTACT** Security Leader for instructions.

6.1.1 IF a safety hazard exists for Security personnel in a Hardened Defense Position (HDP), or other fixed post, THEN immediately **CONTACT** Security Leader **AND REQUEST** 50.54(x) approvals to relocate affected security post(s).

6.1.2 IF affected area is CAS or SAS, THEN **CONTACT** Security Leader for instructions.

6.1.3 IF requested, THEN **DISPATCH** security personnel to local area, **AND COORDINATE** with Team Leader.

6.1.4 **INFORM** Security Leader of all actions taken and times.

## 7.0 **SITE ASSEMBLY/PROTECTED AREA EVACUATION**

7.1 IF directed by Security Leader, THEN **COORDINATE** security personnel to perform the following:

7.1.1 **COLLECT** security photo-identification badges, visitor badges, and visitor escort badges from evacuating personnel from North SPF and South SPF badge drop containers.


7.1.2 **DIRECT** evacuating security personnel to retain Safeguards Information materials.

7.2 Unless otherwise directed, **ENSURE** all personnel exiting PA and visitors proceed to proper assembly area as follows:

- North PA - AWS Multipurpose Room
- South PA - T-20 Building

7.2.1 WHEN directed by Security Leader, THEN **DIRECT** temporary closure of North SPF and/or South SPF except for facilitating PA entry/reentry of ERP and their emergency vehicles.

7.2.2 WHEN requested, THEN **DIRECT** Security Rover(s) to obtain an approximate count of privately owned vehicles parked in all parking locations, and inform Security Leader of counts, by location.

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## 8.0 **ACCOUNTABILITY**



- 8.1 After 15 minutes following the SAE declaration, or request for accountability information by Security Leader, **DIRECT** CAS to generate a new Emergency Accountability Roster.
- 8.1.1 **VERIFY** radiological conditions and need for RP coverage with OSC RP Coordinator.
  - 8.1.2 **DELIVER** current Emergency Accountability Report and any Form EP(123) 294, Personnel Accountability, to Security Leader.
- 8.2 IF Security Computer/PA exit card readers are inoperable, or normal PA evacuation process is bypassed, THEN **PERFORM** accountability as follows:
- 8.2.1 **POST** a security officer at the exits **AND** **DIRECT** them to manually account for those personnel exiting the PA on Form EP(123) 294, Personnel Accountability.
  - 8.2.2 Visitor/Escort badges will also be collected at these posts.
  - 8.2.3 IF an escort is discovered missing THEN **INCLUDE** a list of assigned visitors who are unaccounted for.
  - 8.2.4 Upon completion of evacuation or direction of the Security Leader, immediately **DELIVER** Form EP(123) 294, Personnel Accountability, to the Security Leader.


## 9.0 **EXPOSURE CONTROL**

- 9.1 IF a SAE is declared, or site assembly or site evacuation is ordered, THEN **DIRECT** security force, via security radio network, that no smoking, eating, or drinking is permitted until clearance is given by RP.
- 9.2 **COORDINATE** with RP to ensure posted security personnel exposures are held as low as reasonably achievable.
- 9.3 **PROVIDE** RP Coordinator with locations of all security personnel remaining on post inside PA after site assembly or evacuation.
- 9.3.1 **USE** site maps/diagrams (e.g., PSP or SCP figures) provided to identify post locations.
  - 9.3.2 **PROVIDE** RP protection to those locations.
- 9.4 **EVACUATE** all security posts when there is a hazard to security personnel, as directed by the Security Leader.
- 9.4.1 **DETERMINE** compensatory measures to be implemented with the Security Leader prior to evacuating any security posts unless conditions require immediate relocation.


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- 9.5 **PROVIDE** security assistance with contaminated injuries to escort emergency vehicles within PA, when directed.
- 9.6 **ENSURE** updated hazard information is transmitted to all security posts and search teams on security radio.
- 10.0 **SECURITY TEAM DISPATCH**
- 10.1 **CONTACT** security personnel who have been assigned without OSC coordination to obtain OSC tracking information **AND ENSURE** these personnel are tracked by OSC.
  - 10.1.1 **ACTIVATE** teams from manning level on Form EP(123) 4-G, Dispatch Checklist, **AND INDICATE** status as standby.
  - 10.1.2 **DISPATCH** security personnel as requested by EGL **AND ADVISE** the Security Leader.
- 10.2 During a declared security event, **RECOMMEND** to EGL that a security person be assigned to each repair team to act as an escort.

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- 10.3 **ASSEMBLE** a Response Team when directed by EGL, or WHEN a security team is required (e.g., sweeps), as follows:
- 10.3.1 **COMPLETE** Sections 1 and 2, Form EP(123) 4-G, Dispatch Checklist.
  - 10.3.2 **BRIEF** team AND COMPLETE Section 3, Craft Briefing.
  - 10.3.3 IF heavy smoke and/or visual obstruction is anticipated, THEN DIRECT team to use life lines.
  - 10.3.4 RP will complete Section 4, RP Briefing.
  - 10.3.5 WHEN team is assembled, THEN OBTAIN EGL approval to dispatch team AND RECORD dispatch time in Section 5.
  - 10.3.6 **DISTRIBUTE** checklist per distribution on Form EP(123) 4-G, Dispatch Checklist.
- 10.4 WHEN team returns to OSC, THEN ENSURE team follows all RP control practices.
- 10.4.1 **DEBRIEF** team AND RECORD pertinent information in Section 6, Response Team Debriefing, on the checklist.
  - 10.4.2 **INFORM** RP Coordinator and the EPC of team's return.
  - 10.4.3 **RETRIEVE** copies of checklist provided to RP coordinator and the EPC.
  - 10.4.4 **PROVIDE** completed checklist to OSC Emergency Planning Coordinator (EPC).
- 10.5 Physical Security Plan (PSP)
- 10.6 IF provisions of PSP **CANNOT** be maintained, THEN INFORM the Security Leader.
- 10.7 During a security event, **REQUEST** EGL provide appropriate plant support personnel to augment security teams to conduct PA/VA searches and inspections.
- 10.8 **ADVISE** EGL, by monitoring radio communications, of plant location when each search area has been completed.
- 10.9 **REQUEST** the Security Leader to obtain a waiver of Security/Safeguards procedures when procedures are directly interfering with medical, fire and/or rescue efforts.
- 10.10 **REQUEST** the Security Leader determine with SED if access will be granted to delivery vehicles entering PA.

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## 11.0 **AIRCRAFT**

11.1 **DIRECT** security to report low flying aircraft over the plant or near PA perimeter.

11.1.1 IF aircraft are sighted in vicinity of SONGS during an emergency, THEN REPORT aircraft (news helicopters, private planes, etc.) to the Security Leader, providing as many details to describe aircraft as possible.

11.1.2 IF contacted by SCE Air Operations, THEN DETERMINE, from TSC RP Leader, IF it is safe to approach site.

11.1.3 **NOTIFY** the Security Leader and EOF Security Director of all incoming helicopters.

## 12.0 **WATERCRAFT**

12.1 **DIRECT** security to report watercraft sightings anywhere offshore on the plant frontage.

12.1.1 IF watercraft are sighted offshore from SONGS during an emergency, THEN REPORT watercraft (sailboat, fishing boat, etc.) to the Security Leader, providing as many details to describe watercraft as possible

## 13.0 **TURNOVER**

13.1 WHEN a relief OSSC arrives, THEN CONDUCT a turnover using Form EP(123) 5, Turnover Status.


13.1.1 **RECORD** completion of turnover in log AND REPORT completion of turnover to the Security Leader

## 14.0 **RECOVERY**

14.1 WHEN requested by EGL, THEN RECOMMEND additional security personnel and equipment necessary for a recovery organization.

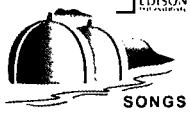
14.2 WHEN emergency conditions have been corrected or are stable, THEN RESTORE AND INSPECT all normal and relaxed security procedures as soon as practicable.

14.2.1 **INFORM** the Security Leader of restoration and inspection of security procedures.

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## 15.0 **OSC RELOCATION**

- 15.1 **IF** an OSC Relocation is ordered, **THEN** **PROCEED** to designated alternate facility as directed by EGL.
- 15.1.1 **DIRECT** security personnel to an alternate location as ordered by the Security Leader in coordination with RP.
  - 15.1.2 **REMOVE** all documents and communication equipment necessary to allow continued security response.
  - 15.1.3 **ESTABLISH** contact with the Security Leader upon completion of relocation, **AND** **ENSURE** on-shift Security Officers are notified of new OSC location upon re-activation.

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### **SUPPLEMENTAL POSITION INSTRUCTION**

#### **NOTE**

1. Sections 16.0 through 29.0 provide supplemental instructions for performing the OSC Security Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.
3. The following steps are an enhancement to the position checklist. Placekeeping is not required.

#### **16.0 CONTINUING ACTIONS**

- 16.1 WHEN directed by Security Leader, THEN INITIATE recall of off-shift security personnel in accordance with existing Security instructions.
- 16.2 **PROVIDE** information on Form EP(123) ERO-10, Emergency Information, to staff at SPFs, North Access Gate, and Mesa Access Gate to update information status board as changes occur.
- 16.3 **ESTABLISH** radio contact on security radio channel, AND USE proper radio protocols.
- 16.4 IF there is a suspected bomb or other explosive device, THEN ADVISE security officers to direct personnel in immediate area to restrict radio transmissions, cellular phones, etc., for a minimum radius of 300 feet.
- 16.5 **MAINTAIN** a log of decisions and actions required by EPIPs.
- 16.6 **PROVIDE** documentation of conditions, events, and communications to ensure a complete and adequate record, to minimize misunderstanding and to identify items requiring follow-up actions.
- 16.7 **CONTACT** SPF(s) and EOF Security post to determine IF any arriving ERO have declared alcohol consumption in the past five hours. IF so, THEN ADVISE the Security Leader of emergency response personnel (ERP) who have declared alcohol consumption within the last five hours are waiting entry into PA or EOF.
- 16.8 **MONITOR** security-related emergency conditions continuously.
- 16.9 **REPORT** all security response actions to the Security Leader in event SCP is implemented in response to a security event.
- 16.10 IF emergency is reclassified, THEN ENSURE all security personnel are notified of reclassification, AND REPEAT Step 16.1 of this checklist.

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16.11 Upon initial classification, event reclassification, or event close-out, **REVIEW** each subsection (17.0, 18.0, etc.) of this checklist to ensure all required steps are performed.

16.12 **CALL** CAS at PAX 89123 to initiate Emergency Accountability.

#### 17.0 **PROTECTED AREA PERSONNEL ACCOUNTABILITY (PAPA) PROCESS**

17.1 For Alert or higher emergency classes or when directed by Security Leader, **CALL** CAS at PAX 89123 **AND HAVE** them initiate the Emergency Accountability system.

17.1.1 All personnel entering OSC **BADGE** into the card reader at the entrance to the OSC.

17.1.2 **IF** a person is unable to badge into an ERF card reader, **THEN** manually **RECORD** that person's information on Form EP(123) 294, Personnel Accountability.

17.1.3 **IF** available, **THEN REQUEST** an in-house dispatch of an OSC team member (preferably a Security Officer) to go to CAS to obtain an updated Emergency Accountability Report.

17.1.4 **ENSURE** personnel permanently exiting OSC should log out of PAPA-ERF system or accountability form.

17.1.5 **OBTAIN** list of Operations watch standers from Operations **AND LOG** all on Form EP(123) 294, Personnel Accountability.


17.2 For Alert or higher emergency classes or when directed by Security Leader, **PERFORM** this step when the Emergency Accountability system is unavailable or inoperable.

17.2.1 **PROVIDE** all OSC Coordinators with Form EP(123) 294 to initiate backup accountability of their personnel.

#### 18.0 **SITE EVACUATION**

18.1 **WHEN** a declared Security Event is in progress, **THEN INFORM** EGL Security personnel will **NOT** be able to support these activities.




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18.2 IF a Site Evacuation has been ordered, THEN PERFORM the following steps:

- 18.2.1 **OBTAIN** status of emergency conditions from Security Leader, contaminated areas, and direction of site evacuation.
- 18.2.2 **NOTIFY** OCA Supervisor of Site Evacuation order, evacuation route, and to initiate activation steps of Form EP(123) OSC-6, Site Evacuation, Section 2.0.
- 18.2.3 **REPORT** to Security Leader when activation steps of Form EP(123) OSC-6, Site Evacuation, Section 2.0 have been completed.
- 18.2.4 **REPORT** start of Site Evacuation to Security Leader.
- 18.2.5 **REPORT** completion of Site Evacuation to Security Leader.
- 18.3 **DIRECT** security search teams or in-place personnel to sweep PA, OCA, and Mesa Area to ensure complete evacuation of site, retrieve Safeguards Information material left unattended, AND promptly **IDENTIFY** discovered injured personnel to Security Leader.
- 18.4 **ENSURE** security sweep teams are dispatched in accordance with Section 24.0, Security Team Dispatch of this attachment.
  - 18.4.1 **REPORT** results of sweeps to Security Leader.
  - 18.4.2 **DIRECT** Security sweep teams to turn in Safeguards Information to other Security personnel.
- 18.5 WHEN directed by EGL, SM, or SED to permit re-entry into evacuated areas, THEN PROVIDE security support for re-entry efforts and coordinate with Security Leader.

## 19.0 MUTUAL AID

- 19.1 IF off-site emergency vehicles or equipment are responding to SONGS, THEN REQUEST for assistance during emergency event, THEN PERFORM the following steps:
  - 19.1.1 **ENSURE** off-site responders are aware of any known radiological, chemical or biological hazards associated with response as provided by Emergency Services Coordinator.
  - 19.1.2 **ENSURE** unimpeded entry of properly identified emergency response personnel and equipment per SO123-IV-5.4, Protected Area/Vital Area Emergency Vehicle/Personnel Access.
  - 19.1.3 **ENSURE** emergency vehicles are directed to designated (PA) entry points.
  - 19.1.4 **NOTIFY** EGL and security personnel of their arrival and destination.


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## 20.0 **LOCAL AREA HAZARDS/LOCAL EVACUATION**

- 20.1 IF safety hazards exist (Fire, Smoke, Fumes, Radiological, etc.) which threaten personnel or equipment safety, THEN **CONTACT** the Security Leader for instructions.
- 20.1.1 IF a safety hazard exists for Security personnel in a HDP, or other fixed post, THEN immediately **CONTACT** Security Leader **AND REQUEST** 50.54(x) approvals to relocate affected security post(s).
- 20.1.2 IF affected area is CAS or SAS, THEN **CONTACT** Security Leader for instructions.
- 20.1.3 IF requested, THEN **DISPATCH** security personnel to local area, and coordinate with Team Leader.
- 20.1.4 **INFORM** the Security Leader of all actions taken and times.

