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SOUTHERN NUCLEAR
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April 8, 2016

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Docket Nos.: 50-321 50-348 50-424 52-025
50-366 50-364 50-425 52-026

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

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4
Response to Second Request for Additional Information Regarding
Standard Emergency Plan

Ladies and Gentlemen:

By letter dated August 31, 2015 (NL-15-1392), Southern Nuclear Operating Company (SNC) requested license amendments (LARs) for approval of a fleet standard emergency plan for Edwin I. Hatch Nuclear Plant Units 1 and 2, Joseph M. Farley Nuclear Plant Units 1 and 2, and Vogtle Electric Generating Plant Units 1, 2, 3 and 4 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML15246A045). By letter dated February 4, 2016, the U.S. Nuclear Regulatory Commission (NRC) issued its second Requests for Additional Information (RAIs) (ADAMS Accession Number ML 16029A035).

Specifically, the NRC staff completed its initial technical review of the proposed SNC fleet standard emergency plan related to proposed changes to Emergency Response Organization (ERO) on-shift and augmentation staffing and concluded that additional information was needed to support the NRC staff's continued review of the proposed site-specific Annexes. Therefore, site-specific RAIs were issued for each plant.

The NRC RAIs and the SNC responses are provided in Attachment 1. Additional information, including revisions to SNC documents enclosed in the August 31, 2015 submittal (ML15246A045) and updated on February 17, 2016 (ML 16060A283) in response to the NRC's first set of RAIs (ML 15334A009), that supports the SNC response to the RAI is attached in the enclosures. Also included are a few editorial changes to correct typographical errors and keep the documents current with minor organizational and position title changes.

AX45
NRR
NRO

SNC is notifying the states of Georgia and Alabama of this response to the NRC RAI by transmitting a copy of this letter and enclosures to the designated state official.

This letter contains no new regulatory commitments. If you have any questions, please contact Ken McElroy at (205) 992-7369.

Mr. C. R. Pierce states he is the Regulatory Affairs Director for Southern Nuclear Operating Company, is authorized to execute this oath on behalf of Southern Nuclear Operating Company and, to the best of his knowledge and belief, the facts set forth in this letter are true.

Respectfully submitted,

C. R. Pierce

C. R. Pierce
Regulatory Affairs Director

CRP/EFB/lac

Sworn to and subscribed before me this 8th *day of* April, *2016.*

Laura L. Crump
Notary Public

My commission expires: 10-8-2017

Attachment 1 - NRC RAIs and SNC Responses

Enclosures (Changes from the original August 31, 2015 SEP submittal enclosures as updated on February 17, 2016 in response to the first set of RAIs):

1. Evaluation of the Proposed Changes - LAR for the Adoption of a Standard Emergency Plan for the SNC Fleet (No changes)
2. SNC Standard Emergency Plan. (Marked-up pages and clean copy)
3. Corporate Joint Information Center Staffing - Detailed Description and Technical Evaluation. (Deleted)
4. Farley Staffing - Detailed Description and Technical Evaluation. (Marked-up pages and clean copy)
5. Farley Standard Emergency Plan Annex. (No changes)
6. Farley Justification Matrix (Marked-up pages and clean copy)
7. Hatch Staffing - Detailed Description and Technical Evaluation. (Marked-up pages and clean copy)
8. Hatch Standard Emergency Plan Annex (No changes)
9. Hatch Justification Matrix. (Marked-up pages and clean copy)

10. Vogtle (Units 1 and 2) Staffing - Detailed Description and Technical Evaluation. (Marked-up pages and clean copy)
11. Vogtle (Units 1 and 2) Standard Emergency Plan Annex. (No changes)
12. Vogtle (Units 1 and 2) Justification Matrix. (Marked-up pages and clean copy)
13. Vogtle (Units 3 and 4) Staffing - Detailed Description and Technical Evaluation. (Marked-up pages and clean copy)
14. Vogtle (Units 3 and 4) Standard Emergency Plan Annex. (Marked-up pages and clean copy)
15. Vogtle (Units 3 and 4) Justification Matrix. (Marked-up pages and clean copy)
16. Evaluation of Proposed Changes – LAR for the Revision to Vogtle 3 and 4 Emergency Planning ITAAC. (No changes)
17. Vogtle (Units 3 and 4) Revision to Unit 3 COL Appendix C – Proposed Changes – Markups. (No changes)
18. Vogtle (Units 3 and 4) Revision to Unit 4 COL Appendix C – Proposed Changes – Markups. (No changes)
19. Off-site Response Organizations – Letters of Consultation and Concurrence (No changes)

cc: Nuclear Regulatory Commission
Mr. W. M. Dean, Director of the Office of Nuclear Reactor Regulations
Ms. C. Haney, Regional Administrator
Mr. M. Delligatti, Deputy Division Director, DNRL
Mr. L. Burkhart, Branch Chief, LB4, DNRL
Mr. M. E. Ernstes, Branch Chief, DRP, RII
Mr. R. E. Martin, NRR Senior Project Manager – Vogtle 1 & 2
Mr. S. A. Williams, NRR Project Manager – Farley
Mr. M. D. Orenak, NRR Project Manager – Hatch
Mr. C. Patel, NRO Project Manager - Vogtle 3 & 4
Mr. P. Kallan, Senior Project Manager – Vogtle 3 & 4
Mr. B. M. Bavol, Project Manager – Vogtle 3 & 4
Ms. R. Reyes, Project Manager – Vogtle 3 & 4
Ms. M. A. Sutton, Project Manager – Vogtle 3 & 4
Mr. G. Khouri, Senior Project Inspector – Vogtle 3 & 4
Mr. D. H. Hardage, Senior Resident Inspector – Hatch
Mr. A. M. Alen, Resident Inspector- Vogtle 1 & 2
Mr. P. K. Niebaum, Senior Resident Inspector- Farley
Mr. J. D. Fuller, Senior Resident Inspector, Vogtle 3 & 4
Ms. S. Temple, Resident Inspector – Vogtle 3 & 4

Alabama Department of Public Health
Dr. T. M. Miller, State Health Officer

State of Georgia
Mr. J. H. Turner, Director- Environmental Protection Division

Blind Copy List (without enclosures unless noted):

Southern Nuclear Operating Company
- Mr. S. E. Kuczynski, Chairman, President & CEO
- Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
- Mr. M. D. Rauckhorst, Construction V.P. – Vogtle 3-4
- Mr. D. H. Jones, Vice President Technical Compliance – Vogtle 3-4
- Ms. K. D. Fili – Vice President - Operational Readiness
- Ms. C. A. Gayheart, Vice President - Farley
- Mr. D. R. Vineyard, Vice President – Hatch
- Mr. B. K. Taber, Vice President – Vogtle 1-2
- Mr. D. R. Madison, Vice President – Fleet Operations
- Mr. M. D. Meier, Vice President – Regulatory Affairs
- Mr. B. J. Adams, Vice President – Engineering
- Mr. C. R. Pierce, Regulatory Affairs Director - Fleet
- Mr. B. H. Whitley, Regulatory Affairs Director – Nuclear Development
- Mr. M. J. Yox, Regulatory Affairs Director – Vogtle 3-4
- Ms. B. L. Taylor, Regulatory Affairs Manager – Farley
- Mr. G. L. Johnson, Regulatory Affairs Manager – Hatch
- Mr. G. W. Gunn, Regulatory Affairs Manager – Vogtle 1-2
- Mr. W. A. Sparkman, Licensing Manager – Nuclear Development
- Mr. T. W. Yelverton – Commercial Director - Vogtle 3-4
- Mr. D. L. Fulton – Nuclear Development Environmental Manager
- Mr. J. C. Harrelson – Project Manager
- Mr. T. R. Takats – Engineering Supervisor
- Mr. J. P. Redd – Licensing Supervisor
- Mr. J. G. Hall – Emergency Preparedness Supervisor
- RTYPEs: CFA04.054; CHA02.004; CVC7000; VND.LI.L00 (w/enclosures)
- File AR.01.02.06 (w/enclosures)

Oglethorpe Power Corporation
- Mr. M. W. Price
- Mr. Ms. K. T. Haynes
- Ms. A Whaley

Municipal Electric Authority of Georgia
- Mr. J. E. Fuller
- Mr. S. M. Jackson

Dalton Utilities
- Mr. T. Bundros

WECTEC
- Ms. K. Stoner
- Mr. C. A. Castell

Westinghouse Electric Company, LLC
- Mr. R. Easterling
- Mr. J. W. Crenshaw
- Mr. C. D. Churchman
- Mr. L. Woodcock
- Mr. P. A. Russ
- Mr. G. F. Couture
- Mr. M. Y. Shaqqo

Other
- Mr. J. E. Hesler, Bechtel Power Corporation
- Ms. L. A. Matis, Tetra Tech NUS, Inc.
- Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.
- Mr. S. Roetger, Georgia Public Service Commission
- Ms. S. W. Kernizan, Georgia Public Service Commission
- Mr. K. C. Greene, Troutman Sanders
- Mr. S. Blanton, Balch Bingham
- Mr. R Grumbir, APOG
- Ms. A. RiceMr. J. R. Bouknight, South Carolina Electric & Gas Company
- Mr. D. Kersey, South Carolina Electric & Gas Company
- Mr. B. Kitchen, Duke Energy
- Mr. S. Franzone, Florida Power & Light

ATTACHMENT 1

Second Set of Requests for Additional Information
On License Amendment Request
For Fleet Standard Emergency Plan

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4

SNC Response

NRC RAIs – General

The following NRC RAIs include a number of requests for information related to SNC's plans for revising procedures, providing training, and practicing drills prior to implementation of the proposed changes. For brevity, SNC offers the following general information on the SNC Change Management Plan, which will not be repeated in the responses to the site-specific RAIs.

SNC Response – General

In the August 31, 2015 License Amendment Request (LAR), SNC requested a coordinated effort with the NRC to schedule implementation of the changes. SNC is implementing a comprehensive Change Management Plan for the conversion to the Standard Emergency Plan (SEP). The Change Management Plan aligns with key plant milestones, outage schedules, and the Vogtle 3 & 4 construction and start-up schedule.

Key elements of the Change Management Plan include:

1) development of functional based implementing procedures (EPIPs);
2) ERO training;
3) functional area drills and facility tabletops; and
4) an integrated drill for each site.

SNC will be developing drafts of the EPIPs and planning the training and drill activities in parallel with the NRC's review of the SEP. The functional area drills and facility tabletops will be designed and performed to demonstrate SNC's ability to safely and effectively implement the SEP.

The final SEP integrated drill exercises will be coordinated with the Offsite Response Organizations and communicated to the NRC residents. If the NRC requests to participate in an SEP integrated drill, SNC will coordinate and communicate the drill information accordingly.

RAI-FNP-1

Enclosure 2 (page E2-7), "Definitions," does not include the term "hostile force." This term is defined in the current FNP Emergency Plan (Version 64). Please justify the omission of the definition, or revise accordingly.

SNC Response

The Definitions Section of the Standard Plan has been updated to include:

"HOSTILE FORCE: One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction."

RAI-FNP-2

Enclosure 4 (page E4-4), "Notification and Communication," states, in part:

In the proposed SNC Fleet Emergency Plan, the FNP staffing for this position is reduced to a single on-shift communicator as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. However, the number of control personnel to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Farley Nuclear Plant On-Shift Staffing in Enclosure 5, "Farley Standard Emergency Plan Annex," provides a Note 2 stating that this function "may be provided by shift personnel assigned other functions."

Please explain whether this function will be performed by a dedicated Communicator since the justification for the proposed change of reducing the current number of personnel from 2 to 1 is that the function "may be assigned to a member of the control room staff with no collateral tasks."

SNC Response

The function will not be performed by a dedicated communicator. Farley on-shift staffing for licensed operators (SROs and ROs) provided in Table 2.2.A is such that one additional licensed operator is provided above that necessary to fulfill the requirements of the Plant Operations and Assessment of Operational Aspects function. This results in a pool of licensed operators sufficient to ensure a licensed operator is available for the Notification/Communication function. Enclosure 4 has been revised to clarify this position.

The SNC Standard Emergency Plan licensing amendment submittal Enclosure 4 (ML15246A050) contained information regarding the performance of the notification function on-shift. This information was intended to relay that the function will continue to be performed by on-shift personnel as noted in Revision 64 of the Farley Plan. The proposed Farley Annex provides further clarification that the notification function will be performed by Reactor Operators or Senior Reactor Operators without any conflicting duties as demonstrated during the On-Shift Staffing Analysis. A revision of Enclosure 4 is provided to properly convey the staffing intent for the function.

Per NUREG-0654/FEMA-REP-1, Revision 1 the Notification/Communication function in Table B-1 included the major tasks to notify licensee, state, local and federal personnel and maintain communications. Table B-1 also noted that this function could be performed by the engineering aid to the shift supervisor.

The current Farley Emergency Plan, Revision 64, maintains the established commitment for performance of notifications as a collateral duty by on-shift personnel. In Table 3 of Revision 64, the Notification/Communication function on-shift is identified by "2****". The asterisks refer to a note at the bottom of the table which states that the function may be performed by any available, qualified shift individual (e.g., SM, SS, SSS, STA, RO or other qualified individual).

The proposed Farley Annex, Table 2.2.A, replaces '2****' as noted in the current Plan Table 3, with 'Note 2' for performance of the on-shift Notification/Communication function. 'Note 2' refers the reader to the bottom of

the page where the clarification, "May be provided by shift personnel assigned other functions" is located. Table 2.2.A also includes the position designator of "Licensed Operator (RO or SRO)" for the notification function. This is consistent with the approach used in the current revision of the Farley Plan. The purpose in using the 'Note 2' nomenclature is to provide clarity in the number of individuals actually on-shift. Industry operating experience has shown that the inclusion of numeric values representing personnel performing more than one function can be misleading and contributes to errors in the determination of the total number of personnel on-shift. Use of 'Note 2' supports improved clarity by counting on-shift operations personnel only under the Emergency Direction and Control and Plant Operations and Assessment of Operational Aspects functional areas in Table 2.2.A. of the Farley Annex.

In accordance with the proposed revision, Plant Farley will maintain four Reactor Operators (RO) and three Senior Reactor Operators (SRO) on-shift that are qualified to perform the notification function. As demonstrated during the On-Shift Staffing Analysis, completed in accordance with 10 CFR 50 Appendix E A.V.9, one RO or SRO is always available to perform the notification function as required.

RAI-FNP-3

Enclosure 4 (page E4-7) states, in part:

Revision 64.0.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform on-site out of plant surveys - an individual qualified to perform the survey and an assistant to drive a vehicle. ...As part of the proposed SNC Fleet Emergency Plan, the FNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as the performance of multiple tasks simultaneously (i.e., driving vehicle, communications, plume monitoring) been considered?

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

Safety factors, including performance of multiple tasks, were considered for the on-site out-of-plant responder. The SNC plan calls for the on-site, out-of-plant survey to be performed at pre-determined, specific locations on-site. In the early response phases, prior to being augmented with the driver, the technician will be responding with hands-free communications to those specific locations for dose rate surveys for initial plume assessment. The use of hands-free communication with the on-shift dose assessment responder will not adversely impact the safe performance of driving activities, and may be completed in accordance with existing site procedures/policies. Additionally, the use of portable survey

equipment in audible response mode will allow the responder to focus on driving activities when required, while providing audible indication of changes in area dose rates. Should such indication occur, the responder, per procedure, would stop the vehicle and verify dose rates or other readings as applicable. At no time would the responder be expected to maintain focus on both driving activities and monitor readings simultaneously. The responder is also provided with a digital alarming dosimeter with preset dose and rate alarms to alert the responder to unexpected changes in radiological conditions while in transit.

The functional area drills will be designed and performed to demonstrate SNC's ability to safely and effectively implement the SEP, including as appropriate, adverse conditions and off-hours performance. The ability of the on-site, out-of-plant responder to perform needed surveys in a safe manner will be demonstrated as part of the drill portion of the change management plan.

RAI-FNP-4

Enclosure 4 (page E4-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan FNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

Communications between the Dose Assessor and the On-site Out-of-Plant Technician and performance of assigned tasks will be reflected in the implementing procedures. The ability to demonstrate communications between the Dose Assessor and the On-site Out-of-Plant Technician while effectively performing their assigned tasks will be demonstrated as part of the drill portion of the Change Management Plan.

RAI-FNP-5

Enclosure 4 (page E4-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

NUREG-0654/FEMA REP-01 Revision 1 and the current draft to Revision 2 (ML14245A519) direct staffing for two site staffed field teams. Industry practice in general, has followed the NUREG-0654 staffing in this functional area. The original commitment for three field monitoring teams included resources for on-site out-of-plant monitoring as well as offsite survey capability such that augmented responders were available for two offsite teams, each placed on opposite sides of the Chattahoochee River if warranted by the plume path.

In the proposed SEP, a single individual on-shift would be utilized as the resource for on-site out-of-plant monitoring, and two augmented responders would be utilized as a single off-site monitoring team. A third augmented individual would become the driver for the second off-site team which would be led by the on-shift resource who transitions from on-site out-of-plant monitoring to the off-survey function. Any subsequent on-site monitoring would be completed by augmented OSC resources as a part of the event response process.

In addition to off-site monitoring provided by Farley, Radiation Field Monitoring teams (RFMTs) are dispatched from the Houston County Health Department in Dothan, Alabama by the State Radiological Monitoring Assessment Center (SRMAC), as well as Radiological Emergency Response Teams (RERT), dispatched by the Georgia Forward Emergency Operating Center (FEOC) in accordance with the Georgia Radiological Emergency Plan. Georgia procedures direct the State Field Team Coordinator (FTC) to dispatch the number of Field Teams needed to respond to the event out of the pool of trained personnel. Normal practice is to dispatch two ORO Field Teams. The FTC coordinates with the utility counterpart to ensure that each organization has full and unlimited access to field monitoring data.

The functional area drills will be designed and performed to demonstrate SNC's ability to safely and effectively implement the SEP, including as appropriate, adverse conditions and off-hours performance. The ability of two field teams to assess the magnitude and spread of a simulated plume will be demonstrated as part of the drill portion of the change management plan.

RAI-FNP-6

Enclosure 5, Section 2.2.2 (page E5-11) states:

The FNP Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on the proposed emergency response facility minimum staffing in these figures is not consistent with Section V.B, "Organization Activation," of the current FNP Emergency Plan, nor the existing FNP procedure FNP-0-EIP-0.0, "Emergency Organization." These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes to the

current FNP Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The Standard Plan organization charts were added to provide the organizational structure of the various ERFs. Additionally, the minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. The transition of Command and Control functions between ERFs is depicted in Section B of the Standard Plan (Figure B.2.A). Criteria for facility activation are included in Section H.4 of the Standard Plan and include achieving minimum staffing within the specific facility and completion of a briefing for facility personnel. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

The minimum staffing identified in the Standard Plan Figure B.2.1.A (TSC) is compared to that described in the current Plan Section V.B.1, in the table below.

Current Plan Section V.B.1	**Proposed Plan Figure B.2.1.A**	**Justification**
Emergency Director	TSC Emergency Director	No change. Position supports Emergency Direction and Control function
TSC Manager	TSC Manager	No change. Position supports Emergency Direction and Control function
Operations Supervisor	Operations Supervisor	No change. Position supports Plant Operations and Assessment function
Health Physics Supervisor	RP Supervisor	Change in title only. Position supports Radiological Assessment /Dose Assessment functions
Engineering Supervisor	Reactor Engineer	Specified position responsible for Plant System Engineering/Core Damage Assessment functions
Maintenance Supervisor	None	Position not included as minimum staff in the proposed plan as there are no tasks associated with the transfer of command and control assigned. Maintenance Supervisor position continues to be assigned to the TSC and is a 75 minute responder.
ENN Communicator	None	Position will transfer from CR to EOF and is a minimum staff position for that facility.
None	ENS Communicator	Additional position included to support NRC Notification function
None	ERF Communicator	Additional position included to support inter-facility communication

The current Emergency Plan does not identify a minimum staff for the OSC. The minimum staffing identified in Standard Plan Figure B.2.2.A (OSC) includes the

- OSC Manager,
- RP/Chemistry Group Lead and
- ERF Communicator.

These positions were selected because they support the oversight of Repair and Corrective Action function provided by the Shift Manager. These positions represent an additional response commitment beyond the Maintenance personnel identified in Table 2.2.A of the Farley Annex.

The minimum staffing identified in Standard Plan Figure B.3.1.A (EOF) exceeds the number of positions identified in Appendix G of the current Plan which identifies the positions associated with minimum staff for the EOF. Below is a table comparing the positions between the two documents.

Current Plan Appendix G	**Proposed Plan Figure B.3.1.A**	**Justification**
None	Emergency Director	Additional response commitment supports Emergency Direction and Control function
EOF Manager	EOF Manager	No change in title. Position supports the Emergency Direction and Control function and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.
Dose Assessment Supervisor	Dose Assessment Supervisor	Additional response commitment supports Radiological Assessment function
Dose Analyst	Dose Analyst	Additional response commitment supports Radiological Assessment function
None	ERF Communicator	Additional response commitment supports Communication function
ENN Communicator	ENN Communicator	No change. Position supports state/local Notification function
Field Team Coordinator	None	Prior to Augmentation the on-site out of plant technician will communicate directly with the Dose Analyst as depicted explained in RAI-FNP-3. Field Team Coordinator remains a 75 minute responder supporting the augmented teams on response.

Licensing Support Coordinator	None	The Licensing Support Coordinator title has changed to EOF Emergency Communications Coordinator and retains the duties of the Licensing Support Coordinator. The EOF Emergency Communications Coordinator reports to the EOF Manager who will maintain oversight of communications with off-site agencies until the EOF Emergency Communications Coordinator arrives as a 75 minute responder.

Procedure FNP-0-EIP-0.0, "Emergency Organization" will be updated to reflect the Standard Plan organization as part of the Change Management Plan.

RAI-FNP-7

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Section V.B, "Organization Activation," of the current FNP Emergency Plan, the existing FNP procedure FNP-0-EIP-0.0, Emergency Organization," nor the "proposed column" of the table provided in Enclosure 6 (page E6-201). These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes made to the current FNP Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The table provided below provides a line by line comparison of augmented responders from the current plan Table 3 to the proposed SEP Tables 1, 2 & 3 for the ERO. Justification for each change is provided in the table. The proposed SEP incorporates augmented responders into the Tables, those positions included in other areas of the current Plan but not listed in Table 3 specifically. Inclusion of augmented positions into the proposed SEP Tables better defines augmentation expectations for each position.

The procedures will be revised to reflect the SEP organization as part of the Change Management Plan.

Function	Current Plan Table 3	Proposed Plan Tables 1, 2 & 3	Justification
Plant Operations and Assessment of Operational Aspects	None	None	No Change

Function	Current Plan Table 3	Proposed Plan Tables 1, 2 & 3	Justification
Emergency Direction and Control	None	ED (TSC) (1)	Response commitment from Section II of current Plan
		TSC Manager (1)	Response commitment from Section II of current Plan
		Operations Sup. (TSC) (1)	Response commitment from Section II of current Plan
		OSC Mgr. (OSC) (1)	Response commitment from Section II of current Plan
		ED (EOF) (1)	No net change. Function repositioned from Rad. Assessment function.
		EOF Mgr. (1)	Response commitment from Appendix 7 of current Plan
		Security Coord (1)	Response commitment from Appendix 7 of current Plan
		Offsite Response Coord. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Emergency Communications Coordinator (EOF) (1)	Current Plan Appendix 7 commitment for Licensing Support Coordinator in EOF. The title changes to Emergency Communications Coordinator with no change in responsibilities.
Radiological Accident Assessment and Support of Operational Accident Assessment	Not specifically addressed	RP Sup. (TSC) (1)	Response commitment from Section II of current Plan
		Dose Assessment Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Dose Analyst (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Chemistry Support (TSC) (1)	Current Plan Section II commitment for Chemistry Supervisor in TSC. The title changes to Chemistry Support with no change in responsibilities.
	Chem Tech (1)	Chem. Tech (OSC) (1)	No Change

Function	Current Plan Table 3	Proposed Plan Tables 1, 2 & 3	Justification
	Senior Manager (EOF)	None	No net change. ED EOF Director position relocated in Table to Emergency Direction and Control.
	Offsite Surveys (2)	Field Monitoring Personnel (3)	Augmented Field Monitoring personnel will make up one Field Monitoring Team. See response to FNP-RAI-5 for additional clarification on Field Team response and capabilities.
		Field Team Coordinator (EOF) (1)	Response commitment from Appendix 7 Response commitment from Section II of current Plan
Radiological Accident Assessment and Support of Operational Accident Assessment (continued)	On-Site (out of Plant) Surveys (2)	On-site or In-Plant Surveys (2)	Augmented responders for on-site or in-plant surveys are aligned with values listed in NUREG 0654 Table B-1
	In-Plant Surveys (2)		
Notification/ Comm.	2 (Unspecified)	ENS Comm. (TSC) (1)	Additional response commitments with specific communications responsibilities assigned.
		HPN Comm. (TSC) (1)	
		ERF Comm. (TSC) (1)	
		ERF Comm. (OSC) (1)	
		ENN Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		ENS Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		HPN Comm. (EOF) (1)	Additional response commitments with specific communications responsibilities assigned.
		ERF Comm. (EOF) (1)	

Function	Current Plan Table 3	Proposed Plan Tables 1, 2 & 3	Justification
		Field Team Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
Plant System Engineering Repair and Corrective Action	Core Thermal Eng. (1)	Reactor Eng. (TSC) (1)	No Change
	Elect. Eng. (1)	Eng. Support (2)	The SNC Engineering organization is typically organized into systems, programs, projects and design engineering providing a wide array of engineering skills to draw upon in the event of an emergency. The 2 initial Engineering Support responders will be augmented from this pool of engineering personnel and report to the TSC Engineering Supervisor for initial engineering repair and corrective action support. Additional event specific engineering expertise will be augmented as needed based on the nature of the event.
	Mech. Eng. (1)		
	None	Eng. Sup. (TSC) (1)	Response commitment from Section II of current Plan
	None	Tech. Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
	None	Maint. Sup. (TSC) (1)	Response commitment from Section II of current Plan
	Mech. Maint./ RWO (1)	Mech. Maint. Group Leader (OSC) (1)	No net change. Group Leader provides support to the on-shift maintenance.
	Elect. Maint. (1)	Elect. Maint. Group Leader (OSC) (1)	
	I&C Tech. (1)	I&C Maint. Group Leader (OSC) (1)	
	RWO (1)	None	Based on lessons learned since the Three Mile Island event Rad Waste Operations is not needed in the emergency phase of the response.

Function	Current Plan Table 3	Proposed Plan Tables 1, 2 & 3	Justification
Protective Actions	RP Tech (2)	RP Tech (OSC) (2)	No Change
	None	RP/Chem Group Leader (OSC) (1)	Additional response commitment
Fire-Fighting	Local Support	Local Support	No Change
Rescue/First Aid	Local Support	Local Support	No Change

RAI-FNP-8

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the FNP Emergency Plan.

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

RAI-FNP-9

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

SNC Response

The proposed changes have been reviewed against SECY-04-0236. The information below identifies differences between the proposed SEP and the SECY conditions and provides a justification for each.

Staffing and Training

Current Plan	Proposed Plan	Justification
Augmentation of the EOF within 60 minutes of Notification of an Alert or higher classification	Augmentation of the EOF within 75 minutes of Classification of an Alert or higher classification	No net change. Augmentation from 75 minutes of event classification rather than 60 minutes from event notification incorporates the 15 minute window established for performance of the notification function as required by regulation.

Current Plan	Proposed Plan	Justification
For events which occur at more than one site, EOF Managers and Technical Supervisors will respond for their respective sites	EOF Manager and Technical Supervisor are corporate positions responsible for general oversight of event response as well as obtaining needed external resources for the sites.	An EOF ED has been added to the EOF ERO with overall command and control responsibility for the EOF. The EOF ED will be responsible for Notification and PAR functions. These functions use fleet standard process and as such do not require site specific designation for an ED. Likewise a single EOF Manager will be responsible for managing and directing EOF activities. These duties also use fleet standard process and as such do not require site specific designation. Corporate Engineering and technical staff have been relocated from the SNC corporate office to the individual sites. The proposed Plan utilizes the newly placed site Engineering resources for positions in the TSC at each site to better align the technical resource to the onsite Emergency Response Facility where it is needed. The EOF Technical Supervisor in the proposed Plan is responsible for coordination of external support, equipment and resources needed by the site. These duties also use fleet standard process and as such do not require site specific designation
Common EOF activation in support of all activities that include TSC activation resulting in EOF activation in a drill/exercise at least three times a year.	No specific commitment associated with the frequency of EOF activation in a drill/exercise.	Drill participation at SNC Emergency Response Facilities is tracked in accordance with NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 7. This guidance is the industry standard for ensuring appropriate participation by ERO members in order to ensure performance proficiency. Data associated with this process is inspected by the NRC every two years under IP 71151, "Performance Indicator Verification". In light of industry standard practices and NRC inspection requirements associated with ERO performance, there is no longer a need for a specific commitment associated with facility participation in drills/exercises.
Conduct of a drill once every 5 years involving more than one SNC site.	No commitment associated with conduct of drills involving more than one SNC site.	This commitment will be added to Section N.2.11 of the Common Plan to reflect maintenance of the commitment as part of the RAI response. The revised page is submitted as part of the response.

RAI-HNP-1

Enclosure 7 (page E4-4), "Notification and Communication," states, in part:

However, an additional Reactor Operator will be added to the HNP control room staff to ensure there will be sufficient appropriately trained personnel on-shift for the Communications function to be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Hatch Nuclear Plant On-Shift Staffing in Enclosure 7, "Hatch Standard Emergency Plan Annex," provides a Note 2 stating that this function "may be provided by shift personnel assigned other functions." Please explain whether this function will be performed by a dedicated Communicator.

SNC Response

The function will not be performed by a dedicated communicator. Hatch on-shift staffing for licensed operators (SROs and ROs) provided in Table 2.2.A is such that one additional licensed operator is provided above that necessary to fulfill the requirements of the Plant Operations and Assessment of Operational Aspects function. This results in a pool of licensed operators sufficient to ensure a licensed operator is available for the Notification/Communication function. Enclosure 7 has been revised to clarify this position.

The SNC Standard Emergency Plan licensing amendment submittal Enclosure 7 (ML15246A053) contained information regarding the performance of the notification function on-shift. This information was intended to relay that the function will continue to be performed by on-shift personnel as noted in Revision 36 of the Hatch Plan. The proposed Hatch Annex provides further clarification that the notification function will be performed by Reactor Operators or Senior Reactor Operators without any conflicting duties as demonstrated during the On-Shift Staffing Analysis. A revision of Enclosure 7 is provided to properly convey the staffing intent for the function.

Per NUREG-0654/FEMA-REP-1, Revision 1 the Notification/Communication function in Table B-1 included the major tasks to notify licensee, state, local and federal personnel and maintain communications. Table B-1 also noted that this function could be performed by the engineering aid to the shift supervisor. The current Hatch Emergency Plan, Revision 36, maintains the established commitment for performance of notifications as a collateral duty by on-shift personnel. This is depicted in Table B-1 of the Hatch Emergency Plan under the 'Position title' column where 'Nuclear Plant Operator or other trained personnel (ENN Communicator)' is listed.

The proposed Hatch Annex, Table 2.2.A, replaces the '1' as noted in the current Plan Table B-1, with 'Note 2' for performance of the on-shift Notification/Communication function. 'Note 2' refers the reader to the bottom of the page where the clarification, "May be provided by shift personnel assigned other functions" is located. Table 2.2.A also includes the position designator of "Licensed Operator (RO or SRO)" for the notification function. This is consistent

with the approach used in the current revision of the Hatch Plan. The purpose in using the 'Note 2' nomenclature is to provide clarity in the number of individuals actually on-shift. Industry operating experience has shown that the inclusion of numeric values representing personnel performing more than one function can be misleading and contributes to errors in the determination of the total number of personnel on-shift. Use of 'Note 2' supports improved clarity from a human performance perspective by counting on-shift operations personnel only under the Emergency Direction and Control and Plant Operations and Assessment of Operational Aspects functional areas in Table 2.2.A of the Hatch Annex.

Additionally, per the proposed Plan, a Reactor Operator (RO) is being added to the on-shift operations complement to improve flexibility in performance of required emergency response functions and will maintain four Reactor Operators (RO) and three Senior Reactor Operators (SRO) on-shift that are qualified to perform the notification function. As demonstrated during the On-Shift Staffing Analysis, completed in accordance with 10 CFR 50 Appendix E A.V.9, one RO or SRO is available to perform the notification function as required.

RAI-HNP-2

Enclosure 7 (page E4-7) states, in part:

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides two individuals for the task of off-site survey and an additional individual for the task of on-site (out of plant) survey. Collectively, these individuals include one individual qualified to perform the survey, an assistant to drive the team vehicle, and an individual is to coordinate communications between the survey team and the dose assessor. ...As part of the proposed SNC Fleet Emergency Plan the HNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained personnel.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as performance of multiple tasks simultaneously (i.e., driving vehicle communications, plume monitoring) been considered?

SNC Response

The SNC response is the same as provided in **RAI-FNP-3**.

RAI-HNP-3

Enclosure 7 (page E7-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan HNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

SNC Response

The SNC response is the same as provided in **RAI-FNP-4**.

RAI-HNP-4

Enclosure 7 (page E7-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

NUREG-0654/FEMA REP-01 Revision 1 and the current draft to Revision 2 (ML14245A519) direct staffing for two site staffed field teams. Industry practice in general, has followed the NUREG-0654 staffing in this functional area. The original commitment for three field monitoring teams included resources for on-site out-of-plant monitoring as well as offsite survey capability such that augmented responders were available for two offsite teams, each placed on opposite sides of the Chattahoochee River if warranted by the plume path.

In the proposed SEP, a single individual on-shift would be utilized as the resource for on-site out-of-plant monitoring, and two augmented responders would be utilized as a single off-site monitoring team. A third augmented individual would become the driver for the second off-site team which would be led by the on-shift resource who transitions from on-site out-of-plant monitoring to the off-survey function. Any subsequent on-site monitoring would be completed by augmented OSC resources as a part of the event response process.

In addition to off-site monitoring provided by Hatch, Radiological Emergency Response Teams (RERT) are dispatch by the Georgia Forward Emergency Operating Center (FEOC) in accordance with the Georgia Radiological Emergency Plan. Georgia procedures direct the State Field Team Coordinator (FTC) to dispatch the number of Field Teams needed to respond to the event out of the pool of trained personnel. Normal practice is to dispatch two ORO Field Teams. The FTC coordinates with the utility counterpart to ensure that each organization has full and unlimited access to field monitoring data.

The functional area drills will be designed and performed to demonstrate SNC's ability to safely and effectively implement the SEP, including as appropriate, adverse conditions and off-hours performance. The ability of two field teams to assess the magnitude and spread of a simulated plume will be demonstrated as part of the drill portion of the change management plan.

RAI-HNP-5

Enclosure 8, Section 2.2.2 (page E5-11) states:

The HNP Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3). The information on the proposed emergency response facility minimum staffing in these figures is not consistent with Table B-1, "Minimum Staffing Capacity for Emergencies," of the current HNP Emergency Plan, nor the existing HNP procedures 73EP-EIP-063-0, "Technical Support Center Activation," and 73EP-EIP-062-0, "Operations Support Center Activation."

These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes to the current HNP Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed change.

SNC Response

The Standard Plan organization charts were added to provide the organizational structure of the various ERFs. Additionally, the minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. The transition of Command and Control functions between ERFs is depicted in Section B of the Standard Plan (Figure B.2.A). Criteria for facility activation are included in Section H.4 of the Standard Plan and include achieving minimum staffing within the specific facility and completion of a briefing for facility personnel. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

No equivalent minimum staff was previously identified in the Hatch Plan for the TSC. The minimum staffing identified in the Standard Plan Figure B.2.1.A (TSC) includes the following:

- TSC Emergency Director
- TSC Manager
- Operations Supervisor
- RP Supervisor
- Reactor Engineer
- ERF Communicator
- ENS Communicator

These positions were selected because they support the Emergency Direction and Control, Radiological Assessment, Plant System Engineering and Notification/Communication.

No equivalent minimum staff was previously identified for the OSC. The minimum staffing identified in Standard Plan Figure B.2.2.A (OSC) includes the following:

- OSC Manager
- RP/Chemistry Group Lead and
- ERF Communicator.

These positions were selected because they support the oversight of Repair and Corrective Action function provided by the Shift Manager. These positions represent an additional response commitment beyond the Maintenance personnel identified in Table 2.2.A of the Hatch Annex.

The minimum staffing identified in Standard Plan Figure B.3.1.A (EOF) exceeds the number of positions identified in Appendix 7 of the current Plan which identifies the positions associated with minimum staff for the EOF. Below is a table comparing the positions between the two documents.

Current Plan Appendix 7	Proposed Plan Figure B.3.1.A	Justification
None	Emergency Director	Additional response commitment supports Emergency Direction and Control function
EOF Manager	EOF Manager	No change in title. Position supports the Emergency Direction and Control function control function and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.
Dose Assessment Supervisor	Dose Assessment Supervisor	No change. Position supports Radiological Assessment function
Dose Analyst	Dose Analyst	No change. Position supports Radiological Assessment function
None	ERF Communicator	Additional response commitment supports Communication function
ENN Communicator	ENN Communicator	No change. Position supports state/local Notification function
Field Team Coordinator	None	Prior to Augmentation the on-site out of plant technician will communicate directly with the Dose Analyst as depicted explained in RAI-HNP-2. Field Team Coordinator remains a 75 minute responder supporting the augmented teams on response.

Licensing Support Coordinator	None	The Licensing Support Coordinator title has changed to EOF Emergency Communications Coordinator and retains the duties of the Licensing Support Coordinator. The EOF Emergency Communications Coordinator reports to the EOF Manager who will maintain oversight of communications with off-site agencies until the EOF Emergency Communications Coordinator arrives as a 75 minute responder.

HNP procedures 73EP-EIP-063-0, "Technical Support Center Activation," and 73EP-EIP-062-0, "Operations Support Center Activation will be updated to reflect the Standard Plan organization as part of the Change Management Plan.

RAI-HNP-6

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Table B-1, "Minimum Staffing Capacity for Emergencies," of the current HNP Emergency Plan, the existing HNP procedures 73EP-EIP-063-0, "Technical Support Center Activation," and 73EP-EIP-062-0, "Operations Support Center Activation," nor the "proposed column" of the table provided in Enclosure 9 (page E9-251).

These differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes made to the current HNP Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The table provided below provides a line by line comparison of augmented responders from the current plan Table B-1 to the proposed Plan Tables 1, 2 & 3 for the ERO. Justification for each change is provided in the table. The proposed Plan incorporates augmented responders into the Tables, those positions included in other areas of the current Plan but not listed in Table B-1 specifically. Inclusion of augmented positions into the proposed Plan Tables better defines augmentation expectations for each position.

Function	Current Plan Table B-1	Proposed Plan Tables 1&2	Justification
Plant Operations and Assessment of Operational Aspects	None	None	No Change

Function	Current Plan Table B-1	Proposed Plan Tables 1&2	Justification
Emergency Direction and Control	ED (TSC)	ED (TSC)	No Change
	None	TSC Manager (1)	Response commitment from Section B of current Plan
		Operations Sup. (TSC) (1)	Response commitment from Section B of current Plan
		OSC Mgr. (OSC) (1)	Response commitment from Section B of current Plan
		ED (EOF) (1)	No net change. ED EOF Director position relocated in Table to Emergency Direction and Control.
		EOF Mgr. (1)	Response commitment from Appendix 7 of current Plan
		Security Coord (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Offsite Response Coord. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Emergency Communications Coordinator (EOF) (1)	Current Plan Appendix 7 commitment for Licensing Support Coordinator in EOF. The title changes to Emergency Communications Coordinator with no change in responsibilities.
Radiological Accident Assessment and Support of Operational Accident Assessment	RP/Chem Sup. (TSC) (1)	RP Supv. (TSC) (1)	Response commitment from Section B of current Plan
		Chemistry Support (TSC) (1)	Additional response commitment.
	Not specifically addressed	Dose Assessment Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Dose Analyst (EOF) (1)	Response commitment from Appendix 7 of current Plan
	EOF Manager (1)	None	No net change. ED EOF Manager position relocated in Table to Emergency Direction and Control.

Function	Current Plan Table B-1	Proposed Plan Tables 1&2	Justification
	Offsite Surveys (2)	Field Monitoring Personnel (3)	Augmented Field Monitoring personnel will make up one Field Monitoring Team. See RAI-HNP-4 for additional field monitoring information.
		Field Team Coord. (EOF) (1)	Response commitment from Appendix 7 of current Plan
Radiological Accident Assessment and Support of Operational Accident Assessment (continued)	On-Site (out of Plant) Surveys (1)	On-site and In-Plant Surveys (2)	No Change
	In-Plant Surveys (1)		
	Chem/RadioChem (1)	Chem Tech (OSC) (1)	No Change
Notification/Comm	2 (Unspecified)	ENS Comm. (TSC) (1)	Additional response commitments with specific communications responsibilities assigned.
		HPN Comm. (TSC) (1)	
		ERF Comm. (TSC) (1)	
		ERF Comm. (OSC) (1)	
		ENN Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		ENS Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		HPN Comm. (EOF) (1)	Additional response commitments with specific communications responsibilities assigned.
		ERF Comm. (EOF) (1)	
		Field Team Comm (EOF) (1)	Response commitment from Appendix 7 of current Plan

Function	Current Plan Table B-1	Proposed Plan Tables 1&2	Justification
Plant System Engineering Repair and Corrective Action	Core Thermal Eng. (1)	Reactor Eng. (TSC) (1)	No Change
	Elect. Eng. (1)	Eng. Support (2)	The SNC Engineering organization is typically organized into systems, programs, projects and design engineering providing a wide array of engineering skills to draw upon in the event of an emergency. The 2 initial Engineering Support responders will be augmented from this pool of engineering personnel and report to the TSC Engineering Supervisor for initial engineering repair and corrective action support. Additional event specific engineering expertise will be augmented as needed based on the nature of the event.
	Mech. Eng. (1)		
	None	Eng. Sup. (TSC) (1)	Response commitment from Section B of current Plan
	None	Tech. Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
	None	Maint. Sup. (TSC) (1)	Response commitment from Section B of current Plan
	Mech. Maint. (1)	Mech. Maint. Group Leader (OSC) (1)	No net change. Group Leader provides support to the on-shift maintenance.
	Elect. Maint. (1)	Elect. Maint. Group Leader (OSC) (1)	
	I&C Tech. (1)	I&C Maint. Group Leader (OSC) (1)	
Protective Actions	HP Tech (2)	RP Tech (OSC) (2)	No Change
	None	RP/Chem Group Leader (OSC) (1)	Additional response commitment
Fire-Fighting	Local Support	Local Support	No Change
Rescue/First Aid	Local Support	Local Support	No Change

HNP procedures 73EP-EIP-063-0, "Technical Support Center Activation," and 73EP-EIP-062-0, "Operations Support Center Activation will be updated to reflect the Standard Plan organization as part of the Change Management Plan.

RAI-HNP-7

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the HNP Emergency Plan.

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

RAI-HNP-8

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

SNC Response

The SNC response is the same as provided in **RAI-FNP-9.**

RAI-VEGP-1

Enclosure 10 (page E10-4), "Notification and Communication," states, in part:

In the proposed SNC Fleet Emergency Plan, the VEGP Unit 1 and 2 staffing for this position is reduced to a single on-shift communicator as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. However, the number of control personnel to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Vogtle Electric Generating Plant On-Shift Staffing in Enclosure 11, "Vogtle 1 and 2 Standard Emergency Plan Annex," provides a Note 2 stating that this function "may be provided by shift personnel assigned other functions."

Please explain whether this function will be performed by a dedicated Communicator, since the justification for the proposed change of reducing the current number of personnel from 2 to 1 is that the function "may be assigned to a member of the control room staff with no collateral tasks."

SNC Response

The function will not be performed by a dedicated communicator. Vogtle1&2 on-shift staffing for licensed operators (SROs and ROs) provided in Table 2.2.A is such that one additional licensed operator is provided above that necessary to fulfill the requirements of the Plant Operations and Assessment of Operational Aspects function. This results in a pool of licensed operators sufficient to ensure

a licensed operator is available for the Notification/Communication function. Enclosure 10 has been revised to clarify this position.

The SNC Standard Emergency Plan licensing amendment submittal Enclosure 10 (ML15246A055) contained information regarding the performance of the notification function on-shift. This information was intended to relay that the function will continue to be performed by on-shift personnel as noted in Revision 63 of the Vogtle 1&2 Plan. The proposed Vogtle 1&2 Annex provides further clarification that the notification function will be performed by Reactor Operators or Senior Reactor Operators without any conflicting duties as demonstrated during the On-Shift Staffing Analysis. A revision of Enclosure 10 is provided to properly convey the staffing intent for the function.

Per NUREG-0654/FEMA-REP-1, Revision 1 the Notification/Communication function in Table B-1 included the major tasks to notify licensee, state, local and federal personnel and maintain communications. Table B-1 also noted that this function could be performed by the engineering aid to the shift supervisor.

The current Vogtle 1&2 Emergency Plan, Revision 63, maintains the established commitment for performance of notifications as a collateral duty by on-shift personnel. This is depicted in Table B-1 of the Vogtle 1&2 Emergency Plan under the 'Position title' column where 'Shift trained personnel' is indicated.

The proposed Vogtle 1&2 Annex, Table 2.2.A, replaces '2(b)' with 'Note 2' for performance of the on-shift Notification/Communication function. 'Note 2' refers the reader to the bottom of the page where the clarification, "May be provided by shift personnel assigned other functions" is located. Table 2.2.A also includes the position designator of "Licensed Operator (RO or SRO)" for the notification function. This is consistent with the approach used in the current revision of the Vogtle 1&2 Plan. The purpose in using the 'Note 2' nomenclature is to provide clarity in the number of individuals actually on-shift. Industry operating experience has shown that the inclusion of numeric values representing personnel performing more than one function can be misleading and contributes to errors in the determination of the total number of personnel on-shift. Use of 'Note 2' supports improved clarity from a human performance perspective by counting on-shift operations personnel only under the Emergency Direction and Control and Plant Operations and Assessment of Operational Aspects functional areas in Table 2.2.A of the Vogtle 1&2 Annex.

In accordance with the proposed revision, Vogtle 1&2 Plant will maintain four Reactor Operators (RO) and three Senior Reactor Operators (SRO) on-shift that are qualified to perform the notification function. As demonstrated during the On-Shift Staffing Analysis, completed in accordance with 10 CFR 50 Appendix E A.V.9, one RO or SRO is available to perform the notification function as required.

RAI-VEGP-2

Enclosure 10 (page E10-6) states, in part:

Revision 63.0.0 of the VEGP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform on-site out of plant surveys - an individual qualified to perform the survey and an assistant to drive a vehicle. As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 1 and Unit 2, on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 3 and Unit 4. ...The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as the performance of multiple tasks simultaneously (i.e., driving vehicle, communications, plume monitoring) been considered?

SNC Response

The SNC response is the same as provided in **RAI-FNP-3.**

RAI-VEGP-3

Enclosure 10 (page E10-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan VEGP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

SNC Response

The SNC response is the same as provided in **RAI-FNP-4.**

RAI-VEGP-4

Enclosure 10 (page E10-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

NUREG-0654/FEMA REP-01 Revision 1 and the current draft to Revision 2 (ML14245A519) direct staffing for two site staffed field teams. Industry practice in general, has followed the NUREG-0654 staffing in this functional area. The original commitment for three field monitoring teams included resources for on-site out-of-plant monitoring as well as offsite survey capability such that augmented responders were available for two offsite teams, each placed on opposite sides of the Chattahoochee River if warranted by the plume path.

In the proposed SEP, a single individual on-shift would be utilized as the resource for on-site out-of-plant monitoring, and two augmented responders would be utilized as a single off-site monitoring team. A third augmented individual would become the driver for the second off-site team which would be led by the on-shift resource who transitions from on-site out-of-plant monitoring to the off-survey function. Any subsequent on-site monitoring would be completed by augmented OSC resources as a part of the event response process.

In addition to off-site monitoring provided by Vogtle 1&2, Field Teams are dispatched from the State of South Carolina by both the Savannah River Site and the South Carolina Department of Health and Environmental Control (SCDHEC) as well as Radiological Emergency Response Teams (RERT) which are dispatched by the Georgia Forward Emergency Operating Center (FEOC) in accordance with the Georgia Radiological Emergency Plan. Teams from SCDHEC are dispatched at an Alert or higher classification. By practice, two field teams are dispatched. Georgia procedures direct the State Field Team Coordinator (FTC) to dispatch the number of Field Teams needed to respond to the event out of the pool of trained personnel. Normal practice is to dispatch two ORO Field Teams. The FTC coordinates with the utility counterpart to ensure that each organization has full and unlimited access to field monitoring data.

The functional area drills will be designed and performed to demonstrate SNC's ability to safely and effectively implement the SEP, including as appropriate, adverse conditions and off-hours performance. The ability of two field teams to assess the magnitude and spread of a simulated plume will be demonstrated as part of the drill portion of the change management plan.

RAI-VEGP-5

Enclosure 11, Section 2.2.2 (page E11-11) states:

The VGEP Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on emergency response facility minimum staffing in these figures is not consistent with the information provided in Table B-1, "Minimum Staffing for

Power Operation," of the current VEGP Unit 1 & 2 Emergency Plan, nor the existing VEGP Unit 1 & 2 procedures - such as Procedure No.91202-C Version 26, "Activation and Operation of the Operations Support Center," and Procedure No. 91201-C Version 20 "Activation and Operation of the Technical Support Center." These differences are not identified in this LAR, nor are they justified. Please identify all proposed changes to the current VEGP Unit 1 & 2 Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The Standard Plan organization charts were added to provide the organizational structure of the various ERFs. Additionally, the minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. The transition of Command and Control functions between ERFs is depicted in Section B of the Standard Plan (Figure B.2.A). Criteria for facility activation are included in Section H.4 of the Standard Plan and include achieving minimum staffing within the specific facility and completion of a briefing for facility personnel. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

No equivalent minimum staff was previously identified in the Vogtle Plan for the TSC. The minimum staffing identified in the Standard Plan Figure B.2.1.A (TSC) includes the following:

- TSC Emergency Director
- TSC Manager
- Operations Supervisor
- RP Supervisor
- Reactor Engineer
- ERF Communicator
- ENS Communicator

No equivalent minimum staff was previously identified for the OSC. These positions were selected because they support the Emergency Direction and Control, Radiological Assessment, Plant System Engineering and Notification/Communication.

The minimum staffing identified in Standard Plan Figure B.2.2.A (OSC) includes the following:

- OSC Manager
- RP/Chemistry Group Lead and
- ERF Communicator.

These positions were selected because they support the oversight of Repair and Corrective Action function provided by the Shift Manager. These positions represent an additional response commitment beyond the Maintenance personnel identified in Table 2.2.A of the Vogtle Annex.

The minimum staffing identified in Standard Plan Figure B.3.1.A (EOF) exceeds the number of positions identified in Appendix 7 of the current Plan which identifies the positions associated with minimum staff for the EOF. Below is a table comparing the positions between the two documents.

Current Plan Appendix 7	Proposed Plan Figure B.2.1.A	Justification
None	Emergency Director	Additional response commitment supports Emergency Direction and Control function
EOF Manager	EOF Manager	No change in title. Position supports the Emergency Direction and Control function and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.
Dose Assessment Supervisor	Dose Assessment Supervisor	No change. Position supports Radiological Assessment function
Dose Analyst	Dose Analyst	No Change. Position supports Radiological Assessment function
None	ERF Communicator	Additional response commitment supports Communication function
ENN Communicator	ENN Communicator	No change. Position supports state/local Notification function
Field Team Coordinator	None	Prior to Augmentation the on-site out of plant technician will communicate directly with the Dose Analyst as depicted explained in RAI-VEGP-2. Field Team Coordinator remains a 75 minute responder supporting the augmented teams on response.
Licensing Support Coordinator	None	The Licensing Support Coordinator title has changed to EOF Emergency Communications Coordinator and retains the duties of the Licensing Support Coordinator. The EOF Emergency Communications Coordinator reports to the EOF Manager who will maintain oversight of communications with off-site agencies until the EOF Emergency Communications Coordinator arrives as a 75 minute responder.

Procedure No.91202-C Version 26, "Activation and Operation of the Operations Support Center," and Procedure No. 91201-C Version 20 "Activation and Operation of the Technical Support Center" will be revised to reflect the approved Plan as part of the Change Management Plan.

RAI-VEGP-6

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Table B-1, "Minimum Staffing for Power Operation," of the current VEGP Unit 1 & 2 Emergency Plan, nor the existing VEGP Unit 1 & 2 procedures - such as Procedure No.91202-C Version 26, "Activation and Operation of the Operations Support Center," and Procedure No. 91201-C Version 20, "Activation and Operation of the Technical Support Center," nor the "proposed column" of the table provided in Enclosure 12 (page E12-216). These differences are not identified in this LAR, nor are they justified. Please identify all proposed changes made to the current Vogtle Units 1 & 2 Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The table provided below provides a line by line comparison of augmented responders from the current plan Table B-1 to the proposed Plan Tables 1, 2 & 3 for the ERO. Justification for each change is provided in the table. The proposed Plan incorporates augmented responders into the Tables, those positions included in other areas of the current Plan but not listed in Table B-1 specifically. Inclusion of augmented positions into the proposed Plan Tables better defines augmentation expectations for each position.

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
Plant Operations and Assessment of Operational Aspects	None	None	No Change
Emergency Direction and Control	ED (EOF) (1)	ED (EOF) (1)	No net change. Function repositioned from Rad. Assessment function.
	None	ED (TSC) (1)	Response commitment from Section B of current Plan
		TSC Manager (1)	Response commitment from Section B of current Plan
		Operations Sup. (TSC) (1)	Response commitment from Section B of current Plan
		OSC Mgr. (OSC) (1)	Response commitment from Section B of current Plan

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
		EOF Mgr. (1)	Response commitment from Appendix 7 of current Plan
		Security Coord (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Offsite Response Coord. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Emergency Communications Coordinator (EOF) (1)	Current Plan Appendix 7 commitment for Licensing Support Coordinator in EOF. The title changes to Emergency Communications Coordinator with no change in responsibilities.
Radiological Accident Assessment and Support of Operational Accident Assessment	HP/Chemistry Shared Foreman (1)	RP Sup. (TSC) (1)	Response commitment from Section B of current Plan
		Chemistry Support (TSC) (1)	Current Plan Section B commitment for Chemistry Supervisor in TSC. The title changes to Chemistry Support with no change in responsibilities.
		Dose Assessment Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Dose Analyst (EOF) (1)	Response commitment from Appendix 7 of current Plan
	EOF Manager (1)	None	No net change. ED EOF Director position relocated in Table to Emergency Direction and Control.
	Offsite Surveys Onsite Out of Plant (3)	Field Monitoring Personnel (3)	No net change. The onsite Out-of-Plant survey function and off site surveys are not impacted by the point of release. See RAI-VEGP-4 for additional field monitoring information.
		Field Team Coord. (EOF) (1)	Response commitment from Appendix 7 of current Plan

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
Radiological Accident Assessment and Support of Operational Accident Assessment (continued)	None	On-site and In-Plant Surveys (2)	Additional response commitment
	Chem/RadioChem (1)	Chem Tech (OSC) (1)	No Change
Notification/Comm.	2 (Unspecified)	ENS Comm. (TSC) (1)	Additional response commitment with specific communications responsibilities assigned.
		HPN Comm. (TSC) (1)	
		ERF Comm. (TSC) (1)	
		ERF Comm. (OSC) (1)	
		ENN Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		ENS Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		HPN Comm. (EOF) (1)	Additional response commitment with specific communications responsibilities assigned.
		ERF Comm. (EOF) (1)	
		Field Team Comm (EOF) (1)	Response commitment from Appendix 7 of current Plan
Plant System Engineering Repair and Corrective Action	None	Reactor Eng. (TSC) (1)	Additional response commitment
	Elect. Eng. (1)	Eng. Support (2)	The SNC Engineering organization is typically organized into systems, programs, projects and design engineering providing a wide array of engineering skills to draw upon in the event of an emergency. The 2 initial Engineering Support responders will be augmented from this pool of engineering personnel and report to the TSC Engineering Supervisor
	Mech. Eng. (1)		

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
			for initial engineering repair and corrective action support. Additional event specific engineering expertise will be augmented as needed based on the nature of the event.
	None	Eng. Sup. (TSC) (1)	Response commitment from Section B of current Plan
	None	Tech. Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
	None	Maint. Sup. (TSC) (1)	Response commitment from Section B of current Plan
	Mech. Maint. (1)	Mech. Maint. Group Leader (OSC) (1)	No net change. Group Leader provides support to the on-shift maintenance.
	Elect. Maint. (1)	Elect. Maint. Group Leader (OSC) (1)	
	None	I&C Maint. Group Leader (OSC) (1)	Additional response commitment
	System Operator (1)	None	The Systems Operator fills the Rad Waste Operations role. Based on lessons learned since the Three Mile Island event Rad Waste Operations is not needed in the emergency phase of the response.
Protective Actions	HP Tech (2)	HP Tech (OSC) (2)	No Change
	None	RP/Chem Group Leader (OSC) (1)	Additional response commitment
Fire-Fighting	Local Support	Local Support	No Change
Rescue/First Aid	Local Support	Local Support	No Change

Procedure No.91202-C Version 26, "Activation and Operation of the Operations Support Center," and Procedure No. 91201-C Version 20, "Activation and Operation of the Technical Support Center," will be updated as part of the Change Management Plan.

RAI-VEGP-7

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the VEGP Emergency Plan.

SNC Response

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

RAI-VEGP-8

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

SNC Response

The SNC response is the same as provided in **RAI-FNP-9**.

RAI-VEGP3&4-1

Enclosure 13 (page E13-4), "Notification and Communication," states, in part:

In the proposed SNC Fleet Emergency Plan, the VEGP Unit 3 and 4 staffing for this position is reduced to a single on-shift communicator as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. However, the number of control personnel to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no collateral tasks.

However, Table 2.2.A – Vogtle Electric Generating Plant On-Shift Staffing in Enclosure 14, "Vogtle 3 and 4 Standard Emergency Plan Annex," provides a Note 1 stating that this function "may be provided by shift personnel assigned other functions."

Please explain whether this function will be performed by a dedicated Communicator, since the justification for the propose change of reducing the current number of personnel from 2 to 1 is that the function "may be assigned to a member of the control room staff with no collateral tasks."

SNC Response

The function will not be performed by a dedicated communicator. Vogtle 3&4 on-shift staffing for licensed operators (SROs and ROs) provided in Table 2.2.A is such that one additional licensed operator is provided above that necessary to fulfill the requirements of the Plant Operations and Assessment of Operational Aspects function. This results in a pool of licensed operators sufficient to ensure

a licensed operator is available for the Notification/Communication function. Table 2.2.A has been revised to clarify this position.

The SNC Standard Emergency Plan licensing amendment submittal Enclosure 13 (ML15246A058) contained information regarding the performance of the notification function on-shift. This information was intended to relay that the function will continue to be performed by on-shift personnel as noted in Revision 3 of the Vogtle 3&4 Plan. The proposed Vogtle 3&4 Annex provides further clarification that the notification function will be performed by Reactor Operators or Senior Reactor Operators without any conflicting duties as demonstrated during the On-Shift Staffing Analysis. A revision of Enclosure 13 is provided to properly convey the staffing intent for the function.

Per NUREG-0654/FEMA-REP-1, Revision 1 the Notification/Communication function in Table B-1 included the major tasks to notify licensee, state, local and federal personnel and maintain communications. Table B-1 also noted that this function could be performed by the engineering aid to the shift supervisor. The current Vogtle 3&4 Emergency Plan, Revision 3, designates the performance of notification function by two on-shift operations personnel. This designation was always intended to convey that a minimum of two qualified personnel were available to perform the function. This is depicted in Table B-1 of the Vogtle 3&4 Emergency Plan under 'Position title' column where 'Shift Administrative Assistance or other personnel' is indicated.

The proposed Vogtle 3&4 Annex, Table 2.2.A, replaces '2' as noted in the current Plan Table B-1, with '1' for performance of the on-shift Notification/Communication function. Table 2.2.A also includes the position designator of "Licensed Operator (RO or SRO)" for the notification function.

During the review of the Vogtle 3&4 Annex, it was noted that Table 2.2.A failed to identify a second communicator which is a shared resource with Vogtle Units 1&2. The shared resource is an on-shift Reactor Operator or Senior Reactor Operator, utilized for completion of notification functions during the Aircraft Threat scenario evaluated as part of the On-Shift Staffing Analysis. This did not represent a conflict for Vogtle 1&2 shift resources as the individual performing notification functions was accounted for in the Vogtle 1&2 On-Shift Staffing Analysis as performing the same activity for the Aircraft Threat scenario which is an event impacting all four units at the site. Table 2.2.A of the Vogtle 3&4 Annex has been revised to reflect this change.

Table 2.2.A - Vogtle Electric Generating Plant On-Shift Staffing

Vogtle 3 & 4					
Major Functional Area	**Major Tasks**	**Position**	**On-Shift Unit 3**	**On-Shift Unit 4**	**Shared Resources with Unit 1&2**
Emergency Direction and Control		Shift Manager (SM)/ Emergency Director (ED)	1	1	1 Note 3

Plant Operations and Assessment of Operational Aspects		Shift Supervisor (SRO)	1	1	
		Shift Support Supervisor /Fire Brigade(SRO/FBL)	1		
		Licensed Operator (SRO or RO)	1		
		Reactor Operators (RO)	2	2	
		System Operators (SO)	2	2	
		System Operators / Fire Brigade (SO/FBM)	4		
Plant System Engineering, Repair and Corrective Actions	Technical Support	Shift Technical Advisor	Note 1		
Notification/ Communication	Notify licensee, State local and Federal personnel & maintain communication	Licensed Operator (SRO or RO)	Note 1		1 Note 3
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Chemistry Technician			1
	In-plant surveys	RP Technician	1	1	
	Offsite Surveys Onsite (out-of-plant)	RP Technician			1
Protective Actions	Radiation Protection: a. Access Control b. RP Coverage for repair, corrective actions, search and rescue first- aid & firefighting c. Personnel monitoring d. Dosimetry	RP Technician	1	1	
	Chemistry/Radio-chemistry	Chemistry Technician	1	1	
Plant System Engineering, Repair and Corrective Actions	Repair and Corrective Actions	Maintenance Supervisor			1
		Mechanic			1
		Electrician			1
		I & C Technician			1
		Total:	**24**		**8**
Firefighting		Fire Brigade Note 2	5		
Rescue Operations and First Aid		Rescue Operations/First Aid Note 1			2

Plant Access and Personnel Accountability		Security	Sec Plan	

Note 1 – May be provided by shift personnel assigned other functions
Note 2 – Fire Brigade made up of Fire Brigade Leader (SSS) and 4 System Operators
Note 3 – Vogtle Unit 1&2 resource may be used for events impacting multiple units

RAI-VEGP3&4-2

Enclosure 13 (page E13-6) states, in part:

As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 3 and Unit 4, on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 1 and Unit 2. ...The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated? Have various safety factors, such as the performance of multiple tasks simultaneously (i.e., driving vehicle, communications, plume monitoring) been considered?

SNC Response

The SNC response is the same as provided in **RAI-FNP-3**.

RAI-VEGP3&4-3

Enclosure 13 (page E13-7) states, in part:

Additionally, the proposed SNC Fleet Emergency Plan VEGP 3&4 Annex on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor.

Has this been effectively demonstrated through drills or exercises and have plant procedures been revised (although in draft form) to validate that this function can be performed as stated?

SNC Response

The SNC response is the same as provided in **RAI-FNP-4**.

RAI-VEGP3&4-4

Enclosure 13 (page E13-7) states, in part:

SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Has this been effectively demonstrated through drills or exercises under adverse condition (night) and have plant procedures been revised (although in draft form) to validate that this function can be performed in a timely manner as stated to locate plume boundaries and perform sampling activities?

SNC Response

This question is applicable to Vogtle Units 1 and 2 in the RAI response. Due to the construction timing for Vogtle 3 and 4 the adequacy of two environmental field teams will be resolved in the approval process as it applies to the SNC operating units adoption of the Standard Plan.

As previously discussed, SNC is implementing a comprehensive Change Management Plan as part of the Standard Plan conversion.

NUREG-0654/FEMA REP-01 Revision 1 and the current draft to Revision 2 (ML14245A519) direct staffing for two site staffed field teams. Industry practice in general, has followed the NUREG-0654 staffing in this functional area. The original commitment for three field monitoring teams included resources for on-site out-of-plant monitoring as well as offsite survey capability such that augmented responders were available for two offsite teams, each placed on opposite sides of the Chattahoochee River if warranted by the plume path.

In the proposed SEP, a single individual on-shift would be utilized as the resource for on-site out-of-plant monitoring, and two augmented responders would be utilized as a single off-site monitoring team. A third augmented individual would become the driver for the second off-site team which would be led by the on-shift resource who transitions from on-site out-of-plant monitoring to the off-survey function. Any subsequent on-site monitoring would be completed by augmented OSC resources as a part of the event response process.

In addition to off-site monitoring provided by Vogtle 1&2, Field Teams are dispatched from the State of South Carolina by both the Savannah River Site and the South Carolina Department of Health and Environmental Control (SCDHEC) as well as Radiological Emergency Response Teams (RERT) which are dispatched by the Georgia Forward Emergency Operating Center (FEOC) in accordance with the Georgia Radiological Emergency Plan. Teams from SCDHEC are dispatched at an Alert or higher classification. By practice, two field teams are dispatched. Georgia procedures direct the State Field Team Coordinator (FTC) to dispatch the number of Field Teams needed to respond to the event out of the pool of trained personnel. Normal practice is to dispatch two ORO Field Teams. The FTC coordinates with the utility counterpart to ensure that each organization has full and unlimited access to field monitoring data.

Drills for Vogtle Units 3 & 4 will be conducted in accordance with the existing EP ITAAC commitments. (Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) including EP ITAAC E.3.9.07.01.03 (COL Appendix C Item 867) and EP ITAAC E.3.9.08.01.01 (COL Appendix C Item 870).

As part of the drill portion of the Change Management Plan, the functional area drills will be designed and performed to demonstrate SNC's ability to safely and

effectively implement the SEP, including as appropriate, adverse conditions and off-hours performance. The ability of two field teams to assess the magnitude and spread of a simulated plume will be demonstrated.

RAI-VEGP3&4-5

Enclosure 13 (page E13-9) states, in part:

The current version of the VEGP Units 3 and Unit 4 Emergency Plan provides for one mechanical journeyman, one electrical journeyman, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. These numbers will be maintained in the proposed SNC Fleet Emergency Plan. However, these positions will be shared for the VEGP site, as the maintenance personnel will be trained and qualified to perform work on VEGP Units 1 and 2 and Units 3 and 4. In addition to these personnel, a maintenance supervisor will be added to shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability. This position will also be shared for the VEGP site.

Please explain how the proposed compliment of maintenance personnel could support timely and effective repair and corrective actions if a simultaneous event classification at multiple units (e.g., were to affect Units 1 or 2 and Units 3 or 4 (one of each reactor type) simultaneously). Please explain how the proposed compliment of maintenance personnel could support timely and effective repair and corrective actions if a simultaneous event classification at multiple units (e.g., were to affect Units 1 or 2 and Units 3 or 4 (one of each reactor type) simultaneously).

SNC Response:

Should an event occur that has adverse effects on more than one unit (one from each reactor type) requiring an emergency response, the use of shared maintenance resources is acceptable because of the enhanced safety features of the VEGP 3 and 4 design. VEGP 3 and 4 is designed such that the response to design basis events does not rely on operator actions for up to 72 hours (UFSAR Subsection 1.9.4.2.2, Item B-17). The AP1000 safety-related passive systems automatically establish and maintain safe shutdown conditions for the plant following design basis events, including an extended loss of ac power sources. The passive systems can maintain these safe shutdown conditions after design basis events, without operator action, following a loss of both onsite and offsite ac power sources (UFSAR Subsection 1.9.5.1.5). Should all divisions of the safety related plant monitoring and control systems be inoperable, a diverse actuation system (DAS) provides for an alternative means to monitor and control the plant (UFSAR Subsection 7.7.1.11). Control room habitability can be maintained through the duration of a design basis accident. The passive control room habitability is capable of providing ventilation and pressurization of the control room for 72 hours (UFSAR Subsection 6.4.2). The fire protection analysis confirms that the plant can be safely shutdown following a postulated fire. The initial fire response is by the fire brigade which is composed of operations personnel (UFSAR Subsection 9.5.1.3). Operations of the passive safety systems discussed above do not rely on maintenance support.