## 21.0 **SITE ASSEMBLY/PROTECTED AREA EVACUATION**

- 21.1 IF directed by Security Leader, THEN **COORDINATE** security personnel to perform the following:
- 21.1.1 **COLLECT** security photo-identification badges, visitor badges, and visitor escort badges from evacuating personnel from North SPF and South SPF badge drop containers.
- 21.1.2 **DIRECT** evacuating security personnel to retain Safeguards Information materials.
- 21.2 Unless otherwise directed, **ENSURE** all personnel exiting PA and visitors proceed to proper assembly area as follows:
- North PA - AWS Multipurpose Room
  - South PA - T-20 Building
- 21.2.1 WHEN directed by Security Leader, THEN **DIRECT** temporary closure of North SPF and/or South SPF except for facilitating PA entry/reentry of ERP and their emergency vehicles.
- 21.2.2 WHEN requested, THEN **DIRECT** Security Rover(s) to obtain an approximate count of privately owned vehicles parked in all parking locations, and inform Security Leader of counts, by location.

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## 22.0 **ACCOUNTABILITY**



22.1 After 15 minutes following the SAE declaration, or request for accountability information by Security Leader, **DIRECT** CAS to generate a new Emergency Accountability Roster.

22.1.1 **VERIFY** radiological conditions **AND NEED** for RP coverage with OSC RP Coordinator.

22.1.2 **DELIVER** current Emergency Accountability Report and any Form EP(123) 294 to Security Leader.

22.2 **IF** Security Computer/PA exit card readers are inoperable, or normal PA evacuation process is bypassed, **THEN PERFORM** accountability as follows:

22.2.1 **POST** a security officer at the exits **AND DIRECT** them to manually account for those personnel exiting the PA on Form EP(123) 294.

22.2.2 Visitor/Escort badges will also be collected at these posts.

22.2.3 **IF** an escort is discovered missing **THEN INCLUDE** a list of assigned visitors who are unaccounted for.

22.2.4 Upon completion of evacuation or direction of the Security Leader, immediately **DELIVER** Form EP(123) 294 to Security Leader.

## 23.0 **EXPOSURE CONTROL**

23.1 **IF** a SAE is declared, or site assembly or site evacuation is ordered, **THEN DIRECT** security force, via security radio network, that **NO** smoking, eating, or drinking is permitted until clearance is given by RP.

23.1.1 **COORDINATE** with RP to ensure posted security personnel exposures are held as low as reasonably achievable.


23.2 **PROVIDE** RP Coordinator with locations of all security personnel remaining on post inside PA after site assembly or evacuation.

23.2.1 **USE** site maps/diagrams (e.g., PSP or SCP figures) provided to identify post locations.

23.2.2 **PROVIDE** RP protection to those locations.


23.3 **EVACUATE** all security posts when there is a hazard to security personnel, as directed by Security Leader.

23.3.1 **DETERMINE** compensatory measures to be implemented with Security Leader prior to evacuating any security posts unless conditions require immediate relocation.

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- 23.4 **PROVIDE** security assistance with contaminated injuries to escort emergency vehicles within PA, when directed.
- 23.5 **ENSURE** updated hazard information is transmitted to all security posts and search teams on security radio.
- 24.0 **SECURITY TEAM DISPATCH**
- 24.1 **CONTACT** security personnel who have been assigned without OSC coordination to obtain OSC tracking information **AND ENSURE** these personnel are tracked by OSC.
- 24.1.1 **ACTIVATE** teams from manning level on Form EP(123) 4-G, Dispatch Checklist, **AND INDICATE STATUS** as STANDBY.
- 24.1.2 **DISPATCH** security personnel as requested by EGL **AND ADVISE** Security Leader.
- 24.2 During a declared security event, **RECOMMEND** to EGL that a security person be assigned to each repair team to act as an escort.
- 24.3 **ASSEMBLE** a Response Team when directed by EGL, **OR WHEN** a security team is required (e.g., sweeps), as follows:
- 24.3.1 **COMPLETE** Sections 1 and 2, Form EP(123) 4-G, Dispatch Checklist.
- 24.3.2 **BRIEF** team **AND COMPLETE** Section 3, Craft Briefing.
- 24.3.3 **IF** heavy smoke and/or visual obstruction is anticipated, **THEN DIRECT** team to use life lines.
- 24.3.4 RP will complete Section 4, RP Briefing.
- 24.3.5 **WHEN** team is assembled, **THEN OBTAIN** EGL approval to dispatch team **AND RECORD** dispatch time in Section 5.
- 24.3.6 **DISTRIBUTE** checklist per distribution on Form EP(123) 4-G, Dispatch Checklist.
- 24.4 **WHEN** team returns to OSC, **THEN ENSURE** team follows all RP control practices.
- 24.4.1 **DEBRIEF** team **AND RECORD** pertinent information in Section 6, Response Team Debriefing, of checklist.
- 24.4.2 **INFORM** RP Coordinator and the EPC of team's return.
- 24.4.3 **RETRIEVE** copies of checklist provided to RP Coordinator and the EPC.
- 24.4.4 **PROVIDE** completed checklist to OSC Emergency Planning Coordinator (EPC).

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## 24.5 PHYSICAL SECURITY PLAN (PSP)

- 24.5.1 IF provisions of PSP **CANNOT** be maintained, THEN **INFORM** the Security Leader.
- 24.5.2 During a security event, **REQUEST** EGL provide appropriate plant support personnel to augment security teams to conduct PA/VA searches and inspections.
- 24.5.3 **ADVISE** EGL, by monitoring radio communications, of plant location when each search area has been completed.
- 24.5.4 **REQUEST** the Security Leader to obtain a waiver of Security/Safeguards procedures when procedures are directly interfering with medical, fire and/or rescue efforts.
- 24.5.5 **REQUEST** the Security Leader determine with SED if access will be granted to delivery vehicles entering PA.

## 25.0 AIRCRAFT


- 25.1 **DIRECT** security to report low flying aircraft over the plant or near PA perimeter.
  - 25.1.1 IF aircraft are sighted in vicinity of SONGS during an emergency, THEN **REPORT** aircraft (news helicopters, private planes, etc.) to the Security Leader, providing as many details to describe aircraft as possible.
  - 25.1.2 IF contacted by SCE Air Operations, THEN **DETERMINE**, from TSC RP Leader, IF it is safe to approach site.
  - 25.1.3 **NOTIFY** Security Leader and EOF Security Director of all incoming helicopters.

## 26.0 WATERCRAFT

- 26.1 **DIRECT** security to report watercraft sightings anywhere offshore on the plant frontage.
  - 26.1.1 IF watercraft are sighted offshore from SONGS during an emergency, THEN **REPORT** watercraft (sailboat, fishing boat, etc.) to the Security Leader, providing as many details to describe watercraft as possible.

## 27.0 TURNOVER

- 27.1 WHEN a relief OSSC arrives, THEN **CONDUCT** a turnover using Form EP(123) 5, Turnover Status.
- 27.2 **RECORD** completion of turnover in log AND **REPORT** completion of turnover to the Security Leader.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>  Page 66 of 82
OSC Security Coordinator Checklist		<b>Attachment 5</b>

28.0 **RECOVERY**

28.1 WHEN requested by EGL, THEN RECOMMEND additional security personnel and equipment necessary for a recovery organization.

28.2 WHEN emergency conditions have been corrected or are stable, THEN RESTORE AND INSPECT all normal and relaxed security procedures as soon as practicable.

28.2.1 **INFORM** the Security Leader of restoration and inspection of security procedures.


29.0 **OSC RELOCATION**

29.1 IF an OSC Relocation is ordered, THEN PROCEED to designated alternate facility as directed by EGL.

29.1.1 **DIRECT** security personnel to an alternate location as ordered by the Security Leader in coordination with RP.

29.1.2 **REMOVE** all documents and communication equipment necessary to allow continued security response.

29.1.3 **ESTABLISH** contact with the Security Leader upon completion of relocation, **AND ENSURE** on-shift Security Officers are notified of new OSC location upon re-activation.

 EDISON SONGS	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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<b>OSC Maintenance Coordinator Checklist</b>		<b>Attachment 6</b>

### **POSITION CHECKLIST**

#### **NOTE**

Steps may be performed in any order or concurrently.

#### 1.0 **INITIAL ACTIONS**

1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) 4-G, Dispatch Checklist
- EP(123) OSC-3, Team Dispatch Instructions

1.2 **WHEN** ready to perform your ERO duties, **THEN** **SIGN-ON** to the OSC minimum staffing board.

1.3 **LOG** into the Protected Area Personnel Accountability (PAPA) system.

1.4 **REPORT** to OSC Emergency Group Leader (EGL).

1.5 **ESTABLISH AND MAINTAIN** a log using Form EP(123) 6, Log Book.

1.6 **REVIEW** maintenance resources.


1.7 **REMIND** OSC maintenance personnel to:

- **SIGN IN** on the minimum staffing board.
- **LOG** onto PAPA for accountability.
- **PRINT** out personal summary sheets.
- **PICK** up a PED and entry ticket.

1.8 **ENSURE** the emergency tool kits are open and stocked.

1.9 **IDENTIFY** Work Orders (WOs) initiated during the emergency.


1.10 **FORWARD** a list of WO's to Work Control.

 <div>EDISON Nuclear Energy</div>	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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OSC Maintenance Coordinator Checklist		<b>Attachment 6</b>

2.0 **CONTINUING ACTIONS**

- 2.1 **MONITOR** maintenance resources and Response Teams.
- 2.2 **NOTIFY** ERO members in the field of changing radiological conditions. [NN202065874]
- 2.3 **COORDINATE** parts procurement with the EOF Admin Leader (refer to ERTD).
- 2.4 IF radiological hazards are present or expected, THEN **DIRECT** a maintenance team to obtain radiological protective equipment AND to stand-by in the staging area.
- 2.5 **RECALL** maintenance personnel.
- 2.6 **ASSIST** with team dispatch.
- 3.0 **TEAM DISPATCH**
- 3.1 **PERFORM** team dispatch per Form EP(123) OSC-3, Team Dispatch Instructions.



	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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<b>OSC Operations Coordinator Checklist</b>		<b>Attachment 7</b>

### POSITION CHECKLIST

#### NOTE

Steps may be performed in any order or concurrently.

#### 1.0 INITIAL ACTIONS

1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) 4-G, Dispatch Checklist

1.2 **WHEN** ready to perform your ERO duties, **THEN** **SIGN-ON** to the OSC minimum staffing board.

1.3 **LOG** into the Protected Area Personnel Accountability (PAPA) system.

1.4 **REPORT** to OSC Emergency Group Leader (EGL).

1.5 **ESTABLISH AND MAINTAIN** a log using Form EP(123) 6.

1.6 **INITIATE AND MONITOR** Ivory Phone Communications.


1.7 **CONNECT** the OSC Operations Coordinator phone into the labeled modular jack on the Conference table.



1.8 **CONTACT** Control Room for status of response per AOIs and EOIs (every 15 - 20 minutes).

1.9 **MAINTAIN** a log of information communicated over the Ivory Phone, and items requiring feedback (i.e., Technical Leader and EOF Technical inquiries).

1.10 **KEEP** Technical Leader and Technical Team Mitigators informed of plant status and plant priorities.

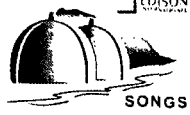
	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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<b>OSC Operations Coordinator Checklist</b>		<b>Attachment 7</b>

2.0 **CONTINUING ACTIONS**

- 2.1 **MONITOR** Operations radio and Ivory Phone communications.
- 2.2 **DETERMINE** the location of in-plant operators **AND TRACK** dispatched operators on Team Status Board.
- 2.3 **COORDINATE** Operator Dispatch using Form EP(123) 4-G.
- 2.4 **REVIEW** in-plant radiological conditions with the RP Coordinator **AND INFORM** the Control Room of any changes.
- 2.5 **COMMUNICATE** local area hazards to Control Room for consideration of Local Area Evacuation.

3.0 **EVENT CLOSEOUT AND RECOVERY**

- 3.1 **WHEN** conditions have improved and meet the criteria for event closeout, **THEN PERFORM** actions IAW SO123-VIII-10.5.
- 3.2 **ASSIST** the Emergency Group Leader in assembling a list of damaged plant equipment.
- 3.3 **DELIVER** all OSC Operations Coordinator documentation to the Emergency Planning Coordinator.

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>  Page 71 of 82
OSC Emergency Planning Coordinator Checklist		<b>Attachment 8</b>

### **POSITION CHECKLIST**

#### **NOTE**

Steps may be performed in any order or concurrently.

#### 1.0 **INITIAL ACTIONS**

1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) 294, Personnel Accountability.
- EP(123) 295, EOF Personnel Accountability
- EP(123) 4-G, Dispatch Checklist

1.2 **ESTABLISH AND MAINTAIN** a log using Form EP(123) 6, Log Book.

1.3 **WHEN** ready to perform your ERO duties, **THEN** **SIGN-ON** to the board.

1.4 **ENSURE** all emergency response equipment is open or unlocked.

1.5 **LOG** into the Protected Area Personnel Accountability (PAPA) system.

1.6 **REPORT** to OSC Emergency Group Leader (EGL).

1.7 **ENSURE** position notebooks are distributed **AND** **ASSIST** in facility setup


1.8 **DIRECT** OSC personnel to:

1.8.1 **SIGN-ON** to the Emergency Response Activity.

1.8.2 **PRINT** out personal summary sheet.

1.8.3 **LOG** into RCA **AND** **OBTAIN** a PED and entry ticket.

1.9 **NOTIFY** OSC Emergency Group Leader the Emergency Planning Coordinator will be acquiring EP(123) 4-G, Dispatch Checklist, from the Control Room.

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	OSC Emergency Planning Coordinator Checklist	

## 2.0 **CONTINUING ACTIONS**

- 2.1 **MAINTAIN** Team Status Board for tracking of all teams in the field.
- 2.2 IF the Emergency Services Coordinator (Shift Captain) has been dispatched to the incident scene, THEN ESTABLISH communication with dispatch, PAX 86655.
- 2.3 **TRACK** the arrival and any dispatch of Telecommunications personnel using Form EP(123) 4-G.
- 2.4 **ASSIST** in the formation, briefing, dispatching and tracking of emergency response personnel and activities using Form EP(123) 4-G.
- 2.5 **ASSIST** in debriefing returning personnel, collecting completed Form EP(123) 4-G **AND** **MAINTAINING** the Team Status Board.
- 2.6 In case of relocation:
  - 2.6.1 **INFORM** personnel of specific routes to the alternate facility.
  - 2.6.2 **DIRECT** personnel to take materials and equipment needed to perform their emergency response functions at the alternate facility.
  - 2.6.3 **INFORM** Ivory phone talker to inform EOF manager and TSC manager of relocation actions.
  - 2.6.4 Once the alternate facility is activated, **INITIATE** accountability using Form EP(123) 294, Personnel Accountability or Form EP(123) 295, EOF Personnel Accountability.
  - 2.6.5 **CONVEY** EGL briefs to personnel in the OSC Staging Area.
- 2.7 **CONDUCT** turnover using Form EP(123) 5
- 3.0 **EVENT TERMINATION**
- 3.1 WHEN conditions have improved and meet the criteria for event closeout, THEN PERFORM actions IAW SO123-VIII-10.5.
- 3.2 **OBTAIN AND REVIEW** for accuracy all completed forms, logs and data from emergency response personnel (ERP), and forward to EP.