Operators respond to design basis events using emergency operating procedures (EOPs). If an expected response is not received, the procedure directs the operator to take action in accordance with actions described in a "response not obtained" column of the procedure. These response not obtained actions may refer the operator to abnormal operating procedures (AOPs). In some instances, execution of the AOPs may rely on maintenance support. However, these actions will not occur until after augmented maintenance response personnel would be available. Functional Restoration Procedures (FRPs) are used by operators to respond to events resulting in challenges to critical safety functions. As with EOPs, maintenance personnel would not be called upon to support actions in these procedures until after augmented resources would be available.

Vogtle Electric Generating Plan (VEGP) Units 3 and 4 maintenance personnel will be included in a maintenance organization that will provide maintenance services for all units at the VEGP site. Maintenance personnel work to common maintenance procedures and combined common training. Maintenance personnel assigned to emergency response teams will be trained and qualified to perform maintenance activities on components for all VEGP units.

In addition, the staffing analysis performed in accordance with the requirements of License Condition 2.D.(12)(d) was performed for Vogtle Units 3 & 4 using the Standard Plan proposed staffing. The proposed staffing was found to be acceptable. The Vogtle 3 & 4 Staffing Analysis will be submitted in a separate letter to coincide with this RAI response.

Augmentation of the Vogtle Units 3 & 4 TSC and OSC will be performed in accordance with the Standard Plan Tables as specified in Section 2 of the Vogtle Units 3 & 4 Site Annex. Section 2 has been revised to delete the subsection on technology specific response and match the Vogtle Units 1 and 2 staffing for the TSC and OSC as noted in response to RAI-VEGP3&4-7.

RAI-VEGP3&4-6

Enclosure 14, Section 2.2.2 (page E14-11) states:

The Vogtle Unit 3 & 4 Augmented Emergency Response Organization is described in Figures B.2.1.A, B.2.2.A, B.3.1.A, and B.3.2.A in the Emergency Plan (SEP B.2, B.3).

The information on the proposed emergency response facility minimum staffing in these figures is not consistent with Section B, "VEGP emergency response organization" of the current VEGP Unit 3 & 4 Emergency Plan. The differences are not identified in this request as changes, nor are they justified.
Please identify all proposed changes to the current VEGP Unit 3 & 4 Emergency Plan with respect to minimum staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The Standard Plan organization charts were added to provide the organizational structure of the various ERFs. Additionally, the minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. The transition of Command and Control functions between ERFs is depicted in Section B of the Standard Plan (Figure B.2.A). Criteria for facility activation are included in Section H.4 of the Standard Plan and include achieving minimum staffing within the specific facility and completion of a briefing for facility personnel. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

No equivalent minimum staff was previously identified in the Vogtle 3&4 Plan for the TSC. The minimum staffing identified in the Standard Plan Figure B.2.1.A (TSC) includes the following:

- TSC Emergency Director
- TSC Manager
- Operations Supervisor
- RP Supervisor
- Reactor Engineer
- ERF Communicator
- ENS Communicator

Figures B-2 and B-3 of the current Emergency Plan provide a general organizational structure for the 75 minute responders for the TSC and were not intended to convey a minimum staff concept. The comparison of augmented responders between the proposed Standard Plan and Revision 3 of the current Vogtle Units 3&4 Emergency Plan is provided in the response to RAI-VEGP3&4-7. (Below) These positions were selected because they support the Emergency Direction and Control, Radiological Assessment, Plant System Engineering and Notification/Communication.
No equivalent minimum staff was previously identified for the OSC. The minimum staffing identified in Standard Plan Figure B.2.2.A (OSC) includes the following:

- OSC Manager
- RP/Chemistry Group Lead and
- ERF Communicator.

These positions were selected because they support the oversight of Repair and Corrective Action function provided by the Shift Manager. These positions represent an additional response commitment beyond the Maintenance personnel identified in Table 2.2.A of the Vogtle Annex.

The minimum staffing identified in Standard Plan Figure B.3.1.A (EOF) exceeds the number of positions identified in Appendix 7 of the current Plan which identifies the positions associated with minimum staff for the EOF. Below is a table comparing the positions between the two documents.

Current Plan Appendix 7	Proposed Plan Figure B.3.1.A	Justification
None	Emergency Director	Additional response commitment supports Emergency Direction and Control function
EOF Manager	EOF Manager	No change in title. Position supports the Emergency Direction and Control function and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.
Dose Assessment Supervisor	Dose Assessment Supervisor	Additional response commitment supports Radiological Assessment function
Dose Analyst	Dose Analyst	Additional response commitment supports Radiological Assessment function
None	ERF Communicator	Additional response commitment supports Communication function
ENN Communicator	ENN Communicator	No change. Position supports state/local Notification function
Field Team Coordinator	None	Prior to Augmentation the on-site out of plant technician will communicate directly with the Dose Analyst as depicted explained in RAI-FNP-3. Field Team Coordinator remains a 75 minute responder supporting the augmented teams on response.
Licensing Support Coordinator	None	The Licensing Support Coordinator title has changed to EOF Emergency Communications Coordinator and retains the duties of the Licensing Support Coordinator. The EOF Emergency Communications Coordinator reports to the EOF Manager who will maintain oversight of communications with off-site agencies until the EOF Emergency Communications Coordinator arrives as a 75 minute responder.

RAI-VEGP3&4-7

Enclosure 2 (pages E2-25 and 26) provide Tables 1 and 2 that list the proposed 75 minute augmenting positions. The information on the proposed emergency response facility augmented staffing in these figures is not consistent with the information provided in Section B, "VEGP emergency response organization" of the current VEGP 3 & 4 Emergency Plan. The differences are not identified in this request as changes, nor are they justified. Please identify all proposed changes made to the current VEGP 3 & 4 Emergency Plan with respect to the proposed changes to augmented staffing for each emergency response facility, and provide justification for each of the proposed changes.

SNC Response

The table provided below provides a line by line comparison of augmented responders from the current plan Table B-1 to the proposed Plan Tables 1, 2 & 3 for the ERO. Justification for each change is provided in the table. The proposed Plan incorporates augmented responders into the Tables, those positions included in other areas of the current Plan but not listed in Table B-1 specifically. Inclusion of augmented positions into the proposed Plan Tables better defines augmentation expectations for each position.
The procedures will be revised to reflect the Standard Plan organization as part of the overall Change Management Plan supporting the implementation process.

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
Plant Operations and Assessment of Operational Aspects	None	None	No Change
Emergency Direction and Control	ED (Location unspecified)	ED (EOF) (1)	No change.
	None	ED (TSC) (1)	Response commitment from Section B of current Plan
		TSC Manager (1)	Response commitment from Section B of current Plan
		Operations Sup. (TSC) (1)	Response commitment from Section B of current Plan
		OSC Mgr. (OSC) (1)	Response commitment from Section B of current Plan
		EOF Mgr. (1)	Response commitment from Appendix 7 of current Plan
		Security Coord (EOF) (1)	Response commitment from Appendix 7 of current Plan

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
		Offsite Response Coord. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Emergency Communications Coordinator (EOF) (1)	Current Plan Appendix 7 commitment for Licensing Support Coordinator in EOF. The title changes to Emergency Communications Coordinator with no change in responsibilities.
Radiological Accident Assessment and Support of Operational Accident Assessment	HP/Chemistry Shared Foreman (1)	RP Sup. (TSC) (1)	No Change
		Chemistry Support (TSC) (1)	Current Plan Section B commitment for Chemistry Supervisor in TSC. The title changes to Chemistry Support with no change in responsibilities.
		Dose Assessment Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		Dose Analyst (EOF) (1)	Additional response commitment
	Chem Tech (2)	Chem Tech (1)	Aligns augmented response to standard implemented by other SNC sites.
	EOF Direction(1)	None	No net change. ED EOF and EOF Manager positions relocated in Table to Emergency Direction and Control.
	Offsite Surveys Onsite Out of Plant (3)	Field Monitoring Personnel (3*)	This is a shared resource with Vogtle Units 1 and 2. The onsite Out-of-Plant and off site survey function are not impacted by the point of release. See RAI-VEGP3&4-4 for additional field monitoring information.
		Field Team Coordinator. (EOF) (1)	Response commitment from Appendix 7 of current Plan
	In-Plant Surveys (1)	On-site and In-Plant Surveys (2)	Additional response commitment

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
Notification/Comm.	2 (Unspecified)	ENS Comm. (TSC) (1)	Additional response commitment with specific communications responsibilities assigned.
		HPN Comm. (TSC) (1)	
		ERF Comm. (TSC) (1)	
		ERF Comm. (OSC) (1)	
		ENN Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		ENS Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
		HPN Comm. (EOF) (1)	Additional response commitment with specific communications responsibilities assigned.
		ERF Comm. (EOF) (1)	
		Field Team Comm. (EOF) (1)	Response commitment from Appendix 7 of current Plan
Plant System Engineering Repair and Corrective Action	None	Reactor Eng. (TSC) (1)	Additional response commitment
	Elect. Eng. (1)	Eng. Support (2)	The SNC Engineering organization is typically organized into systems, programs, projects and design engineering providing a wide array of engineering skills to draw upon in the event of an emergency. The 2 initial Engineering Support responders will be augmented from this pool of engineering personnel and report to the TSC Engineering Supervisor for initial engineering repair and corrective action support. Additional event specific engineering expertise will be augmented as needed based on the nature of the event.
	Mech. Eng. (1)		

Function	Current Plan Table B-1	Proposed Plan Tables 1, 2 & 3	Justification
	None	Eng. Sup. (TSC) (1)	Response commitment from Section B of current Plan
	None	Tech. Sup. (EOF) (1)	Response commitment from Appendix 7 of current Plan
	None	Maint. Sup. (TSC) (1)	Response commitment from Section B of current Plan
	Mech. Maint. (1)	Mech. Maint. Group Leader (OSC) (1)	No net change. Group Leader provides support to the on-shift maintenance. Maintenance responds as part of the all call response.
	Elect. Maint. (2)	Elect. Maint. Group Leader (OSC) (1)	
	I&C Tech. (1)	I&C Maint. Group Leader (OSC) (1)	Additional response requirement.
	System Operator (1)	None	The Systems Operator fills the Rad Waste Operations role. Based on lessons learned since the Three Mile Island event the Rad Waste Operations is not needed in the emergency phase of the response.
Protective Actions	HP Tech (4)	RP Tech (OSC) (2)	Aligns augmented response to standard implemented by other SNC sites.
	None	RP/Chem Group Leader (OSC) (1)	Additional response commitment
Fire-Fighting	Local Support	Local Support	No Change
Rescue/First Aid	Local Support	Local Support	No Change

RAI-VEGP3&4-8

Does SNC intend to perform drills or exercises prior to implementing these changes to validate that these proposed changes to facility staffing levels do not impact the ability to effectively implement the VEGP Unit 3 & 4 Emergency Plan.

SNC Response

The SNC Standard Emergency Plan (SEP) as it applies to Vogtle Units 3&4 will be tested first through a series of drills for the three operating sites. SNC is implementing a comprehensive Change Management Plan for the conversion to

the SEP. The Change Management Plan aligns with key plant milestones, outage schedules, and the Vogtle 3 & 4 construction and start-up schedule.

Key elements of the Change Management Plan include:

5) development of functional based implementing procedures (EPIPs);
6) ERO training;
7) functional area drills and facility tabletops; and
8) an integrated drill for each site.

SNC will be developing drafts of the EPIPs and planning the training and drill activities in parallel with the NRC's review of the SEP. EPIPs for Vogtle Units 3 & 4 will be adopted to support the drill schedule outlined in the inspections, tests, analyses, and acceptance criteria (ITAACs).

The functional area drills and facility tabletops will be designed and performed to demonstrate SNC's ability to safely and effectively implement the SEP. For Vogtle 3 & 4, the results of drills and the exercise will be documented in emergency planning ITAACs including EP ITAAC E.3.9.07.01.03 (COL Appendix C Item 867) and EP ITAAC E.3.9.08.01.01 (COL Appendix C Item 870). (The ITAAC identification numbers are identical for Units 3 and 4.)

The final SEP integrated drill exercises will be coordinated with the Offsite Response Organizations and communicated to the NRC residents. If the NRC requests to participate in an SEP integrated drill, SNC will coordinate and communicate the drill information accordingly.

RAI-VEGP3&4-9

Has SNC evaluated these proposed changes for impacts that may affect any information used in the approval of SECY-04-0236 by the Commission for the existing common Emergency Operation Facility?

SNC Response

The SNC response is the same as provided in **RAI-FNP-9**.

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4

Enclosure 2
SNC Standard Emergency Plan
(Marked-Up Pages and Clean Copy)

Hostile Force

One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

Independent Spent Fuel Storage Installation (ISFSI)

A complex designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

Ingestion Exposure Pathway Emergency Planning Zone (IPZ)

The IPZ is the fifty-mile radius area around an SNC-operated plant site for which protective actions are planned for the general population, farmers, dairy farmers, ranchers, food processors and distributors.

Inplant

The area located within the confines of the SNC Plant Power Block Protected Area.

Letters of Agreement (LOA)

Letters of agreement include contracts, letters or other formal agreements between Southern Company and/or SNC-operated plants and certain off site resources who provide assistance during emergency events, including a Hostile Action, at SNC-operated plants.

Nuclear Administrative and Technical Manual (NATM)

The collection of onsite programs and procedures that prescribes how SNC-operated plants are controlled, operated, maintained, and tested to meet the requirements of applicable licenses, standards, codes, and guides. It establishes effective management practices.

Offsite

Any position or area not located within the confines of the Site Boundary.

Onsite

Any position or area located within the confines of the Site Boundary.

Owner Controlled Area

The area owned by the licensee and located within the confines of the Site Boundary.

Plume Exposure Pathway Emergency Planning Zone (EPZ)

The Plume Exposure Pathway EPZ is the ten-mile radius area around an SNC-operated plant site for which protective actions are planned.

Protected Area(s) (PA)

An area, located within the Site Exclusion Area Boundary, encompassed by physical barriers and to which access is controlled per 10 CFR 73.55. The SNC Power Block Protected Area and the ISFSI Protected Area are two Protected Areas located within the Site Owner Controlled Area.

Protective Actions

Emergency measures taken to avoid or reduce radiation dose. These commonly include sheltering, evacuation, and prophylaxis.

B.2 On Site Emergency Response Organization (ERO)

Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF) and JIC are detailed below. A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24-hour-a-day basis for an extended event. On-shift as well as offsite state and local government interfaces are detailed in the site-specific Annexes.

Command and Control normally shifts from the Control Room to the TSC and subsequently to the EOF. Command and Control may move in either direction, depending on conditions that would warrant passing such authority. Command and Control may be completed sequentially or in parallel, based on the discretion of the EDs. A qualified ED in either facility can relieve the other facility of the Command and Control authority and responsibilities. Figure B.2.A depicts the transition of Command and Control responsibilities between facilities. Alternative Facilities have been identified to ensure timely ERO response during a hostile action event. Details on the Alternative Facilities are included in Section H.

CONTROL ROOM	TSC	EOF
Shift Manager / Emergency Director	**TSC Emergency Director**	**EOF Emergency Director**
Classification →	Classification	
Notifications →		Notifications
PARs →		PARs
Emergency Exposure Controls →	Emergency Exposure Controls	

Figure B.2.A Transition of Command and Control Functions

B.2.1 Technical Support Center (TSC)

See Figure B.2.1.A at the end of Section B.

B.2.1.1 TSC Emergency Director (ED)

The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure Authorization, and on-site protective actions.

B.2.1.2 TSC Manager

The TSC Manager reports to the TSC ED and is responsible for coordinating activities between the TSC and other emergency response facilities, directing the activities of the TSC staff, and ensuring communications are established with applicable offsite agencies.

TSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control		Emergency Director
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		Health Physics Network (HPN) Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Radiation Protection (RP) Supervisor
		Dose Analyst*
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue first aid, & firefighting	
	Personnel monitoring	
	Dosimetry	
Total		**13**
Note: Site Annexes contain any additional site specific staffing. *** Security Supervisor is filled by on shift Security Supervisor. Dose Analyst is filled by the on-shift Chemistry Technician.** **** Support Coordinator does not have a 75-minute Augmentation Time.**		

Table 1

OSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Tasks**	**Position Title**
Emergency Direction and Control		OSC Manager
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Lead (1) Field Monitoring Team Assistant~~Personnel~~ (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP /Chemistry Group Lead
	• RP coverage for repair, corrective actions, search and rescue first aid, & firefighting • Personnel monitoring • Dosimetry	RP Technicians (2)
Total		**14~~3~~**

Table 2

EOF 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control	Emergency Operations Facility (EOF) Director	Emergency Director (ED)
		EOF Manager
		Support Coordinator**
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff **
		Liaisons (at EOCs)** - GA - AL - SC
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		~~Nuclear Spokesperson~~
		~~Technical Assistant~~
		News Writer
		Field Team Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
	Chemistry/Radio Chemistry	Not required in this facility
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue first aid, & firefighting	
	Personnel monitoring	
	Dosimetry	
Total		**17**

Table 3

**Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute Augmentation Time.

SECTION G: PUBLIC EDUCATION AND INFORMATION

G.1 Purpose

Southern Nuclear Company (SNC) will provide education and emergency information to the public consisting of the following:

- The release of information to the public through the dissemination of timely, accurate emergency communications.
- The orderly flow of emergency information during the recovery period.
- Providing public education and information for the distribution of emergency preparedness materials to residents and transient populations.

G.2 News Media Training

A program will be offered each calendar year to acquaint the news media with the methodology for obtaining information during an emergency and with overall emergency preparedness at APC/GPC nuclear plants, as appropriate. Training will include information about the plant, emergency response, and the role of the JIC, as well as opportunities to participate in drill activities.

G.3 News Releases

The Utility will issue news releases covering events, conditions, and actions at the Plant. News releases are designed to be a written confirmation of events and are public information.

The SNC News Writer will write news releases in the EOF and obtain SNC approval from the EOF Manager, then forward them to the JIC as appropriate. The Facility Manager at that location will obtain communications approval and direct distribution of the release.

G.4 Press Briefings

Press briefings will be conducted to keep the media informed of events and activities relating to the emergency. Briefings will provide the most current, up-to-date information about events and response to the incident. Public Information Officers (PIOs) from ~~all~~ offsite agencies responding to the emergency will be encouraged to participate in the briefings to discuss their particular activities.

G.5 Public Response

~~All a~~Appropriate information will be released as clearly, concisely, and quickly as possible. Public announcements will be made on a frequent and regular basis.

G.6 Resource Materials

Media guides are available on the Utility websites and are accessible from the CMC and JIC. These guides are updated regularly and are available to ~~all~~ news media.

An emergency web page will be activated and will replace the normal web page on the appropriate Utility's website at the PID's discretion.

Maps, photographs, and diagrams of the plant and its operations are stored and maintained at the JIC for use during news briefings

G.7 Public Information Plan For Recovery

The lead emergency communications representative in the Recovery Organization will be the Public Information Director. This person or designee will maintain close contact with the Recovery Manager. Emergency communications response will follow the guidelines and procedures described for accident response.

As conditions and public interest warrant, additional Public Information personnel will be assigned to support the flow of information concerning recovery operations.

Information for possible release will be cleared with the Recovery Manager and the Public Information Director and given to the media through established procedures.

~~All i~~Information will be released through established channels of communication to federal and state authorities, the utility industry, the public, and employees.

Advance notice will be given to the public through the media, of any Company action that will or may affect the health and safety of the plume exposure pathway EPZ residents. Information of this type will be followed up with a news release as soon as the results of any such action are known.

G.8 Public Information and Education Program

The goal of the public information program is to acquaint the general public with the emergency plans for the operation of APC/GPC nuclear plants, as appropriate, and actions they should take in the event of a plant emergency.

Emergency information is disseminated each calendar year for residents in the plume exposure pathway Emergency Planning Zone.

would be permitted, operating staff in participating facilities would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills may focus on the onsite exercise training objectives.

N.2.2 Hostile Action Based (HAB) Drills

Hostile Action Based (HAB) drills involving an air, land or water based attack scenario will be conducted at sites on a frequency of at least once every eight (8) years.

N.2.3 Fire Drills

Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.

N.2.4 Medical Emergency Drills

A medical emergency drill, involving a simulated contaminated individual, and containing provisions for participation by local support services organizations including ambulance response, are conducted annually at the nuclear plants. Local support service organizations that support more than one plant shall only be required to participate once each calendar year.

N.2.5 Environs Drills

Plant environs and radiological monitoring drills are conducted annually. These drills include collection and analysis of sample media and provisions for communications and record keeping. These drills also evaluate the response to, and analysis of, simulated airborne and direct radiation measurements in the environment.

N.2.6 Radiation Protection Drills

Radiation Protection Drills involving a response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements are conducted semi-annually. At least annually, these drills shall include a demonstration of the sampling system capabilities, as applicable.

N.2.7 Accountability Drills

Accountability drills are conducted annually.

N.2.8 Alternative Facility Drills

At least once per drill cycle, use of designated Alternative Facilities to stage Onsite ERO Responders to facilitate rapid activation following a hostile action.

N.2.9 Rapid Escalation

At least one per drill cycle, a scenario resulting in an initial classification of, or rapid escalation to, a Site Area or General Emergency, will be conducted.

N.2.10 Minimal/No Release Drill

At least once per drill cycle, a scenario resulting in no radiological release, or an unplanned minimal release resulting in a classification of a Site Area Emergency but not requiring declaration of a General Emergency, shall be conducted.

N.2.11 Multi-Site Drills

At least once in every five years, a drill involving more than one SNC site will be conducted demonstrating the ability of the Common EOF to effectively implement the Emergency Plan for an event involving more than one site.

N.3 Scenarios

When a major drill or exercise is required, the Emergency Preparedness (EP) group will coordinate the preparation of a scenario. The EP group will also coordinate efforts with appropriate federal, state and local emergency organizations and agencies, schedule a date to conduct the drill or exercise, and assign qualified controllers.

The Emergency Preparedness group retains critique results for review prior to future drills or exercise and for guidance in properly modifying the site-specific Annexes, Emergency Plan Implementing Procedures (EPIPs), or other procedures as appropriate.

A scenario, prepared in advance, will govern the conduct of exercises and drills. Scenarios will include the following:

- Objectives of the drill or exercise; a measurable and observable objective must be specified for each major problem and solution.
- Dates, time period, places, personnel, and participating organizations.
- Simulated events.
- Time schedule of real and simulated initiating events.
- Narrative summary describing the conduct of the exercise or drill, including simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing and associated equipment, deployment of personnel and radiological teams, and public information activities.

During the exercise planning cycle described in Section N.1.4, SNC sites vary the content of exercise scenarios to provide ERO members the opportunity to demonstrate proficiency in key skills necessary to respond to several specific scenario elements including:

- Hostile Action directed at the plant site.
- No radiological release, or unplanned release that does not require public protective actions.
- An initial classification of, or rapid escalation to, a Site Area Emergency or General Emergency.
- Implementation of strategies, procedures, and guidance developed in 50.54(hh), (i.e., potential aircraft threat, explosion or large fire).
- Integration of offsite resources with onsite response.
- A drill initiated between the hours of 6 p.m. and 4 a.m.
- Drills using essentially 100 percent of Initiating Conditions in the 8-year cycle

Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations.

SECTION P: RESPONSIBILITY FOR THE PREPAREDNESS EFFORT

The President/Chief Executive Officer (CEO) Southern Nuclear Operating Company (SNC) has direct responsibility for the operation and maintenance of the SNC Plants. The president/CEO is also responsible for all technical and administrative support activities provided by SNC. The president/CEO directs the chief nuclear officer/executive vice president, Executive Vice President-Operational Readiness and Integration, and the vice president of regulatory affairs in fulfillment of their responsibilities.

Responsibility for the performance of Emergency Preparedness functions is assigned to various members of the SNC organization and coordinated as follows.

P.1 Fleet Emergency Preparedness

The Vice President - Regulatory Affairs is responsible for the overall coordination of the corporate emergency preparedness programs and Emergency Plans. Their direct report, the Fleet Emergency Preparedness Director, has governance and oversight responsibility for the SNC Fleet Emergency Preparedness functional area.

The Fleet Emergency Preparedness Director is responsible for the oversight of Emergency Preparedness activities and coordinating those activities with Licensee, federal, state, and local response organizations. The Fleet Emergency Preparedness organization in the SNC Corporate office provides oversight and support for site and corporate functions. Reporting to the Fleet Emergency Preparedness Director are the EP Programs Manager and the EP Planning Manager. EP Programs Manager responsibilities include Regulations, Projects, Procedures and Performance Improvement. EP Planning Manager responsibilities include offsite interface, Drill and Exercise Coordination and Training.

Strategic direction for the emergency preparedness program and maintenance of the SNC Emergency Plan(s) is provided by the SNC Fleet Emergency Preparedness Director. Emergency Preparedness Coordinator(s) coordinate functional elements of the emergency preparedness program for the SNC fleet under the direction of the Fleet Emergency Preparedness Director.

Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.

P.2 Site Emergency Preparedness

The Vice President-(Site) is responsible for the site Emergency Preparedness aspects of the program at each site. The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity. The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President-(Site) for Plants Hatch, ~~and~~ Farley and Vogtle 1-2. During project construction for Vogtle 3 and 4~~, the Vogtle 1-2 Emergency Preparedness Supervisor reports to the Site Integration Director. The Vogtle 3-4~~ Emergency Preparedness Supervisor reports to the Emergency Preparedness/Security Project Manager, who reports to the Site Integration Director. The Site Integration Director reports to the Executive Vice President – Operational Readiness

Southern Nuclear Operating Company

Standard Emergency Plan

Revision 0

Table of Contents

INTRODUCTION

Purpose

The Southern Nuclear Operating Company's (SNC) Emergency Plan provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to nuclear power plants operated by SNC, and plant employees. SNC operates the Hatch Nuclear Plant (HNP), Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP).

Background

The SNC Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The SNC Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E, and the intent of NUREG 0654 Revision 1. The SNC Emergency Plan is organized using the structure of NUREG-0654 Revision 1, and that structure provides the cross-reference to the base document.

Scope

Detailed procedures concerning the implementation of the SNC Emergency Plan are in the Emergency Plan Implementing Procedures (EPIPs). Those documents describe the duties of individuals and groups in the event of emergencies, and also serve as the interface between the SNC Emergency Plan, plant operations, security, and radiological control programs. SNC also has procedures in place that implement onsite protective actions and personnel accountability during hostile action threats or events that are appropriate for plant and environmental conditions. These procedures are available for use at the plants. There are supporting and complementing emergency plans, including those of federal agencies, the states of Alabama, Georgia, South Carolina, and individual counties.

SNC has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The authority for planning, developing, and coordinating emergency control measures is derived from being the Nuclear Regulatory Commission (NRC) license holder for the nuclear power plants operated by SNC.

The SNC Emergency Plan describes the organization, facilities, training, and maintenance of both onsite and offsite facilities and equipment that will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public.

Three phases of responsive action are described in the SNC Emergency Plan. The first phase includes initial actions to protect personnel and eliminate the potential for further exposure to the hazard. The second phase includes immediate and planned action to terminate the condition, contain any effluent, establish incident boundaries, establish control, channel information, and protect the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively using these phases, emergencies are classified according to increasing severity: Unusual Event, Alert, Site Area Emergency, or General Emergency.

DEFINITIONS

The following are definitions of terms commonly used in this Emergency Plan and each site specific Annex:

Area Radiation Monitoring System (ARMS)

An instrumentation system designed to detect abnormal area radiation levels and activate corresponding station alarms.

Committed Dose Equivalent (CDE)

CDE is the dose equivalent to organs or tissues of reference that will be received from an intake of radioactive material by an individual during the 50-year period following the intake.

Committed Effective Dose Equivalent (CEDE)

CEDE is the sum of the products of the weighting factors applicable to each of the body organs or tissues that are irradiated and the CDE to these organs or tissues.

Deep-Dose Equivalent (DDE)

DDE is the dose equivalent at a tissue depth of 1 cm (1000 mg/cm2), which applies to external whole-body exposure.

Dose Equivalent (DE)

DE is the product of the absorbed dose in tissue, quality factor and all other necessary modifying factors at the location of interest. The units of dose equivalent are the rem and sievert (Sv).

Effective Dose Equivalent (EDE)

EDE is the sum of the products of the dose equivalent to each organ or tissue and a weighting factor applicable to each of the body organs or tissues that are irradiated.

Emergency Action Levels (EALs)

Parameters used to designate a particular classification of emergency. These parameters may include radiological dose rates, levels of airborne or waterborne activity, or instrument indications/plant parameter values.

Exclusion Area Boundary

An area surrounding the reactor in which the reactor licensee has the authority to determine all activities, including exclusion or removal of personnel and property from the area.

Hostile Action

An act towards a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the nuclear power plant. Non-terrorist based EALs should be used to address such activities, (e.g., violent acts between individuals in the owner controlled area).

Hostile Force

One or more individuals who are engaged in a determined assault, overtly or by stealth and deception, equipped with suitable weapons capable of killing, maiming, or causing destruction.

Independent Spent Fuel Storage Installation (ISFSI)

A complex designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

Ingestion Exposure Pathway Emergency Planning Zone (IPZ)

The IPZ is the fifty-mile radius area around an SNC-operated plant site for which protective actions are planned for the general population, farmers, dairy farmers, ranchers, food processors and distributors.

Inplant

The area located within the confines of the SNC Plant Power Block Protected Area.

Letters of Agreement (LOA)

Letters of agreement include contracts, letters or other formal agreements between Southern Company and/or SNC-operated plants and certain off site resources who provide assistance during emergency events, including a Hostile Action, at SNC-operated plants.

Nuclear Administrative and Technical Manual (NATM)

The collection of onsite programs and procedures that prescribes how SNC-operated plants are controlled, operated, maintained, and tested to meet the requirements of applicable licenses, standards, codes, and guides. It establishes effective management practices.

Offsite

Any position or area not located within the confines of the Site Boundary.

Onsite

Any position or area located within the confines of the Site Boundary.

Owner Controlled Area

The area owned by the licensee and located within the confines of the Site Boundary.

Plume Exposure Pathway Emergency Planning Zone (EPZ)

The Plume Exposure Pathway EPZ is the ten-mile radius area around an SNC-operated plant site for which protective actions are planned.

Protected Area(s) (PA)

An area, located within the Site Exclusion Area Boundary, encompassed by physical barriers and to which access is controlled per 10 CFR 73.55. The SNC Power Block Protected Area and the ISFSI Protected Area are two Protected Areas located within the Site Owner Controlled Area.

Protective Actions

Emergency measures taken to avoid or reduce radiation dose. These commonly include sheltering, evacuation, and prophylaxis.

Protective Action Recommendations (PARs)

Protective actions recommended by an SNC-operated plant to governmental authorities to protect the health and safety of the public within the plume exposure pathway during an emergency event at an SNC-operated plant.

Protective Action Guides (PAGs)

The projected dose to individuals that would warrant consideration of protective action against an accidental release of radioactive material.

Sabotage

Deliberate damage, misalignment, or misoperation of plant equipment with the intent to render the equipment inoperable. Equipment found tampered with or damaged due to malicious mischief may not meet the definition of sabotage until this determination is made by security supervision.

Security Condition

Any security event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A security condition does not involve a hostile action.

Site Boundary

The boundary of a reactor site beyond which the land or property is not owned, leased, or otherwise controlled by the licensee.

Total Effective Dose Equivalent (TEDE)

TEDE is the sum of the Deep-Dose Equivalent (for external exposures) and the CEDE (for internal exposures).

Vital Areas

Areas within the protected area that contain equipment vital to the operations of the plant.

SECTION A: ASSIGNMENT OF RESPONSIBILITY

A.1 Primary Federal Organizations

A.1.1 Nuclear Regulatory Commission (NRC)

The NRC acts as the lead federal agency for technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response. The Chairman can transfer control of emergency response activities when deemed appropriate.

Incident Response Centers have been established at the NRC regional offices and NRC headquarters, to centralize and coordinate NRC's emergency response. Provision is made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.

A.1.2 Department of Homeland Security (DHS)

In accordance with the National Response Framework (NRF), DHS is responsible for the overall coordination of a multi-agency Federal response to a significant radiological incident.

A.1.3 Federal Emergency Management Agency (FEMA)

The primary role of FEMA is to support the states by coordinating the delivery of federal non-technical assistance. FEMA coordinates state requests for federal assistance, identifying which federal agency can best address specific needs. If deemed necessary, FEMA will establish a nearby Joint Field Office from which it will manage its assistance activities.

A.1.4 Department of Energy (DOE)

The DOE provides radiological assistance on request, and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The Radiological Assistance Team can be expected to respond to SNC-operated sites as directed by the Savannah River Operations Office of DOE.

A.1.5 Federal Bureau of Investigation (FBI)

Support from the FBI is available through its statutory responsibility, based in public law and the US code, and through a memorandum of understanding for cooperation with the NRC. Notification to the FBI of emergencies in which they would have an interest will be through the provisions of a plant security plan, or by the NRC.

A.1.6 National Weather Service (NWS)

NWS provides meteorological information during emergency situations, if required. Data available will include existing and forecasted wind directions, wind speeds, and ambient air temperatures.

A.1.7 Environmental Protection Agency (EPA)

The EPA can assist with field radiological monitoring, sampling, and non-plant related recovery and reentry guidance.

A.2 State and Local Organizations

A.2.1 State of Alabama

A.2.1.1 Alabama Emergency Management Agency (AEMA)

The Alabama Emergency Management Agency coordinates the Radiological Emergency Plans and offsite operations of affected state agencies and local governments including notification of state and local agencies of a nuclear incident at a nuclear power plant impacting the state of Alabama, direction of activities at the state Emergency Operations Center, coordination of non-radiological operations with utility and federal authorities, and coordination of news information.

A.2.1.2 Alabama Department of Public Health Office of Radiation Control

Through the Alabama Department of Public Health, the Alabama Office of Radiation Control is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. The state plan provides a detailed description of the notification procedures and the responsibilities and duties of the local and state agencies involved. The Alabama Office of Radiation Control has primary responsibility and authority for handling the offsite aspects of an emergency in Alabama with primary focus on the welfare and safety of the general public.

A.2.1.3 Other Alabama State Agencies

Responsibilities of other state agencies are described in the Alabama Radiological Response Plan for Nuclear Power Plants.