### **POSITION CHECKLIST**

#### OSC Emergency Services Coordinator Supplemental Position Instructions Table of Contents

Section Number	Title	Page
6.0	EMERGENCY RESPONSE COORDINATION .....	77
7.0	TURNOVER .....	79
8.0	RECOVERY .....	79

#### **NOTE**

1. Sections 6.0 through 8.0 provide supplemental instructions for performing the OSC Emergency Services Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.

#### 1.0 **INITIAL ACTIONS**


1.1 **ENSURE** the following is contained in the position notebook:

- EP(123) 5, Turnover Status
- EP(123) 6, Log Book
- EP(123) OSC-1, Multi-Casualty Incident Dispatch Tailboard Briefing Checklist
- EP(123) 4-G, Dispatch Checklist
- SFP B.5.b SOG
- B.5.b SOG for Spray


1.2 **REPORT** your presence to the Emergency Group Leader, **AND SIGN ON** to the OSC Minimum Staffing Board.

1.3 **ESTABLISH** Orange Phone contact with the Camp Pendleton Fire Department.

1.4 **IF** Emergency Services personnel report to the OSC to wait for assignment, **THEN DIRECT** them to log into the Protected Area Personnel Accountability (PAPA) system. **LOG IN** for Dosimetry **AND PRINT** qualifications.

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- 1.5 IF Emergency Services personnel are responding directly to the scene, THEN **MAINTAIN** accountability of Emergency Services Personnel in the field. The OSC can be activated as long as the Emergency Services personnel are inside the Protected Area. **CALL IN** to establish Team Tracking.
- 1.6 Emergency Planning Coordinator **ASSUME** responsibility for BSC.
- 1.7 **MAINTAIN** a log of decisions and actions required by EIPs.
- 1.8 **COORDINATE** fire, medical, and rescue operations with the EGL, OSC Security Coordinator, OSC Operations Coordinator, OSC Radiation Protection (RP) Coordinator, Maintenance Coordinator, and OSC Emergency Planning Coordinator.
- 2.0 **EVACUATION**
- 2.1 IF any of the hazards listed below affect a local area or major portions of the Protected Area or Owner Controlled Area exist, THEN INITIATE a Local Area Evacuation, OR contact the Emergency Group Leader **AND RECOMMEND** a local area evacuation or a site assembly/evacuation.
- High radiation alarms or unexpected high radiation levels on Area Radiation Monitors (ARMs), building or containment ventilation monitors, portable radiation monitors, or continuous air monitors
  - Spills of radioactive material which may result in excessive personnel exposure
  - Fire in any occupied area
  - Toxic/flammable gases or heavy smoke reported
  - Chemical hazards to personnel
  - High pressure steam or water leaks
  - Security hazards which threaten personnel or equipment safety
- 2.2 IF any of the hazards listed in Step 2.1 affect a major portion of the Mesa Area, THEN CONTACT the Emergency Group Leader **AND RECOMMEND** a Mesa Area assembly or evacuation.
- 2.3 At the direction of the Emergency Group Leader, **DISPATCH** Firefighters/Fire Brigade members, First Aid responder, an RP Technician to the area.
- 2.3.1 **COORDINATE** with the Incident Commander in charge of the team.
- 2.4 IF the local area is the OSC, THEN PROCEED to the alternate OSC as directed by the Emergency Group Leader and RP.
- 2.4.1 **TAKE** materials and equipment necessary to perform emergency response functions at the alternate facility.

 <div>EDISON FIRE PROTECTION SONGS</div>	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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<b>OSC Emergency Services Coordinator Checklist</b>		<b>Attachment 9</b>

## 2.5 Re-Entry Into Evacuated Areas

- 2.5.1 WHEN requested by personnel directing re-entry, THEN PROVIDE Fire Department/Brigade considerations and personnel to support re-entry efforts.

## 3.0 EMERGENCY RESPONSE COORDINATION



- 3.1 For tasks that are less than ten minutes and are **NOT** within a hazardous area and **NOT** a mitigation effort, **TRACK** response teams by logbook entry.
- 3.2 As directed by the Emergency Group Leader, assemble a response team using Form EP(123) 4-G Dispatch Checklist.
- 3.3 **OBTAIN** Emergency Group Leader approval AND **DISPATCH** team.
- 3.4 WHEN the team returns, THEN DEBRIEF AND RECORD information on the checklist.
- 3.5 **RETRIEVE** copies of checklist AND PROVIDE to the OSC Emergency Planning Coordinator. **DISTRIBUTE** the checklist.
- 3.6 **INFORM** Emergency Group Leader of reported fire/medical emergencies.
- 3.6.1 **ENSURE** injuries are reported to the Emergency Response Facilities via the Ivory Phone.
- 3.6.2 **PROVIDE** updates.
- 3.6.3 IF contaminated injured person is being transported to the hospital, THEN NOTIFY the hospital to activate REA.
- 3.7 WHEN Security/Safeguards procedures are hampering medical, fire and/or rescue efforts, THEN REQUEST Emergency Group Leader obtain a waiver of Security/Safeguards procedures.
- 3.8 WHEN Fire Department/Brigade support is requested by the Emergency Group Leader, THEN:
- **PROVIDE** a briefing of assigned task and potential safety hazards
  - **VERIFY** that Emergency Services personnel have been equipped with the proper tools and equipment needed to complete the assigned task
  - **COORDINATE** search and rescue efforts
  - **MAINTAIN** voice radio contact with the Emergency Services personnel
- 3.9 IF additional Emergency Services personnel are needed, THEN DIRECT the Administrative Leader to coordinate recall.

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OSC Emergency Services Coordinator Checklist	<b>Attachment 9</b>
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4.0 **TURNOVER**

4.1 **CONDUCT** turnover with the oncoming Emergency Services Coordinator per Form EP(123) 5, Turnover Status.

5.0 **RECOVERY**

5.1 WHEN requested by the Emergency Group Leader, THEN **CONSIDER** assigning additional Fire Department/Brigade personnel and equipment necessary for a recovery organization.



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OSC Emergency Services Coordinator Checklist

Attachment 9

### SUPPLEMENTAL POSITION INSTRUCTION

#### NOTE


1. Sections 6.0 through 8.0 provide supplemental instructions for performing the OSC Emergency Services Coordinator duties and may be referenced for clarification of duties.
2. Steps may be performed in any order or concurrently.
3. The following steps are an enhancement to the position checklist. Placekeeping is not required.

## 6.0 EMERGENCY RESPONSE COORDINATION

### 6.1 Response Teams



- 6.1.1 For tasks that are less than ten minutes and are **NOT** within a hazardous area and **NOT** a mitigation effort, **TRACK** response teams by log book entry.
- 6.1.2 **WHEN** directed by the Emergency Group Leader to assemble a response team, **THEN** **OBTAIN** Form EP(123) 4-G, Dispatch Checklist, **AND COMPLETE** Sections 1 and 2.
- 6.1.3 **BRIEF** the team **AND COMPLETE** Section 3, Craft Briefing, of the checklist.
- 6.1.4 **COMPLETE** Section 4, RP Briefing, when radiological conditions are present.
- 6.1.5 **OBTAIN** Emergency Group Leader approval **AND DISPATCH** the response team.
- 6.1.6 **RECORD** time in Section 5 on the checklist.
- 6.1.7 **DISTRIBUTE** the checklist per the copy distribution on the form.
- 6.1.8 **NOTIFY** ERO members in the field of changing radiological conditions.
- 6.1.9 **WHEN** the team returns to the OSC, **THEN**:
  - 6.1.9.1 **DEBRIEF** the team **AND RECORD** pertinent information in Section 6, Debrief, of the checklist.
  - 6.1.9.2 **INFORM** the RP Coordinator and the EPC of the team return.
  - 6.1.9.3 **RETRIEVE** the copies of the checklist provided to the RP Coordinator and the EPC.
  - 6.1.9.4 **PROVIDE** the completed checklist to the OSC Emergency Planning Coordinator.


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	<b>OSC Emergency Services Coordinator Checklist</b>	

## 6.2 "86911" Notification/Response

- 6.2.1 **INFORM** the Emergency Group Leader and Emergency Planning Coordinator of reported fire/medical emergencies.
- 6.2.2 **ENSURE** injuries are reported to Emergency Response Facilities via the Ivory Phone, and to EOF Medical Personnel at PAX 88124 if staffed.
- 6.2.3 **PROVIDE** updates as information is received.
- 6.2.4 IF a contaminated injured person(s) is to be transported to an offsite hospital, THEN **NOTIFY** the hospital.

## 6.3 Waiver of Security/Safeguards Procedures

- 6.3.1 **REQUEST** the Emergency Group Leader to obtain a waiver of Security/Safeguards procedures WHEN Security/Safeguards procedures are hampering medical, fire and/or rescue efforts.
- 6.3.2 WHEN Fire Department/Brigade support is requested by the Emergency Group Leader, THEN:
  - 6.3.2.1 **OBTAIN** information regarding expected hazards.
  - 6.3.2.2 **CONSULT** with the Fire Department/Brigade Incident Commander to verify personnel have been equipped with the proper tools and equipment needed to complete the assigned task, **AND VERIFY** all safety-related equipment is operational and complete.
  - 6.3.3 IF emergency conditions permit, THEN **PROVIDE** a briefing of assigned task and potential safety hazards that may be encountered, such as:
    - Toxic Gas Leaks
    - Fire Ignition Sources
    - Steam Leaks
    - Radiological Hazards
    - Hazards Security personnel
  - 6.3.4 **COORDINATE** search and rescue efforts for missing personnel with the OSC Security Coordinator.
  - 6.3.5 **MAINTAIN** voice radio contact with the Fire Department/Brigade personnel.

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#### 6.4 Emergency Recall

6.4.1 IF additional Fire Department/Brigade personnel are needed, THEN **DIRECT** the EOF Administrative Leader to coordinate recall.

#### 7.0 **TURNOVER**

7.1 WHEN a recall Emergency Services Coordinator arrives at the OSC, THEN:


7.1.1 **CONDUCT** turnover with the oncoming Emergency Services Coordinator per Form EP(123) 5, Turnover Status.

7.1.2 **RECORD** completion of the turnover in the Emergency Services Coordinator Log.

7.1.3 **REPORT** completion of the turnover to the Emergency Planning Coordinator.

#### 8.0 **RECOVERY**

8.1 WHEN requested by the Emergency Group Leader, THEN **RECOMMEND** additional Fire Department/Brigade personnel and equipment necessary for a recovery organization.


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Summary of Changes	Attachment 10
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Notification tracking 10 CFR 50.54(q): 202945537-0002


Author: Steve Seward

NN, Order, or Other Action	Description of Change	Reviewer	Step, Section, Attachment or Page
202608283	Revise Mesa Assembly Area from G-50 to W-48.  Revise South Plant Assembly Area from K-50 to T-20.	Seward Alvarado Sischo	Att 2 Step 6.1.1  Att 2 Step 6.1.1 and Att 5 Bullets at Steps 7.2 and 21.2
202750391	Include steps to perform sampling and analysis when no Chem Techs are available when qualified.  Remove acronym and reference to Post Accident Sampling System (PASS).		Att 4 steps 2.3.1 and 8.5.1  old Step 2.40; Att 2 Step 2.5.3.3
Betterment	Change Procedure Owner  Delete duplicate step.  Clarify the ability to send more than one RP Tech for various teams.		Cover page  Att 2 old Step 3.3.1  Att 2 Steps 3.3, 3.3.1, 3.3.2
Decommissioning	Update to reflect Fire Brigade: - Remove acronym  - Include Fire Brigade as responders  - Delete sections for Dispatcher relocation and evacuation  - Delete step for placement of fire apparatus and ambulance  - Update personnel dispatched in an evacuation  Revise Mesa locations, position titles, and use of shuttle  Remove steps for events that will no longer occur	Seward Alvarado Sischo Metz	Step 2.54  Att 2, Step 11.6.2; Att 9 Steps 2.5.1, 3.8, 5.1; 6.3.2, 6.3.2.2, 6.3.5, 6.4.1, and 8.1  Att 9, Sections 2.0, 7.0 and 8.0  Att 9 Step 1.2  Att 9 Step 2.3  Att 2, Step 4.1.4, 4.1.5, 6.4  Att 2 Step 4.6 and 4.7

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>
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<b>NN, Order, or Other Action</b>	<b>Description of Change</b>	<b>Reviewer</b>	<b>Step, Section, Attachment or Page</b>
202743593	Delete step to remove bollards in Parking Lot #2.	Seward Alvarado Sischo Holcomb	Att 6 Step 2.5
CA 202861523-0009	Add step for OSC EPC to notify OSC EGL Dispatch Checklist will be acquired from Control Room	Seward Alvarado Sischo	Att 8 Step 1.9
202945537	Reword "dispatch" to "assign" to align with position duties.  Correct for whom to provide complete Team Dispatch Form.  Delete references to Chemistry teams.  Move and remove steps regarding actions when RP Leader has not arrived to Activation section.	Seward Alvarado Sischo	Att 2 steps 1.4.5, 1.4.7  Att 2 Step 2.5.13  Att 2 Section 2.7  Att 2 Steps 3.4 - 3.11

	<b>Emergency Response Organization (ERO) Operations Support Center Position Checklists</b>	<b>SO123-VIII-OSC REV: 1</b>  Page 82 of 82
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Summary of Changes	Attachment 10
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NN, Order, or Other Action	Description of Change	Reviewer	Step, Section, Attachment or Page
Clarification	Update when the OSC may be activated.	Seward Alvarado Sischo Collins Metz	Att 1 Step 2.5.4
	Include new form in OSC Rad Protection Coord Notebook		Att 2 Step 1.1
	Delete use of telephone		Att 2 Steps 1.3.3.1, 1.5, 1.6,
	Reword step to be active voice		Att 2 Step 1.4.5
	Eliminate sending survey data to OSC Radio Operator.		Att 2 Step 1.8
	Clarify Coordinator duties.		Att 2 Steps 2.5, 2.11; & Att 9 Steps 2.3, 2.3.1
	Move list of hazards to applicable step and revise referenced step numbers.		Att 2 Steps 5.1.1, 5.1.3, 5.1.4; & Att 9 Steps 2.1, 2.2
	Clarify actions recording contamination.		Att 2 Step 11.6.3.1 and 11.6.3.4
	Remove steps regarding PAX phones in EKITs.		Att 5 Step 1.8, and Att 9 Step 1.4
	Move Steps regarding alternate OSC location activities.		Att 9 from 8.2.3 through 8.3.1 to 2.4 through 2.5.1
	Clarify activities regarding SCE Medical facility staffing availability,		Att 2 Step 11.6.3.1, and Att 9 Step 6.2.1

<b>MAINTENANCE AND CONTROL OF EMERGENCY PLANNING DOCUMENTS</b>
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Procedure Usage Requirements		Sections
Reference Use	<ul style="list-style-type: none"> <li>Review and understand the procedure before performing any steps.</li> <li>Have a copy of the procedure or applicable pages/sections available at the work site.</li> <li>Use Placekeeping method according to SO123-XV-HU-3.</li> <li>If any portion of the procedure is performed from memory, do so in the sequence specified in the procedure. Perform each step as written, except when the procedure or approved processes specifically allow deviation.</li> <li>Refer to the procedure at least once to complete the task in accordance with the requirements.</li> <li>Review the document at the completion of the task to verify that all appropriate steps are performed and documented.</li> </ul>	ALL

QA Program Affecting

50.59 DNA / 72.48 DNA / RX DNA

Procedure Owner

<b>Kelli Gallion</b>
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## MAINTENANCE AND CONTROL OF EMERGENCY PLANNING DOCUMENTS

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**REFERENCE USE**

## **MAINTENANCE AND CONTROL OF EMERGENCY PLANNING DOCUMENTS**

### **1.0 PURPOSE**

1.1 Provide guidance for maintenance and control of the following:

- Emergency Plan (E-Plan),
- Recognition and Classification of Emergencies (SO123-VIII-1),
- Emergency Action Level (EAL) Technical Bases (EPD-1),
- Manual of Emergency Events (MOEE),
- E-Plan Implementing Procedures (EIPs),
- E-Plan Forms,
- Radiation Monitor Setpoint Transmittal,
- Letters of Agreement,
- Emergency Response Organization (ERO) Training Codes,
- Respirator Qualifications,
- Recall Roster Data Review,
- Records Management E-Plan and MOEE Distribution Matrix,
- Drill Matrix,
- Emergency Planning (EP) Council Meeting Record,
- 10CFR50.54(q) Qualifications and Responsibilities

1.2 Provide a means of evaluating compensatory measures for emergency response equipment and facilities in accordance with SO123-VIII-0.101.