A.2.2 State of Georgia

A.2.2.1 Georgia Emergency Management Agency (GEMA)

GEMA is responsible for general state emergency planning and overall direction and control of emergency or disaster operations as assigned by executive order and in accordance with the Georgia Emergency Operations Plan (GEOP). GEMA has responsibilities for coordinating the state of Georgia response to emergencies at nuclear power plants.

A.2.2.2 Department of Natural Resources Environmental Protection Division (DNR-EPD)

The DNR-EPD has primary responsibility for implementation and administration of the state radiological emergency response function.

A.2.2.3 Other Georgia State Agencies

Responsibilities of other state agencies are described in the Georgia Emergency Operations Plan (GEOP).

A.2.3 State of South Carolina

A.2.3.1 Emergency Management Division (EMD)

The EMD is assigned the responsibility for coordinating the emergency planning efforts of state, county, and municipal agencies in accordance with the South Carolina Radiological Emergency Response Plan (SCORERP); conducting a preparedness program to assure capability of the government to execute the plan; establishing and maintaining a State EOC and providing support of the State emergency staff and work force; and establishing an effective system for reporting, analyzing, and disseminating emergency information.

A.2.3.2 Department of Health and Environmental Control (DHEC), Nuclear Emergency Planning Section

The Department of Health and Environmental Control (DHEC) maintains a radiological hazard assessment capability and provides technical support, coordination, and guidance for the State and local governments. It will conduct and/or coordinate radiological surveillance and monitoring in coordination with DOE-Savannah River Site (SRS) and nuclear power plants. DHEC will obtain and coordinate radiological assistance resources from the Federal Government, other states, and the nuclear industry as required.

A.2.3.3 Other South Carolina State Agencies

Responsibilities of the other state agencies are described in the South Carolina Radiological Emergency Response Plan (SCORERP).

A.2.4 Emergency Planning Zone (EPZ) Counties

The Emergency Management Agencies representing the counties of Aiken, Allendale, Appling, Barnwell, Burke, Early, Henry, Houston, Jeff Davis, Tattnall, and Toombs have the responsibility for notification and providing direction to residents in the event of an emergency that affects their respective jurisdiction. The 24-hour notification points have the responsibility to notify necessary local civil support groups in the event of an accident. The County is responsible for protection of the public and can provide personnel and equipment for evacuation, relocation and isolation.

A.3 Contractor and Private Organizations

A.3.1 Southern Nuclear

Southern Nuclear Operating Company (SNC) serves as the architect-engineer.

A.3.2. Bechtel Power Corporation

SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.

A.3.3 Westinghouse

SNC has established an agreement with Westinghouse to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. Westinghouse provides the capability to respond on a 24-hour-a-day basis.

A.3.4 General Electric Company (GE)

The licensee has established an agreement with GE to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. GE provides a capability to respond on a 24-hour-a-day basis.

A.3.5 Radiological Monitoring Assistance

Radiological monitoring in the plant and in the environs, both onsite and offsite, will be augmented by outside vendors as necessary. Initial radiological monitoring will be performed by available Southern Company resources (e.g., Georgia Power Company (GPC) Central Laboratory).

A.3.6 Contract Laboratories

SNC-operated plants maintain contracts with offsite laboratories to assist with emergency analytical services. Copies of these contracts are maintained in accordance with Emergency Plan procedures.

A.4 Other Utilities

The Institute of Nuclear Power Operations (INPO) aids nuclear utilities in obtaining resources beyond their usual capabilities during recovery from an emergency. As one of its roles, INPO will assist affected utilities by applying the resources of the nuclear industry to meet the needs of an emergency.

A.5 Agreements

Letters of Agreement (LOAs) are not necessary with federal and state agencies that are legally required to respond to an emergency; however, agreements are necessary if an agency is expected to provide assistance not required by law. Written agreements have been developed which establish the extent of operations between SNC-operated plants and other support organizations that have an emergency response role consistent with this plan. These agreements identify the emergency measures to be provided, the mutually accepted criteria for implementation, and the arrangements for exchange of information.

The respective nuclear power plants have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOAs are referenced in the site-specific plant Annexes and the actual letters are maintained in accordance with 10 CFR 50, Appendix E, IV.A.7.

SECTION B: EMERGENCY RESPONSE ORGANIZATION (ERO)

B.1 Normal Plant Organization

The normal onsite organization of an SNC-operated nuclear power plant provides a staff capable of providing the initial response to an emergency event. The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. The number and ERO position titles of personnel available within 75 minutes following declaration of an Alert or higher classification are shown in Tables 1, 2, 3, and 4.

SNC plants maintain 24-hour emergency response capability. The normal on-shift complement provides the initial response to an emergency. This group is trained to respond to emergency situations until the augmented Emergency Response Organization (ERO) arrives. The ERO is composed of personnel with specialties in operations, maintenance, engineering, radiochemistry, radiation protection, fire protection, and security.

B.1.1 The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing off site emergency measures. The ED, at their discretion or when procedurally required, activates the ERO.

The Emergency Director's non-delegable duties include:

- Event classification in accordance with the emergency classification system.
- Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination.
- Notifications of offsite agencies and approval of state, local, and NRC notifications.
- Authorization of emergency exposures in excess of federal limits.
- Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent.
- Request federal assistance as needed.

After being relieved as Emergency Director, the Shift Manager directs the activities of the operating crew and is responsible for the safe operation of the plant. The Shift Manager, after relinquishing duties and responsibilities of the Emergency Director, functionally reports to the Operations Supervisor in the Technical Support Center (TSC).

B.1.2 Shift Supervisors, who hold Senior Reactor Operator (SRO) licenses, supervise operation of the unit and may assume the duties of the ED in the absence of the Shift Manager. Additional details of the normal on-shift organization are contained in the site specific annexes to this Plan.

B.2 On Site Emergency Response Organization (ERO)

Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF) and JIC are detailed below. A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24-hour-a-day basis for an extended event. On-shift as well as offsite state and local government interfaces are detailed in the site-specific Annexes.

Command and Control normally shifts from the Control Room to the TSC and subsequently to the EOF. Command and Control may move in either direction, depending on conditions that would warrant passing such authority. Command and Control may be completed sequentially or in parallel, based on the discretion of the EDs. A qualified ED in either facility can relieve the other facility of the Command and Control authority and responsibilities. Figure B.2.A depicts the transition of Command and Control responsibilities between facilities. Alternative Facilities have been identified to ensure timely ERO response during a hostile action event. Details on the Alternative Facilities are included in Section H.

CONTROL ROOM	TSC	EOF
Shift Manager / Emergency Director	**TSC Emergency Director**	**EOF Emergency Director**
Classification →	Classification	
Notifications →		Notifications
PARs →		PARs
Emergency Exposure Controls →	Emergency Exposure Controls	

Figure B.2.A Transition of Command and Control Functions

B.2.1 Technical Support Center (TSC)

See Figure B.2.1.A at the end of Section B.

B.2.1.1 TSC Emergency Director (ED)

The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure Authorization, and on-site protective actions.

B.2.1.2 TSC Manager

The TSC Manager reports to the TSC ED and is responsible for coordinating activities between the TSC and other emergency response facilities, directing the activities of the TSC staff, and ensuring communications are established with applicable offsite agencies.

B.2.1.3 TSC Operations Supervisor

The Operations Supervisor reports to the TSC Manager. Major position functions include evaluating plant conditions and initiating mitigation actions, coordinating TSC efforts in determining the nature and extent of plant conditions affecting plant equipment, actions to limit or contain the emergency, invoking the provisions of 10 CFR 50.54(x) if appropriate, assisting the OSC Manager in determining the priority assigned to OSC activities, and timely completing offsite notifications.

B.2.1.4 TSC Maintenance Supervisor

The Maintenance Supervisor reports to the TSC Manager and is responsible for planning and coordination of repair, damage control, and plant modification activities. The Maintenance Supervisor works closely with the Engineering Supervisor in planning for plant modifications and repairs.

B.2.1.5 TSC Radiation Protection (RP) Supervisor

The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Health Physics Network (HPN) Communicator. The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.

B.2.1.6 TSC Dose Analyst

The Dose Analyst reports to the RP Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.

B.2.1.7 TSC Engineering Supervisor

The Engineering Supervisor reports to the TSC Manager. The TSC Engineering Supervisor is responsible for the overall direction of Engineering Group activities and assessment. The Engineering Supervisor also directs the analysis of plant problems and core damage, and provides recommendations for plant modifications to mitigate the effects of the accident.

B.2.1.8 TSC Reactor Engineer

The Reactor Engineer reports to the Engineering Supervisor in the TSC. The Reactor Engineer is responsible for monitoring core conditions and providing recommendations to maintain the viability of the core. The Reactor Engineer relieves the Shift Technical Advisor (STA) of Core Thermal Analysis responsibilities.

B.2.1.9 TSC Engineering Support

The TSC Engineering Support reports to the Engineering Supervisor in the TSC. The TSC Engineering Support is responsible for monitoring the plant systems and planning corrective actions as appropriate.

B.2.1.10 TSC Chemistry Support

The TSC Chemistry Support reports to the RP Supervisor. The TSC Chemistry Support is responsible for directing and evaluating in-plant chemistry and analyses, directing and evaluating post-accident sampling, and assisting in core damage assessment.

B.2.1.11 TSC Emergency Notification System (ENS) Communicator

The ENS Communicator reports to the Operations Supervisor and is responsible for ensuring NRC notifications are completed in accordance with the requirements of 10 CFR 50.72 and 73.

B.2.1.12 TSC Health Physics Network (HPN) Communicator

The HPN Communicator reports to the RP Supervisor and is responsible for providing radiological and environmental information to the NRC on the HPN Line.

B.2.1.13 TSC Emergency Response Facility (ERF) Communicator

The ERF Communicator reports to the TSC ED. The ERF communicator is responsible for staffing continuous communications links with their CR, OSC and EOF counterparts.

B.2.1.14 TSC Security Supervisor

The Security Supervisor reports to the TSC Manager. The TSC Security Supervisor is responsible for carrying out the plant security and Access Control program, maintaining personnel accountability onsite, and assisting in evacuation of onsite areas.

B.2.1.15 TSC Support Coordinator

The Support Coordinator reports to the TSC Manager and directs the clerical and logistic activities in the TSC, ensures support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers, and ensures office supplies, drawings, and other documents are available to TSC and OSC personnel.

B.2.2 Operations Support Center (OSC)

See Figure B.2.2.A at end of Section B.

B.2.2.1 OSC Manager

The OSC Manager reports to the TSC Manager and directs a staff in providing labor, tools, protective equipment, and parts needed for emergency repair, damage control, firefighting, search and rescue, first aid, and recovery.

B.2.2.2 OSC Mechanical Maintenance Group Lead

The Mechanical Maintenance Group Lead reports to the OSC Manager and provides oversight for Mechanical Maintenance personnel. Their responsibilities include planning the activities, briefing and debriefing the teams, tracking job progress, and maintaining periodic communication with the teams.

B.2.2.3 OSC Electrical Group Lead

The Electrical Group Lead reports to the OSC Manager and provides oversight for Electrical Maintenance personnel. Their responsibilities include planning work activities, team member selection and briefing, tracking job progress, and maintaining communication.

B.2.2.4 OSC RP/Chemistry Group Lead

The RP/Chemistry Group Lead reports to the OSC Manager and provides oversight for RP and Chemistry Technicians. Their responsibilities include onsite radiological surveys, access control, personnel monitoring and decontamination, dosimetry issuance and monitoring, and onsite habitability surveys.

B.2.2.5 OSC I&C Group Lead

The I&C Group Lead reports to the OSC Manager and provides oversight for I&C Maintenance personnel. Their responsibilities include planning work activities, team member selection and briefing, tracking job progress, and maintaining communication.

B.2.2.6 OSC ERF Communicator

The ERF Communicator reports to the OSC Manager and is responsible for maintaining communications with their counterpart in the Control Room, TSC and EOF.

B.2.2.7 OSC Personnel

Selected personnel report to the OSC as directed. Emergency personnel from the Maintenance, Operations, and RP/Chemistry Departments are directed to report to the OSC. OSC teams are headed by a designated team leader, who maintains communication with the OSC. The following emergency teams may be formed by OSC personnel, as necessary:

- Search and rescue.
- Repair.
- Post-accident sampling.
- Internal survey.
- Field monitoring.

B.3 Offsite Emergency Response Organization (ERO)

The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company corporate offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.1.D and B.1.E. The EOF and JIC Organizations may also include state and local personnel.

B.3.1 EOF Organization

The EOF Organization consists of selected management and staff members located in the SNC Corporate Office. This organization is responsible for providing offsite emergency response support and resources, as needed. The EOF Organization is displayed on Figure B.1.D. When the EOF is activated, EOF staff electronic devices are activated, and EOF personnel are expected to report to the EOF. Personnel who are not needed to augment positions are briefed and dismissed with a standby status.

See Figure B.3.1.A at end of Section B.

B.3.1.1 EOF Emergency Director

The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.

B.3.1.2 EOF Manager

The EOF Manager reports to the EOF ED and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.

B.3.1.3 EOF Support Coordinator

The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the TSC for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.

B.3.1.4 EOF Dose Assessment Supervisor

The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies.

B.3.1.5 EOF Dose Analyst

The Dose Analyst reports to the Dose Assessment Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.

B.3.1.6 EOF Field Team Coordinator

The Field Team Coordinator reports to the Dose Assessment Supervisor. The Field Team Coordinator develops the environmental sampling strategy in response to potential radiological releases and advises the Dose Assessment Supervisor and Dose Analyst of measured radiological values in the environment.

B.3.1.7 EOF Field Team Communicator

The Field Team Communicator reports to the Field Team Coordinator. The Field Team Communicator is responsible for communications with the Environmental Teams, providing them sampling direction and plant status with respect to team safety.

B.3.1.8 EOF Emergency Notification Network (ENN) Communicator

The ENN Communicator in the EOF reports to the Emergency Communication Coordinator and is responsible for providing offsite agency notifications and periodic updates.

B.3.1.9 EOF Emergency Notification System (ENS) Communicator

The ENS Communicator reports to the Emergency Communication Coordinator and is responsible for ensuring NRC notifications applicable to EOF operations are completed in accordance with the requirements of 10 CFR 50.72 and 73.

B.3.1.10 EOF Emergency Communications Coordinator

The Emergency Communications Coordinator reports to the EOF Manager. The Emergency Communications Coordinator is responsible for assisting with the coordination and facilitation of communications both within the facility as well as with external agencies.

B.3.1.11 EOF Security Coordinator

The Security Coordinator reports to the EOF Manager. The duties and responsibilities of the Security Coordinator will be assumed by SNC corporate personnel. Responsibilities include supporting the plant security manager, keeping the EOF Manager informed of any security events or issues, communication of Security Related information to the NRC using the security bridge line, and as establishing and maintaining access control for the EOF.

B.3.1.12 EOF Offsite Response Coordinator

The Offsite Response Coordinator reports to the EOF Manager. The duties and responsibilities of the Offsite Response Coordinator include coordination of activities for the dispatch and update of technical liaisons to state and local authorities and monitoring EOF functional areas to facilitate coordination between the licensee and state and local agencies.

B.3.1.13 EOF Health Physics Network (HPN) Communicator

The HPN Communicator reports to the Dose Assessment Supervisor and is responsible for providing radiological and environmental information to the NRC using the HPN Line.

B.3.1.14 EOF Administrative Support Staff

The Administrative Support Staff report to the EOF Support Coordinator. The administrative support staff is responsible for providing clerical and administrative

support to the Emergency organization, making entries to and retrieving data from the Nuclear Network, retrieval of file documents, and updating status boards using information provided from the sites.

B.3.1.15 EOF Liaisons

Liaisons report to the Offsite Response Coordinator and respond to the applicable state and county Emergency Operations Centers (EOCs) as required by the type and source of the event. Liaisons are assigned to Georgia, Alabama, and/or South Carolina state EOCs depending on which SNC site declared the initiating event.

B.3.1.16 EOF Emergency Response Facility (ERF) Communicator

The ERF Communicator reports to the EOF Emergency Director and is responsible for maintaining communications with their counterpart in the Control Room, TSC and OSC.

B.3.1.17 EOF Technical Supervisor

The Technical Supervisor reports to the EOF Manager and is responsible for providing engineering expertise during an emergency event at an SNC-operated plant. This may include interacting with non-SNC response groups, developing mitigation and recovery plans, and coordinating work performed by SNC and non-SNC engineering groups.

B.3.1.18 EOF News Writer

The News Writer reports to the EOF Manager, gathers information, and prepares news bulletins verified for distribution. The News Writer coordinates technical approval with the EOF Manager.

B.3.2 Joint Information Center (JIC)

See Figure B.3.2.A at end of Section B.

B.3.2.1 Public Information Director (PID)

The PID is responsible for coordination of emergency information between the utility and responding offsite organizations participating in the Corporate Media Center (CMC) or Joint Information Center (JIC). Additional duties include managing approval and dissemination of utility news bulletins, facilitating news briefings, overseeing public response, serving as liaison to the media and coordinating offsite agencies. The PID is responsible for evaluating the emergency's severity in terms of public interest and safety. The PID may delegate emergency communications approval authority to other staff members.

B.3.2.2 JIC Manager

The JIC Manager reports to the PID and supervises the activities of the technical and communications advisors, technical communicator and an administrative staff. The JIC Manager responsibilities include:

- Providing the EOF Manager with an overview of the public and media impacts of plant and governmental activities.

- Advising the Nuclear Spokesperson regarding information to be released to the public.
- Maintaining up-to-date knowledge of conditions of the plant and environment, and the actions of SNC and governmental support personnel.
- Coordinating with the state to review and access media coverage of the emergency event.

B.3.2.3 JIC Assistant

The JIC Assistant reports to the JIC Manager and is responsible for supervision and direction of clerical staff in the facility; verification, approval, and distribution of news bulletins; direction of support staff activities; and maintenance of an accurate record of facility activities.

B.3.2.4 Facility Coordinator

The Facility Coordinator reports to the JIC Manager and is responsible for setting up the facility and ensuring ongoing operability, as well as providing oversight for facility Security personnel.

B.3.2.5 Public Response Coordinator

The Public Response Coordinator reports to the PID and is responsible for directing the facility's public response activities, keeping staff informed of the most current plant status, and obtaining responses for rumors and public inquiries.

B.3.2.6 Public Response Staff

The Public Response Staff reports to the Public Response Coordinator and is responsible for coordinating and developing responses to rumors and public inquiry.

B.3.2.7 Media Relations Representative

The Media Relations Representative reports to the JIC Manager and is responsible for implementing utility media response and supervision of AV staff.

B.3.2.8 Nuclear Spokesperson

The Nuclear Spokesperson speaks on behalf of the company, providing plant status updates during news briefings. The Spokesperson also may do one-on-one media interviews. The position works with the Technical Assistant in keeping abreast of the event status and keeps the Public Information Director (PID) posted on that status

B.3.2.9 Technical Assistant

The Technical Assistant reports to the Nuclear Spokesperson and is responsible for gathering accurate and timely information about the event and the plant's status from displays, ENN Forms and the EOF staff.

B.4 Contractor and Private Organizations

B.4.1 Vendors and Contractors

Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation, General Electric Corporation, and Bechtel Power Corporation, which can provide the following assistance in an emergency:

- Trained personnel.
- Technical analysis.
- Operational analysis.
- Accident and transient analysis.

B.4.2 Other Utilities

- Other nuclear power plant organizations may provide personnel and equipment. Prior written agreements frequently exist in these situations.
- The unaffected SNC plants provide mutual support;
- Assistance from any nuclear power plant may be requested through an existing INPO link;
- Voluntary Assistance Groups.

B.4.3 Other Organizations

B.4.3.1 Contract laboratories can provide assistance in environmental monitoring and sampling.

B.4.3.2 National Weather Service (NWS) provides up to date meteorological information to the individual nuclear power plants.

B.4.3.3 Local Organizations

Other local organizations are detailed in the site-specific Annexes.

B.5 Letters of Agreement (LOAs)

The respective nuclear power plants have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOA's are referenced in the site-specific plant Annex and the actual letters are maintained in accordance with Emergency Plan procedures.

B.6 Local Emergency Support Organizations

B.6.1 Local Law Enforcement Agencies

Local law enforcement agencies may be called upon to lend assistance during the response to emergencies at any of the SNC-operated nuclear power plants. Details on the services offered are in the SNC plant's site-specific Annex.

B.6.2 Ambulance Services

Agreements for ambulance services are in place to transport injured personnel from the plants to the designated medical facility. Training is provided for the transport of contaminated personnel, and qualified utility personnel may accompany the ambulance. Details on the services offered are in the SNC plant's site-specific Annex.

B.6.3 Medical Services

Prior arrangements have been made for medical treatment at a variety of facilities. SNC-operated nuclear power plants are supported, and sites offer training to the medical staff in dealing with contaminated injured personnel. Details on the services offered are the SNC plant's site-specific Annex.

B.6.4 Fire Fighting

To supplement the Fire Brigade on-site, agreements are made with local fire departments. Details on the services offered may be found in the SNC plant's site-specific Annex.

TSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control		Emergency Director
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		Health Physics Network (HPN) Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Radiation Protection (RP) Supervisor
		Dose Analyst*
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue first aid, & firefighting	
	Personnel monitoring	
	Dosimetry	
Total		**13**

Note: Site Annexes contain any additional site specific staffing.
*** Security Supervisor is filled by on shift Security Supervisor. Dose Analyst is filled by the on-shift Chemistry Technician.**
**** Support Coordinator does not have a 75-minute Augmentation Time.**

Table 1

OSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Tasks**	**Position Title**
Emergency Direction and Control		OSC Manager
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Lead (1) Field Monitoring Team Assistant (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP /Chemistry Group Lead
	• RP coverage for repair, corrective actions, search and rescue first aid, & firefighting • Personnel monitoring • Dosimetry	RP Technicians (2)
Total		**14**

Table 2

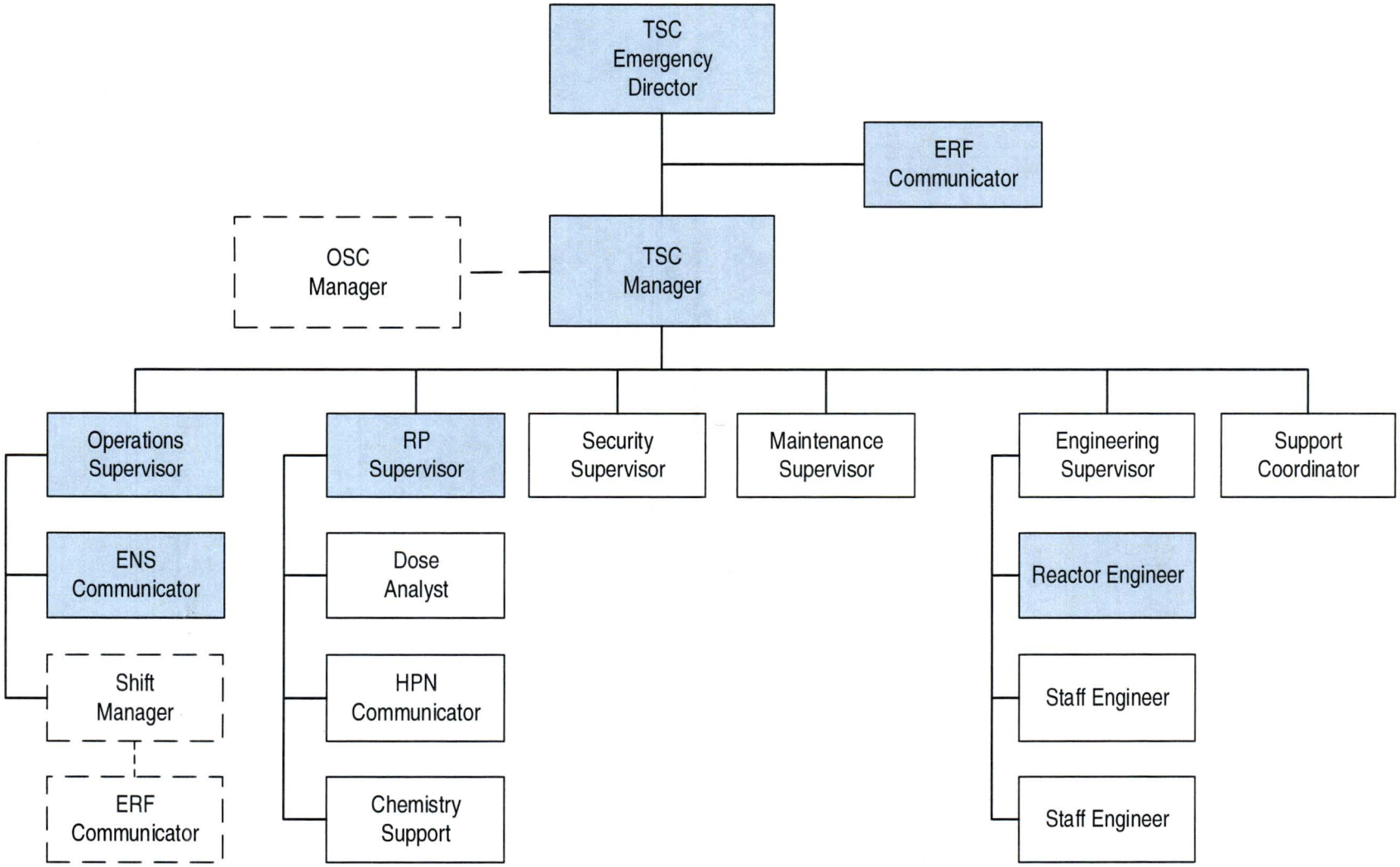
EOF 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control	Emergency Operations Facility (EOF) Director	Emergency Director (ED)
		EOF Manager
		Support Coordinator**
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff **
		Liaisons (at EOCs)** - GA - AL - SC
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		News Writer
		Field Team Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
	Chemistry/Radio Chemistry	Not required in this facility
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue first aid, & firefighting	
	Personnel monitoring	
	Dosimetry	
Total		**17**

Table 3

**Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute Augmentation Time.

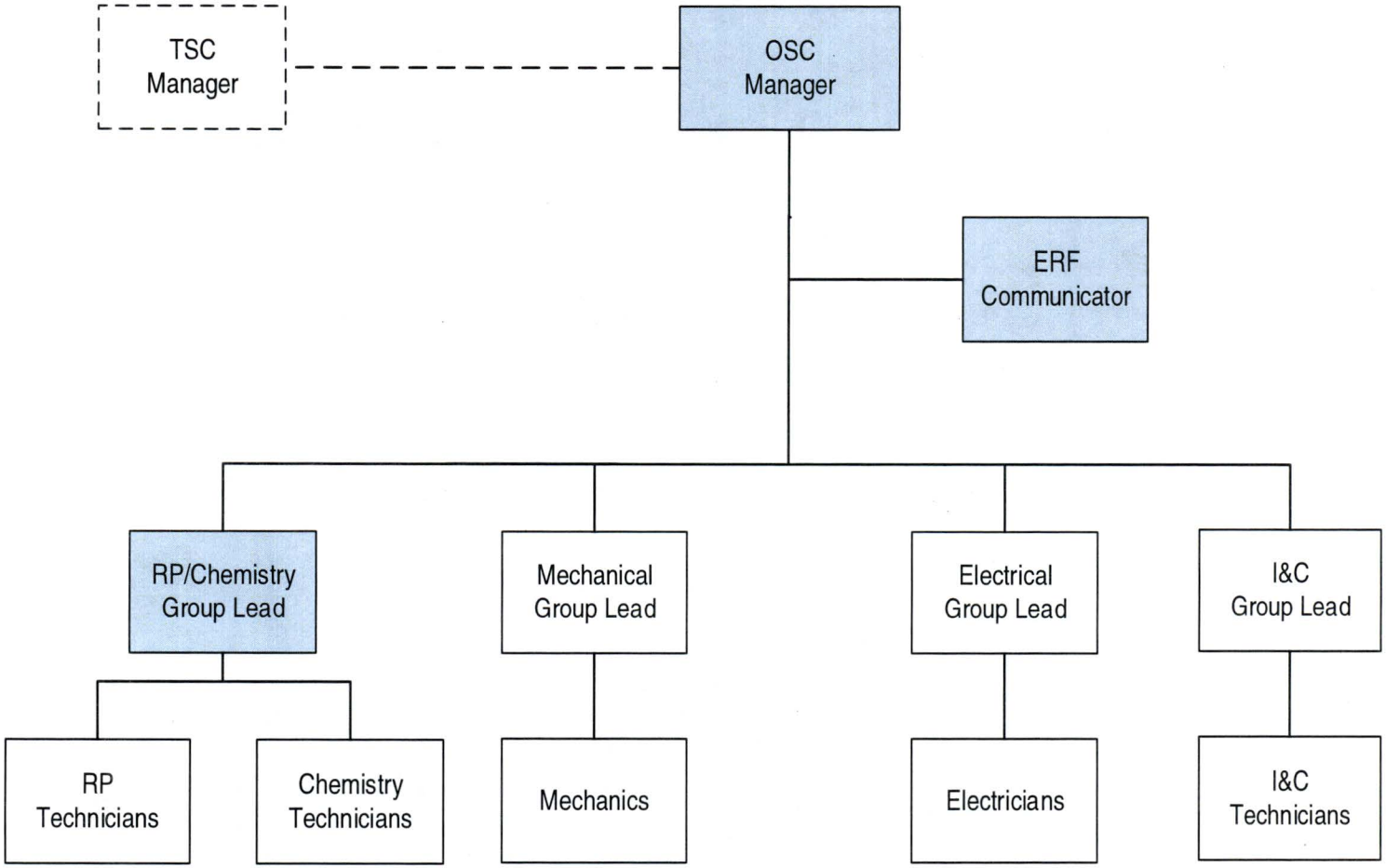
JIC Staff*		
Functional Area	**Major Task**	**Position Title**
Media Response	Media Response	Public Information Director
		Nuclear Spokesperson
		Technical Assistant
		JIC Manager
		JIC Assistant
		Facility Coordinator
		Clerical Staff
		Security
		Public Response Coordinator
		Public Response Staff
		Media Relations Representative
Total		**5**
Note: * JIC Staff does not have a 75-minute Augmentation Time.		

Table 4



Minimum Staff positions are shaded boxes

Figure B.2.1.A – Technical Support Center Organization



Minimum Staff positions are shaded boxes

Figure B.2.2.A – Operations Support Center Organization

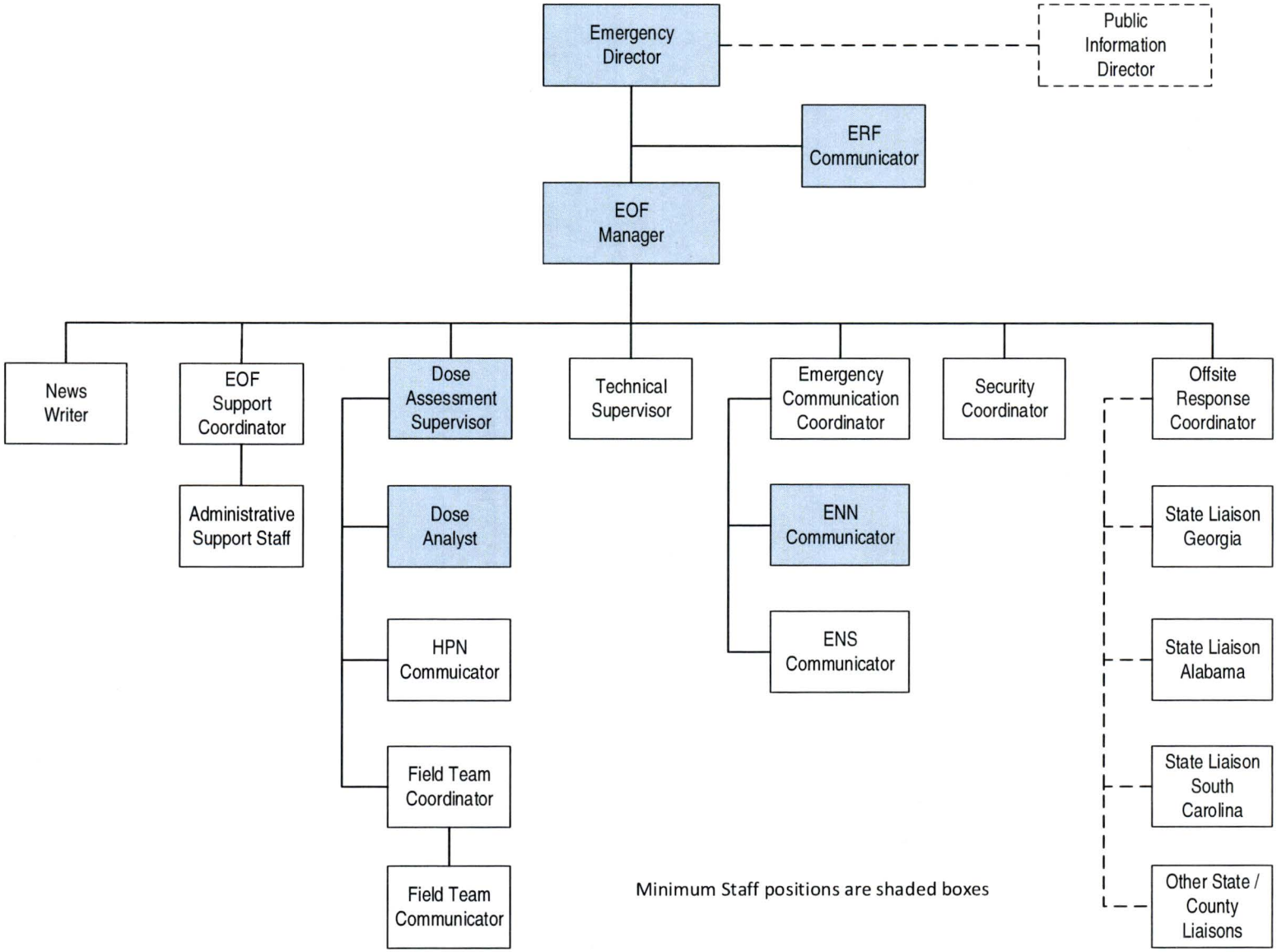
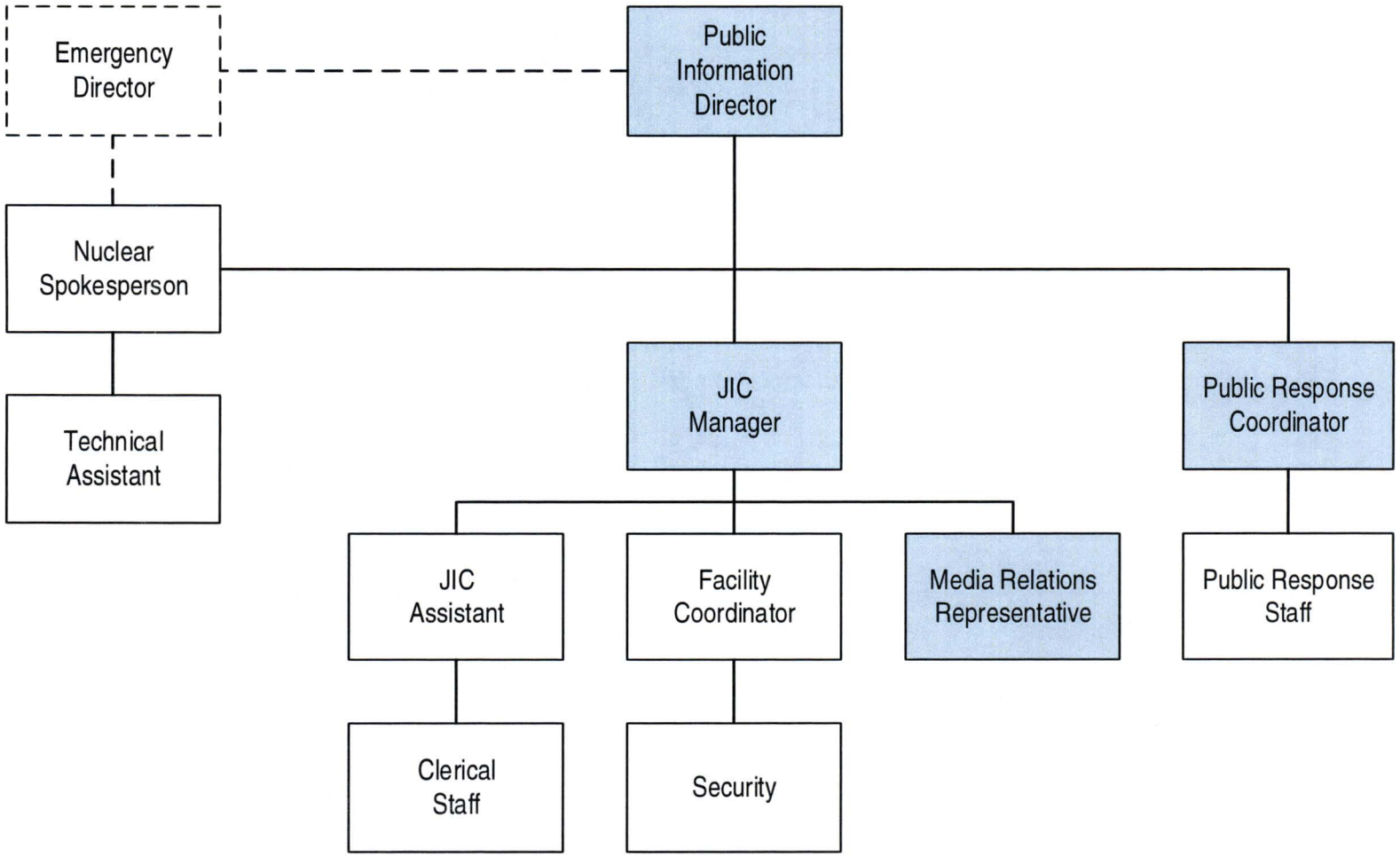


Figure B.3.1.A – Emergency Operations Facility Organization



Minimum Staff Positions are shaded boxes

Figure B.3.2.A – Joint Information Center Organization

SECTION C: EMERGENCY RESPONSE SUPPORT AND RESOURCES

Once an emergency has been declared, the Emergency Director (ED) has the authority and responsibility to request aid from offsite organizations, whether they are other SNC-operated nuclear power plants, federal, state, local, or private organizations.