### **2.0 SCOPE**

2.1 To ensure that changes to Emergency Plan related regulatory documents required by the sixteen Planning Standards in 10CFR50.47(b) and 10CFR50 Appendix E, and the equipment and facilities described in those documents, are maintained in accordance with 10CFR 50.54(q) to prevent a reduction in the effectiveness of the Emergency Plan.

### **3.0 RESPONSIBILITIES**

#### **3.1 General Responsibilities**

- 3.1.1 Manager, Emergency Preparedness Planning (EPP), has overall responsibility for maintenance and control of EP documents, and for coordinating reviews and changes to EP documents as specified in this procedure.

## **REFERENCE USE**

### 3.2 10CFR50.54(q) Responsibilities

3.2.1 Preparers of EP Licensing Document Impact Screenings and 10CFR50.54(q) Evaluations are responsible for:

3.2.1.1 Ensuring qualification requirements in Step 6.1.1 are met.

3.2.1.2 Ensuring EP Licensing Document Impact Screening/50.54(q) Evaluation Task is completed and screen/ evaluation is performed in accordance with this procedure.

3.2.1.3 Having adequate expertise in technical or administrative matters related to activity being addressed. (Refer to Step 6.1.2)

3.2.2 Reviewers of EP Licensing Document Impact Screenings and 10CFR50.54(q) Evaluations are responsible for:

3.2.2.1 Ensuring qualification requirements in Step 6.1.1 are met.

3.2.2.2 Ensuring Task is completed and change assessment is performed in accordance with this procedure.

3.2.2.3 Having adequate expertise in technical or administrative matters related to activity being addressed. (Refer to Step 6.1.2)

3.2.2.4 Taking equal responsibility with preparer for results and conclusions of the change assessment being performed.

### 4.0 PRECAUTIONS

4.1 Use SO123-XV-51, Site Program Impact (SPI) Assessment and Resolution when making changes to the Emergency Plan, Emergency Action Levels (EALs), EPSD-1 EAL Technical Bases, or emergency facilities and equipment to determine if there is an impact to the EPIPS or other SONGS division programs or procedures.

### 5.0 PREREQUISITES

5.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.

5.2 **VERIFY** Level of Use requirements on the first page of this procedure.

### REFERENCE USE

**NOTE**

Steps in this procedure may be performed in any order as long as the intent is not changed.

**6.0 PROCEDURE**

**6.1 10CFR50.54(q) Qualification**

**6.1.1 10CFR50.54(q) Evaluator Qualification [201135750-CA0008]**

6.1.1.1 Personnel preparing or reviewing EP Licensing Document Impact Screenings and 10CFR50.54(q) Evaluations shall have completed training per 5054SE "Performing Effective 50.54(q) Evaluations" and 54QQWT "Emergency Plan and Procedure 50.54(q) Revision Qualification Walkthrough."

6.1.1.2 54QQWT requires a retraining frequency of every two calendar years to maintain qualification. IF 54QQWT training expires, THEN initial training must be repeated using 5054SE and 54QQWT to requalify as a 50.54(q) Evaluator.

6.1.1.3 **ENSURE** that qualified 10CFR50.54(q) evaluators are briefed by the procedure author on changes to 10CFR50.54(q) rules, forms, procedures, and processes.

6.1.1.3.1 **DOCUMENT** brief by submitting an attendance form to the records office.

**6.1.2 Preparer/Reviewer Expertise Limits**

6.1.2.1 WHEN scope of EP Licensing Document Impact Screening or 10CFR50.54(q) Evaluation extends beyond expertise of preparer or reviewer, THEN request assistance via the Manager, EPP from other appropriately qualified personnel.

**NOTE**

Forms EP(123) 22, "EP Licensing Document Impact Screening," and EP(123) 23, "10CFR 50.54(q) Evaluation ", are intended for use as electronic equivalent forms. It is expected the forms will be expanded to contain required information. If an electronic equivalent form is not available, additional sheets may be added.

6.1.3 Plant Maintenance (PM) [Emergency Plan Evaluation (N-EPE) assignment type] shall be used to perform EP Licensing Document Impact Screenings and 10CFR50.54(q) Evaluations unless the Notification system is not available.

**REFERENCE USE**

- 6.1.4 IF Notification system is **NOT** available, THEN use hard copy Forms EP(123) 22 and EP(123) 23 in accordance with this procedure.
- 6.1.4.1 Preparer/Reviewer shall ensure any EP Licensing Document Impact Screenings or 10CFR50.54(q) Evaluations prepared on Forms EP(123) 22 or EP(123) 23 are entered into an N-EPE Task when the Notification system is available, duplicating content exactly.
- 6.1.4.2 Entry of Form EP(123) 22 or EP(123) 23 content into the Notification system should be accomplished within 14 calendar days of the Notification system return to availability.

## 6.2 **Document Change Precursors**

- 6.2.1 Emergency Planning document changes may be initiated in response to:
  - 6.2.1.1 New Rules for EP - When directed by the NRC
  - 6.2.1.2 Engineering Change Package (NECP)/Engineering Change Notice (ECN) - When identified as part of a NECP/ECN
  - 6.2.1.3 Audit **OR** Review - When identified during annual review in accordance with SONGS Topical Quality Assurance Manual, Chapter 1-A, Section 9.7
  - 6.2.1.4 Nuclear Regulatory Affairs **OR** NRC Inspection/ Review - When identified during an inspection or audit
  - 6.2.1.5 NRC Bulletin, Regulatory Issue Summary, etc. - When guidance is determined to be applicable to SONGS Emergency Plan
  - 6.2.1.6 Operating Experience (OE) - When OE is determined to be applicable to SONGS Emergency Plan
  - 6.2.1.7 Security Contingency Plan (SCP), Dose Assessment, Emergency Operating Procedures (EOIs) and Technical Specification (TS) changes that can impact the Emergency Plan or Recognition and Classification of Emergencies Procedure and Emergency Action Level (EAL) Technical Bases document.
- 6.2.2 IF upon identification **AND** review of these precursors **OR** other possible change initiatives the Manager, EPP or designee determines there may be a resulting impact to the Emergency Planning Program, THEN INITIATE a Notification to EP to evaluate whether the precursor requires further action.

### 6.3 **Document Revision Preparation**

**NOTE**

EPSD-1 implements CAPR 202827656-0010. SO123-XV-50.CAP-4 describes the requirements that must be satisfied prior to altering the CAPR in EPSD-1 identified with CAPR 202827656-0010. **[CAPR 202827656-0010]**

6.3.1 **REVISE** Emergency Planning Document as follows:

6.3.1.1 **INITIATE** a Notification to track the draft revision development.

6.3.1.2 **REQUEST** an EP Staff peer check prior to sending document changes to Site Procedures Group for processing for formal review per EP(123) 21.

6.3.1.3 **CHECK** for open EP Notifications for inclusion in the new revision.

**NOTE**

E-Plan, MOEE, SO123-VIII-1, and EPSD-1 revisions require independent review via the SAP workflow using Form EP(123) 20 to identify the description of changes. Reviews and approvals are captured electronically in the SAP workflow (SBWP).

6.3.1.4 **ATTACH** a copy of the markup of the procedure to the Services for Object of the Task tracking the change and **INCLUDE** a Planned Finish Date.

## 6.4 Document Level of Review and Approval

6.4.1 Changes to the following documents require increased review and approval:

- SONGS Emergency Plan
- SO123-VIII-1, Classification and Recognition of Emergencies
- EPSD-1 Emergency Action Level (EAL) Technical Bases
- Manual of Emergency Events (MOEE)

6.4.1.1 IF the change to documents listed in Step 6.4.1 is editorial per SO123-XV-109.1, THEN the review and approval requires Final Document Approval signatures only, OTHERWISE, the following additional reviews shall be included:  
[201135750-CA0008]

- Nuclear Regulatory Affairs (NRA) compliance review (per Step 6.4.3)
- Independent Organization Technical Review (per Step 6.4.2)
- Independent 50.54(q) Evaluation (per Step 6.4.2)
- Onsite Review Committee (OSRC) Review (per Step 6.6.3.1.1)

6.4.1.2 Final document approvals are completed in Step 6.6.3.1 following 50.54(q) evaluation **AND** comment resolution.

6.4.2 A technical change to documents listed in Emergency Plan Appendix E require a minimum of one independent technical review **AND** a 50.54(q) Screening and Evaluation with an independent evaluation.

6.4.3 A technical change to documents listed in Step 6.4.1 require an NRA Compliance Review.

6.4.4 A change to lower-tiered documents **NOT** listed in Emergency Plan Appendix E does **NOT** normally require a 50.54(q) review but should be documented in a Notification.

- IF an Emergency Plan requirement is removed from the Emergency Plan **AND** relocated to a lower tiered document, THEN the lower tiered document must be reviewed in accordance with 50.54(q). In this case, the lower tiered document now contains the Emergency Plan license requirement **AND** should be listed in Emergency Plan Appendix E.
- IF a change is made to Emergency Plan equipment that impacts requirements listed in 10CFR50.47(b) **OR** 10CFR50 Appendix E, THEN a 50.54(q) screening is required.

6.4.5 **RESOLVE** reviewer comments **AND PREPARE** the file containing the draft document revision and description of changes using EP(123) 20 for 50.54(q) Screening and Evaluation.

## 6.5 **Emergency Action Level (EAL) Change Review Process**

- 6.5.1 IF SO123-VIII-1, Recognition and Classification of Emergencies, **OR** EPSD-1 Emergency Action Level (EAL) Technical Bases, are **NOT** being changed, **THEN GO TO** Step 6.6.
- 6.5.2 Initial EALs require review **AND** agreement with the State and local jurisdictions. Subsequent EAL changes do **NOT** require agreement but shall be reviewed with the State and local jurisdictions once per year. **DOCUMENT** review in Offsite Inter-jurisdictional Planning Committee (IPC) meeting minutes.
- 6.5.3 **EVALUATE** for differences **OR** deviations per RIS 2003-18 Supplement 2. [201135750-CA0005]
- 6.5.3.1 **DOCUMENT** any difference where a proposed EAL change differs in wording but agrees in meaning **AND** intent with the NRC approved EAL such that the classification of an event would remain the same using the proposed EAL.
- 6.5.3.2 **FLAG** a deviation as a Reduction in Effectiveness (RIE) for an EAL change where the proposed wording alters the meaning **OR** intent, such that classification of the event could be different than the NRC approved site-specific EAL per Step 6.6.
- 6.5.4 **REVIEW** MOEE per Step 6.10 to determine if a revision is warranted when a change to EALs occurs.
- 6.5.5 **INCLUDE** designated reviewers as directed by Manager, EPP or designee, to conduct a technical review of the EAL changes. Designated reviewers should include personnel from affected cognizant organizations to perform the following verifications, and 10CFR50.54(q) evaluation.
- 6.5.5.1 **PERFORM** a technical review of proposed changes against the NRC approved Emergency Action Level Technical Bases **AND** the most recent NRC issued Safety Evaluation Report (SER) applying to the EAL to ensure compliance.
- 6.5.5.2 **PERFORM** validation to ensure the EAL change can be implemented in a timely manner consistent with the NRC approved EAL. Examples of validation methods are as follows:
- **EVALUATE** availability of information to assess, classify, and declare an emergency condition within 15 minutes of detecting indications that an EAL has been exceeded.
  - IF conditions permit, **THEN** perform simulator validation of proposed EAL change(s) prior to issuance of EPIP SO123-VIII-1.
  - **PERFORM** a field verification that EAL instrument range and scale changes can actually be obtained in the field prior to issuance of EPIP SO123-VIII-1.
- 6.5.6 **RESOLVE** EAL comments **AND PREPARE** the file containing the draft document revision and description of changes for 50.54(q) Screening and Evaluation.



6.6 **50.54(q) Screening and Evaluation**

**NOTE**

The 50.54(q) evaluation is a two-factor test. The first factor is met if the emergency plan capability exceeds the regulations; but the second factor must consider whether the change is a reduction in plan effectiveness. The "margin" of the E-Plan requirement compared to the regulation does **NOT** have a role in whether the capability of the plan is reduced when compared to the approved NRC Safety Evaluation Report (SER).

- 6.6.1 **PERFORM** an evaluation of the proposed change by assigning an N-EPE Task to the Notification. Include the summary of change, the change bases, and determine if the change requires prior NRC approval. If SAP is temporarily unavailable, Forms EP(123) 22 and EP(123) 23 shall be used in lieu of the N-EPE.
- 6.6.1.1 **DETERMINE** the overall impact of proposed changes on the effectiveness of the emergency plan or its implementation during the 50.54(q) Evaluation. A RIE will occur if there is a change or reduction in an emergency planning function without a commensurate reduction or change in the licensing bases for that emergency planning function.
- 6.6.2 **EVALUATE** the change for the RIE determination from the most recent NRC issued SER against the capability to perform the functions as follows: [201135750-CA0005]
- 6.6.2.1 **DETERMINE** whether the capability or timeliness to perform a function is lost or degraded.
- 6.6.2.2 **VERIFY** that the change(s) continue to meet the standards and requirements as set forth in 10 CFR 50.47(b) and Appendix E to Part 50.
- 6.6.2.3 **DETERMINE** if a change in the number of minimum staff positions (additions or deletions) per E-Plan Table 5-4, may affect the ability to achieve timely ERO augmentation upon recall activation based on the INPO Industry Event Report (IER) 11-39, recommendation 3b. (201809145-CA0005)
- 6.6.2.4 **PREPARE** a Summary of Analysis, Form EP(123) 26, for the NRA 30 day submittal letter per NRA Objective Evidence File (OEF) requirements. (202066759-CA0004)

- 6.6.3           **PERFORM** a 50.54(q) Evaluation for revisions to the following licensing documents that require Manager, EPP approval plus final review and approval per Step 6.6.3.1:
- SONGS Emergency Plan
  - SO123-VIII-1 Recognition and Classifications of Emergencies
  - EPSD-1 Emergency Action Level Technical Bases
  - Manual of Emergency Events (MOEE)
- 6.6.3.1           **OBTAIN** Final Document Approval from the Manager, Nuclear Regulatory Affairs & Emergency Preparedness (or designee).
- 6.6.3.1.1           For technical changes, **OBTAIN** Onsite Review Committee (OSRC) approval.
- 6.6.3.2           IF it is determined that prior NRC approval is required to make the change, THEN GO TO Step 6.6.5.
- 6.6.4           A Change to documents listed in Emergency Plan Appendix E require an independent EP Staff review of the 50.54(q) Screening and Evaluation prior to approval by the Manager, EPP.
- 6.6.4.1           A Change to lower-tiered documents, forms, facilities and equipment **NOT** listed in Emergency Plan Appendix E do **NOT** require a 50.54(q) Screening/Evaluation.
- 6.6.4.2           **OBTAIN** final review and approval revisions under 50.54(q) authorization and go to Step 6.7.

6.6.5 IF a proposed change is not authorized under 50.54(q) due to one of the following:

- Not in compliance with 10CFR50.47(b) or 10CFR50 Appendix E, or
- Identified as a reduction in effectiveness (RIE), or
- The evaluation does not support 10CFR50.54(q) approval or is otherwise in doubt,

THEN proceed as follows, OTHERWISE go to Step 6.7: [201135750-CA0005]

- 6.6.5.1 IF 50.54(q) evaluation determines the change is **NOT** authorized without prior NRC approval, THEN a complete markup copy shall be submitted through Nuclear Regulatory Affairs to determine whether station management supports submitting a license amendment for the change in accordance with 10CFR50.90.
- 6.6.5.2 IF plant management supports the processing of the change as a license amendment, THEN, in addition to the filing requirements of 10CFR 50.90 and 50.91, the request must include all emergency plan pages affected by that change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for requesting NRC prior approval to make a change that cannot be submitted under 50.54(q).
- 6.6.5.3 IF plant management determines the change will **NOT** be submitted as a license amendment, THEN the change will be revised so that it can meet the requirements of 50.54(q) or the change shall not be made.
- 6.6.5.4 IF the NRC grants prior approval of the requested change accompanied by a Safety Evaluation Report (SER), attach the SER to the Notification, document any further NRC required changes THEN proceed to Step 6.7, OTHERWISE STOP. The change can **NOT** be made as proposed.

## 6.7 Document Issue and Tracking

- 6.7.1 IF the revision is to the Emergency Plan, or MOEE, THEN **SUBMIT** a clean file copy (no strikeout or highlight) to the Document Control Desk for distribution to the Offsite Agencies per the Records Management Distribution Matrix.
- 6.7.2 **ISSUE** all other documents, forms and procedures via the Records Management process.
- 6.7.3 **COMMUNICATE** changes of Emergency Planning documents to affected ERO personnel via an E-mail or Emergency Planning Bulletin (EPB) at the discretion of the document author.

- 6.7.4 **COMMUNICATE** changes to SO123-VIII-0.201, Section 6.10, Community Alert Siren System, and all changes to SO123-XVIII-10 series procedures regarding the offsite Alert and Notification System (ANS) to Plant Engineering, Warehouse/Facilities , and IT via individual Nuclear Notifications for their information and review. **[CAPR 800407962-0010 and CAPR 200501125-0004]**
- 6.7.4.1 **ASSIGN** a second task on the Notification to Telecom Management to generate a Trouble Ticket for TCC Management to review the associated procedure change notice. **[CAPR 800407962-0010 and CAPR 200501125-0004]**
- 6.7.5 **INITIATE** an N-REG Task to NRA for the 30-day NRC notification requirement from the effective date of the E-Plan or any document listed in E-Plan Appendix E.
- 6.7.5.1 **FORWARD** approved Summary of Analysis documents to NRA for the 30 day Submittal Letter. (202066759-CA0004)
- 6.7.5.2 NRA shall prepare a transmittal letter for EP review **AND SUBMIT** document change(s) to the NRC with the Summary of Analysis within 30 days of issue date by Records Management. (202066759-CA0004)

## 6.8 **Emergency Plan Implementing Procedures (EIPs)**

### **NOTE**

EIPs are procedures which implement policy and requirements contained in the SONGS E-Plan and are listed in E-Plan Appendix E.

- 6.8.1 EIPs shall be reviewed annually per SONGS E-Plan in accordance with SO123-VI-1.0.2.
- 6.8.2 Emergency Response Facilities (ERF) and Equipment are reviewed per SO123-VIII-0.201 and SO123-VIII-0.301.
- 6.8.3 Research, draft, and submit changes to EIPs and ERFs to ensure appropriate staff peer review is conducted.
- 6.8.3.1 Prepare and process proposed EPIP or Equipment change packages for Site approval in accordance with Step 6.3.
- 6.8.4 Records Management shall distribute copies of EPIP changes to Emergency Response Notebooks.

## 6.9 **90-Day and 60-Day Exercise Submittals**

6.9.1 Prepare 90-Day Exercise Submittal by including the following documents:

- Cover Letter (from Nuclear Regulatory Affairs)
- Extent of Play
- Exercise Objectives

6.9.2 Complete and attach the most current revision of Form EP(123) 20 to Exercise Submittal package.

6.9.2.1 Assign an appropriate reviewer to each section of submittal. Document review and resolve any comments with reviewer.

6.9.2.2 Obtain final approval from Manager, Regulatory Affairs & Emergency Preparedness or designee on submittal letters.

6.9.2.3 Provide completed packages to Licensing/Compliance for postmarking on or before due date.

6.9.3 Prepare 60-Day Exercise Submittal as follows:

6.9.3.1 Assemble submittal by including updated elements listed in Step 6.9.1.

6.9.3.2 Contact the NRC and FEMA to determine which of the following sections to include in their respective packages and how many copies of each:

- Radiation Protection (RP) data
- Plant data
- Summary
- Sequence of Events
- Guidelines for Exercise Conduct
- Instructions for Exercise Controllers
- Meteorological Data
- Rumor Control cue cards

6.9.3.3 Repeat Step 6.9.2.

## 6.10 **Manual of Emergency Events (MOEE)**

- 6.10.1 EP shall review the MOEE annually to identify changes to be incorporated in the next revision.
- 6.10.1.1 Track pending changes in the Notification system.
- 6.10.1.2 Document review in Attachment 13.
- 6.10.2 Review MOEE to determine if a revision is warranted when a change to EALs occurs.
- 6.10.3 Changes to the MOEE shall be prepared in accordance with Step 6.3.

## 6.11 **Review of Emergency Planning Documents**

- 6.11.1 EP shall review E-Plan annually, such that all E-Plan sections are reviewed.
- 6.11.1.1 Document review on Attachment 1.
- 6.11.2 Coordinate E-Plan requirements with Physical Security Plan (PSP) and Safeguards Contingency Plan (SCP) requirements annually.
- 6.11.2.1 Document review on Attachment 10.
- 6.11.3 Manager, EPP shall be responsible for Evacuation Time Study and all letters of agreement involving local jurisdictions, including arrangements for medical services, in accordance with SO123-EP-1, SONGS Emergency Plan Implementation.
- 6.11.3.1 Review documentation annually and document review on Attachment 12.
- 6.11.4 Manager, EPP shall be responsible for all letters of agreement involving firefighting assistance, medical, rescue, local law enforcement, and other support activities anticipated during an emergency, and liability insurance in E-Plan.
- 6.11.4.1 Review applicable Letters of Agreement annually and document on Attachment 2.
- 6.11.5 Review Radiation Monitor Setpoint Transmittals for gaseous and liquid radiation monitors annually to identify if SO123-VIII-1, Recognition and Classification of Emergencies, needs to be changed.
- 6.11.5.1 A change should be initiated if calibration constant in setpoint transmittal deviates by 20% from constant used to derive declaration values specified in SO123-VIII-1.
- 6.11.5.2 Document review on Attachment 3.

- 6.11.6 Review Emergency Recall positions annually.
- 6.11.6.1 Positions without required number of qualified personnel should be brought to the attention of appropriate management with a request for replacements.
- 6.11.6.2 Document review on Attachment 4.
- 6.11.7 Review ERO Respirator Qualification Report quarterly to ensure minimum requirement is met.
- 6.11.7.1 Document review on Attachment 5.
- 6.11.8 Review SONGS Recall Roster quarterly to ensure recall information (contact numbers) is maintained current.
- 6.11.8.1 Document review on Attachment 6.
- 6.11.9 Records Management E-Plan and MOEE Distribution Matrix Review.
- 6.11.9.1 EP to review Records Management EP distribution matrix annually to verify Offsite information; EP to verify Onsite information.
- 6.11.9.2 Record reviews on Attachment 7.
- 6.11.9.3 Records Management shall verify manuals are current periodically in accordance with SO123-VI-28.1.
- 6.11.9.4 EP shall spot-check five E-Plan manuals annually for current revision and document the check on Attachment 7.
- 6.11.9.5 E-Plan shall be distributed by Records Management in accordance with procedure(s).
- 6.11.9.6 Records Management shall verify change requests to distribution matrix in accordance with procedure(s).
- 6.11.9.7 **EVALUATE** Fire Brigade records to determine whether drills have been completed.
- 6.11.10 Drill Objective Matrix and Fire Brigade records review.
- 6.11.10.1 EP shall **EVALUATE** Matrix of Drill Objectives against accomplished objectives prior to end of third quarter, to ensure all required objectives are performed or scheduled within their periodicity.
- 6.11.10.2 **REPORT** any discrepancies to Manager, EPP.
- 6.11.10.3 Document results on Attachment 8.
- 6.11.11 Quarterly Emergency Planning Council meetings shall be documented on Attachment 9 by Manager, EPP. (per E-Plan, Section 8.1.6)

## REFERENCE USE

- 6.11.12 Review On-Shift ERO Roster Exception Report quarterly to ensure On-Shift requirements are met.
- 6.11.12.1 Document review on Attachment 11.
- 6.11.13 Manager, EPP shall be responsible for reviewing the EALs on SO123-VIII-1 with the State and local jurisdictions on an annual basis.
- 6.11.13.1 Document review on Attachment 12.
- 6.11.14 Manager, EPP shall be responsible for dissemination to the public within the exposure pathway Emergency Planning Zone (EPZ) of basic emergency planning education information on an annual basis.
- 6.11.14.1 Document review on Attachment 12.
- 6.11.15 Annually Review EPSD-1, Emergency Action Level Technical Bases, MOEE, and the EAL Chart and document the review on Attachment 13 (CA 202827656-0018).

## 7.0 **ACCEPTANCE / FUNCTIONAL CRITERIA**

- 7.1 None

## 8.0 **RETENTION / RECORDS**

- 8.1 A history file for E-Plan, EALs, MOEE, and EIPs shall be retained in SAP for five years after the date of each change.
- 8.2 Completed Attachments 5, 6, 9, and 11 shall be sent to Records Management on a quarterly basis within three months of the end of the quarter.
- 8.3 Completed Attachments 1-4, 7-8, 10, 12, and 13 shall be sent to Records Management- on an annual basis within three months of the end of the calendar year.
- 8.4 Completed copies of attachments used on this procedure shall be retained in EP files for at least three years.

## 9.0 **DEFINITIONS**

- 9.1 None

## REFERENCE USE



## 10.0 **REFERENCES / COMMITMENTS**

### 10.1 **Implementing Reference**

#### 10.1.1 Procedures

- 10.1.1.1 SO123-VIII-1, Recognition and Classification of Emergencies
- 10.1.1.2 SO123-XII-18.1, Audit Program
- 10.1.1.3 SO123-XV-50.CAP-1, Writing Nuclear Notifications for Problem Identification and Resolution
- 10.1.1.4 SO123-XXI-1.11.3, Emergency Plan Training Program Description
- 10.1.1.5 SO123-XXIV-10.1, Engineering Design Change Process - NECPs
- 10.1.1.6 SO123-XV-51, Site Program Impact (SPI) Assessment and Resolution
- 10.1.1.7 SO123-XV-HU-3, Written Instruction Use and Adherence
- 10.1.1.8 SO123-VI-1.0.2, Periodic Review of Orders, Procedures and Instructions
- 10.1.1.9 SO123-VI-28.1, Corporate Documentation Management Controlled and Reference Files Distribution, Updating, and Auditing
- 10.1.1.10 SO123-VIII-0.101, Emergency Response Equipment Management
- 10.1.1.11 SO123-VIII-0.200, Emergency Plan Drills and Exercises
- 10.1.1.12 SO123-VIII-0.201, Emergency Plan Equipment Surveillance Program (EPESP)
- 10.1.1.13 SO123-VIII-0.301, Emergency Telecommunications Testing
- 10.1.1.14 SO123-XV-109.1, Processing Procedures and Instructions

#### 10.1.2 Forms

- 10.1.2.1 Form EP(123) 20, Emergency Planning Document Review Sheet
- 10.1.2.2 Form EP(123) 21, EPIP Modification Checklist
- 10.1.2.3 Form EP(123) 22, EP Licensing Document Impact Screening
- 10.1.2.4 Form EP(123) 23, 10CFR50.54(q) Evaluation
- 10.1.2.5 Form EP(123) 26, San Onofre Nuclear Generating Station Report and Analysis Summary 10 CFR 50.54(q)(iv)(5)

## REFERENCE USE

- 10.1.3 Other
  - 10.1.3.1 IER 11-39, Lack of Timely Emergency Response Organization and Emergency Response Facility Activation. Recommendation 3.b: Clearly define emergency response facility activation criteria.
  - 10.1.3.2 SO123-EP-1, SONGS Emergency Plan Implementation
- 10.2 Developmental References
  - 10.2.1 Commitments
    - 10.2.1.1 10CFR50.54(q), 10CFR50.47(b), 10CFR50 Appendix E
    - 10.2.1.2 NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response and Preparedness in Support of Nuclear Power Plants
    - 10.2.1.3 Topical Quality Assurance Manual (TQAM) Chapters 2 C and 5 J, Section 7.0
    - 10.2.1.4 SONGS Topical Quality Assurance Manual, Chapter 1-A, Section 9.7
    - 10.2.1.5 Emergency Plan for San Onofre Nuclear Generating Station (SONGS)
    - 10.2.1.6 San Onofre Nuclear Generating Station Manual of Emergency Events
    - 10.2.1.7 EPSD-1, Emergency Action Level (EAL) Technical Bases
  - 10.2.2 Corrective Actions
    - 10.2.2.1 201135750-CA0005, Incorporate regulatory/industry issued changes that were not previously captured to ensure the 50.54(q) evaluation process prevents a Reduction in Effectiveness (RIE) [Sections 6.5.3, 6.6.2 and 6.6.5]
    - 10.2.2.2 201809145-CA0005, Revise SO123-VIII-0100 Maintenance and Control of Emergency Planning Documents to limit and control additions of minimum staffing positions based on the IER 11-39 3.b recommendation.
    - 10.2.2.3 202066759-CA0004, Add guidance to SO123-VIII-0.100 on use of summary of analysis form from CA0003 that requires a Summary of Analysis to be submitted to NRC along with the 50.54(q)(5).
    - 10.2.2.4 201135750-CA0008, Establish EPlan and EAL development, review and approval requirements in SO123-VIII-0.100 [Sections 6.1.1, 6.4.1.1 and 6.6.3]
    - 10.2.2.5 CA 202827656-0018, EAL NOUE not declared for Seismic Event [Step 6.11.15] |