C.1 Federal Assistance

Federal agencies that may provide assistance in direct support of SNC in the event of an accident are identified in Section A of this plan. If needed, federal resources are expected to be made available to SNC.

C.2 State Interfaces

Designated SNC personnel are assigned to the state or county Emergency Operations Centers (EOCs). Locations have been provided in the EOF for liaisons from the state and county.

C.3 Radiological Laboratories

C.3.1 Onsite Laboratory

The onsite laboratory/counting rooms at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of marine and air samples, and qualitative analysis of terrestrial samples.

Additional facilities for counting and analyzing samples are available at the other SNC-operated nuclear plants or state and federal laboratory services. These laboratories can act as backup facilities in the event that the affected nuclear power plant's counting room and laboratory become unusable or the capacity or capability of the plant's laboratory is exceeded.

C.3.2 Contract Laboratories

Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.

C.4 Assistance Agreements

C.4.1 Nuclear Industry

The nuclear industry provides a reservoir of personnel with a wide range of technical expertise and knowledge. A nuclear industry national inventory of personnel who may be called upon to supplement company personnel has been developed through the Institute of Nuclear Power Operations (INPO). In addition, a number of utilities have entered into an INPO coordinated Voluntary Assistance Agreement program. This provides a mechanism to draw on industry resources during an emergency. Support may also be requested from neighboring utilities for the following:

- Personnel and equipment to assist with in-plant and emergency field monitoring.

- Engineering, design, and technical expertise to assist in determining the cause of the accident and to support recovery.
- Personnel and equipment to assist in maintenance and repairs to the facility.
- SNC-operated plants are a signatory to two comprehensive agreements among electric utility companies:
- Nuclear Power Plant Emergency Response Voluntary Assistance Agreement.
- Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials.

C.4.2 Offsite resources

SNC supports the sharing of personnel and resources among SNC-operated nuclear power plants, providing a large personnel and equipment base.

C.4.2.1 American Nuclear Insurers (ANI)

ANI provides insurance to cover SNC legal liability up to the limits imposed by the Price-Anderson Act, for bodily injury and/or property damage caused by the nuclear energy hazard resulting from an accident at a nuclear power plant.

C.4.2.2 Civil/Structural Engineers

Plants have an Architect-Engineer that could be called on to provide engineering expertise in dealing with a nuclear power plant accident.

C.4.2.3 Nuclear Steam Supply System Vendor

Under established contracts, the following will supply available engineering expertise, specialized equipment, and other services identified as needed and deemed appropriate to provide in an emergency situation:

- General Electric (GE) Nuclear Energy.
- Westinghouse Electric Company.

C.4.2.4 Supplemental Emergency Assistance to the ERO

SNC-operated nuclear power plants maintain agreements with outside support agencies that do not take part in the organizational control of the emergency, but provide assistance when called on during an emergency or during the recovery phase. These agreements identify the emergency measures to be provided, the mutually accepted criteria for implementation, and the arrangements for exchange of information. These support agencies provide services of:

- Law enforcement.
- Fire protection.
- Ambulance services.
- Medical and hospital support.
- DOE Radiological Assistance Program (RAP).

C.4.2.5 Local Response Organizations

In many cases, local groups provide for emergency communications and other services, such as transportation and medical assistance. References to these groups are contained in the site-specific Annexes.

SECTION D: EMERGENCY CLASSIFICATION SYSTEM

D.1 Classification of Emergencies

D.1.1 Emergency Conditions

D.1.1.1 Emergency classification is divided into four classification levels described in 10 CFR 50 Appendix E and NUREG 0654 and based on NEI 99-01 and 07-01 methodologies.

Emergency Action Levels (EALs), based on indications available in the control room and correlated to the emergency classifications, are provided to the operator.

SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.

The classification scheme is provided to and discussed by Southern Nuclear Company, agreed upon by state and county governmental authorities and approved by the NRC. The classification scheme and specific Emergency Action Levels are reviewed with the State and local governmental authorities on an annual basis.

D.1.1.2 Emergency Classification Level Descriptions

There are three considerations related to emergency classification levels. These are:

(1) The potential impact on radiological safety, either as known now or as can be reasonably projected.

(2) How far the plant is beyond its predefined design, safety, and operating envelopes.

(3) Whether or not conditions that threaten health are expected to be confined to within the site boundary.

The Initiating Conditions (ICs) deal explicitly with radiological safety impact by escalating from levels corresponding to releases within regulatory limits to releases beyond EPA Protective Action Guideline (PAG) plume exposure levels.

The four emergency classification levels are described as follows:

UNUSUAL EVENT (UE)

Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

ALERT

Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment

because of hostile action. Any releases are expected to be limited to small fractions of the EPA PAG exposure levels.

SITE AREA EMERGENCY (SAE)

Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts toward site personnel or equipment that could 1) lead to the likely failure of, or 2) prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA PAG exposure levels beyond the site boundary.

GENERAL EMERGENCY (GE)

Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.

D.2 Basis for Emergency Classification Criteria

D.2.1 Emergency Action Levels.

Planned evolutions involve preplanning to address the limitations imposed by the condition, the performance of required surveillance testing, and the implementation of specific controls prior to knowingly entering the condition, in accordance with the specific requirements of Technical Specifications. Planned or unplanned activities that cause the plant to operate beyond the limits allowed by Technical Specifications may result in an EAL threshold being met or exceeded. Planned evolutions to test, manipulate, repair, or perform maintenance or modifications to systems and equipment that result in an EAL value being met or exceeded are not subject to classification as long as the evolution proceeds as planned and is within the operational limitations imposed by the operating license.

Classifications are based on evaluation of the applicable Unit. Classifications are based on valid indications, reports, or conditions. Thresholds assume valid indications. Reports or conditions are considered valid when they are verified by 1) an instrument channel check, or 2) indications on related or redundant indications, or 3) by direct observation by plant personnel, in such a way that any doubt as to the indication's operability, the condition's existence, or the report's accuracy is removed. Implicit in this definition is the need for timely assessment.

Although the majority of the EALs provide very specific thresholds, the Emergency Director must remain alert to events or conditions that lead to the conclusion that exceeding the EAL is imminent. If, in the judgment of the Emergency Director, an imminent situation is at hand, the classification should be made as if the threshold has been exceeded.

An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant

conditions. The ICs are segregated into Recognition Categories. The Recognition Categories are:

- **R** – Abnormal Radiological Levels/Radiological Effluent.
- **C** – Cold Shutdown/Refueling System Malfunctions.
- **E** – Independent Spent Fuel Storage Installations (ISFSI).
- **F** – Fission Product Barrier.
- **H** – Hazards and Other Conditions Affecting Plant Safety.
- **S** – System Malfunction.

With each IC are Threshold Values (TV) that provide the criteria for classification associated with the appropriate classification level. When the IC is observed to exist, the TV must also be met, exceeded or in some cases imminent to become a classifiable Emergency Action Level.

The Fission Product Barrier and System Malfunction criteria are only applicable when in the hot operating modes. The Cold Shutdown/Refueling System malfunctions are only applicable in cold shutdown and Defueled modes or as specifically designated in each EAL. The EALs associated with the Radiological, ISFSI, and Hazards categories are applicable in all modes of operation.

D.2.2 Initiating Conditions have symptom-based, event-based, or barrier-based criteria.

Symptom-based ICs refer to those indicators that are measurable over some continuous spectrum, such as core temperature, coolant levels, or containment pressure. When one or more of these indicators begin to show off-normal readings, reactor operators are trained to identify the probable causes and potential consequences of these "symptoms" and take corrective action. The level of seriousness that these symptoms indicate depends on the degree to which they have exceeded technical specifications, the other symptoms, or events that are occurring contemporaneously, and the capability of the licensed operators to gain control and bring the indicator back to safe levels.

Event-based ICs refer to occurrences with potential safety significance, such as the failure of a safety valve or a loss of electric power to some part of the plant. The range of seriousness of these "events" is dependent on the location, number of contemporaneous events, remaining plant safety margin, and so forth.

Barrier-based ICs refer to the level of challenge to the principal barriers that ensure containment of radioactive materials contained within a nuclear power plant. For radioactive materials that are contained within the reactor core, these barriers are: fuel cladding, reactor coolant system pressure boundary, and containment. The level of challenge to these barriers encompasses the extent of damage (loss or potential loss) and the number of barriers concurrently under challenge. In general, challenge to one or more barriers is initially identified through instrument readings and periodic sampling. Deterioration of the reactor coolant system pressure boundary or the fuel clad barrier usually indicates an Alert condition, two barriers under challenge a Site Area Emergency, and loss of two barriers with the third barrier under challenge is a General Emergency. The fission product barrier criteria

recognize that some events may represent a challenge to more than one barrier, and that the containment barrier is weighted less than the reactor coolant system pressure boundary and the fuel clad barriers.

D.2.3 Emergency Action Level Threshold Values

The most common bases for establishing Threshold Values are the Technical Specifications, Operating Procedures, the Offsite Dose Calculation Manual (ODCM), and setpoints that have been developed in the design basis calculations for the Final Safety Analysis Report (FSAR).

Another critical element of the analysis to arrive at Threshold Value conditions is the time that the plant might stay in that condition before moving to a higher emergency classification level. The time dimension is critical to the EAL, since the purpose of the emergency classification level for state and local officials is to notify them of the level of mobilization that may be necessary to address the emergency. This is particularly true when a Site Area Emergency or General Emergency is imminent. A time variable is used to allow for correction of the condition before a classification is made.

Site-specific Threshold Values for Emergency Action Level Initiating Conditions are maintained in the station's Emergency Action Level Technical Basis document.

D.2.4 Treatment of Multiple events and Classification Level Upgrading

When multiple simultaneous events occur, the emergency classification level is based on the highest EAL reached. Emergency classification level upgrading considers the potential for radioactive release from the entire site due to the event or simultaneous events.

D.2.5 Emergency Classification Level Downgrading and Termination

The SNC policy is that once an emergency classification is made, it cannot be downgraded to a lower classification. Termination criteria contained in the Emergency Plan Implementing Procedures shall be completed for an event to be terminated. At termination, on an event specific basis, the site can either enter normal operating conditions or enter a recovery condition with a recovery organization established for turnover from the ERO.

D.2.6 Classifying Transient Events

Many of the Initiating Conditions and/or EALs described in this document employ time-based threshold criteria. These criteria will require that the threshold conditions be present for a defined period of time before an emergency classification is warranted. In cases where no time-based criteria are specified, it is recognized that some transient events may cause an EAL threshold to be met for a few seconds to a few minutes. The following guidance should be applied to the classification of these events.

<u>EAL threshold momentarily met during expected plant response</u> - There may be instances where an EAL threshold is briefly met during an expected plant response. In these cases, an emergency declaration is not warranted, provided that systems

and components are operating as expected, and associated operator actions are appropriate.

EAL threshold met but the condition clears or is corrected prior to emergency declaration - The key consideration is to determine if any plant damage occurred as a result of the transient event.

- If plant damage is readily apparent, or if further assessment is necessary to confirm or rule out such damage, then the EAL threshold should be considered met and the appropriate emergency declaration made. Terminate the emergency if the assessment determines that there was no plant damage from the event and when other termination criteria are met.

- If no plant damage is readily apparent and no further damage assessment is warranted, no emergency declaration is required; however, the event should be reported to the NRC per 10 CFR 50.72 within one hour, and notification of the state and local emergency response organizations should be made in accordance with the arrangements made between the site and offsite organizations.

EAL threshold met but classification was not made at the time of the event. - This situation occurs when personnel discover that a condition existed which met an EAL threshold but no emergency was declared and the condition no longer exists at the time of this discovery. This may be due to the emergency condition not being recognized at the time, or an error was made in the emergency classification process. In these cases, the guidance contained in NUREG-1022, section 3.1.1 is applicable. Specifically, the event should be reported to the NRC per 10 CFR 50.72 within one hour of the discovery of the undeclared event, and notification of the state and local emergency response organizations should be made in accordance with the arrangements made between the site and offsite organizations.

D.2.7 Operating Mode Applicability

The plant operating mode that existed at the time that the event occurred, prior to any protective system or operator action initiated in response to the condition, is compared to the mode applicability of the EALs. If an event occurs, and a lower or higher plant operating mode is reached before the emergency classification level can be declared, the emergency classification level shall be based on the mode that existed at the time the event occurred.

SECTION E: NOTIFICATION METHODS AND PROCEDURES

E.1 Notification Methodology

E.1.1 SNC, in cooperation with state and county authorities, has established methods and procedures for notification of offsite response organizations consistent with the emergency classification and emergency action level scheme. These notifications include a means of verification or authentication. The methods used for authentication are developed and mutually agreed to by the utility and offsite authorities. The primary notification method will be by a dedicated communications system.

SNC-operated plants maintain the capability of notifying state and local agencies within 15 minutes of a declared emergency as required by 10CFR50 Appendix E, IV.D.3. The methods and forms used for notifying state and county authorities are site-specific, and detailed in plant specific Emergency Plan Implementing Procedures (EPIPs).

NRC will be notified by the Headquarters Operations Officer immediately following state and local notifications, but within an hour of an emergency classification.

When multiple units of a multi-unit site are affected by an emergency, the classification shall be reported as applicable to all affected units. In situations where multiple units of a multi-unit site are affected by emergency events, but the events are not related and the classification for each unit is different, notification will be made for the highest classification.

An accelerated call to the NRC Headquarters Operations Officer will be made following discovery of an imminent threat or attack against a plant. During a plant transient or an imminent threat situation requiring physical security response, plant personnel are primarily responsible for stabilizing the plant and keeping it safe. An accelerated notification will not interfere with plant or personnel safety or physical security response.

The accelerated notification will be completed after or concurrent with notification of local law enforcement agencies. The goal will be to initiate the notification within 15 minutes of discovery of an imminent threat or attack against a plant. The information provided in the accelerated notification will be limited to the following:

- Site name.
- Emergency classification if determined prior to the accelerated notification.
- Nature of the threat and the attack status.

E.2 Notification of Personnel

E.2.1 Notification of Onsite Personnel

The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on-site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system.

Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level. In the event of a Design Basis Threat, personnel may be directed to respond to alternative facilities.

Notification of persons who are in the public access areas, on or passing through the site, or within the controlled area, will be performed by the Security Department. Such notifications will be in accordance with the Emergency Plan Implementing Procedures (EPIPs).

Visitors within the protected area are escorted by a permanently badged individual. This individual is responsible for informing the visitors of emergencies when they occur and for taking action to evacuate the visitors from the site, as necessary.

Notification procedures include notification of Emergency Response Organization Personnel (ERO) not on site or during backshift hours. ERO members will be notified by means of an automated callout system activated by on-shift personnel.

E.2.2 Notification of State and local Authorities

A dedicated ENN will normally be used to accomplish state and local notifications. Backup means of communication are described in Section F, Emergency Communications, of this plan.

E.2.2.1 State and Local Agencies

State and local agencies listed in the site specific Annexes shall be notified within fifteen (15) minutes of:

- The initial emergency classification.
- Classification change.
- The issuance of, or change to, a Protective Action Recommendation (PAR).

E.2.2.2 Initial Notification Message Form

In conjunction with state and county authorities, SNC-operated plants have established the contents of the initial and subsequent state notification message forms to be used during an emergency. These forms are described in EPIPs. The content of the forms has been reviewed and agreed on by the respective Offsite Response Organizations.

E.2.2.3 Follow-up Emergency Message

The Emergency Director is responsible for the completion of a follow-up emergency message. The appropriate ERO personnel will ensure the emergency communicator(s) periodically provide follow-up messages to the appropriate offsite federal, state, and local authorities.

E.2.3 Notification of the Nuclear Regulatory Commission (NRC)

The NRC is notified via the ENS. If the ENS is inoperative, the required notification will be made using alternate means in accordance with regulatory requirements. The Emergency Response Data System (ERDS), will be initiated within one hour of the declaration of an Alert or higher classification.

Specific information on the notifications to the NRC for emergency events is detailed in the reporting requirements of 10 CFR 50.72.

E.2.4 Notification of Other Federal Agencies

Notification of other Federal Agencies will be made in accordance with site specific Procedures.

E.2.5 Notification of the Public

Prompt alerting and notification of the public within the plume exposure pathway EPZ is the obligation of state and local government or other responsible authority. The responsibility for ensuring the means exist to carry out this purpose rests with Southern Nuclear Operating Company. An overview of these means excluding the Savannah River Site is listed in the site specific Annex of this Plan.

Initial notification of the public will occur in a manner consistent with assuring the public health and safety. The design objective for the system is to meet the acceptance criteria provided in a subsequent section of the FEMA approved design report for each SNC-operated plant. The design objective does not constitute a guarantee that prompt notification can be provided for everyone with 100 percent assurance, or that the system when tested under actual field conditions will meet the design objectives.

In the event of an emergency, the Emergency Director is responsible for notifying appropriate state and local response organizations, plant emergency response organization, and plant personnel.

E.2.5.1 Concept of Operations

In the event of a serious emergency at any SNC site, the primary means for alerting the public will be by the FEMA approved Alert and Notification System (ANS) referenced in the site specific Annex.

Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system. Details of the backup methods can be found in the site specific Annex.

Detailed information and instructions will be provided on local EAS radio and television stations. Commercial radio stations and television stations whose broadcasts are received in the plume exposure pathway EPZs have agreed to broadcast emergency instructions and information in cooperation with offsite officials.

These continuing instructions will provide more specific or detailed information of any protective actions advised for affected areas. Information on the nature of the accident, on any releases, and on the progress in ameliorating or terminating the emergency event, will also be provided periodically on the commercial stations, along with a prognosis for escalation or termination of the event.

E.2.5.2 Criteria for Acceptance

1. Within the plume exposure pathway EPZ, the prompt alerting and notification system will provide an alerting signal and notification by fixed sirens; further notification will be provided by local commercial radio and television stations activated by EAS.
2. The minimum acceptable design objectives for coverage by the system are:
   a) Capability for both an alerting signal and an informational or instructional message to the population on an area-wide basis throughout the plume exposure pathway EPZ, within 15 minutes.
   b) The initial notification system will assure direct coverage of essentially 100 percent of the population within five miles of the site.

   These design objectives have been met by FEMA approved ANS Design report referenced in the site specific Annex.
3. Local and state agencies have the capability to provide information promptly over local commercial radio and television at the time of the activation of the alerting signal. Authority for activation of the EAS, which permits designated governmental officials to issue emergency information and instruction in threatened or actual emergencies, is given by 47CFR part 11, EAS Rules.

Information will be distributed on an annual basis to residents and businesses within the EPZ.

The testing and maintenance of the public alerting sirens are the responsibility of SNC. The maintenance program will consist of both periodic routine checks and, as required, corrective maintenance.

The periodic routine maintenance and test program will be based on the manufacturers' recommendations and experience gained with the installation.

Annually, the system will be activated in the normal mode. Advance notice of the test will be provided to the public. Activation of sirens will be verified by the system. Reports of siren failures will be investigated and repaired by the respective SNC site.

Unsatisfactory conditions detected by any means will be promptly repaired.

State and local emergency management will detail the Prompt Notification System (PNS) activation.

Activation of the alert and notification system (ANS) is discussed in the offsite agencies' specific emergency response plans.

E.2.6 Public Protective Action Messages

State and local authorities have developed procedures and messages to be provided to the public in the event of an emergency at an SNC-operated nuclear power plant. Details of these procedures and messages are in the appropriate state and local emergency plans.

E.2.7 Verification of Notification Messages

The SNC emergency notification form is transmitted electronically to the responsible state and local agencies using a secure data sharing system provided by SNC. Once transmitted to the OROs, the receipt of this information is confirmed using a dedicated communications link. In the event an agency is unable to obtain the emergency notification form electronically, the affected agency will be contacted using a dedicated communication link and the content of the form will be communicated verbally to the agency. As these systems are dedicated systems, no additional verification of the authenticity of the message is required for verification of messages with state and local agencies in the states of Alabama and Georgia. Communications with agencies in the state of South Carolina will be authenticated using the authentication system provided by the South Carolina Emergency Management Division. In the unlikely event both the electronic notification transmittal capability and dedicated communications links are lost then the emergency notification form will be communicated verbally using commercial telephone lines, and the receiving agency may verify authenticity of the message by calling the licensee back.

SECTION F: EMERGENCY COMMUNICATIONS

F.1 Communications

F.1.1 At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established.

The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.

F.1.2 SNC-operated plants maintain the capability to make initial notifications to the designated offsite agencies 24 hours per day. Offsite notifications can be made to state and county warning points and Emergency Operations Centers from the Control Room, Technical Support Center, and Emergency Operations Facility using the ENN. Reliable backup methods have been written into procedures. State and county warning points are continuously staffed.

F.1.3 Provisions exist for continuous communications with state and local governments within the Emergency Planning Zones, as detailed above. At least one on-site and one offsite communications system is maintained, each with a backup power source to ensure continuous communications.

F.1.4 SNC has established communications systems to provide reliable communications with federal emergency response organizations. Communications with federal agencies is primarily by commercial telephone, with alternate systems being utilized as needed.

Communication with the Nuclear Regulatory Commission (NRC) is on the Federal Telephone System (FTS) telephone network, which connects the SNC plant site and EOF with the NRC Operations Center. Site extensions are located in the Control Room, TSC, and Site NRC Resident Inspector's Office. Site extensions include ENS, HPN, ERDS, and other designated counterpart links connecting to the NRC Operations Center.

Commercial telephone lines serve as the backup to the ENS and other FTS lines.

F.1.4.1 NRC Emergency Notification System (ENS)

This communications line provides a communications link to the NRC Operations Center in Rockville, Maryland, and is used for continuous communications in a classified emergency.

F.1.4.2 NRC Health Physics Network (HPN)

This communications line provides a communications link with the NRC to provide radiological information.

F.1.4.3 NRC Reactor Safety Counterpart Link (RSCL)

This communications line provides a communications link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.

F.1.4.4 Protective Measures Counterpart Link (PMCL)

This communications line provides a communications link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.

F.1.4.5 Management Counterpart Link (MCPL) (Executive Bridge Line)

This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.

F.1.4.6 Security Bridge Line

This communications line provides a communications link with the NRC to provide security-related information by the site team with access to the NRC Headquarters Operations Center LAN

F.1.4.7 Southern Company Network Access

This communications line provides the NRC site team with access to the NRC Operations Center's LAN. LAN connections are provided on the Southern Company network.

F.1.4.8 Emergency Response Data System (ERDS)

ERDS is a dedicated network and is a direct near real-time electronic data link between the plant's on-site computer system and the NRC Operations Center. It provides for the automated transmission of a limited data set of selected parameters.

F.1.5 SNC-operated nuclear power plants have reliable communications between the plants and the EOF, state and local emergency operations centers, and radiological monitoring teams, as detailed above.

F.1.6 SNC-operated nuclear power plants use an automated ERO Notification System to rapidly notify members of the ERO. The system is designed with redundant power, and with geographic separation.

SNC Emergency Communications Matrix																				
	On Site						State			Counties										
	Control Room	TSC	OSC	EOF	JIC	Assembly Area	Alabama EOC	Georgia EOC	South Carolina EOC	Aiken	Allendale	Appling	Barnwell	Burke	Early	Henry	Houston	Jeff Davis	Tattnall	Toombs
SNC Phone System	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Commercial Phones	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Sound Powered Phones	X																			
Emergency Notification Network (ENN)	X	X		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X
Radios	X	X	X	X																
Public Address (PA)	X	X	X			X														
NRC Line Access	X	X		X																
Emergency Response Data System (ERDS)	X	X						X												

Table 5

F.2 Medical Emergency Communications

Communications have been established between the primary and backup medical hospitals and transportation services with SNC-operated plants.

F.3 Communications Tests

Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages in the test.

- Communications with state and local governments within the plume exposure pathway will be tested monthly.
- Communications with federal response organizations and state governments within the plume exposure pathway will be tested quarterly.
- Communications between SNC-operated nuclear power plants, state Emergency Operating Centers and local Emergency Operations Centers, and radiation monitoring teams will be tested annually.
- Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.
- The Emergency Response Data System (ERDS) will be tested on a quarterly basis.
- The fixed siren portion of the Alert and Notification System (ANS) will be tested and verified in accordance with existing FEMA approvals.

SECTION G: PUBLIC EDUCATION AND INFORMATION

G.1 Purpose

Southern Nuclear Company (SNC) will provide education and emergency information to the public consisting of the following:

- The release of information to the public through the dissemination of timely, accurate emergency communications.
- The orderly flow of emergency information during the recovery period.
- Providing public education and information for the distribution of emergency preparedness materials to residents and transient populations.

G.2 News Media Training

A program will be offered each calendar year to acquaint the news media with the methodology for obtaining information during an emergency and with overall emergency preparedness at APC/GPC nuclear plants, as appropriate. Training will include information about the plant, emergency response, and the role of the JIC, as well as opportunities to participate in drill activities.

G.3 News Releases

The Utility will issue news releases covering events, conditions, and actions at the Plant. News releases are designed to be a written confirmation of events and are public information.

The SNC News Writer will write news releases in the EOF and obtain SNC approval from the EOF Manager, then forward them to the JIC as appropriate. The Facility Manager at that location will obtain communications approval and direct distribution of the release.

G.4 Press Briefings

Press briefings will be conducted to keep the media informed of events and activities relating to the emergency. Briefings will provide the most current, up-to-date information about events and response to the incident. Public Information Officers (PIOs) from offsite agencies responding to the emergency will be encouraged to participate in the briefings to discuss their particular activities.

G.5 Public Response

Appropriate information will be released as clearly, concisely, and quickly as possible. Public announcements will be made on a frequent and regular basis.

G.6 Resource Materials

Media guides are available on the Utility websites and are accessible from the CMC and JIC. These guides are updated regularly and are available to news media.

An emergency web page will be activated and will replace the normal web page on the appropriate Utility's website at the PID's discretion.

Maps, photographs, and diagrams of the plant and its operations are stored and maintained at the JIC for use during news briefings

G.7 Public Information Plan For Recovery

The lead emergency communications representative in the Recovery Organization will be the Public Information Director. This person or designee will maintain close contact with the Recovery Manager. Emergency communications response will follow the guidelines and procedures described for accident response.

As conditions and public interest warrant, additional Public Information personnel will be assigned to support the flow of information concerning recovery operations.

Information for possible release will be cleared with the Recovery Manager and the Public Information Director and given to the media through established procedures.

Information will be released through established channels of communication to federal and state authorities, the utility industry, the public, and employees.

Advance notice will be given to the public through the media, of any Company action that will or may affect the health and safety of the plume exposure pathway EPZ residents. Information of this type will be followed up with a news release as soon as the results of any such action are known.

G.8 Public Information and Education Program

The goal of the public information program is to acquaint the general public with the emergency plans for the operation of APC/GPC nuclear plants, as appropriate, and actions they should take in the event of a plant emergency.

Emergency information is disseminated each calendar year for residents in the plume exposure pathway Emergency Planning Zone.

SECTION H: EMERGENCY FACILITIES AND EQUIPMENT

H.1 Onsite Emergency Response Facilities

SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. Emergency Response Facilities may be activated at an Unusual Event at the discretion of the Emergency Director. Until the TSC and OSC are activated, required functions of these facilities are performed in the Control Room.

H.1.1 Control Room

The Control Room is the centralized onsite location from which the plant's reactors and major plant systems are operated. The Control Room is equipped with instrumentation to supply detailed information on the reactors and major plant systems. The Control Room is continuously staffed with qualified, licensed operators, and is the first onsite facility to respond to emergency events. Control Room personnel evaluate and effect control over emergencies until support centers can be activated. As other Emergency Response Facilities (ERFs) become activated, they will support the Control Room, and overall Command and Control of the emergency will transfer to the TSC. Offsite Agency Notification and Protective Action Recommendation determination will transfer to the EOF. Control Room activities may include:

- Reactor and plant control.
- Initial direction of plant related operations.
- Accident recognition, classification, mitigation and initial corrective actions.
- Alerting of onsite personnel.
- Notification of appropriate individuals.
- Activation of emergency response facilities and ERO notification.
- Notification of offsite agencies.
- Notification and update of the NRC via ENS.
- Continuous evaluation of the magnitude and potential consequences of any incident.
- Recommendations for immediate protective actions for the public.
- Activation of the Emergency Response Data System (ERDS).

H.1.2 Technical Support Center (TSC)

SNC-operated nuclear power plants have established a TSC for use during emergency situations by plant management, technical, and engineering support personnel. The TSC is procedurally required to be activated within 75 minutes following the declaration of an Alert or higher classification. Activation for Unusual Events or unclassified incidents is optional. When activated, TSC functions include:

- Support for the Control Room's emergency response efforts.
- Performance of response management functions when in Command & Control.
- Continued evaluation of event classification.
- Assessment of the plant status and potential offsite impact.

- Coordination of emergency response actions.
- Notification of appropriate corporate and plant management.
- Notification and update of the NRC via the ENS.
- Notification and update of the NRC via Health Physics Network (HPN).

The TSC is the on-site location used to support the Control Room for assessment of plant status and for implementation of emergency actions. TSC personnel provide technical data and information to the EOF. Each TSC provides reliable voice and electronic communications to the Control Room, the OSC, the EOF, the NRC, and state Emergency Operations Centers.

The TSC is sized to accommodate ERO responders and NRC Representatives. State and county personnel are not expected to report to the TSC. Personnel in the TSC are protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions, with similar radiological habitability standards as Control Room personnel.

To ensure adequate radiological protection, radiation monitoring equipment has been installed in the TSC, or periodic radiation surveys are conducted. These systems indicate radiation dose rates while in use. In addition, potassium iodide (KI) is available for use.

The TSC has access to a controlled set of drawings and other records, including general arrangement diagrams, piping and instrumentation diagrams (P&IDs), and electrical schematics. The TSC has the capability to display vital plant data, in real time, to be used by knowledgeable individuals responsible for engineering and management support of reactor operations, and for implementation of emergency procedures.

Details of the TSC configuration and location are in the site specific Annexes.

H.1.3 Operations Support Center (OSC)

The OSC has been established to provide an area for coordinating and planning activities and staging personnel and equipment. The OSC responders include groups such as Instrument and Control Technicians, Mechanics, Electricians, Nuclear Chemistry and RP Technicians, Operations personnel, and oncoming shift personnel. Additional space is available to accommodate personnel as required. If the OSC is deemed uninhabitable, the OSC may be moved to other locations as deemed appropriate by the OSC Manager.

Emergency supplies are maintained in the OSC. When an emergency condition exists at one SNC-operated nuclear power plant, additional supplies can be obtained from other unaffected plants and SNC resources upon request.

Details of the OSC configuration and location are in the site specific Annexes.

H.1.4 Alternative Facilities

An Alternative Facility for staging of ERO personnel has been designated at the sites. In the event of a Security or Hostile Action threat or event, the designated Alternative Facility may also serve as an evacuation location for TSC and OSC personnel. The Alternative Facility is designed to be accessible in the event of an onsite HAB event and has the capability to:

- Communicate with the Control Room, Security, and the EOF.