- 10.2.3 Corrective Actions to Prevent Recurrence (CAPR)
  - 10.2.3.1 CAPR 800407962-0010, Add steps that require notifications be created to Computer Engineering, Facilities Management, Telecommunications, and Offsite EP to communicate when a revision to the SONGS Emergency Plan or Emergency Plan implementing procedures are made [Section 6.7.4]
  - 10.2.3.2 CAPR 200501125-CA0004, Add Steps that Require a Task on the Notification to Telecom Management to Generate a Trouble Ticket for TCC Management to Review the Associated Procedure Change Notice [Steps 6.7.4 and 6.7.4.1]
  - 10.2.3.3 CAPR 202827656-0010, Clarify the definition for "felt earthquake" in EPSD-1, HU1.1, in accordance with SO123-XV-ERO-1, Step 6.10, Process for Clarifying or Revising EAL Declaration Criteria (NN 201944331-CA0014) **[NOTE at Step 6.3.1]**
- 10.2.4 Procedures
  - 10.2.4.1 SO123-XV-109, Procedure and Instruction Format and Content
  - 10.2.4.2 SO123-VI-28, Corporate Documentation Management Control of Nuclear Organization Manuals and Revision-Controlled Document Preparation, Transmittal, and Processing
- 10.2.5 Other (may be drawings, manuals, etc.)
  - 10.2.5.1 RPA 92-0010, Emergency Plan 50.54(q) Packages
  - 10.2.5.2 AR 050501711-02, Licensing Interpretation of 10CFR50 EAL Review
  - 10.2.5.3 AR 070100476-10, Evaluate Radiation Monitors for OE Potential Problems
  - 10.2.5.4 NRC Bulletin 2005-2, Emergency Preparedness and Response Actions for Security Based Events
  - 10.2.5.5 NEI 03-12, Generic Security Plan Template
  - 10.2.5.6 RIS 2003-18, Supplement 2, Use of Nuclear Energy Institute (NEI) 99-01, Methodology for Development of Emergency Action Levels
  - 10.2.5.7 RIS 2005-02, Clarifying the Process for making Emergency Plan Changes
  - 10.2.5.8 RIS 2007-01, Clarification of NRC Guidance for Maintaining a Standard Emergency Action Level Scheme.
  - 10.2.5.9 Regulatory Guide 1.219, Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors
  - 10.2.5.10 SONGS MOEE, Manual of Emergency Events

E-PLAN REVIEW

1.0 Review E-Plan annually to ensure documents are current.

1.1. EP review of Emergency Plan has been completed per Step 6.11.1.

**PERFORMED BY:** \_\_\_\_\_  
Emergency Planning Staff

**DATE:** \_\_\_\_\_

Comments: \_\_\_\_\_  
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2.0 The E-Plan review has been reviewed per Sections 6.11.1.

**E-PLAN REVIEW VERIFIED BY:** \_\_\_\_\_  
Emergency Planning Staff

**DATE:** \_\_\_\_\_

**APPROVED BY:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

**DATE:** \_\_\_\_\_

E-PLAN LETTERS OF AGREEMENT REVIEW

1.0 Review the following E-Plan letters of agreement annually to ensure documents are current per Step 6.11.4.

1.1. Firefighting Assistance Agreement has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review was performed and who was contacted): \_\_\_\_\_  
\_\_\_\_\_

1.2. Medical Response Agreement has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review was performed and who was contacted): \_\_\_\_\_  
\_\_\_\_\_

1.3. Liability Insurance Coverage Agreement has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review was performed and who was contacted): \_\_\_\_\_  
\_\_\_\_\_

1.4. Rescue Response Agreement has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review was performed and who was contacted): \_\_\_\_\_  
\_\_\_\_\_

1.5. Letters of agreement involving local jurisdictions have been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review was performed and who was contacted): \_\_\_\_\_  
\_\_\_\_\_

E-PLAN LETTERS OF AGREEMENT REVIEW

- 1.6. Letters of agreement involving local law enforcement agencies have been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review was performed and who was contacted): \_\_\_\_\_  
\_\_\_\_\_

- 2.0 The specified letters of agreement have been reviewed per Step 6.11.4.

**VERIFIED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

**REVIEWED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

RADIATION MONITOR SETPOINT TRANSMITTAL REVIEW

- 1.0 Review Radiation Monitors Setpoint Transmittal annually for changes that impact SO123-VIII-1, Recognition and Classification of Emergencies per Step 6.11.5.

Comments: \_\_\_\_\_

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- 2.0 The Setpoint Transmittals for Units 2 and 3 Gas and Liquid Monitors have been reviewed per Step 6.11.5.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

**REVIEWED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

ERO CODES AND DEPTH OF POSITION REVIEW

- 1.0 Review all Emergency Recall positions annually. IF a position does **NOT** contain the required number of qualified responders, THEN request replacements per Section 6.11.6.

Comments: \_\_\_\_\_

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- 2.0 The Emergency Recall positions have been reviewed per Step 6.11.6.

PERFORMED BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
Emergency Planning Staff

REVIEWED BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
Manager, Emergency Preparedness Planning



1.0 Review respirator qualifications quarterly to ensure minimum requirement is met per Step 6.11.7.

[illegible]

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Page 1 of 1

### RECALL ROSTER DATA REVIEW

- 1.0 Review the Recall Roster quarterly to ensure all recall information is maintained current per Step 6.11.8.

Comments: \_\_\_\_\_

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- 2.0 The Recall Roster has been reviewed per Step 6.11.8.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

**REVIEWED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

RECORDS MANAGEMENT E-PLAN, AND MOEE DISTRIBUTION MATRIX REVIEW

1.0 Review the Records Management E-Plan, and MOEE Distribution Matrices annually to verify documents are current per Step 6.11.9.

1.1. Review the Records Management E-Plan Distribution Matrix.

**PERFORMED BY:** \_\_\_\_\_  
Emergency Planning Staff

**DATE:** \_\_\_\_\_

1.2. Review the Records Management MOEE Distribution Matrix.

**PERFORMED BY:** \_\_\_\_\_  
Emergency Planning Staff

**DATE:** \_\_\_\_\_

1.3. Spot check 5 E-Plan manuals annually for current revision.

Manuals checked:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

**PERFORMED BY:** \_\_\_\_\_  
Emergency Planning Staff

**DATE:** \_\_\_\_\_

Comments: \_\_\_\_\_  
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2.0 The Records Management E-Plan and MOEE Distribution Matrices review have been reviewed per Step 6.11.9.

**PERFORMED BY:** \_\_\_\_\_  
Emergency Planning Staff

**DATE:** \_\_\_\_\_

**REVIEWED BY:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

**DATE:** \_\_\_\_\_

DRILL MATRIX OBJECTIVES REVIEW

1.0 Annually Review Matrix of Drill Objectives and Fire Brigade records per Step 6.11.10.

- 1.1. Review the Matrix of Drill Objectives using SO123-VIII-0.200. Emergency Plan Drills and Exercises, and ensure all objectives have been accomplished or scheduled within their periodicity.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

- 1.2. Review Fire Brigade records to determine if drills required by SONGS Emergency Plan, Fire Emergency Drills section have been completed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments: \_\_\_\_\_  
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2.0 The Matrix of Objectives has been reviewed per Step 6.11.10.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

**REVIEWED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

EP COUNCIL MEETING RECORD

1.0 Record date of each Emergency Planning Council Quarterly Meeting conducted per Step 6.11.11.

1.1. First Quarter Dates:

1.2. Second Quarter Date:

1.3. Third Quarter Date:

1.4. Fourth Quarter Date:

Comments: \_\_\_\_\_

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REVIEWED BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
Emergency Planning Staff

REVIEWED BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
Manager, Emergency Preparedness Planning

1.0 Coordinate E-Plan requirements with PSP and SCP per Section 6.11.2.

- Notification Number: \_\_\_\_\_

2.0 The E-Plan requirements have been coordinated with the PSP and SCP per Step 6.11.2.

Page 1 of 1

1.0 Review On-Shift ERO Roster Exception Report quarterly to ensure work groups have correctly assigned on-shift ERO personnel per Section 6.11.12. If discrepancies are found, create a Task to the respective group and document it on Comments section of this attachment.

[illegible]

- PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff
- REVIEWED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning

EP DOCUMENTS REVIEW

1.0 Review the following documentation annually per Steps 6.11.3, 6.11.13 and 6.11.14.

1.1. Evacuation Time Study has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review/task was performed): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.2. EALs review with State and Local jurisdictions has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review/task was performed): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

1.3. Basic emergency planning information dissemination to the public within the exposure pathway EPZ has been reviewed.

**PERFORMED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Emergency Planning Staff

Comments (include how review/task was performed): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2.0 EP responsible tasks specified in Steps 6.11.3, 6.11.13 and 6.11.14 have been reviewed.

**REVIEWED BY:** \_\_\_\_\_ **DATE:** \_\_\_\_\_  
Manager, Emergency Preparedness Planning



ANNUAL EPSD-1 EMERGENCY ACTION LEVEL TECHNICAL BASES, MOEE, AND EAL CHART  
REVIEW

(CA 202827656-0018)

**NOTE**

SAP Order/Operations are used to track surveillance requirements.

1.0 Perform the following steps to complete the annual review of EPSD-1, MOEE, and EAL Chart, in accordance with Step 6.11.15.

1.1. Request from the Nuclear Energy Institute (NEI) issues or problems related to the EAL Chart or Technical Bases Document as related to decommissioned plants.

\_\_\_\_\_  
Name of NEI Contact

\_\_\_\_\_  
Date

1.1.1 IF issues or problems are identified, THEN initiate an NN to track any subsequent items and resolve issues in accordance with SO123-XV-ERO-1, Section for Process for Clarifying or Revising EAL Declaration Criteria. Indicate NN number or N/A.

\_\_\_\_\_  
NN #

1.2. Request from decommissioned plants (e.g., Crystal River or Kewaunee) issues or problems related to their EAL Chart or Technical Bases Document.

\_\_\_\_\_  
Name of Contact(s)

\_\_\_\_\_  
Date

1.2.1 IF issues or problems are identified, THEN initiate an NN to track any subsequent items and resolve issues in accordance with SO123-XV-ERO-1, Section for Process for Clarifying or Revising EAL Declaration Criteria. Indicate NN number or N/A.

\_\_\_\_\_  
NN #

1.3. Record additional contact names and dates or any comments or issues not discussed in the NN.

COMMENTS: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

1.4. Attach a pdf of this attachment to the Operation and close (TECO) the Order/Operation.

PERFORMED BY:

\_\_\_\_\_  
Manager, Emergency Preparedness Planning

\_\_\_\_\_  
Date

SUMMARY OF CHANGES

Author: Lucia Sischo

NN, Order, or Other Action	Description of Change	Reviewer	Step(s), Section(s) or page number
Other	Correct how to identify Corrective Action and CAPR.  Include CAPR as a reference.	Sischo Hurn Seward	NOTE at Step 6.3.1; Steps 6.11.15, 10.2.2.5, Att 13  Step 10.2.3.3

**Attachment 2**

**SONGS EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIPs) INDEX**

## SONGS EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIPs) INDEX

<u>DOCUMENT</u>	<u>REV. #</u>	<u>EC</u>	<u>TITLE</u>	
SO123-VIII-0.100	18	EC 1	MAINTENANCE AND CONTROL OF EMERGENCY PLANNING DOCUMENTS	
SO123-VIII-0.101	0		EMERGENCY RESPONSE EQUIPMENT MANAGEMENT	
SO123-VIII-0.200	18		EMERGENCY PLAN DRILLS AND EXERCISES	
SO123-VIII-0.201	28		EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM (EPESP)	
SO123-VIII-0.202	12		ASSIGNMENT OF EMERGENCY RESPONSE PERSONNEL	
SO123-VIII-0.301	16	1	EMERGENCY TELECOMMUNICATIONS TESTING	
SO123-VIII-0.302	8		ONSITE EMERGENCY SIREN SYSTEM TEST	
SO123-VIII-0.303	5		PERIMETER PUBLIC ADDRESS SYSTEM (PPAS) ROUTINE TEST	
SO123-VIII-1	37		RECOGNITION AND CLASSIFICATION OF EMERGENCIES	
SO123-VIII-10	32		EMERGENCY COORDINATOR DUTIES	
SO123-VIII-10.3	16		PROTECTIVE ACTION RECOMMENDATIONS	
SO123-VIII-10.5	5		EVENT CLOSE OUT AND RECOVERY	
SO123-VIII-10.6	7		EMERGENCY RESPONSE ACTIONS FOR A DECLARED SECURITY EVENT	
SO123-VIII-30.7	18		EMERGENCY NOTIFICATIONS	
SO123-VIII-40.100	19		DOSE ASSESSMENT	
SO123-VIII-40.200	8		RADDOSE-V DOSE ASSESSMENT	
SO23-VIII-50.3	11		CORE DAMAGE ASSESSMENT	
SO123-VIII-CR	3		EMERGENCY RESPONSE ORGANIZATION	

## SONGS EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIPs) INDEX

<u>DOCUMENT</u>	<u>REV. #</u>	<u>EC</u>	<u>TITLE</u>
SO123-VIII-EOF	3		EMERGENCYRESPONSE ORGANIZATION (ERO) EMERGENCY OPERATIONS FACILITY POSITION CHECKLISTS
SO123-VIII-JIC	0		EMERGENCY RESPONSE ORGANIZATION (ERO) JOINT INFORMATION CENTER (JIC) POSITION CHECKLIST
SO123-VIII-OSC	1		EMERGENCY RESPONSE ORGANIZATION (ERO) OPERATIONS SUPPORT CENTER POSITION CHECKLISTS
SO123-VIII-TSC	1		EMERGENCY RESPONSE ORGANIZATION (ERO) TECHNICAL SUPPORT CENTER POSITION CHECKLISTS

**Attachment 3**

**SONGS EMERGENCY PLAN REFERENCED MANUALS,  
ORDERS AND TRAINING PROCEDURES INDEX**

<u>DOCUMENT</u>	<u>REV. #</u>	<u>TITLE</u>
SO123-EP-1	9	SONGS EMERGENCY PLAN IMPLEMENTATION
SO123-XXI-1.11.3	31	EMERGENCY PLAN TRAINING PROGRAM DESCRIPTION
EPSP-1	6	EMERGENCY ACTION LEVEL TECHNICAL BASES
EPSP-1 1.0	2	SECTION 1.0 - PURPOSE
EPSP-1 2.0	3	SECTION 2.0 - DISCUSSION
EPSP-1 3.0	3	SECTION 3.0 - REFERENCES
EPSP-1 4.0	5	SECTION 4.0 - DEFINITIONS, ACRONYMS AND ABBREVIATIONS
EPSP-1 5.0	2	SECTION 5.0 - EAL TECHNICAL BASES
EPSP-1 5.1	4	SECTION 5.1 - CATEGORY A -ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT
EPSP-1 5.2	4	SECTION 5.2 - CATEGORY C - COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION
EPSP-1 5.3	3	SECTION 5.3 - CATEGORY E - EVENTS RELATED TO INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS
EPSP-1 5.4	5	SECTION 5.4 - CATEGORY F - FISSION PRODUCT BARRIER DEGRADATION
EPSP-1 5.5	5	SECTION 5.5 - CATEGORY H - HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
EPSP-1 5.6	6	SECTION 5.6 - CATEGORY S - SYSTEM MALFUNCTION

## **Attachment 4**

### **Reports and Analysis Summaries of SONGS Emergency Plan Implementing Procedures Changes**

**SO123-VIII-CR, Revision 3, Emergency Response  
Organization (ERO) Control Room  
Position Checklists**

**SO123-VIII-OSC, Revision 1, Emergency Response  
Organization (ERO) Operations Support Center  
Position Checklists**

**SO123-VIII-0.100, Revision 18 EC 1, Maintenance and Control of  
Emergency Planning Documents**

**SO123-VIII-0.302, Revision 8, Onsite Emergency Siren System Test**



**San Onofre Nuclear Generating Station  
Report and Analysis Summary  
10 CFR 50.54(q)(iv)(5)**

**Document Number: SO123-VIII-CR, Rev 3**  
**Title: EMERGENCY RESPONSE ORGANIZATION (ERO) CONTROL ROOM POSITION CHECKLISTS**  
**SONGS Nuclear Notification (NN) #: 202633694 task 5**

Section and Change Description	Analysis Summary
<p>Change 1 Cover page, Updated procedure owner</p> <p>Change 2 Step 2.21 and Attachment 1 step 2.5, removed Emergency Response Data System acronym and related instructions.</p> <p>Change 3 Attachment 1 step 2.1, changed word from "verify" to "ensure" and added notification or recall of ERO members to Notification Time Limits table.</p> <p>Change 4 Attachment 1 step 2.2, updated ERO recall/notification and 15-Minute Verbal Notification instructions to provide clarifying direction.</p> <p>Change 5 Attachment 1 step 2.2.4, added step to direct implementation of PA/Siren Coordination after completion of ERO recall/notification and 15-Minute Verbal Notification, when the person is assigned to perform Operations Leader duties as well, in order to streamline procedure based on sequential performance.</p> <p>Change 6 Attachment 1 step 2.3, updated 30-Minute Printed Message instructions to provide clarifying direction.</p> <p>Change 7 Attachment 1 step 2.4, moved instructions related to NRC notifications previously located in Attachment 1 steps 2.1, 2.2, 2.3 and 2.4 to new step 2.4 to streamline procedure based on sequential performance.</p> <p>Change 8 Attachment 1 step 2.5, updated 90-Minute Follow-Up Verbal and Printed Message instructions to provide clarifying direction.</p> <p>Change 9 Attachment 1 step 2.6, updated Turnover instructions to provide clarifying direction.</p> <p>Change 10 Attachment 1 step 3.0, updated Yellow Phone System Problems instructions to add steps to take if off-site agencies do not respond to the all-call notification</p> <p>Change 11 Attachment 2 step 1.1, added EP(123) 4-G Dispatch Checklist to items contained in the position notebook.</p>	<p>Changes 1, 3, 7, 13, 15, 19 and 20 are considered editorial changes as defined in SO123-XV-109.1, Attachment 2, and do not cause a Reduction in Effectiveness to the SONGS Emergency Plan.</p> <p>Change 2 for the removal of the Emergency Response Data System (ERDS) is not a reduction of the effectiveness of the Emergency Plan based on the following:  Section VI of Appendix E is not applicable to permanently shut-down facilities, the modified emergency plan will continue to meet the applicable requirements.  The objective of ERDS, since its inception, has been to facilitate NRC monitoring of licensee response to the event and NRC assessment of the situation at the plant. Providing ERDS data to the NRC is not an emergency planning function as defined in Paragraph 50.54(q)(1)(iii). Because a reduction in effectiveness requires a reduction of the licensee's capability to perform an emergency planning function and providing data to the NRC through ERDS is not an emergency planning function, removing ERDS would not reduce the effectiveness of the licensee's capability to perform an emergency planning function. The SONGS Emergency Plan does not rely upon ERDS for the provision of assessment data to the emergency response organization. The Plant Computer System will continue to provide the same assessment data to the CFMS computers in the Emergency Response Facilities after ERDS removal.  Accordingly, removing ERDS would not reduce the effectiveness of SONGS Emergency Plan.</p> <p>Change 4 updates the Emergency Response Organization recall/notification and the 15-Minute Verbal Notification instructions to provide clarifying direction. The emergency planning function for planning standard 10 CFR 50.47(b)(5), procedures for notification of State and local governmental agencies are capable of initiating notification within 15 minutes after declaration of an emergency, is maintained after incorporation of this change. The emergency planning function for planning standard 10 CFR 50.47(b)(6), systems are established for prompt communication to emergency response personnel, is maintained after incorporation of this change. This change does not reduce the capability to perform these functions and does not reduce the effectiveness of the Emergency Plan.</p> <p>Change 5 adds a step to direct implementation of PA/Siren Coordination after completion of ERO recall/notification and 15-Minute Verbal Notification, when the person is assigned to perform Operations Leader duties as well, in order to streamline procedure based on sequential performance. This change is in accordance with the current Emergency Plan, Rev 36, and with the SONGS ERO On-Shift Staffing Analysis, Revision 2, which allow concurrent or sequential functions to be performed by on-shift minimum staff in the functional area of Notification and Communications. The emergency planning function for planning standard 10 CFR 50.47(b)(6), systems are established for prompt communication to emergency response personnel, is maintained after incorporation of this change. This change does not</p>

Change 12

Attachment 2 step 1.3, changed text from "the Control Room Staff" to "those Operators who may be dispatched to the field" to specify who needs to sign onto a REP and obtain dosimetry.

Change 13

Attachment 2 step 2.0, updated PA/Siren Coordination instructions previously located in Attachment 2 steps 1.3 and 11.0, placing all instructions for this task in one section.

Change 14

Attachment 2 step 2.10, added step to direct implementation of 30-Minute Printed message section after completion of PA/Siren Coordination, when the person is assigned to perform Shift Communicator duties as well, in order to streamline procedure based on sequential performance.

Change 15

Attachment 2 step 3.0, updated Dispatching and Tracking of Operators instructions previously located in Attachment 2 steps 5.0 and 15.0, placing all instructions for this task in one section.

Change 16

Attachment 2 step 3.0 added Emergency Teams to Dispatching and Tracking instructions, added use of EP(123) 4-G to dispatch Operators and Emergency Teams, removed items which are covered by the use of EP(123) 4-G, and removed notes stating control room responsibilities for direction and tracking of personnel, personnel dose limit, and dispatch of RP technicians from the OSC.

Change 17

Attachment 2 step 4.5, changed text from "Control Room Lunch Room" to "Control Room" to change location where Control Room staff report for security events.

Change 18

Attachment 2 step 14.2, added bullet for work activities in progress as item to inform the OSC for accountability and tracking.

Change 19

Throughout Attachment 2, changed text from Auxiliary Operator(s) to Operator(s).

Change 20

Throughout procedure, updated step numbers.

reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.

Change 6 updates 30-Minute Printed Message instructions to provide clarifying direction. This change is in accordance with the Emergency Plan and other implementing procedures, and it does not constitute a reduction in effectiveness of the Emergency Plan.

Change 8 updates 90-Minute Follow-Up Verbal and Printed Message instructions to provide clarifying direction. This change is in accordance with the Emergency Plan and other implementing procedures, and it does not constitute a reduction in effectiveness of the Emergency Plan.

Change 9 updates Turnover instructions to provide clarifying direction. This change supports transfer of information needed by the oncoming Shift Communicator to perform his/her function. This change is administrative in nature and does not constitute a reduction in effectiveness of the Emergency Plan.

Change 10 updates Yellow Phone System Problems instructions to add steps to take if off-site agencies do not respond to the all-call notification. This change supports additional means to notify off-site agencies if they not respond to the primary all-call notification. The emergency planning function for planning standard 10 CFR 50.47(b)(5), procedures for notification of State and local governmental agencies are capable of initiating notification within 15 minutes after declaration of an emergency, is maintained after incorporation of this change. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.

Change 11 adds EP(123) 4-G Dispatch Checklist to items contained in the Operations Leader notebook. This change supports the dispatch and tracking of operators and emergency field teams from the control room prior to the OSC activation. The emergency planning function for planning standard 10 CFR 50.47(b)(10), a range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events, is maintained after incorporation of this change. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.

Change 12 changes text from "the Control Room Staff" to "those Operators who may be dispatched to the field" to specify who needs to sign onto a REP and obtain dosimetry. This change ensures that personnel that may be dispatched to the field is signed into a radiological exposure permit and has equipment to track his/her dose. Control Room personnel staying in the Control Room do not need to perform this step as the Control Room is surveyed by Radiation Protection in a periodic basis. The emergency planning function for planning standard 10 CFR 50.47(b)(10), a range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events, is maintained after incorporation of these changes. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.

Change 14 adds step to direct implementation of 30-Minute Printed message section after completion of PA/Siren Coordination, when the person is assigned to perform Shift Communicator duties as well, in order to streamline procedure based on sequential performance. This change is in accordance with the current Emergency Plan, Rev 36, and with the SONGS ERO On-Shift Staffing Analysis, Revision 2, which allow concurrent or sequential functions to be performed by on-shift minimum staff in the functional area of Notification and Communications. The emergency planning function for planning standard 10 CFR 50.47(b)(6), systems are established for prompt communication to emergency response personnel, is maintained after

	<p>incorporation of this change. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.</p> <p>Change 16 adds the Emergency Teams to Dispatch and Tracking instructions and the use of EP(123) 4-G to dispatch Operators and Emergency Teams. It also removes items which are covered by the use of EP(123) 4-G, and notes stating control room responsibilities for direction and tracking of personnel, personnel dose limit, and dispatch of RP technicians from the OSC. This change supports the dispatch and tracking of operators and emergency field teams from the control room prior to the OSC activation. The emergency planning function for planning standard 10 CFR 50.47(b)(10), a range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events, is maintained after incorporation of this change. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.</p> <p>Change 17 changes the location where Control Room staff report for security events. With the current Control Room staffing requirements, the Control Room space is sufficient to accommodate all personnel in one place. The emergency planning function for planning standard 10 CFR 50.47(b)(10), a range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events, is maintained after incorporation of this change. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.</p> <p>Change 18 adds work activities in progress as an item to inform the OSC for accountability and tracking. In conjunction with the use of EP(123) 4-G to dispatch and track personnel, this change provides the OSC information used to track and protect personnel in the field. The emergency planning function for planning standard 10 CFR 50.47(b)(10), a range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events, is maintained after incorporation of this change. This change does not reduce the capability to perform this function and does not reduce the effectiveness of the Emergency Plan.</p> <p>Assessment Summary:</p> <p>Changes performed in this revision remove instructions related to the Emergency Response Data System (ERDS) and update instructions for the Shift Communicator and the Operations Leader. After incorporation of the changes, the procedure continues to ensure that Emergency Notifications, Public Address announcements and siren activations, and Dispatch and Tracking of Operators and Emergency Teams are performed. The ability to meet the standards of 10CFR50.47(b) and 10CFR50 Appendix E are not reduced. The capability to perform the emergency planning functions related to the 10CFR50.47(b) standards applicable to this procedure is not reduced. The changes do not reduce the effectiveness of the Emergency Plan.</p>
<p>PREPARED BY: Lucia Sischo</p> <p>DATE: 8/11/2014</p>	<p>REVIEWED BY: Steve Seward</p> <p>DATE: 8/11/2014</p>

Refer to SO123-XV-109.1, Processing Procedures and Instructions for the types of allowed editorial corrections.

San Onofre Nuclear Generating Station  
Report and Analysis Summary  
10 CFR 50.54(q)(iv)(5)

**Document Number: SO123-VIII-OSC, Rev 1**  
**Title: SO123-VIII-OSC, Emergency Response Organization (ERO) Operations Support Center Position Checklists**  
**SONGS Nuclear Notification (NN) #: 202945537 task 2**

Section and Change Description	Analysis Summary
<p>Change 1 Cover page, changed Procedure Owner to new EP Manager.</p> <p>Change 2 Updated Acronyms list: Added Certified Fuel handler to the SM title, Removed SOFD, PASS and STA acronyms.</p> <p>Change 3 Attachment 1, Step 2.5.4: removed Incident Commander from the OSC Emergency Services Coordinator title for when the OSC may be activated.</p> <p>Change 4 Attachment 2, Step 1.1: included new form, EP(123) OSC-9, Contaminated Injury Radiological Information, to the OSC Radiation Protection Coordinators position Notebook.</p> <p>Change 5 Attachment 2, Steps 1.3.3.1, 1.5, 1.6: removed specific reference to telephone as the only communication device.</p> <p>Change 6 Attachment 2, Step 1.4.5 and 1.4.7: reworded step to be active voice.</p> <p>Change 7 Attachment 2, Step 1.8: eliminated forwarding survey data to OSC Radio Operator.</p> <p>Change 8 Attachment 2, Steps 2.5, clarified Coordinator duties.</p> <p>Change 9 Attachment 2, Step 2.5.14, correct the position title responsible for filing completed Team Dispatch Forms.</p> <p>Change 10 Attachment 2, Step 2.5.3.3, removed specific reference to acquiring PASS samples.</p> <p>Change 11 Attachment 2, Step 2.7, removed references to Chemistry Teams.</p> <p>Change 12 Attachment 2, Step 2.11, Removed duplicate step.</p> <p>Change 13 Attachment 2, Step 3.3, add clarification of team dispatch and remove redundant step 3.3.1.</p> <p>Change 14</p>	<p>Changes 1, 2, 3, 4, 5, 6, 8, 9, 10, 12, 13, 15, 16, 17, 19, 22, 23, 26, and 30 are considered editorial changes as defined in SO123-XV-109.1, Attachment 2, and therefore will not be further assessed.</p> <p>Based on the above, the remaining assessment will only deal with changes 7, 11, 14, 18, 20, 21, 24, 25, 27, 28, 29, 31, 32 and 33. The following questions were answered yes:</p> <p>2. Alter assembly, accountability, shelter or Evacuation of workers/public? (Ref: NUREG-0396 &amp; EPA-400) Yes</p> <p>7. Alter Emerg. Response Facility (ERF), Assembly Area, or equipment? (Ref: EPLAN SECT-7 &amp; NUREG-0737) Yes</p> <p>8. Alter test or inspection requirements for ERFs or equipment? (Ref: EPLAN SECT-8 &amp; 10CFR50 App E) Yes</p> <p>15. Affect the ability to meet 10CFR50.47(b) Planning Standards and Appendix E, Section IV Requirements? Yes</p> <p>10CFR50.47(b)(8) Adequate emergency facilities and equipment to support the emergency response are provided and maintained. 10CRF50 Appendix G. Maintaining Emergency Preparedness</p> <p>Provisions to be employed to ensure that the emergency plan, its implementing procedures, and emergency equipment and supplies are maintained up to date shall be described.</p> <p>Change 7 removes the step for forwarding survey data to OSC Radio Operator. Revision 36 to the SONGS Emergency Plan eliminated the position of the OSC Radio Operator and the OSC RP Coordinator will retain the RP survey data. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Change 11 removes the reference to Chemistry Teams in Attachment 2, Step 2.7. The Chemistry Technician minimum Staff positions have been eliminated in the previous revision 36 to the SONGS Emergency Plan, therefore these steps are no longer required. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Change 14 removes the redundant steps for Radiological Airborne Releases which are already contained in the referenced procedure guidance, whereas, Dose Assessment is performed in accordance with</p>