- Conduct engineering assessment activities including damage control team planning and preparation.

The functions of Notification and PARs will be performed from the EOF should the Alternative Facility be activated. Details of Alternative Facilities can be found in the Site Specific Annex.

H.2 Offsite Emergency Facilities

H.2.1 Emergency Operations Facility

The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification. The EOF provides for:

- Management of overall emergency response.
- Coordination of radiological and environmental assessments.
- Protective Action Recommendations.
- Notification of Offsite Agencies.
- Management of recovery operations.
- Notification and update of the NRC via ENS.
- Notification and update of the NRC via Health Physics Network (HPN).
- Coordination of emergency response activities with federal, state, and local agencies.

The EOF is capable of accommodating designated SNC personnel and offsite local, state and federal responders including NRC and FEMA. It is anticipated that representatives from the state(s) of Georgia, South Carolina, Alabama, or Florida may be dispatched to the EOF for an event at specific SNC site(s). Responders from state and local agencies have access to plant parameters through the various data displays available in the EOF. See Figure H.2.A.

Based on the physical location of the EOF, specialized ventilation systems are not required. The EOF ventilation system is consistent in design with standard building codes. Similarly, EOF functions would not be interrupted by radiation releases from any SNC site.

Normal power to the EOF is from a reliable offsite source. Emergency lighting is provided by battery-operated lights. Backup power for the EOF is supplied by onsite diesel generation. Essential equipment is backed up by the diesel generation system.

The EOF is located at SNC Corporate Headquarters. The following records or information are available:

- Technical Specifications.
- Selected plant operating procedures.
- Emergency Plans.
- Emergency Plan Implementing Procedures.
- Final Safety Analysis Reports (FSARs).

- System piping and instrumentation diagrams and HVAC flow diagrams.
- Electrical one-line, elementary, and wiring diagrams.

The above records are updated as necessary to ensure currency and completeness.

Access to the EOF is controlled through the use of electronic card readers.

SNC will maintain space for members of an NRC Site Team and federal, state and local responders at a location near the site that includes space for conducting briefings with emergency response personnel and communications with other licensee and offsite emergency responders.

Details on the near site location are in the site-specific Annexes.

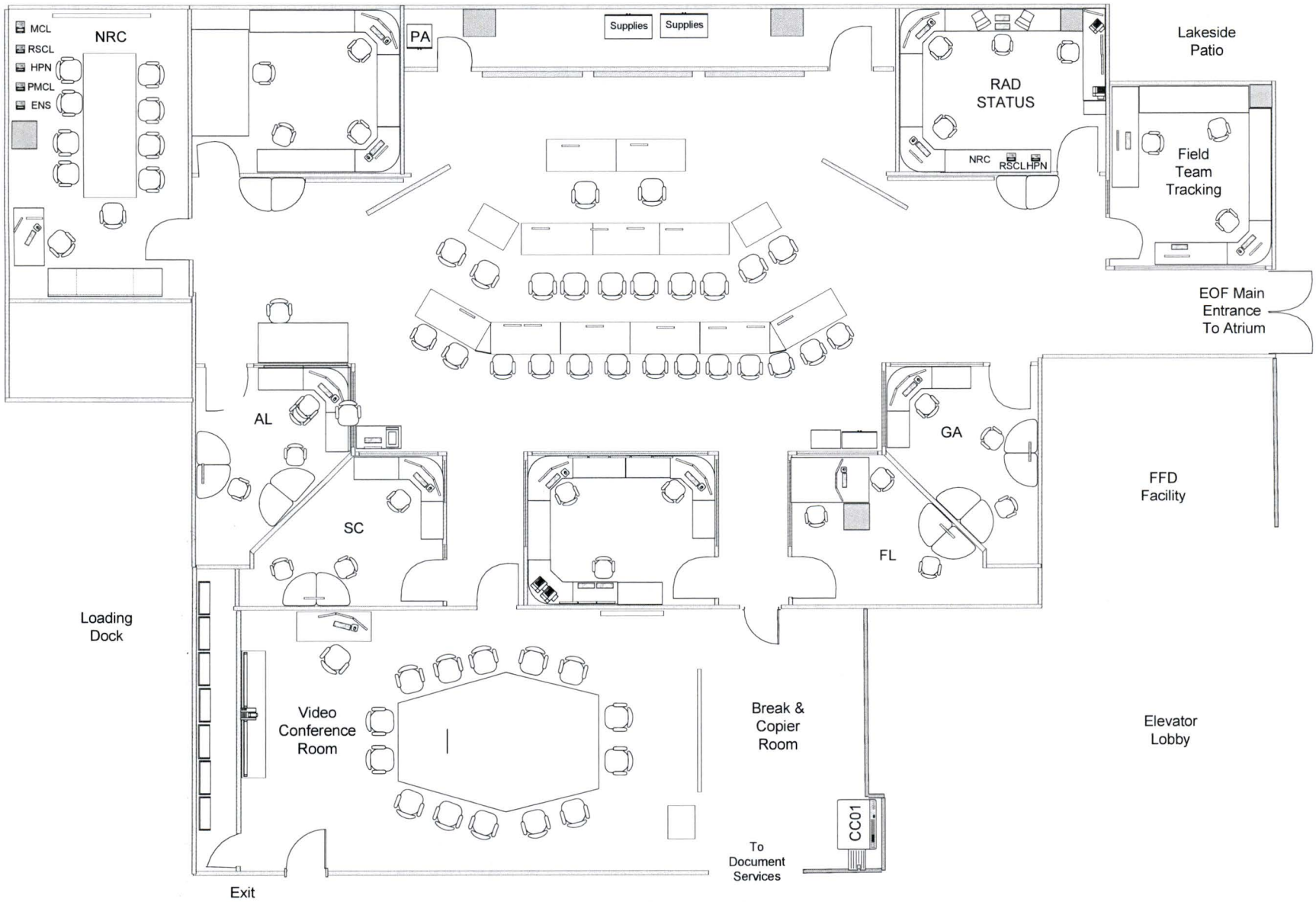


Figure H.2.A – Emergency Operations Facility Layout (Typical)

H.2.2 Corporate Media Center (CMC)

Upon notification of an Alert or higher classification, the Public Information Director and corporate staff assigned to JIC functions will assemble at the CMC. The CMC, located at the Atlanta/Birmingham corporate headquarters building of Georgia Power Company/Alabama Power Company, as appropriate, is the official location for coordination of emergency communications response until the site specific JIC has been activated. The Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the site specific JIC. When the decision is made to activate the JIC the CMC will maintain emergency communications response coordination until the site specific JIC is ready to assume these responsibilities. Once overall responsibility for emergency communications response transfers to the site specific JIC the remaining CMC staff will provide support for the JIC as needed.

H.2.3 Joint Information Center (JIC)

After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs).

Site specific JIC is provided in the site specific Annexes.

H.3 State and local Emergency Operations Centers (EOC)

EOCs operated by the state and by local communities allow direction and control of emergency response functions. The states' EOCs are capable of continuous (24-hour) operations for a protracted period.

The county EOCs serve as Command and Control headquarters for local emergency response activities as well as a center for the coordination of communications to field units and to the state EOCs. Additional details for state and county EOCs are in the state and county emergency plans.

H.4 Emergency Response Facility Staffing and Activation

SNC-operated nuclear power plants have plans and procedures to ensure timely activation of its emergency response facilities. The Shift Manager, as Emergency Director, will initiate a call-out in accordance with the implementing procedures. The ERO augmentation process identifies individuals who are capable of fulfilling the specific response functions listed in Tables 2 through 5.

Although the response time will vary due to factors such as weather and traffic conditions, a goal of 75 minutes for minimum staffing, following the declaration of an Alert or higher emergency classification, has been established for ERO personnel responding to plant emergency facilities including the TSC, OSC and EOF.

The facility can be declared activated when the following conditions are met:

- Minimum staffing has been achieved.
- Personnel have been briefed on the situation and are ready to assume Command and Control functions.

H.5 Onsite Monitoring

SNC-operated nuclear power plants have installed monitoring instrumentation for seismic monitoring, radiation monitoring, fire protection and meteorological monitoring, in accordance with its Final Safety Analysis Report (FSAR) and plant Technical Specifications (TS), or commitments made to the NRC. Details of these systems differ from plant to plant, and are in the site specific Annexes.

H.5.1 Geophysical Monitors

- Meteorological Instrumentation: A permanent meteorological monitoring station is located near the plant for the acquisition and recording of wind speed, wind direction, and ambient and differential temperatures for use in making offsite dose projections. Meteorological information is displayed in the CR, TSC, and EOF. Additional information located in Section H.7.
- Seismic Monitoring: The seismic monitoring system measures and records the acceleration of the structure if activated by an earthquake of sufficient magnitude. It also provides signals for immediate remote indication that specific preset response accelerations have been exceeded.
- Hydrological Monitors: SNC-operated nuclear power plants have hydrological monitors as appropriate. The design basis flood, probable maximum precipitation, and other extremes in hydrologic natural phenomena are as detailed in the FSAR as appropriate.

H.5.2 Radiological Monitors and Sampling

H.5.2.1 Radiation Monitoring System (RMS)

Radiation monitoring instruments are located at selected areas within the plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne and air particulate monitors.

- Area monitors respond to gamma radiation.
- Airborne monitors detect and measure radioactive gaseous effluent concentrations.

Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.

H.5.2.2 Liquid and Gaseous Sampling Systems

The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Pre-designated monitoring and sampling points are listed in site procedures. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The system can provide information on post-accident plant conditions to

allow operator actions to mitigate and control the course of an accident. Various chemical analyses and radiological measurements on these samples can be performed, including the determination of radionuclide concentrations.

H.5.2.3 Laboratory Facility

SNC sites have a laboratory facility for analysis of radioactive samples.

H.5.2.4 Portable Radiation Monitoring Equipment

Portable radiation survey instruments are available for a wide variety of uses such as area, sample, personnel surveys, and continued accident assessment.

H.5.3 Process Monitors

The Control Room and redundant backup locations are equipped with extensive plant process monitors for use in both normal and emergency conditions. These indications include reactor coolant system pressure and temperatures, containment pressure and temperature, and various liquid levels, flow rates, status, or lineup of equipment components.

H.5.3.1 Plant Monitoring/Information System

A plant monitoring/information system provides the data acquisition and database capability for performing plant monitoring and functions. The system is designed to scan, convert to engineering units, make sensor range and alarm limit checks, apply required transformations, store for recall and analysis, and display the reading of transformed data from plant instrumentation. The system scans flows, pressures, temperatures, fluid levels, radiation levels, equipment, and valve status at required frequencies.

H.5.3.2 Safety Parameter Display System (SPDS)

The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.

H.5.4 Fire Detection System

The Fire Detection System is designed to detect products of combustion or heat in designated areas of the plant. The fire alarm communication systems and subsystems are located at strategic points throughout the plant to warn personnel of a fire or other emergency conditions. Additional description of the fire system is provided in the FSAR.

H.5.5 Fire Station

Firefighting equipment and supplies are available for damage control operations. The equipment is stored in various areas within the plant.

H.6 Offsite Monitoring

SNC-operated nuclear power plants have made provisions to access data from the following offsite sources of monitoring and analysis equipment:

H.6.1 Geophysical Monitors:

- In the event that the onsite meteorological tower or monitoring instrumentation becomes inoperative, meteorological data may be obtained directly from the National Weather Service.
- A central point of contact to obtain information about a seismic event is the National Earthquake Information Center.

H.6.2 Radiological Environmental Monitors, Sampling, and Monitoring Equipment

SNC-operated nuclear power plants maintain a sufficient supply of portable offsite radiological monitoring equipment. These supplies are located at each staging point for Field Monitoring Teams.

SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.

H.6.3 Laboratory Facilities

External facilities for counting and analyzing samples, and for dosimetry processing, can be provided by other SNC-operated plants including the GPC Central Laboratory, state, federal, or contracted laboratories. Outside analytical assistance may be requested from state and federal agencies, or through contracted vendors. The DOE, through the Radiological Assistance Program (RAP) has access to any national laboratory.

H.7 Meteorological Equipment

SNC-operated nuclear power plants have meteorological towers equipped with instrumentation for continuous reading of wind speed, wind direction, air temperature and differential air temperature. Meteorological tower details are in the site-specific Annexes. Additional capabilities are available to obtain representative current meteorological information from other sources, such as the National Weather Service.

H.8 Emergency Equipment Inventories and Checks

Emergency facilities and equipment are inspected and inventoried using appropriate administrative or department procedures. These procedures provide information on location and availability of emergency equipment and supplies.

Sufficient reserves of instruments and equipment are maintained to replace those removed from emergency kits or lockers for calibration or repair.

H.9 Emergency Kits

Emergency kits are available at SNC-operated nuclear power plants. Designated site or department procedures identify the equipment in the various emergency kits. Details as to kit locations are found in the plant-specific procedures.

H.10 Collection Point for Field Samples

SNC-operated nuclear power plants have designated a point as the location for receipt and analysis of field monitoring team environmental samples. Sampling and analysis equipment

is available for quantitative activity determination of marine and air samples, and qualitative activity determination of terrestrial samples.

SECTION I: ACCIDENT ASSESSMENT

I.1 Systems and Parameters Monitored

SNC-operated nuclear power plants have a comprehensive set of plant system and effluent monitors, as required by the plants' Final Safety Analysis Report. Sites have identified values characteristic of off-normal values and accidents, and identified the plant parameter values that correspond to the example initiating conditions in the Nuclear Energy Institute (NEI) 99-01 and 07-01 Emergency Action Levels (EALs). These are described in Section D of this plan, and detailed in the site-specific Annexes.

Plant system and effluent parameter values are used to determine accident severity and subsequent emergency classification. Environmental and meteorological events are also determining factors in emergency classification. An emergency condition can be the result of just one parameter or condition change, or the combination of several. The specific symptoms, parameter values or events for emergency classification levels are detailed in the plant's site-specific Annex.

To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant.

Some of the key plant parameters monitored in the Control Room are assembled into a single display on the Safety Parameter Display System (SPDS). The SPDS monitors such parameters as reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level, and effluent monitor readings. The instrumentation and equipment capabilities available for emergency facilities are described in Section H. For Vogtle Unit 3 and Unit 4, the Safety Parameter Display System (SPDS) is integrated into the overall human interface design so that the SPDS parameters are available to Operators on workstation visual display units.

Select plant parameters are available to state and local authorities on a secure network dedicated to data distribution among the various offsite emergency response facilities.

I.2 Continuing and Post Accident Assessment

The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.

I.3 Offsite Dose Assessment

SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses.

The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies, and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions.

The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.

I.4 Effluent Monitor Readings and Exposures

The offsite dose assessment program addresses the relationship between effluent monitor readings, onsite and offsite exposures, and contamination for various meteorological conditions.

I.5 Meteorological Monitoring

SNC-operated nuclear power plants have a meteorological monitoring system sufficient to acquire and evaluate meteorological information for accident assessment. This information can be accessed in the Control Room, TSC, and EOF, and is transmitted by the Emergency Response Data System (ERDS) for NRC and offsite authorities use.

I.6 Unmonitored Release

Dose projections can be made during a release through use of sample data in situations where effluent monitors are either off-scale, inoperative, or the release occurs by an unmonitored flow path. In the absence of effluent sample data, a computerized offsite dose projection can be performed by specifying the accident category as a default.

I.7 Environs Surveys and Monitoring

In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs).

The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation, and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant.

Field Monitoring Teams are dispatched by SNC-operated plants to perform a variety of functions in situations potentially involving significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.

The initial environmental surveys involve measurements to confirm or modify the dose projections based on plant parameters. Subsequent environmental monitoring efforts will

be aimed at further defining the offsite consequences, including instituting an expanded monitoring program to enable prompt assessments of any subsequent releases from the plant.

I.8 Release Assessments

SNC-operated nuclear power plants have instrumentation, procedures, and trained personnel with the expertise to make rapid assessments of the actual or potential magnitude and location of any radiological hazards through liquid or gaseous release pathways.

I.9 Environmental Radioiodine Monitoring Capabilities

Field monitoring equipment has the capability to detect and measure airborne radioiodine in the presence of noble gases.

SECTION J: PROTECTIVE RESPONSE

Protective response consists of emergency actions, taken during or after an emergency situation, which are intended to minimize or eliminate hazards to the health and safety of the public and plant personnel. Protective actions have been developed for emergency workers and the general public located in the Plume Exposure Pathway Emergency Planning Zone. Guidelines consistent with federal guidance have been established to aid in choosing protective actions during an emergency. The responsibility for actions outside the owner-controlled area rests with state, county, and other offsite response agencies.

J.1 Alarm Responses

The actuation of alarms associated with fire and radiation levels are available to alert personnel of hazardous conditions and protective actions. Site communications methods may also be used as needed.

The site-specific procedures describe the assembly areas for personnel on-site.

For emergency classifications, personnel within the Protected Area are notified of the classification or escalation of an emergency.

Provisions are made to alert personnel in high noise areas and outbuildings within the Protected Area and within the Owner Controlled Area.

The primary protective measure for non-essential onsite personnel during a Site Area or General Emergency is assembly in a designated area, followed by accounting of site personnel and then determination of appropriate protective actions including Site Evacuation. The designated assembly areas are outside the Protected Area and inside the Owner Controlled Area.

J.2 Radiological Monitoring of Evacuated Personnel

Personnel evacuated from the site will be monitored for contamination, if needed by portal monitors as they exit the Protected Area, or with portable friskers in Assembly Areas, or sent to offsite monitoring locations.

J.3 Non-essential Personnel Evacuation and Decontamination

Requirements for radiological monitoring of personnel evacuated from the site for external radiation exposure are contained in Section K. Section K addresses appropriate actions for any known or suspected overexposures or contamination. Details on the decontamination of non-essential evacuees are in the Emergency Plan Implementing Procedures.

J.4 Onsite Protective Actions

Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. SNC-operated nuclear power plants maintain an inventory of respiratory protection equipment, anti-contamination clothing, and potassium iodide (KI) that is available to emergency workers remaining on site. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel.

Measures that would be taken are:

- On-shift and emergency response personnel use respiratory protection in any environment involving exposure to high level airborne activity or oxygen deficient atmosphere, or where air quality is in doubt. The criteria for issuance of respiratory protection are described in plant Radiation Protection procedures.
- Anti-contamination clothing is available for use by onsite personnel. The criteria for issuance of protective clothing are described in plant Radiation Protection procedures.
- The criteria for administering a thyroid-blocking agent (KI - Potassium Iodide) to emergency personnel depends on the projected absorbed dose to the thyroid based on the severity and magnitude of the accident.

SNC-operated nuclear power plants are responsible for maintaining a supply of KI at their respective site. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.

Onsite protection of employees during hostile action involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the hostile event and advance warning. Site-specific procedures provide specific actions to take during hostile action or severe weather events. During a hostile action or severe weather event, Assembly and Accountability actions may be delayed in favor of other onsite protective actions required to ensure the safety of the site and its personnel. In these cases, accountability will be completed once safe conditions have been established.

J.4.1 Assembly

Assembly is mandatory following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director. When Accountability of onsite personnel is determined to be necessary by the Emergency Director, personnel within the Protected Area will be accounted for and the names of missing individuals determined within 30 minutes of the emergency declaration.

J.4.2 Accountability

Personnel accountability is mandatory at the Site Area or General Emergency classification. Accountability may be initiated at other times at the discretion of the Emergency Director to support worker safety.

Accountability of personnel within the Protected Area is accomplished within 30 minutes of the declaration of Site Area Emergency or higher, and maintained continuously thereafter, using Protected Area(s) boundary access control as described in the Security Plan. If there are station personnel who are unaccounted for, the public address system or other suitable communication methods are used to locate the personnel, or, in extreme cases such as fire, toxic gas release, explosions, or structural damage, trained search and rescue personnel are deployed to search for and assist the missing personnel.

J.4.3 Site Evacuation

If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or immediately leave the site. Personnel will be directed

to either proceed to their homes or reassemble at designated locations. Visitors to the plant will assemble with and follow the instructions of their escorts. Personal transportation will normally be used and established evacuation routes will be followed. Personnel without transportation will be identified and provided transportation as necessary.

Evacuation of personnel is usually conducted immediately after accountability if a Site Area Emergency or General Emergency has been declared and no impediments exist. Evacuation shall commence as directed by the Emergency Director.

J.5 Offsite Protective Action Recommendations (PARs)

Plant conditions, projected dose and dose rates, field monitoring data, and evacuation time estimates are evaluated to develop PARs for preventing or minimizing exposure to the public. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. The Emergency Director will approve PARs. The PAR decision-making flowcharts are site-specific in nature, and are provided in the site-specific implementing procedures. SNC-operated plants have the capability to provide state and local agencies a PAR for beyond the 10-mile EPZ.

There are various types of protective actions that can be recommended to the state and counties. They may include the following:

- Evacuation.
- Shelter in place.
- Monitor and prepare.
- Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy.

J.6 Evacuation Time Estimates (ETE)

An independent ETE report has been performed for SNC-operated nuclear power plants, which provides estimates of the time required to evacuate resident and transient populations surrounding the plant for various times of the year under favorable and adverse conditions. ETEs for evacuation of the plume exposure EPZ surrounding SNC-operated nuclear power plants are summarized in the site-specific Annex and detailed in the ETE report.

J.7 Protective Action Maps

SNC nuclear power plants have maps depicting local roads, primary evacuation travel routes, and the Emergency Planning Zone (EPZ). Maps are also available which show the population distribution within the plant EPZ, and are described in the site-specific Annexes.

SECTION K: RADIOLOGICAL EXPOSURE CONTROL

K.1 Emergency Workers and Lifesaving Protective Actions

SNC-operated nuclear power plant management will make every reasonable effort to minimize radiation exposure to emergency personnel. Plant management approval is required before emergency workers are allowed to exceed the maximum administrative radiation dose.

Under normal operating conditions, SNC-operated plants maintain personnel exposure control programs in accordance with 10 CFR 20. The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents." In emergency situations, workers may receive exposure under a variety of circumstances in order to assure safety and protection of others and of valuable property.

If emergency operations demand life-saving or rescue actions and external radiation fields are minimal, individuals may be allowed exposures to airborne contamination of 10,000 Derived Air Concentration (DAC)-hours. If external radiation fields are not minimal, the sum of the external and internal doses should be limited to 25 rem Total Effective Dose Equivalent (TEDE). Exposures above 2,000 DAC-hours should be received only with the approval of the Emergency Director. These exposures will be justified if the reduced risks and costs to others outweigh the risks to which the workers are subjected.

Table K.1.A Emergency Worker Dose Limits

Dose (TEDE)	Applicability	Conditions
5 rem	All	--
10 rem	Protecting valuable property (or equipment)	Lower dose not practicable
25 rem	Lifesaving or protection of large populations	Lower dose not practicable
>25 rem	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved

K.1.1 Removal of Injured Persons

Injured persons will receive prompt first aid and decontamination, as practical, before transport by ambulance to a local hospital.

K.1.1.1 Transportation Services

Agreements have been made for ambulance services near the SNC-operated nuclear power plants. Training is offered to ambulance personnel, and they participate in drills or exercises simulating the transportation of a contaminated, injured individual.

K.1.2 Decontamination and First Aid

K.1.2.1 Onsite Responsive Action

Selected plant workers at SNC-operated plants have received first aid and decontamination training. If a plant employee cannot be easily decontaminated, the individual is treated as contaminated and measures are taken to prevent the spread of contamination during ambulance transportation and upon arrival at a local hospital.

K.1.3 Medical Treatment

Agreements have been made with local hospitals near SNC-operated nuclear power plants. Training is offered to medical staffs regarding the treatment of contaminated, injured individuals, and hospitals participate in periodic drills using simulated contaminated, injured individuals.

K.2 Emergency Exposure Authorization

SNC-operated plants have a Radiation Protection Program. The Emergency Director may authorize emergency workers to receive doses in excess of the administrative dose levels. In some situations, it is possible that certain activities or duties for the protection of persons or the substantial protection of property may result in doses in excess of 10 CFR 20.1201 limits. Decisions to accept doses in excess of occupational limits will be on a volunteer basis and prospective volunteers shall be made aware of the risks.

K.3 Exposure Controls

K.3.1 24-Hour Capabilities

Plant Radiological Protection Groups have the equipment and personnel to provide 24-hour capability to determine and control radiation exposures of emergency organization personnel. Equipment to perform the following functions:

- Radiation detection devices.
- Personnel monitoring.
- Record keeping equipment.

Contractor and vendor representatives may also be present to assist in exposure control and augment the Radiation Protection Group capabilities. In an emergency situation, onsite personnel, offsite support personnel and local government emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel who are issued dosimetry.

K.3.2 Personnel Monitoring Equipment

SNC-operated nuclear power plants have equipment for radiological monitoring of personnel, ranging from hand-held survey equipment to installed or portable portal monitors. Details of plant monitoring equipment are included in the site-specific Annexes.

K.3.3 Radiation Work Permit Procedures

Where possible, the normal radiation work permit procedure will be used to control exposures. Based on conditions and urgency Radiation Protection supervision may approve emergency radiological work permit controls.

K.4 Offsite Emergency Workers

The responsibility for authorizing offsite emergency workers to receive exposures in excess of the EPA General Public Protective Action Guides rests with the state.

K.5 Decontamination

The Radiation Protection Group will be responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces, and for determining the extent of contamination in controlled and normally uncontrolled areas. During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.

Facilities and supplies for decontaminating personnel are available at various plant locations. Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination. During emergencies, other onsite personnel will be checked for contamination as necessary.

Designated personnel, under the direction of the Radiation Protection Group, are responsible for performing material decontamination. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program.

K.6 Contamination Controls

Contaminated areas are isolated as restricted areas with appropriate radiological protection and access control. Measures will be taken to control onsite access to potentially contaminated potable water and food supplies.

K.7 Offsite Decontamination

Nonessential on-site personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.

SECTION L: MEDICAL AND PUBLIC HEALTH SUPPORT

L.1 Hospital and Medical Services

In addition to the on-site first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses.

SNC-operated nuclear power plants have arranged for hospital and medical services having the capability to evaluate radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

The hospitals are equipped and hospital personnel trained to address contaminated injured individuals. Training of medical support personnel at the agreement hospitals includes basic training on the nature of radiological emergencies, diagnosis and treatment, and follow-up medical care.

Plant personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Arrangements, by letter of agreement or contract, are maintained by SNC-operated plants with a qualified hospital located in the vicinity of the nuclear power plant for receiving and treating contaminated persons with injuries requiring immediate hospital care.

L.2 First Aid

SNC-operated nuclear power plants maintain onsite first aid supplies and equipment necessary for the treatment of contaminated and/or injured persons.

L.3 State Emergency Medical Services

The states of Alabama and Georgia have developed lists of facilities that can provide medical support for treating injured, contaminated individuals. Details are found in the respective state emergency plan.

L.4 Medical Transport

Contaminated and injured persons are transported to a facility specified for SNC-operated nuclear power plants. Arrangements have been made by nuclear power plants for ambulance transport of persons with injuries involving radioactivity to designated hospitals. Such services are available on a 24-hour-per-day basis and are confirmed by letters of agreement. Radiation monitoring services are provided by SNC plant personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons.

SECTION M: RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS

M.1 Recovery

Guidance for determining the transition from Emergency to Recovery Organization is provided in the plant Emergency Plan Implementing Procedures. The composition of the Recovery Organization will depend on the nature of the accident and the conditions following the accident.

The SNC Emergency Plan addresses general principles that serve as guides for developing a Recovery Plan.

It is the responsibility of the Emergency Director (ED) to determine that the facility and surroundings are safe for reentry. The Emergency Director will designate a recovery manager to constitute the recovery organization.

The following guidelines, as applicable to the specific situation, will be addressed prior to terminating the emergency:

- The affected reactor is in a stable condition and can be maintained in that condition indefinitely.
- Plant radiation levels are stable or are decreasing with time.
- Releases of radioactive material to the environment have ceased or are being controlled within permissible limits.
- Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel.
- For a site area emergency or general emergency, discussions with plant management, applicable members of the SNC emergency organization, or offsite authorities do not result in identification of any valid reason for not terminating the emergency.

Upon termination of the emergency phase and at the discretion of the Emergency Director, following consultation with offsite authorities, the SNC Emergency Organization will shift to the Recovery Phase Organization.

The Recovery Manager will structure the recovery organization to accomplish the following general objectives:

- Maintain comprehensive radiation surveillance of the site until levels return to normal.
- Control access to the affected area of the plant and exposures to workers.
- Decontaminate affected areas and equipment.
- Conduct activities in radiation areas in accordance with the plant's standard radiation work practices.
- Isolate and repair damaged systems.
- Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public.
- Provide offsite authorities with plant status reports and information concerning the plant recovery organization.

- Provide assistance with recovery activities undertaken by state and county authorities, if requested.
- Provide public information on the status of recovery operations in releases to the media.

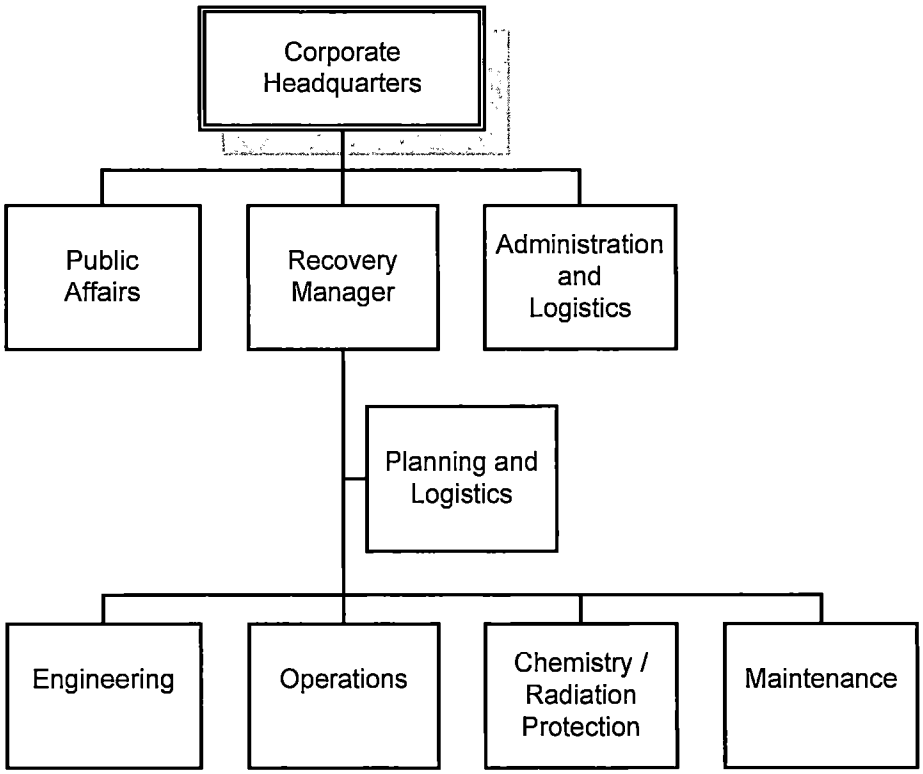
Other recovery operations will not be initiated until the area affected by the emergency has been defined. Particular attention will be directed toward isolating and tagging out components and systems as required for controlling or minimizing hazards. A systematic investigation will be conducted to determine the equipment damaged and the extent of the damage.

Investigation into the accident causes and consequences, both to the plant and to the environment, will be conducted. Test programs to confirm fitness for return to service will be developed and executed.

Recovery operations will be conducted in compliance with normal operational radiation exposure level limits as specified in 10 CFR 20. When possible, any necessary releases of radioactive materials or effluent during recovery will be planned, controlled, evaluated in advance for radiological impact, and appropriate offsite organizations and agencies informed of the scheduled releases and estimated impact.

M.2 Recovery Organization

Figure M.2 Typical Long Term Recovery Organization



M.2.1 Recovery Manager

The nature and extent of the emergency situation will determine what recovery operations are required. The Recovery Organization, shown above, will be established as directed by the Recovery Manager.

M.2.2 Plant Actions

Recovery actions will be preplanned. Specific actions will be developed in advance and discussed with responsible and knowledgeable personnel.

Reasonable efforts will be made to limit radiation exposure of personnel involved in the recovery to levels as low as reasonably achievable. Exposures should not exceed 10 CFR 20 limits. The Recovery Manager is responsible for evaluating the advisability and timing of authorizing personnel to reenter affected area(s).

The Recovery Manager is responsible for gathering available evidence on contributory factors to the accident, and reviewing the recovery operations to ensure that causal factors have been specifically identified. The Recovery Manager will provide a liaison for the NRC Accident Investigation Team, which will interview primary responders, review any documents generated during the accident, and inspect or test damaged equipment prior to its repair.

M.3 Recovery Notification

Members of the ERO will be informed when Recovery is initiated. The recovery organization may be structured like the emergency response organization, with additional modifications depending on the nature of the accident, post-accident conditions, and other factors.

The State EOC will be advised when the plant deems it safe to begin the reentry phase of the offsite recovery operation. If the Governor ordered an evacuation, the law requires the governor to officially rescind the order before any return can be made to evacuated areas. The states are responsible for coordinating reentry procedures for the offsite population.

M.4 Population Exposure Estimates

It is anticipated that the Federal Radiological Monitoring and Assessment Center (FRMAC) will make a total population exposure calculation, based on estimated dose rates and population representing exposed areas.

M.5 Termination of Recovery Phase

Following the completion of the Recovery Phase, the site will transition to an Outage Organization to complete necessary repairs.

SECTION N: EXERCISES AND DRILLS

N.1 Exercises

SNC-operated nuclear power plants will conduct a biennial exercise and additional periodic drills. An exercise is an event that tests integrated capability, and a major portion of the basic elements of emergency preparedness plans and organizations. Drills and exercises shall:

- Test the adequacy of timing and content of implementing procedures and methods.
- Test emergency equipment and communications networks.
- Test the public notification system.
- Ensure emergency organization personnel are familiar with their duties.

SNC-operated nuclear power plants conduct an emergency response exercise to demonstrate the effectiveness of the SNC Standard Emergency Plan on a frequency determined by the NRC. Exercises may include mobilization of state and local personnel and resources, and are intended to verify their capability to respond to an accident. Joint exercises shall be conducted on a frequency described in NRC/FEMA guidance.