<p>Attachment 2, Section 4.4, remove redundant procedural guidance to be consistent with the revised referenced procedure, delete steps regarding SRD correction factors.</p> <p>Change 15 Attachment 2, Step 3.6.6, correct SM/SED position for concurrence.</p> <p>Change 16 Attachment 2, Step 4.1.4, 4.1.5, 6.4: revised references to Mesa Medical, SCBA refilling locations, position titles, and use of shuttle.</p> <p>Change 17 Attachment 2, Moved "Toxic Gas Event", sections 4.2 through 4.10 to "Activation", section 3.4 through 3.11.</p> <p>Change 18 Attachment 2, Step 4.6 and 4.7, removed steps for events that will no longer occur in the permanently defueled mode of operation.</p> <p>Change 19 Attachment 2, Steps 5.1.1, 5.1.3, 5.1.4; &amp; Attachment 9 Steps 2.1, 2.2: moved list of hazards to applicable step and revise referenced step numbers.</p> <p>Change 20 Attachment 2, Step 6.1.1, revised Mesa Assembly Area from G-50 to W-48.</p> <p>Change 21 Attachment 2, Step 6.1.1, and Attachment 5, Step 7.2 and 21.2, revised Site Assembly Area from K-50 to T-20.</p> <p>Change 22 Attachment 2, Step 11.6.2; Attachment 9, Steps 2.5.1, 3.8, 5.1; 6.3.2, 6.3.2.2, 6.3.5, 6.4.1, and 8.1: revised to include Fire Brigade members as responders.</p> <p>Change 23 Attachment 2, Step 11.6.3.1, and Attachment 9 Step 6.2.2: clarified activities regarding SCE Medical facility staffing availability.</p> <p>Change 24 Attachment 2, Step 11.6.3.4: revised references for recording contamination.</p> <p>Change 25 Attachment 4, Steps 2.3.1 and 8.5.1, included steps to perform sampling and analysis when qualified and no Chemistry Technicians are available.</p> <p>Change 26 Attachment 5, Step 1.8 and Attachment 9 Step 1.4: removed steps regarding PAX phones in EKITs.</p> <p>Change 27 Attachment 6, Step 2.5, removed step to remove south bollards in Parking Lot #2.</p> <p>Change 28 Attachment 8, add Step 1.9, to direct the Emergency Planning</p>	<p>SO123-VIII-40.100. This change aligns the procedure to the current requirements of performing dose assessment as the referenced procedure, SO123-VIII-40.100 and the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Change 18 removed the step for pre-planned alternate method for monitoring containment radiation levels if the event is for Loss of Coolant Accident or Excessive Steam Demand Events. These events are no longer possible per the certification of permanent cessation of power operations, and permanently defueled mode of operation. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.</p> <p>Change 20 relocates the Site Assembly Area from Building G-50 to Building W-48. Building G-50 is currently unoccupied and will be demolished. Building W-48 is in close proximity to G-50, was a local assembly area, contains the majority of the remaining workers located on the Mesa site, and has sufficient resources to serve as a Site Assembly Area. Incorporation of change 20 alters site assembly areas location only and the inspection requirements are not changed. This location will continue to support the requirement to maintain adequate emergency facilities and equipment to support the emergency response, including protection of non-essential workers and does not reduce the effectiveness of the Emergency Plan. This change alters the location but not the process for evacuation of workers and equipment and facilities needed for emergency response, it does not reduce the effectiveness of the Emergency Plan.</p> <p>Change 21 relocates the Site Assembly Area from Building K-50 to Building T-20. Building K-50 is currently unoccupied and will be demolished. Building T-20 is in relatively close proximity to K-50, was a local assembly area, contains the majority of the remaining workers located on the south end of the site, and has sufficient resources to serve as a Site Assembly Area. Incorporation of change 21 alters site assembly areas location only and the inspection requirements are not changed. This location will continue to support the requirement to maintain adequate emergency facilities and equipment to support the emergency response, including protection of non-essential workers and does not reduce the effectiveness of the Emergency Plan. This change alters the location but not the process for evacuation of workers and equipment and facilities needed for emergency response, it does not reduce the effectiveness of the Emergency Plan.</p> <p>Change 24 revises the references for recording contamination in accordance with the RP procedure SO123-VII-20.9.4, on attachment 6 or on Form EP(123) OSC-9. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.</p> <p>Change 25 includes steps for others to perform sampling and analysis when qualified when no Chemistry Technicians are available. The Chemistry Technician minimum staff positions have been eliminated in the previous revision 36 to the SONGS Emergency Plan, therefore these steps are no longer required to be performed by Chemistry Technicians and must be performed by the Chemistry Coordinators. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Change 27 removes instructions to remove the security bollards at the south end of Parking Lot #2. Plant security changes eliminate the bollards at that location, and dispatching a maintenance team to remove the bollards during an emergency is no longer needed. This change alters the evacuation of workers and the equipment used for emergency response, but it is not a reduction in effectiveness because the bollards will no longer prohibit evacuation to the south.</p>
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<p>Coordinator (EPC) to acquire dispatch checklists from the Control Room.</p> <p>Change 29 Attachment 9, Step 1.2, deleted step for Fire Department placement of fire apparatus and ambulance.</p> <p>Change 30 Step 1.3.8, updated department title.</p> <p>Change 31 Attachment 9, Sections 2.0, 7.0, and 8.0: deleted sections for Dispatcher relocation and evacuation.</p> <p>Change 32 Attachment 9, move original sections 8.2, Local Area evacuations and section 8.3, Re-Entry Into Evacuation Areas to the correct section 2.3 and 2.4 respectively.</p> <p>Change 33 Attachment 9, Step 2.3, updated personnel dispatched in an evacuation and clarified Coordinator duties.</p>	<p>Change 28 adds a Step to direct the Emergency Planning Coordinator (EPC) to acquire dispatch checklists from the Control Room, this change is associated with the revision to SO123-VIII-CR Revision 3 which formalized the dispatch and tracking of operator and field teams dispatched from the control room prior to the activation of the OSC. This change is not a reduction in effectiveness of the emergency plan and supports the emergency activity for dispatch of onsite/offsite radiological monitoring teams, emergency services (fire, rescue, first aid) and damage assessment, control, and repair.</p> <p>Change 29 delete the step 1.2 in Attachment 9, for the Fire Department placement of fire apparatus and ambulance. The Fire Department, and fire apparatus and Ambulance have been eliminated and evaluated per Revision 36 to the SONGS Emergency Plan, therefore these steps are no longer required. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Change 31 removes the sections for Fire Department Dispatcher relocation and Evacuation. The Fire Department Dispatcher position has been eliminated in Revision 36 to the SONGS Emergency Plan, therefore these steps are no longer required. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Change 32 moved the original sections 8.2, in Attachment 9, Local Area evacuations and section 8.3, Re-Entry into Evacuation Areas to the correct section 2.3 and 2.5.1 respectively. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.</p> <p>Change 33 updates the personnel dispatched in an evacuation to include Firefighters/Fire Brigade members, and First Aid responders. In addition this change provided additional detail to coordinate with the incident commander, the use of alternate OSC location and Fire Department/Brigade consideration for re-entry. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.</p> <p>Assessment Summary:</p> <p>Changes performed in this revision clarify and update instructions for the Operations Support Center Positions. After incorporation of the procedure changes, the Emergency Plan will continue to ensure that: adequate emergency facilities and equipment to support the emergency response are provided and maintained; the Operations Support Center responders have adequate instructions to perform their functions; and the protective actions for plant workers and non-emergency response personnel during an emergency are maintained. The standards of 10CFR50.47(b) and 10CFR50 Appendix E are not reduced.</p>
<p>PREPARED BY: Steve Seward</p> <p>DATE: 8/11/2014</p>	<p>REVIEWED BY: Lucia Sischo</p> <p>DATE: 8/11/2014</p>

Refer to SO123-XV-109.1, Processing Procedures and Instructions for the types of allowed editorial corrections.

San Onofre Nuclear Generating Station  
Report and Analysis Summary  
10 CFR 50.54(q)(iv)(5)

**Document Number: SO123-VIII-0.302, Rev 8****Title: SO123-VIII-OSC, Emergency Response Organization (ERO) Operations Support Center Position Checklists  
SONGS Nuclear Notification (NN) #: 202693242-0003**

Section and Change Description	Analysis Summary
<p>Change 1 Updated references step 2.2.2, and note in attachment 1, 2 and 4, to current procedure: SO123-VIII-TSC, Emergency Response Organization (ERO) Technical Support Center Position Checklist.</p>	<p>Changes 1, 2, 3, 4, 7, 9 and 11 are considered editorial changes as defined in SO123-XV-109.1, Attachment 2, and therefore will not be further assessed.</p> <p>Based on the above, the remaining assessment will only deal with changes 5, 6, 8, 10 and 12.</p>
<p>Change 2 Updated references step 2.2.3, and note in attachment 1, 2 and 4, to current procedure: SO123-VIII-CR, Emergency Response Organization (ERO) Control Room Position Checklist.</p>	<p>Change 5 removed notifications of scheduled OESS tests step 6.1.2 to Offsite Emergency Planning (OEP) 10 days in advance of the scheduled test of the impending test. The OEP group has been eliminated at SONGS and has been incorporated into the Emergency Preparedness Planning group functions which will be conducting these surveillances. The appropriate notifications to the Shift Manager, Operations, Maintenance Work Control, Radiation Protection and affected personnel will be maintained and this does not result in a reduction of effectiveness to implement the SONGS Emergency Plan.</p>
<p>Change 3 Updated description of Prerequisites' in step 3.1, verbiage to the new site standard, "Verify this document is current by using one of the methods described in SO123-XV-HU-3".</p>	<p>Change 6 removed notifications of scheduled OESS tests step 6.1.3.1 to the Containment Work Manager and Containment HP Control Point to inform all containment work groups. The Containment Work Manager and the Containment HP Control Point positions have been eliminated at SONGS. The appropriate notifications to the Shift Manager, Operations, Maintenance Work Control, Radiation Protection and affected personnel will be maintained and this does not result in a reduction of effectiveness to implement the SONGS Emergency Plan.</p>
<p>Change 4 Throughout the procedure, updated division titles and responsibilities due to organizational changes.</p>	<p>Change 8 added sub-step 1.3.3 to open breaker MCC1 BKR11 (located in the AWS). This step was added to prevent inadvertent actuation of the thunderbolt sirens when performing the Units 2/3 Buildings and Grounds OESS Test. This change does not affect the requirements or acceptance criteria for the testing of the OESS surveillance and does not result in a reduction in effectiveness of the SONGS Emergency Plan or to ensure adequate emergency facilities and equipment to support the emergency response are provided and maintained.</p>
<p>Change 5 Removed notifications of scheduled OESS tests step 6.1.2 to Offsite Emergency Planning (OEP) 10 days in advance of the scheduled test of the impending test.</p>	<p>Change 10 added additional clarification to steps 1.4.1 and 1.4.3 in Attachment 2, to include both the "Page All" AND on the Perimeter Public Address System (PPAS) to clarify that both systems are required to be performed with reference to PA system announcements. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.</p>
<p>Change 6 Removed notifications of scheduled OESS tests step 6.1.3.1 to the Containment Work Manager and Containment HP Control Point to inform all containment work groups.</p>	<p>Change 12 added the sub-step 1.6.3 to close breaker MCC1 BKR11 (located in the AWS). This step was added to restore the system configuration added in Change 9 above. This change does not affect the requirements or acceptance criteria for the testing of the OESS surveillance and does not result in a reduction in effectiveness of the SONGS Emergency Plan or to ensure adequate emergency equipment to support the emergency response are provided and maintained.</p>
<p>Change 7 Attachment 2, Moved "Motor Control Center 2/3 BQ" in step 1.3 to the applicable sub-steps 1.3.1 and 1.3.2, "MCC 2/3 BQ"</p>	
<p>Change 8 Attachment 2, Added sub-step 1.3.3 to open breaker MCC1 BKR11 (located in the AWS).</p>	
<p>Change 9 Throughout the procedure replaced "Supervisor of Test personnel" to "Test Coordinator".</p>	
<p>Change 10 Attachment 2, Added "Page All" AND on the Perimeter Public Address System (PPAS) to clarify that both are required with reference to PA system announcements on Attachment 2, steps 1.4.1 and 1.4.3.</p>	
<p>Change 11 Attachment 2, Moved "Motor Control Center 2/3 BQ" in step 1.6 to the applicable sub-steps 1.6.1 and 1.6.2, "MCC 2/3 BQ"</p>	

<p>Change 12 Attachment 2, Added sub-step 1.6.3 to close breaker MCC1 BKR11 (located in the AWS).</p>	<p>Assessment Summary: Changes performed in this revision clarify and update instructions for the testing of the Onsite Emergency Siren System. After incorporation of the procedure changes, the Emergency Plan will continue to ensure that: adequate emergency facilities and equipment to support the emergency response are provided and maintained; The appropriate notifications of siren testing to the Shift Manager, Operations, Maintenance Work Control, Radiation Protection and affected personnel will be maintained; and the capability to provide notification of a Site Evacuation and protective actions for plant workers and non-emergency response personnel during an emergency are maintained. The standards of 10CFR50.47(b) and 10CFR50 Appendix E are not reduced.</p>
<p>PREPARED BY: Steve Seward  DATE: 8/14/2014</p>	<p>REVIEWED BY: Lucia Sischo  DATE: 8/15/2014</p>

Refer to SO123-XV-109.1, Processing Procedures and Instructions for the types of allowed editorial corrections.