A formal critique shall be conducted following the drill or exercise to evaluate the ability of organizations to respond as required in the SNC Standard Emergency Plan and site specific Emergency Plan Implementing Procedures. Critique items will be entered into the SNC corrective action program as appropriate.

Remedial exercises will be required if the emergency plan is not satisfactorily tested during the Biennial Exercise, and it is determined that reasonable assurance that adequate protective measures are not taken in the event of a radiological emergency or the ERO has not maintained key skills specific to emergency response.

N.1.1 Biennial Exercises

Federally prescribed Biennial Exercises are conducted at SNC-operated nuclear power plants. Exercises involving offsite agency participation, required under 10 CFR 50 Appendix E, are conducted at SNC-operated nuclear plants based on Federal Emergency Management Agency (FEMA) guidance and the respective state and local emergency response plans.

N.1.2 Participation

SNC-operated nuclear power plants exercise with offsite authorities to allow state(s) and local governments within the plume exposure pathway EPZ to exercise their emergency plans for operating nuclear power plants biennially, with full or partial participation.

Full and partial participation exercises are described as follows:

- Full participation exercises will include, as appropriate, offsite local and state authorities and SNC personnel actively participating in testing the integrated capability to assess and respond to an accident at a nuclear power plant. Additionally, full participation exercises will include, as appropriate, testing the major observable portions of the onsite and offsite emergency plans and

mobilization of state, local, and SNC personnel, and other resources in sufficient numbers to verify the capability to respond to the accident scenario.

- Partial participation means offsite authorities shall take part in the exercise sufficient to test direction and control functions, including protective action decision-making and communication capabilities among affected state and local authorities and SNC-operated plants. Where partial or full participation by offsite agencies occurs, the sequence of events simulates an emergency that results in the release of radioactivity to the offsite environs, sufficient in magnitude to warrant a response by offsite authorities.

At a minimum, state and local governments are expected to fully participate in accordance with the requirements of 10CFR50 Appendix E, section IV(F)(2)(c).

N.1.3 Ingestion Exposure Pathway Exercise

States within an ingestion exposure pathway EPZ are expected to exercise plans and preparedness related to ingestion exposure pathway measures at least once every 8 years. Opportunities are provided to any state or local government located within the plume exposure pathway EPZ to participate in annual drills and biennial exercises when requested by that state or local government.

N.1.4 Exercise Planning Cycle

The Exercise planning cycle will consist of eight (8) successive calendar years.

N.2 Drills

A drill in this context is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation

N.2.1 Off-Year Drills

SNC-operated nuclear power plants shall ensure adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include:

- Management and coordination of emergency response.
- Accident assessment.
- Event classification.
- Notification of offsite authorities.
- Assessment of the onsite and offsite impact of radiological releases.
- Protective action recommendation development.
- Protective action decision making.
- Plant system repair and corrective actions.

During these drills, activation of all of the licensee's emergency response facilities (TSC, OSC, and the EOF) would not be necessary. The ERO would have the opportunity to consider accident management strategies, supervised instruction

would be permitted, operating staff in participating facilities would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills may focus on the onsite exercise training objectives.

N.2.2 Hostile Action Based (HAB) Drills

Hostile Action Based (HAB) drills involving an air, land or water based attack scenario will be conducted at sites on a frequency of at least once every eight (8) years.

N.2.3 Fire Drills

Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.

N.2.4 Medical Emergency Drills

A medical emergency drill, involving a simulated contaminated individual, and containing provisions for participation by local support services organizations including ambulance response, are conducted annually at the nuclear plants. Local support service organizations that support more than one plant shall only be required to participate once each calendar year.

N.2.5 Environs Drills

Plant environs and radiological monitoring drills are conducted annually. These drills include collection and analysis of sample media and provisions for communications and record keeping. These drills also evaluate the response to, and analysis of, simulated airborne and direct radiation measurements in the environment.

N.2.6 Radiation Protection Drills

Radiation Protection Drills involving a response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements are conducted semi-annually. At least annually, these drills shall include a demonstration of the sampling system capabilities, as applicable.

N.2.7 Accountability Drills

Accountability drills are conducted annually.

N.2.8 Alternative Facility Drills

At least once per drill cycle, use of designated Alternative Facilities to stage Onsite ERO Responders to facilitate rapid activation following a hostile action.

N.2.9 Rapid Escalation

At least one per drill cycle, a scenario resulting in an initial classification of, or rapid escalation to, a Site Area or General Emergency, will be conducted.

N.2.10 Minimal/No Release Drill

At least once per drill cycle, a scenario resulting in no radiological release, or an unplanned minimal release resulting in a classification of a Site Area Emergency but not requiring declaration of a General Emergency, shall be conducted.

N.2.11 Multi-Site Drills

At least once in every five years, a drill involving more than one SNC site will be conducted demonstrating the ability of the Common EOF to effectively implement the Emergency Plan for an event involving more than one site.

N.3 Scenarios

When a major drill or exercise is required, the Emergency Preparedness (EP) group will coordinate the preparation of a scenario. The EP group will also coordinate efforts with appropriate federal, state and local emergency organizations and agencies, schedule a date to conduct the drill or exercise, and assign qualified controllers.

The Emergency Preparedness group retains critique results for review prior to future drills or exercise and for guidance in properly modifying the site-specific Annexes, Emergency Plan Implementing Procedures (EPIPs), or other procedures as appropriate.

A scenario, prepared in advance, will govern the conduct of exercises and drills. Scenarios will include the following:

- Objectives of the drill or exercise; a measurable and observable objective must be specified for each major problem and solution.
- Dates, time period, places, personnel, and participating organizations.
- Simulated events.
- Time schedule of real and simulated initiating events.
- Narrative summary describing the conduct of the exercise or drill, including simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing and associated equipment, deployment of personnel and radiological teams, and public information activities.

During the exercise planning cycle described in Section N.1.4, SNC sites vary the content of exercise scenarios to provide ERO members the opportunity to demonstrate proficiency in key skills necessary to respond to several specific scenario elements including:

- Hostile Action directed at the plant site.
- No radiological release, or unplanned release that does not require public protective actions.
- An initial classification of, or rapid escalation to, a Site Area Emergency or General Emergency.
- Implementation of strategies, procedures, and guidance developed in 50.54(hh), (i.e., potential aircraft threat, explosion or large fire).
- Integration of offsite resources with onsite response.
- A drill initiated between the hours of 6 p.m. and 4 a.m.
- Drills using essentially 100 percent of Initiating Conditions in the 8-year cycle

Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations.

A record of exercises conducted during the 8-year exercise planning cycle that documents the contents of scenarios used during that cycle shall be maintained in accordance with Drill and Exercise procedure guidance.

SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.

N.4 Exercise Evaluation and Critique

A critique shall be conducted at the conclusion of the exercise, to evaluate the organization's ability to respond as called for in the SNC Standard Emergency Plan. Qualified personnel will observe and perform a critique of exercises and drills. Provisions will be made for federal, state, and local observers, as well as SNC personnel, to observe and critique required exercises.

Biennially, representatives from the NRC observe and evaluate the licensee's ability to conduct an adequate self-critical critique. For partial and full offsite participation exercises, the NRC and Federal Emergency Management Agency (FEMA), will observe, evaluate, and critique.

Drill and exercise performance objectives will be evaluated against measurable demonstration criteria. As soon as possible following the conclusion of the drill or exercise, a critique is conducted to evaluate the ability of the Emergency Response Organization (ERO) to implement the emergency plan and procedures, and a formal evaluation will result from the critique.

A written critique report is prepared by the Emergency Preparedness group following a drill or exercise involving the evaluation of designated objectives or following the final simulator set with ERO participation. The report will evaluate the ability of the ERO to respond to a simulated emergency situation. The report will also contain corrective actions and recommendations.

N.5 Exercise/Drill Corrective Actions

The critique and evaluation process is used to identify areas of the Emergency Preparedness Program that require improvement. The Emergency Preparedness group is responsible for evaluating recommendations and comments, determining which items will be incorporated into the program or require corrective actions, and for scheduling, tracking, and evaluating item resolution. Whenever exercises or drills indicate deficiencies in the SNC Standard Emergency Plan, site-specific Annexes, corresponding implementing procedures, or training lesson plans, such documents will be revised as necessary.

The results of exercise critiques, particularly comments on identified areas that require improvement or reevaluation, will be submitted to the Emergency Preparedness Supervisor or designee, for review. The Emergency Preparedness Supervisor or designee will consult with responsible department heads and assign corrective action activities, as appropriate.

SECTION O: RADIOLOGICAL EMERGENCY RESPONSE TRAINING

O.1 Training

To achieve and maintain an acceptable level of emergency preparedness, training will be conducted for members of the Emergency Response Organization (ERO) and those offsite organizations that may be called on to provide assistance in the event of an emergency.

The ERO Training Program ensures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency. Specific emergency response task training, prepared for response positions, is described in lesson plans and study guides. The lesson plans, study guides, and written tests are contained in the ERO Training Program. Responsibilities for implementing the training program are contained in plant procedures. Offsite training is provided to support organizations that may be called on to provide assistance in the event of an emergency.

Personnel from nuclear power plants annually offer to train those non-SNC organizations referenced in the Plant Annexes that may provide specialized services during a nuclear plant emergency. The training offered will acquaint the participants with the special problems potentially encountered during a nuclear plant emergency, notification procedures, and their expected roles. Organizations that must enter the site shall also receive site-specific emergency response training and be instructed as to the identity of those persons in the onsite organization who will control their support activities.

Training of state and local offsite emergency response organizations is described in their respective radiological emergency plans, with support provided by SNC if requested.

O.1.1 Training of Local Services Groups

A training opportunity will be offered annually for offsite organizations and agencies as specified in respective agreements and understandings. In addition, those offsite organizations and agencies that may provide onsite emergency assistance will be encouraged to become familiar with the general layout of SNC plants, and will be invited to attend applicable Emergency Plan training and orientation courses.

Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.

O.2 Performance Demonstration

In addition to general and specialized classroom training, members of the SNC ERO receive periodic performance-based emergency response training. Performance-based training is generally provided by participation in a performance drill or exercise.

A drill is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation. Drills described in Section N of this plan are a part of training. These drills allow individuals to demonstrate the ability to perform their assigned emergency functions. During drills, on-the-spot correction of erroneous performance may be made and a demonstration of the proper performance offered by the Controller.

O.3 First Aid Training

Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.

O.4 ERO Training

SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E, and position-specific responsibilities.

Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned to onsite emergency response positions will receive training specific to their position.

O.4.1 Emergency Response Organization (ERO)

ERO members will receive Emergency Plan training on an annual basis. Personnel identified receive training appropriate to their position in the areas of:

- Accident assessment.
- Accident mitigation.
- Notifications.
- Emergency Classifications.
- Protective Action Recommendations.
- Emergency Action Levels.
- Emergency Exposure Control.

O.4.2 Active Senior Licensed Control Room Personnel

Active Senior Licensed Control Room Personnel shall have training to maintain proficiency on the topics listed below. These subjects shall be covered, as a minimum, on an annual basis:

- Event Classification.
- Protective Action Recommendations.
- Radioactive Release Rate Determination.
- Offsite dose assessment.
- Notification form completion and communication.
- Federal, state, and local notification procedures as appropriate.
- Activating the onsite and offsite ERO.

O.4.3 Radiological Field Monitoring Teams

Radiological Field Monitoring Team personnel will receive classroom and hands-on training for the actions they will be expected to perform during an emergency. The following general topics will be included in the training:

- Equipment and Equipment Checks.

- Communications.
- Plume Tracking Techniques.
- Personnel monitoring.
- Emergency exposure criteria.
- Locations and use of radiological emergency equipment.

O.4.4 Fire Brigade Training

Individuals assigned to Fire Brigade shall maintain fire brigade qualifications.

O.4.5 Operations, Maintenance, Chemistry and Radiation Protection Training

Operations, Maintenance, Chemistry and Radiation Protection personnel who would be assigned to Repair and Damage Control Teams are trained as part of their normal job-specific duties to respond to both normal and abnormal plant operations.

O.4.6 Medical Support

On-site medical personnel receive specialized training in the handling of contaminated victims and hospital interface. Offsite ambulance and hospital personnel are offered annual training as outlined in Section O.1.1.

O.4.7 News Media Training

Local news media personnel will be offered an annual training opportunity as described in Section G.

O.4.8 General Employee Training (GET)

GET will include general training in emergency preparedness for plant and other site personnel. GET will include classification, individual response, signals, accountability, and site evacuation procedures.

O.5 Emergency Preparedness Staff Training

Training for the Emergency Preparedness Staff at an SNC-operated plant consists of initial and continuing training process. Details can be found in site specific procedures and processes.

SECTION P: RESPONSIBILITY FOR THE PREPAREDNESS EFFORT

The President/Chief Executive Officer (CEO) Southern Nuclear Operating Company (SNC) has direct responsibility for the operation and maintenance of the SNC Plants. The president/CEO is also responsible for all technical and administrative support activities provided by SNC. The president/CEO directs the chief nuclear officer/executive vice president, Executive Vice President-Operational Readiness and Integration, and the vice president of regulatory affairs in fulfillment of their responsibilities.

Responsibility for the performance of Emergency Preparedness functions is assigned to various members of the SNC organization and coordinated as follows.

P.1 Fleet Emergency Preparedness

The Vice President - Regulatory Affairs is responsible for the overall coordination of the corporate emergency preparedness programs and Emergency Plans. Their direct report, the Fleet Emergency Preparedness Director, has governance and oversight responsibility for the SNC Fleet Emergency Preparedness functional area.

The Fleet Emergency Preparedness Director is responsible for the oversight of Emergency Preparedness activities and coordinating those activities with Licensee, federal, state, and local response organizations. The Fleet Emergency Preparedness organization in the SNC Corporate office provides oversight and support for site and corporate functions. Reporting to the Fleet Emergency Preparedness Director are the EP Programs Manager and the EP Planning Manager. EP Programs Manager responsibilities include Regulations, Projects, Procedures and Performance Improvement. EP Planning Manager responsibilities include offsite interface, Drill and Exercise Coordination and Training.

Strategic direction for the emergency preparedness program and maintenance of the SNC Emergency Plan(s) is provided by the SNC Fleet Emergency Preparedness Director. Emergency Preparedness Coordinator(s) coordinate functional elements of the emergency preparedness program for the SNC fleet under the direction of the Fleet Emergency Preparedness Director.

Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.

P.2 Site Emergency Preparedness

The Vice President-(Site) is responsible for the site Emergency Preparedness aspects of the program at each site. The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity. The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President-(Site) for Plants Hatch, Farley and Vogtle 1-2. During project construction for Vogtle 3 and 4 Emergency Preparedness Supervisor reports to the Emergency Preparedness/Security Project Manager, who reports to the Site Integration Director. The Site Integration Director reports to the Executive Vice President – Operational Readiness and Integration. The Emergency

Preparedness Supervisor is responsible for the implementation of emergency planning strategies provided by the Fleet Emergency Preparedness Director.

P.3 Coordination

The Fleet Emergency Preparedness Director coordinates site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor. The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and program maintenance activities. Figure P.1 shows the EP organization.

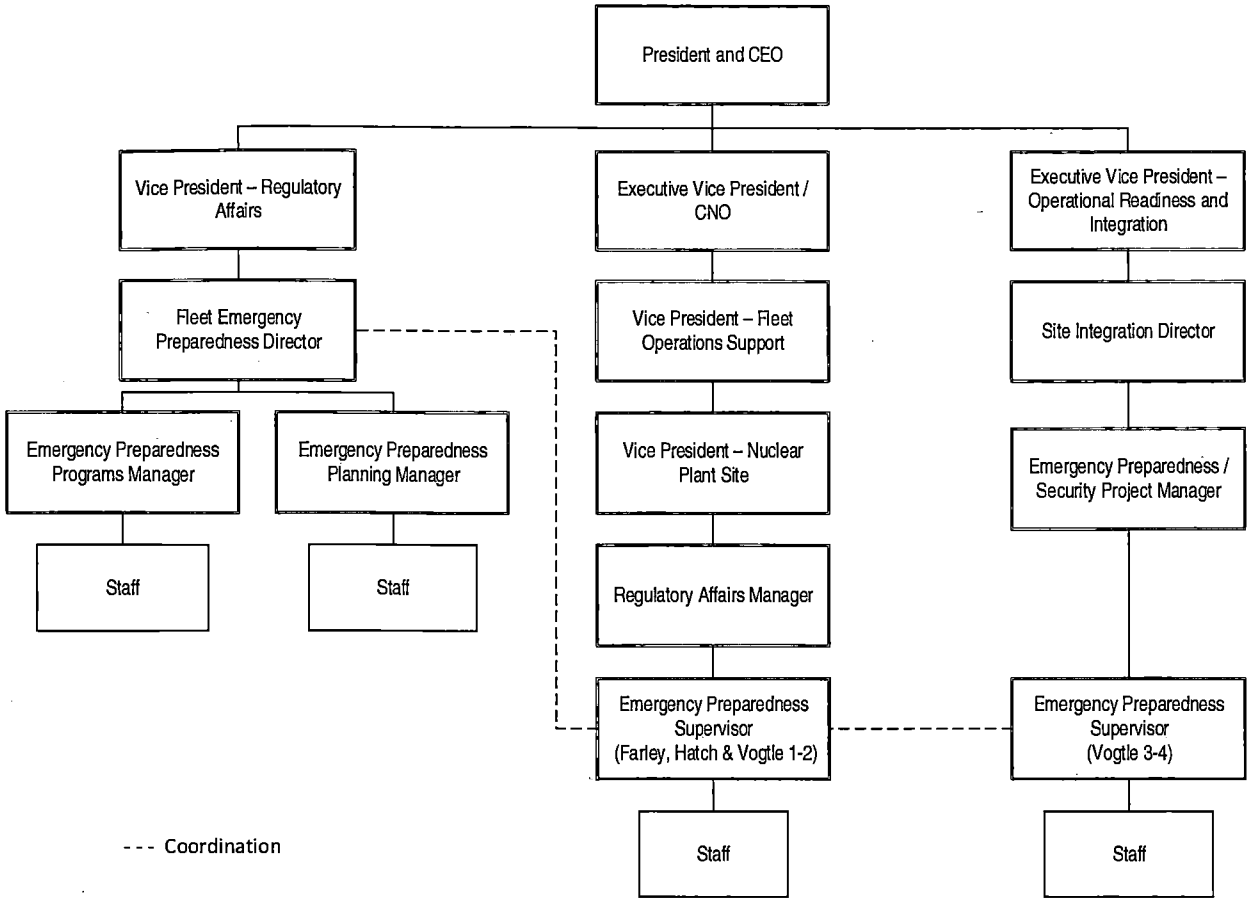
EPIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.

Approved changes to the Emergency Plan are forwarded to key organizations and appropriate individuals who are responsible for implementing the Plan. The Emergency Plan, agreements, and the EPIPs are reviewed once per calendar year and updated as needed. These updates take into account changes identified by drills and exercises, and the independent review described below.

An independent review of the EP program is conducted, as required by 10 CFR 50.54(t). The review includes the Emergency Plan, implementing procedures and practices, training, readiness testing, equipment, and interfaces with offsite agencies. The results of the review, along with recommendations for improvements, are documented and reported to plant management and to appropriate offsite agencies. Management controls are implemented for evaluation and correction of the review findings. Records of these audits and recommendations are maintained for at least 5 years.

In addition to this Plan, several other formal emergency plans have been developed to support the overall emergency response effort. Once per calendar year, the designated Emergency Planning staff performs a review of the emergency plans for Southern Nuclear. This review includes a comparison for consistency of emergency plans for a specific site including the Security Plan, and state and county plans as appropriate.

Figure P.1 - Typical Emergency Preparedness Organization



Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4

Enclosure 4
Farley Staffing - Detailed Description and Technical Evaluation
(Marked-Up Pages and Clean Copy)

Action Based (HAB) event in which the site is not accessible to the ERO, an ED would be available in the EOF within 75 minutes of an Alert or higher declaration to assume these aspects of the Emergency Direction and Control function and minimize the burden on the Shift Manager/ED.

There would be no undue burden on the Control Room staff or impact on the notification function from an addition of the EOF ED. (See table below.)

CONTROL ROOM	TSC	EOF
Shift Manager / Emergency Director	**TSC Emergency Director**	**EOF Emergency Director**
Classification →	Classification	
Notifications →		Notifications
PARs~~S~~ →		PARs~~S~~
Emergency Exposure Controls →	Emergency Exposure Controls	

Finally, the proposed revision to the FNP Unit 1 and Unit 2 Emergency Plan requires augmentation of the following TSC and EOF positions, which support activation of the TSC and EOF, within 75 minutes of declaration of Alert or higher emergency classification event:

- TSC Emergency Director
- TSC Manager
- TSC Operations Supervisor
- TSC Emergency Notification System (ENS) Communicator
- TSC Health Physics Network (HPN) Communicator
- TSC ERF Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Chemistry Support
- TSC Engineering Supervisor
- TSC Reactor Engineer
- TSC Engineering Support
- TSC Maintenance Supervisor
- EOF Emergency Director
- EOF Manager
- EOF Field Team Coordinator
- EOF Emergency Communications Coordinator
- EOF Security Coordinator
- EOF Offsite Response Coordinator
- EOF Emergency Notification Network (ENN) Communicator
- EOF ENS Communicator
- EOF HPN Communicator
- EOF ERF Communicator
- ~~EOF Nuclear Spokesperson~~
- ~~EOF Technical Assistant~~
- EOF News Writer

- EOF Field Team Communicator
- EOF Dose Assessment Supervisor
- EOF Dose Analyst
- EOF Technical Supervisor

Notification and Communication

NUREG-0654/FEMA REP-01 Revision 1 guidance addresses ~~requires one~~the Communicator function~~to be assigned~~ on-shift. Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two Communicators~~, but this is~~ modified by a note providing that this function may be fulfilled by individuals assigned other functions (Shift Manager, Shift Supervisor, Shift Support Supervisor, Shift Technical Advisor, Reactor Operator, or other appropriately qualified personnel). In the proposed SNC Fleet Emergency Plan, the FNP staffing for this function~~position~~ is addressed~~reduced to a single on-shift communicator~~ as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. ~~However, t~~The number of control room personnel available to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no conflicting~~collateral~~ tasks. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In addition, the proposed SNC Fleet Emergency Plan provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the EOF from the control room. The proposed change includes both sufficient communications personnel to perform the communications and an ED with the authority to approve the content of the notification. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel will be available in the EOF within 75 minutes from time of declaration of an Alert or higher emergency classification to assume the Communications function and minimize the burden on the Shift Manager/ED.

The ability to transfer the Communications function directly to the EOF, and provision of sufficient augmented personnel in the EOF to perform the Communicator function within 75 minutes, ensure no additional burden is incurred by the on-shift staff.

Radiological Accident Assessment and Chemistry/Radio-Chemistry

The function of on-site radiological assessment is to: review radiological conditions on site using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures.

Classification is performed by the Shift Manager/ED using NMP-EP-110, Emergency Classification Determination and Initial Action procedure, which uses readily available and easily recognized plant instrumentation to determine the appropriate emergency classification. Off-site and onsite surveys provide additional information, such as direct radiation measurements, that can be directly applied to emergency classification. The on-shift Chemistry Technician takes direction from the Control Room to provide radiological assessment support until the TSC is activated.

As part of the Plant Operations and Assessment of Operational Aspects function, the operating crew uses symptom-based emergency operating procedures (EOPs), which minimize the need for specific accident assessment. The operating crew performs actions based on symptoms that are described in the EOPs, not based on specific accident assessment.

The proposed change presents no adverse impact to ERO staffing because TSC and EOF EDs will continue to provide timely relief to the on-shift ED from the duties and responsibilities for offsite functions.

Offsite Dose Assessment (ODA)/Chemistry

NUREG-0654/FEMA REP-01 Revision 1 does not specify a resource~~provide~~ for the on-shift dose assessment task.~~capability.~~ The current version of the FNP Unit 1 and Unit 2 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to a Radiation Protection individual. In the proposed change, on-shift dose assessment will be assigned to an on-shift Chemistry individual appropriately trained ~~and dedicated to~~for this task with no other conflicting~~collateral~~ emergency response duties. In turn, this will free the Radiation Protection individual to perform other radiation protection related tasks.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can easily and rapidly perform dose assessments during emergency conditions. Enhancements in dose assessment software have reduced the time required to perform dose assessment runs and provide the results to the ED. In addition, the dose assessment software is operational in a Windows operating system on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A second Chemistry individual is provided as part of the minimum on-shift staffing so that any required chemistry samples may be collected without impacting the Chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), FNP Unit 1 and Unit 2 Emergency Plan, and the procedures used by Operations for off-normal plant conditions, did not identify any conflicts between completion of dose assessment and other on-shift Chemistry functions within the 75 minute augmentation time frame. ~~An additional Chemistry support individual will be augmented in the TSC within 75 minutes, who will provide oversight for chemistry sampling and analysis activities.~~ An additional Chemistry technician will be augmented in the OSC within 75 minutes to assist in performing chemistry sampling and analysis.

Augmentation by the RP Supervisor TSC within 75 minutes will relieve the Shift Manager/ED of the role of oversight of the on-shift dose assessor. The TSC will retain this task until relieved by the EOF dose assessment staff, which consists of the Dose Assessment Supervisor and Dose Analyst. There is no loss of function or impact on the timing for performing either of the tasks of dose assessment or required radiochemistry sampling by the proposed on-shift staffing provided in the SNC Fleet Emergency Plan.

Offsite/Onsite Surveys, In-Plant surveys and Radiation Protection (RP)

NUREG-0654/FEMA REP-01 Revision 1 identifies one on-shift RP Technician who is responsible for performing in-plant surveys. NUREG-0654/FEMA REP-01 Revision 1 does not provide for any on-shift personnel for on-site out of plant surveys or for off-site surveys. NUREG-0654 / FEMA REP-01 Revision 1 further identifies two RP technicians under the Protective Actions function for performing the tasks of Access Control, Radiation Protection coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry. However, a note modification provides that these individuals may be assigned other functions, for example, the RP technician assigned to the in-plant surveys task and the individual assigned to the Chemistry/Radio-chemistry task under the Radiological Accident Assessment and Support of Operational Accident Assessment function.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform on-site out of plant surveys - an individual qualified to perform the survey and an assistant to drive a vehicle. A Chemistry technician credited under the Protective Actions (in-plant) function also provides support to coordinate communications between the out of plant team and the dose assessor as needed.

As part of the proposed SNC Fleet Emergency Plan, the FNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual. SNC currently uses predesignated, readily accessible survey points around the FNP Unit 1 and Unit 2 plant site for collecting on-site survey data. Prior to dispatch of the on-site out of plant monitoring technician, the dose assessor will brief the survey technician on the event conditions, direction of potential/actual plume path, potential radiological conditions, and so forth. The technician will be dispatched to one of the predesignated sample points in the downwind direction of the potential/actual plume path. The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location. The dose assessor and the survey technician will have the capability to maintain near continuous communications, which will allow the dose assessor to redirect the technician while in route if needed. Since the designated sample points are on-site and readily accessible from the FNP Unit 1 and Unit 2 plant site road system, there will be no immediate need for the survey technician to travel off-site and this survey can be performed by a single individual without impacting the accuracy or timeliness of the survey.

Additionally, the proposed SNC Fleet Emergency Plan FNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor. This will expedite communication of field survey readings to the dose assessor for input into the dose assessment program, resulting in a shorter completion time of dose assessment runs using actual field survey results.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for augmentation of two off-site survey teams as well as a Field Team Coordinator and Field Team Communicator at the EOF. The proposed staffing for the SNC Fleet Emergency Plan augments a single off-site survey team within 75 minutes of an Alert or higher declaration as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided. A third augmented individual, together with the on-site out of plant technician will make up the second off-site field monitoring team. On-site monitoring will then become a function of the OSC.

Installed effluent radiation monitors and in-plant radiation monitors are able to detect any radioactive release quickly and accurately. The enhanced technology provided by the Integrated Plant Computer (IPC) system and the dose assessment computer model provides reliable visual indication of any radioactive plume and its calculated direction. Quantification of a radioactive release is determined by dose assessment, which is performed by dedicated on-shift personnel then augmented by additional dose assessment personnel in the TSC and EOF. On-site out of plant field teams and off-site field teams are typically used to verify the status of a potential release and validate the dose assessment model. Dose assessment model validation strategies developed and implemented by the EOF staff typically include directing one team to track the leading edge of the radiological plume, and one team to define the lateral edges of the plume and determine plume centerline radiological conditions. If the field team survey data indicates a departure from the dose assessment model, the radiation surveys and air samples collected by these two

field teams can be used to perform dose assessment back calculations. SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys. ~~To better support performing surveys off-site, the on-shift field team, which initially consisted of a single RP technician or other appropriately trained individual, can be augmented by the on-shift dose assessor as a vehicle driver (once relieved by the EOF Dose Analyst).~~ Sufficient instrumentation, communication equipment, and transportation will be maintained on-site for augmenting and dispatching additional teams if needed.

Regarding in-plant surveys, Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform in-plant surveys. These individuals include a qualified RP technician to perform the survey and an assistant (typically a maintenance individual). As part of the proposed change to the SNC Fleet Emergency Plan, the role of in-plant survey assistant is being eliminated from the FNP on-shift staff, with one RP technician assigned to the task of in-plant under the Radiological Accident Assessment and Support of Operational Accident Assessment function. An additional RP technician will be provided for the Protective Actions function discussed later. However, since both of these individuals are qualified RP technicians, they will be available to collectively support either of these functions as needed. An additional two Radiation Protection technicians will respond within 75 minutes to support Radiological Accident Assessment (in-plant) function. This will provide sufficient Radiation Protection resources to address the Radiological Accident Assessment needs of both the on-shift and augmented ERO personnel.

With improved installed instrumentation, dose calculation computer modeling, and dedicated on-shift staffing for dose assessment and on-site out of plant surveys, there is no more than minimal impact to the performance of these tasks as a result of the proposed staffing alignments in the SNC Fleet Emergency Plan.

Plant System Engineering

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

NUREG-0654/FEMA REP-01 Revision 1 guidance provided for a Shift Technical Advisor (STA) to be available on-shift to perform the Technical Support task, including core/thermal hydraulics in response to the NUREG-0737 requirements resulting from the Three Mile Island accident. Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides an individual to fulfill the STA task. The performance of the Technical Support task includes use of the IPC, which graphically displays the pertinent parameters with trending and graphing capabilities, alarm functions, and color-coded indication for changes in state for the Critical Safety Function Status Trees. This enhances critical parameter monitoring and the rapid identification and assessment of in-plant conditions. This remains unchanged for FNP in the SNC Fleet Emergency Plan.

Repair and Corrective Actions

NUREG-0654/FEMA REP-01 Revision 1 Table B-1 specifies the functional area of Repair and Corrective Actions is to be provided on-shift by a total of two individuals who also "may be provided by shift personnel assigned other functions." It further states that the "position title or expertise" for the Repair and Corrective Actions task could be filled by Mechanical Maintenance/Radwaste Operator, Electrical Maintenance, or I&C Technician.

Due to the time needed to stabilize the plant and assess the event, the initial phase of an accident is not expected to involve a significant need for maintenance personnel. Once

plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities.

Typically, the initial stages of Corrective Actions are minor or of limited scope, such as:

- Mechanical – Identification and operation of faulty valves, clogged filters, packing and seal adjustments, or troubleshooting.
- Electrical – Identification and correction of tripped breakers and overloads, or hands-off troubleshooting.
- I&C – Identification and correction of controller and set point adjustment, calibration, or hands-off troubleshooting.

Until the reactor is stabilized and the causal agents identified, actual repairs or realignment of plant equipment would not require large-scale maintenance support. The current version of the FNP Unit 1 and Unit 2 Emergency Plan (Revision 64.0) provides for one mechanical journeyman, one electrical journeyman, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. These numbers will be maintained in the proposed SNC Fleet Emergency Plan FNP on-shift staffing. In addition to these personnel, a maintenance supervisor will be added on-shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability.

The proposed SNC Fleet Emergency Plan provides for augmentation of maintenance discipline specific leads in the OSC as well as an overall OSC Manager within 75 minutes of an Alert or higher emergency classification. The proposal removes one mechanical journeyman, one electrical journeyman, and one instrument and controls technician who currently fulfill Technical Support tasks (Fire Tanker Driver, FMT driver, and in-plant survey assistant) that are addressed elsewhere in this document. This is a reduction in staffing. A 10 CFR 50 Appendix E shift staffing evaluation was performed to validate that removal of the individuals performing the Technical Support tasks did not impact the ability of the proposed on-shift staff to perform all of their assigned tasks during the 75 minutes prior to augmentation.

The NRC Public Meeting on July 16, 2015, discussing proposed changes to guidance regarding ERO staffing and augmentation (ML15174A309) identified that the proposed change primarily meets or exceeds the current regulatory guidance of NUREG-0654/FEMA REP-01 Revision 1 Table B-1 and the proposed NUREG-0654/FEMA REP-01 Revision 2 (ML14246A519). Based on FNP Unit 1 and Unit 2 licensing basis (FSAR), the design philosophy with respect to Emergency Safety Features (ESF) and guidance for restoration, it is unnecessary to have additional Mechanical Maintenance, Electrical Maintenance, and I&C Maintenance augmented within the 75 minute timeframe. ESF systems are redundant in trains (physical separation) and have diversity of subsystems. Therefore, the inoperability of different system components in different trains is not expected to result in a loss of function of the ESF. This allows flexibility in plant operations under circumstances where components in redundant subsystems may be inoperable.

Protective Actions (In-Plant)

For the Protective Actions (In-Plant) function, NUREG-0654/FEMA REP-01 Revision 1 specifies providing two personnel on-shift who "may be provided by shift personnel assigned other functions." The major tasks of this function are access control, RP coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides two individuals for performing this function. One is an RP technician and the other is a chemistry technician who,

Planning Basis for Augmented Emergency Response Organization (ERO)

Positions have been designated as 75 minutes responders in the TSC, OSC, EOF, and JIC. These positions perform major functions and supporting functions in each facility. The tables below outline these positions and functions as provided in the proposed SNC Fleet Emergency Plan.

TSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control		Emergency Director (ED)
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification/Communication	Notify licensee, state, local, and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		HPN Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Radiation Protection (RP) Supervisor
		Dose Analyst*
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

* Security Supervisor filled by one of the on-shift Security Supervisors. Dose Analyst filled by the on-shift chemistry technician.

** Support Coordinator does not have a 75 minute augmentation time.

OSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Tasks**	**Position Title**
Emergency Direction and Control		OSC Manager
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Lead (1) Field Monitoring Team Assistant~~Personnel~~ (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP / Chemistry Group Lead
	• RP coverage for repair, corrective actions, search and rescue, first aid & firefighting • Personnel monitoring • Dosimetry	RP Technicians (2)

EOF 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control	EOF Director	ED
		EOF Manager
		Support Coordinator*
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff *
		Liaisons (at EOCs)* - GA - AL - SC
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		~~Nuclear Spokesperson~~
		~~Technical Assistant~~
		News Writer
		Field Team Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
	Chemistry/Radio Chemistry	Not required in this facility
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

* Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute augmentation time.

JIC Staff*		
Functional Area	**Major Task**	**Position Title**
Media Response	Media Response	Public Information Director
		Nuclear Spokesperson
		Technical Assistant
		JIC Manager
		JIC Assistant
		Facility Coordinator
		Clerical Staff
		Security
		Public Response Coordinator
		Public Response Staff
		Media Relations Representative

* JIC Staff do not have a 75 minute augmentation time.

Minimum staff positions have been identified for each facility. The minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. Facility activation may be completed upon filling of minimum staffing positions and completion of a briefing on the event to ensure personnel in these positions are ready to accept responsibility for their functions. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

Minimum staffing positions for the TSC Organization are as follows:

- TSC Emergency Director (ED)
- TSC Emergency Response Facility (ERF) Communicator
- TSC Manager
- TSC Operations Supervisor
- TSC ENS Communicator
- TSC Radiation Protection (RP) Supervisor
- ~~TSC Dose Analyst~~
- TSC Reactor Engineer~~ing Supervisor~~

Minimum staffing positions for the Operations Support Center (OSC) Organization are as follows:

- OSC Manager
- OSC Emergency Response Facility (ERF) Communicator
- OSC RP/Chemistry Group Lead

Minimum staffing positions for the EOF Organization are as follows:

- EOF Emergency Director (ED)
- EOF Emergency Response Facility (ERF) Communicator
- EOF Manager
- EOF Dose Assessment Supervisor

- EOF Dose Analyst
- EOF ENN Communicator

Minimum staffing positions for the Joint Information Center (JIC) Organization are as follows:

- Public Information Director (PID)
- JIC Manager
- Media Relations Representative
- Public Response Coordinator

In addition to the functional analysis provided, the key Emergency Response Facilities were analyzed to determine the minimum staffing (both numbers and positions) needed for the facilities to activate the facilities and begin facility operations. Any personnel determined to be required to support the minimum staff activation and initiation of activities were added to the revised augmented ERO.

Program Enhancements

The following section discusses technical changes in plant systems, dose assessment, procedures, and training which have been completed in order to better support on-shift functions and ease operator burden. Additional information regarding on-shift and augmented positions and their responsibilities as identified in NUREG-0654/FEMA REP-01 Revision 1 are outlined in Enclosure 6.

Plant Computer System

At the time of the original approval of the FNP Unit 1 and Unit 2 Emergency Plan, the site used a Westinghouse P2500 Plant Computer System. The operator interface consisted of a small number of printers located in the control room and computer room.

In the mid-1980s, the Westinghouse P2500 Plant Computer System was upgraded to a Gould Encore 32/67 Computer System. The design criteria for the new plant computer were based on the requirements of NUREG-0737, Supplement 1 for a Safety Parameter Display System (SPDS) and the upgrading of ERFs. The requirements specified for the SPDS were met or exceeded by a system of displays provided by the Gould Encore 32/67 Computer System. The parameters on the SPDS displays were provided by integrated software on the plant computer system. The system upgrade included introduction of automatic updates to plant overview and system displays on the computer monitors, consolidated safety parameter displays, and increased frequency of parameter updates.

In 2006 for Unit 1 and 2007 for Unit 2, the site installed a Data Systems and Solutions (DS&S) SAIPMS Integrated Plant Computer System. The new IPC significantly improved plant monitoring capabilities in the control room as well as in the site's ERFs, by integrating other independent standalone systems.

Benefits of the upgraded systems include:

- Programming capability for automated response such as indication of critical parameter alarms.
- Improved plant monitoring capability for ED functions.
- Fewer keystrokes required to switch between graphical displays.
- Real time plant data available through graphical displays.
- Functions are available to any desktop computer through the plant's site-wide

This License Amendment Request (LAR) revises the current on-shift and augmented Emergency Response Organization (ERO) for Farley Nuclear Plant (FNP) Unit 1 and Unit 2 Emergency Plan to incorporate a standard on-shift and augmented ERO staffing plan for the Southern Nuclear Operating Company (SNC) Fleet. This proposed change to the ERO will result in an SNC Fleet standard definition of ERO augmentation time as well as an SNC Fleet standard complement of emergency response positions, titles, duties, and responsibilities.

EP Functions Impacted by the Proposed Change

The proposed change impacts the ERO as outlined in 10 CFR 50.47(b) Planning Standards 1 and 2. This change addresses the following Planning Standard Functions:

- 10 CFR 50.47(b) (1): The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the Emergency Plan.
- 10 CFR 50.47(b) (2): Process for timely augmentation of on-shift staff is established and maintained.

The proposed change has been reviewed and continues to perform the functions required of 10 CFR 50.47(b) and the related requirements of 10 CFR 50 Appendix E.

Emergency Response Organization (ERO) Activation

FNP Unit 1 and Unit 2 Emergency Plan Revision 64.0 requires staffing of augmented ERO for the Technical Support Center (TSC) and Operations Support Center (OSC) at 75 minutes from time of declaration of an Alert or higher emergency classification. The FNP 75 minute Emergency Response Facility (ERF) augmentation time for on-site ERFs was established in Revision 25.0 of the FNP Unit 1 and Unit 2 Emergency Plan in coordination with and with concurrence from the NRC Headquarters and Region II staff.

FNP Unit 1 and Unit 2 Emergency Plan Revision 64.0 also directs that the SNC Fleet Emergency Operations Facility (EOF) "... will be operational within about an hour of the initial notification. SNC's goal is to begin notification of all required on-call Emergency Response Organization (ERO) personnel as soon as practicable, within 15 minutes, following the declaration of an Alert emergency or higher emergency classification at any SNC site." This wording was first incorporated in version 41 of the FNP Emergency Plan following prior approval of the SNC Fleet EOF. The augmentation time requirement for the EOF is consistent for the entire SNC Fleet and consistent with the on-site ERF requirements for VEGP 1-2, VEGP 3-4 and HNP, which provide for ERO augmentation within "approximately" one hour.

The proposed SNC Fleet standard definition for ERO augmentation is 75 minutes from declaration. This proposed change redefines the SNC Fleet augmentation time without extension, as the 15-minute notification period will be incorporated in the overall definition of augmentation time. The proposed SNC Fleet definition also removes ambiguous wording such as "about" and "approximately" in order to clearly define the augmentation requirement. Since FNP augmentation time is already defined as 75 minutes from declaration of an Alert or higher emergency, it is not an actual change for FNP. However, since the SNC ERF augmentation time is part of the SNC Fleet Based Plan, it is being addressed in the FNP technical discussion for consistency.

Assignment of Responsibility/Organizational Control

The FNP Unit 1 and Unit 2 Emergency Plan maintains an on-shift organization as documented in the site Emergency Plan Revision 64.0. This Plan identifies the authority and responsibilities for emergency response and assigns major functional areas to on-site and offsite response facilities for augmented response. In the following analysis, the impact of consolidating ERO positions and reassigning responsibilities is assessed based on the capacity of on-shift staff to perform major tasks for each major functional area of FNP.

Plant Operations and Assessment of Operational Aspects

NUREG-0654/FEMA REP-01 Revision 1 guidance assumes the on-shift staff will provide the Plant Operations and Assessment of Operational Aspects function throughout the emergency. The on-shift operations staffing as provided in the current FNP Unit 1 and Unit 2 Emergency Plan Revision 64.0 meets the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the FNP Unit 1 and Unit 2 Technical Specifications. In addition to these requirements, the FNP Unit 1 and Unit 2 Emergency Plan provides for a dedicated Shift Manager position to perform the NUREG-0654/FEMA REP-01 Revision 1 function of Emergency Direction and Control. Per NUREG-0654/FEMA REP-01 Revision 1, this function may be performed as a collateral duty of one of the individuals performing the Plant Operations and Assessment of Operational Aspects function. However, providing a Shift Manager to fill this function as a standalone position enhances the ability of the FNP Unit 1 and Unit 2 control room staff to fulfill the Plant Operations and Assessment of Operational Aspects function while the dedicated ED addresses aspects of the Emergency Direction and Control function. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In accordance with the current FNP Unit 1 and Unit 2 Emergency Plan and proposed SNC Fleet Emergency Plan, the on-shift staffing exceeds the requirements of NUREG-0654/FEMA REP-01 Revision 1 Table B-1, as well as those prescribed in Revision 25.0 of the FNP Unit 1 and Unit 2 Emergency Plan. The on-shift control room staff for FNP, as described, remains unchanged in the proposed SNC Fleet Emergency Plan and continues to ensure support of the Plant Operations and Assessment of Operational Aspects function at the start of an event and until the on-shift staff is properly augmented.

Emergency Direction and Control

NUREG-0654/FEMA REP-01 Revision 1 guidance provides that the Emergency Direction and Control function may be fulfilled by personnel assigned other functions. Per Revision 25.0 of the FNP Unit 1 and Unit 2 Emergency Plan, the Emergency Director (ED) function is a collateral duty of an ED-qualified individual (Shift Manager or ED) assigned to the Plant Operations and Assessment of Operational Aspects function until relieved by an augmented ED in the TSC within 75 minutes of declaration of an emergency.

As provided in the current Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan, the Shift Manager is designated as the on-shift ED to fulfill the function of Emergency Direction and Control until relieved by the TSC ED within 75 minutes of declaration of an Alert or higher emergency. This remains unchanged in the proposed SNC Fleet Emergency Plan.

In addition to the augmentation of an ED in the TSC within 75 minutes of an Alert or higher declaration, the proposed SNC Fleet Emergency Plan provides an additional ED will be augmented in the Emergency Operations Facility (EOF) within 75 minutes of an Alert or higher declaration. Aspects of the Emergency Direction and Control function assigned to the TSC and EOF EDs are clearly defined in the proposed SNC Fleet Emergency Plan. The primary role of the EOF ED will be to assume responsibility for state and local notifications and to approve Protective Action Recommendations (PARs). This ensures that in the unlikely event of a Hostile

Action Based (HAB) event in which the site is not accessible to the ERO, an ED would be available in the EOF within 75 minutes of an Alert or higher declaration to assume these aspects of the Emergency Direction and Control function and minimize the burden on the Shift Manager/ED.

There would be no undue burden on the Control Room staff or impact on the notification function from an addition of the EOF ED. (See table below.)

CONTROL ROOM	TSC	EOF
Shift Manager / Emergency Director	**TSC Emergency Director**	**EOF Emergency Director**
Classification →	Classification	
Notifications →		Notifications
PARs →		PARs
Emergency Exposure Controls →	Emergency Exposure Controls	

Finally, the proposed revision to the FNP Unit 1 and Unit 2 Emergency Plan requires augmentation of the following TSC and EOF positions, which support activation of the TSC and EOF, within 75 minutes of declaration of Alert or higher emergency classification event:

- TSC Emergency Director
- TSC Manager
- TSC Operations Supervisor
- TSC Emergency Notification System (ENS) Communicator
- TSC Health Physics Network (HPN) Communicator
- TSC ERF Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Chemistry Support
- TSC Engineering Supervisor
- TSC Reactor Engineer
- TSC Engineering Support
- TSC Maintenance Supervisor
- EOF Emergency Director
- EOF Manager
- EOF Field Team Coordinator
- EOF Emergency Communications Coordinator
- EOF Security Coordinator
- EOF Offsite Response Coordinator
- EOF Emergency Notification Network (ENN) Communicator
- EOF ENS Communicator
- EOF HPN Communicator
- EOF ERF Communicator
-
-
- EOF News Writer

- EOF Field Team Communicator
- EOF Dose Assessment Supervisor
- EOF Dose Analyst
- EOF Technical Supervisor

Notification and Communication

NUREG-0654/FEMA REP-01 Revision 1 guidance addresses the Communicator function on-shift. Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two Communicators modified by a note providing that this function may be fulfilled by individuals assigned other functions (Shift Manager, Shift Supervisor, Shift Support Supervisor, Shift Technical Advisor, Reactor Operator, or other appropriately qualified personnel). In the proposed SNC Fleet Emergency Plan, the FNP staffing for this function is addressed as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance. The number of control room personnel available to perform this task will remain unchanged. This will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be assigned to a member of the control room staff with no conflicting tasks. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In addition, the proposed SNC Fleet Emergency Plan provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the EOF from the control room. The proposed change includes both sufficient communications personnel to perform the communications and an ED with the authority to approve the content of the notification. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel will be available in the EOF within 75 minutes from time of declaration of an Alert or higher emergency classification to assume the Communications function and minimize the burden on the Shift Manager/ED.

The ability to transfer the Communications function directly to the EOF, and provision of sufficient augmented personnel in the EOF to perform the Communicator function within 75 minutes, ensure no additional burden is incurred by the on-shift staff.

Radiological Accident Assessment and Chemistry/Radio-Chemistry

The function of on-site radiological assessment is to: review radiological conditions on site using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures.

Classification is performed by the Shift Manager/ED using NMP-EP-110, Emergency Classification Determination and Initial Action procedure, which uses readily available and easily recognized plant instrumentation to determine the appropriate emergency classification. Off-site and onsite surveys provide additional information, such as direct radiation measurements, that can be directly applied to emergency classification. The on-shift Chemistry Technician takes direction from the Control Room to provide radiological assessment support until the TSC is activated.

As part of the Plant Operations and Assessment of Operational Aspects function, the operating crew uses symptom-based emergency operating procedures (EOPs), which minimize the need for specific accident assessment. The operating crew performs actions based on symptoms that are described in the EOPs, not based on specific accident assessment.

Similarly, the Shift Manager/ED uses flowcharts in NMP-EP-112, Protective Action Recommendations procedure, which prescribes the decision-making processes for directing on-

site protective measures. The simple information needed to accomplish allows for rapid decision making by the Shift Manager/ED using readily available information.

The Safety Parameter Display System (SPDS) provides the control room with a display of plant parameters from which the status of plant operation can be assessed. The SPDS has the following functions:

- Aids the control room operators in the rapid detection and identification of abnormal operating conditions.
- Provides additional, specific information to analyze and diagnose the cause of abnormal operating conditions.
- Monitors plant response to corrective actions.
- Provides grouping of parameters to enhance the operators' capability to assess plant status quickly without surveying all control room displays concurrently.
- Directs the operators' attention to other specific confirmatory non-SPDS control room displays.
- Provides human factors engineered display formats in simple and consistent display patterns and coding.
- Provides display information on a real-time basis, along with validation of data.
- Provides generated selectable trend displays on a real-time basis for monitoring reactivity control, reactor core cooling and heat removal from the primary system, reactor coolant system integrity, radioactivity control, containment integrity, and other selected parameters.

Therefore, with the proposed changes, the ERO structure continues to meet the intent of the requirements of Appendix E to 10 CFR Part 50 and the standards of 10 CFR 50.47(b).

This Functional Area includes three tasks: EOF Emergency Director; Off-Site Dose Assessment and Chemistry/Radiochemistry; and Off-site, On-Site (out of plant), In-Plant Surveys, and Radiation Protection

Emergency Operations Facility (EOF) Emergency Director (ED)

The TSC ED is not assigned to the on-shift complement. In the current plan, the TSC ED arrives within 75 minutes of declaration of an Alert or higher emergency classification, and relieves the on-shift ED of overall emergency management as well as all off-site responsibilities including PARs and emergency notifications. The EOF is also staffed within this timeframe; however, there is currently no ED provided in the Emergency Operations Facility (EOF).

Under this proposal, within 75 minutes of classification, the Shift Manager/ED is relieved in the TSC by the ED, who then assumes overall control of the response efforts. The EOF ED arrives and relieves the TSC ED of overall emergency management and off-site responsibilities including PARs, dose assessment, and emergency notifications. This ensures that, in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel to perform the Radiological Accident Assessment and Support of Operational Accident Assessment function will be available in the EOF within 75 minutes from time of an Alert or higher declaration and minimize the burden on the Shift Manager/ED.

As discussed earlier, the overall function is enhanced by providing a Shift Manager to fill this function as a standalone position beyond the collateral assignment as designated by NUREG-0654/FEMA REP-01 Revision 1 Table B-1, during the period prior to augmentation.

The proposed change presents no adverse impact to ERO staffing because TSC and EOF EDs will continue to provide timely relief to the on-shift ED from the duties and responsibilities for offsite functions.

Offsite Dose Assessment (ODA)/Chemistry

NUREG-0654/FEMA REP-01 Revision 1 does not specify a resource for the on-shift dose assessment task. The current version of the FNP Unit 1 and Unit 2 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to a Radiation Protection individual. In the proposed change, on-shift dose assessment will be assigned to an on-shift Chemistry individual appropriately trained for this task with no other conflicting emergency response duties. In turn, this will free the Radiation Protection individual to perform other radiation protection related tasks.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can easily and rapidly perform dose assessments during emergency conditions. Enhancements in dose assessment software have reduced the time required to perform dose assessment runs and provide the results to the ED. In addition, the dose assessment software is operational in a Windows operating system on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A second Chemistry individual is provided as part of the minimum on-shift staffing so that any required chemistry samples may be collected without impacting the Chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), FNP Unit 1 and Unit 2 Emergency Plan, and the procedures used by Operations for off-normal plant conditions, did not identify any conflicts between completion of dose assessment and other on-shift Chemistry functions within the 75 minute augmentation time frame. An additional Chemistry technician will be augmented in the OSC within 75 minutes to assist in performing chemistry sampling and analysis.

Augmentation by the RP Supervisor TSC within 75 minutes will relieve the Shift Manager/ED of the role of oversight of the on-shift dose assessor. The TSC will retain this task until relieved by the EOF dose assessment staff, which consists of the Dose Assessment Supervisor and Dose Analyst. There is no loss of function or impact on the timing for performing either of the tasks of dose assessment or required radiochemistry sampling by the proposed on-shift staffing provided in the SNC Fleet Emergency Plan.

Offsite/Onsite Surveys, In-Plant surveys and Radiation Protection (RP)

NUREG-0654/FEMA REP-01 Revision 1 identifies one on-shift RP Technician who is responsible for performing in-plant surveys. NUREG-0654/FEMA REP-01 Revision 1 does not provide for any on-shift personnel for on-site out of plant surveys or for off-site surveys. NUREG-0654 / FEMA REP-01 Revision 1 further identifies two RP technicians under the Protective Actions function for performing the tasks of Access Control, Radiation Protection coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry. However, a note modification provides that these individuals may be assigned other functions, for example, the RP technician assigned to the in-plant surveys task and the individual assigned to the Chemistry/Radio-chemistry task under the Radiological Accident Assessment and Support of Operational Accident Assessment function.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform on-site out of plant surveys - an individual qualified to perform the survey and an

assistant to drive a vehicle. A Chemistry technician credited under the Protective Actions (in-plant) function also provides support to coordinate communications between the out of plant team and the dose assessor as needed.

As part of the proposed SNC Fleet Emergency Plan, the FNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained individual. SNC currently uses predesignated, readily accessible survey points around the FNP Unit 1 and Unit 2 plant site for collecting on-site survey data. Prior to dispatch of the on-site out of plant monitoring technician, the dose assessor will brief the survey technician on the event conditions, direction of potential/actual plume path, potential radiological conditions, and so forth. The technician will be dispatched to one of the predesignated sample points in the downwind direction of the potential/actual plume path. The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location. The dose assessor and the survey technician will have the capability to maintain near continuous communications, which will allow the dose assessor to redirect the technician while in route if needed. Since the designated sample points are on-site and readily accessible from the FNP Unit 1 and Unit 2 plant site road system, there will be no immediate need for the survey technician to travel off-site and this survey can be performed by a single individual without impacting the accuracy or timeliness of the survey.

Additionally, the proposed SNC Fleet Emergency Plan FNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor. This will expedite communication of field survey readings to the dose assessor for input into the dose assessment program, resulting in a shorter completion time of dose assessment runs using actual field survey results.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for augmentation of two off-site survey teams as well as a Field Team Coordinator and Field Team Communicator at the EOF. The proposed staffing for the SNC Fleet Emergency Plan augments a single off-site survey team within 75 minutes of an Alert or higher declaration as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided. A third augmented individual, together with the on-site out of plant technician will make up the second off-site field monitoring team. On-site monitoring will then become a function of the OSC.

Installed effluent radiation monitors and in-plant radiation monitors are able to detect any radioactive release quickly and accurately. The enhanced technology provided by the Integrated Plant Computer (IPC) system and the dose assessment computer model provides reliable visual indication of any radioactive plume and its calculated direction. Quantification of a radioactive release is determined by dose assessment, which is performed by dedicated on-shift personnel then augmented by additional dose assessment personnel in the TSC and EOF. On-site out of plant field teams and off-site field teams are typically used to verify the status of a potential release and validate the dose assessment model. Dose assessment model validation strategies developed and implemented by the EOF staff typically include directing one team to track the leading edge of the radiological plume, and one team to define the lateral edges of the plume and determine plume centerline radiological conditions. If the field team survey data indicates a departure from the dose assessment model, the radiation surveys and air samples collected by these two field teams can be used to perform dose assessment back calculations. SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys.

Sufficient instrumentation, communication equipment, and transportation will be maintained on-site for augmenting and dispatching additional teams if needed.

Regarding in-plant surveys, Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides for two individuals to perform in-plant surveys. These individuals include a qualified RP technician to perform the survey and an assistant (typically a maintenance individual). As part of the proposed change to the SNC Fleet Emergency Plan, the role of in-plant survey assistant is being eliminated from the FNP on-shift staff, with one RP technician assigned to the task of in-plant under the Radiological Accident Assessment and Support of Operational Accident Assessment function. An additional RP technician will be provided for the Protective Actions function discussed later. However, since both of these individuals are qualified RP technicians, they will be available to collectively support either of these functions as needed. An additional two Radiation Protection technicians will respond within 75 minutes to support Radiological Accident Assessment (in-plant) function. This will provide sufficient Radiation Protection resources to address the Radiological Accident Assessment needs of both the on-shift and augmented ERO personnel.

With improved installed instrumentation, dose calculation computer modeling, and dedicated on-shift staffing for dose assessment and on-site out of plant surveys, there is no more than minimal impact to the performance of these tasks as a result of the proposed staffing alignments in the SNC Fleet Emergency Plan.

Plant System Engineering

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

NUREG-0654/FEMA REP-01 Revision 1 guidance provided for a Shift Technical Advisor (STA) to be available on-shift to perform the Technical Support task, including core/thermal hydraulics in response to the NUREG-0737 requirements resulting from the Three Mile Island accident. Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides an individual to fulfill the STA task. The performance of the Technical Support task includes use of the IPC, which graphically displays the pertinent parameters with trending and graphing capabilities, alarm functions, and color-coded indication for changes in state for the Critical Safety Function Status Trees. This enhances critical parameter monitoring and the rapid identification and assessment of in-plant conditions. This remains unchanged for FNP in the SNC Fleet Emergency Plan.

Repair and Corrective Actions

NUREG-0654/FEMA REP-01 Revision 1 Table B-1 specifies the functional area of Repair and Corrective Actions is to be provided on-shift by a total of two individuals who also "may be provided by shift personnel assigned other functions." It further states that the "position title or expertise" for the Repair and Corrective Actions task could be filled by Mechanical Maintenance/Radwaste Operator, Electrical Maintenance, or I&C Technician.

Due to the time needed to stabilize the plant and assess the event, the initial phase of an accident is not expected to involve a significant need for maintenance personnel. Once plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities.

Typically, the initial stages of Corrective Actions are minor or of limited scope, such as:

- Mechanical – Identification and operation of faulty valves, clogged filters, packing and seal adjustments, or troubleshooting.
- Electrical – Identification and correction of tripped breakers and overloads, or hands-off troubleshooting.
- I&C – Identification and correction of controller and set point adjustment, calibration, or hands-off troubleshooting.

Until the reactor is stabilized and the causal agents identified, actual repairs or realignment of plant equipment would not require large-scale maintenance support. The current version of the FNP Unit 1 and Unit 2 Emergency Plan (Revision 64.0) provides for one mechanical journeyman, one electrical journeyman, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. These numbers will be maintained in the proposed SNC Fleet Emergency Plan FNP on-shift staffing. In addition to these personnel, a maintenance supervisor will be added on-shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability.

The proposed SNC Fleet Emergency Plan provides for augmentation of maintenance discipline specific leads in the OSC as well as an overall OSC Manager within 75 minutes of an Alert or higher emergency classification. The proposal removes one mechanical journeyman, one electrical journeyman, and one instrument and controls technician who currently fulfill Technical Support tasks (Fire Tanker Driver, FMT driver, and in-plant survey assistant) that are addressed elsewhere in this document. This is a reduction in staffing. A 10 CFR 50 Appendix E shift staffing evaluation was performed to validate that removal of the individuals performing the Technical Support tasks did not impact the ability of the proposed on-shift staff to perform all of their assigned tasks during the 75 minutes prior to augmentation.

The NRC Public Meeting on July 16, 2015, discussing proposed changes to guidance regarding ERO staffing and augmentation (ML15174A309) identified that the proposed change primarily meets or exceeds the current regulatory guidance of NUREG-0654/FEMA REP-01 Revision 1 Table B-1 and the proposed NUREG-0654/FEMA REP-01 Revision 2 (ML14246A519). Based on FNP Unit 1 and Unit 2 licensing basis (FSAR), the design philosophy with respect to Emergency Safety Features (ESF) and guidance for restoration, it is unnecessary to have additional Mechanical Maintenance, Electrical Maintenance, and I&C Maintenance augmented within the 75 minute timeframe. ESF systems are redundant in trains (physical separation) and have diversity of subsystems. Therefore, the inoperability of different system components in different trains is not expected to result in a loss of function of the ESF. This allows flexibility in plant operations under circumstances where components in redundant subsystems may be inoperable.

Protective Actions (In-Plant)

For the Protective Actions (In-Plant) function, NUREG-0654/FEMA REP-01 Revision 1 specifies providing two personnel on-shift who "may be provided by shift personnel assigned other functions." The major tasks of this function are access control, RP coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides two individuals for performing this function. One is an RP technician and the other is a chemistry technician who, as needed, supports dosimetry issuance, and also supports briefing the on-shift on-site out of

plant survey team prior to dispatch and communication with this team. Under the proposed SNC Fleet Emergency Plan staffing, a single RP technician will support this function.

System Operators are typically dispatched prior to the call-out of augmented personnel. Normally the initial response phase involves search and rescue operations or manual manipulation of equipment. Maintenance actions in the initial response phase are anticipated to be minimal as discussed previously. Installed plant area radiation monitors are used to provide indication of in-plant radiation levels prior to dispatch of personnel into the plant. This allows for personnel to be assigned the appropriate dose and dose rate alarms for their electronic personal dosimetry prior to dispatch and to assign additional Radiation Protection technician support as needed.

Personnel accessing the Radiological Control Areas (RCA) at FNP Unit 1 and Unit 2 are required by procedure to obtain electronic personal dosimetry prior to entry. The same dosimetry is also used as a "key" to unlock turnstiles for access to the RCA. Radiation work permits (RWPs) establish the necessary preset warnings/alarms associated with the dosimetry. During a declared emergency, the normal RCA entry process may use pre-prepared emergency RWPs using the Digital Alarming Dosimeters DADs. In the event the normal access system is non-functional, an emergency reentry process has been developed to use the pre-prepared emergency RWP dose and dose rate alarms manually programed into the DADs. This ensures the teams dispatched to in-plant areas to perform any function during a declared emergency will be afforded ample warning/alarm before exceeding the allowed dose or dose rate. In-plant teams are briefed on radiological conditions prior to being dispatched, including plant event conditions, radiological conditions, dose and dose rate turn back values/alarms, and communications methods to be used if radiological conditions change or if unexpected radiological conditions are encountered. Thus, under emergency conditions, responding personnel will be knowledgeable of dose rates in the area, and radiation protection personnel may not be required to accompany all teams into the plant areas. Dosimeters also can be programmed at the OSC by RP personnel as needed prior to team dispatch. The proposed SNC Fleet Emergency Plan FNP on-shift staffing provides for a total of two Radiation Protection technicians between the Protective Actions (in-plant) and Radiological Accident Assessment (in-plant surveys) to ensure appropriate radiological protective measures are available to the on-shift staff.

An additional two Radiation Protection technicians and an RP/Chemistry OSC lead will be augmented in the OSC within 75 minutes to support the Protective Actions (in-plant) function. This will provide sufficient Radiation Protection resources to address the needs of both the on-shift and augmented ERO personnel for the Protective Actions (in-plant) function.

Fire Fighting

For the Fire Fighting function, NUREG-0654/FEMA REP-01 Revision 1 specifies that staffing is per the site Technical Specifications. Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan states the Fire Brigade staffing is in accordance with the FNP FSAR, where the Fire Brigade commitments for FNP are maintained. The on-shift Fire Brigade is assigned this task throughout the emergency with off-site support provided by local fire departments. The Fire Brigade staffing and associated off-site fire response support remains unchanged in the proposed SNC Fleet Emergency Plan.

Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan provides an additional individual designated as Fire Tanker Driver, who is assigned to drive a large transport vehicle pulling a trailer-mounted water tank, used for fires affecting areas external to the plant such as grass fires or outbuildings outside the installed plant fire protection header. There is no requirement in the FNP FSAR for this position, nor is there any regulatory requirement for maintaining this position

as part of the site's emergency planning basis. Furthermore, the type of fires for which this equipment would be used will be addressed by off-site fire responders with whom FNP maintains support agreements. These agreements with off-site firefighting resources are provided in the current FNP Emergency Plan as well as in the proposed SNC Fleet Emergency Plan. Since the equipment operated by this position is not used to fight fires affecting actual plant equipment, there is no impact to the performance of the Fire Fighting function as the result of eliminating this position from minimum FNP on-shift staffing requirements in the SNC Fleet Emergency Plan.

A staffing analysis meeting the requirements of 10 CFR 50 Appendix E.IV.A.9 for the proposed organization was performed. The results of that analysis showed that the required response functions could be conducted with parallel activation of the fire brigade for the subject scenarios.

Rescue Operations and First Aid

Per NUREG-0654/FEMA REP-01 Revision 1, the Rescue Operations and First Aid function "may be provided by shift personnel assigned other functions." There are no proposed changes to this area. The FNP Unit 1 and Unit 2 Emergency Plan provides appropriately trained on-shift personnel to fulfill this function as a collateral duty. There are no additional personnel augmented for this task. Local off-site support provides for any additional assistance. There are no proposed changes to this area.

Site Access Controls and Personnel Accountability

There are no proposed changes to this area. This function is part of the Security Contingency Plan and is staffed accordingly.

Onsite Emergency Response Organization (ERO) – 10 CFR 50.47(b) (2)

The current ERO provided in Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan was developed in response to NUREG-0654/FEMA REP-01 Revision 1. The ERO developed by NUREG-0654/FEMA REP-01 Revision 1 was developed without a specific technical basis. The Emergency Preparedness Enhanced Rulemaking of November 23, 2011, required the capabilities of the on-shift staff to be validated by a formal analysis. This requirement was documented in 10 CFR 50 Appendix E.IV.A.9. In support of this submittal, the proposed ERO for the FNP Unit 1 and Unit 2 Site was analyzed and it was determined that the on-shift staff proposed is capable of performing the response functions required of the revised rule.

Reason for the Change

The proposed ERO in the SNC Fleet Emergency Plan provides a standard complement of emergency response positions, titles, duties, and responsibilities. This will result in a more effective interface between ERO members at the sites and their counterparts at the SNC Fleet EOF. Having a common ERO organization for the SNC Fleet will also support sharing of ERO resources between affected and non-affected stations during emergencies.

Establishing an appropriately staffed SNC Fleet standard on-shift and an augmented ERO staffing model with an SNC Fleet standard definition for ERO augmentation time is a practical and prudent alternate method to ensure effective and timely emergency response augmentation.

Details associated with the on-shift ERO, revised augmented ERO, and revised key responsibilities and tasks as identified in NUREG-0654/FEMA REP-01 Revision 1, are included in Enclosure 6.

Planning Basis for Augmented Emergency Response Organization (ERO)

Positions have been designated as 75 minutes responders in the TSC, OSC, EOF, and JIC. These positions perform major functions and supporting functions in each facility. The tables below outline these positions and functions as provided in the proposed SNC Fleet Emergency Plan.

TSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control		Emergency Director (ED)
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification/Communication	Notify licensee, state, local, and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		HPN Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Radiation Protection (RP) Supervisor
		Dose Analyst*
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

* Security Supervisor filled by one of the on-shift Security Supervisors. Dose Analyst filled by the on-shift chemistry technician.

** Support Coordinator does not have a 75 minute augmentation time.

OSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Tasks**	**Position Title**
Emergency Direction and Control		OSC Manager
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Lead (1) Field Monitoring Team Assistant (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP / Chemistry Group Lead
	• RP coverage for repair, corrective actions, search and rescue, first aid & firefighting • Personnel monitoring • Dosimetry	RP Technicians (2)

EOF 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control	EOF Director	ED
		EOF Manager
		Support Coordinator*
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff *
		Liaisons (at EOCs)* - GA - AL - SC
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		News Writer
		Field Team Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
	Chemistry/Radio Chemistry	Not required in this facility
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

* Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute augmentation time.

JIC Staff*		
Functional Area	**Major Task**	**Position Title**
Media Response	Media Response	Public Information Director
		Nuclear Spokesperson
		Technical Assistant
		JIC Manager
		JIC Assistant
		Facility Coordinator
		Clerical Staff
		Security
		Public Response Coordinator
		Public Response Staff
		Media Relations Representative

* JIC Staff do not have a 75 minute augmentation time.

Minimum staff positions have been identified for each facility. The minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. Facility activation may be completed upon filling of minimum staffing positions and completion of a briefing on the event to ensure personnel in these positions are ready to accept responsibility for their functions. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

Minimum staffing positions for the TSC Organization are as follows:

- TSC Emergency Director (ED)
- TSC Emergency Response Facility (ERF) Communicator
- TSC Manager
- TSC Operations Supervisor
- TSC ENS Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Reactor Engineer

Minimum staffing positions for the Operations Support Center (OSC) Organization are as follows:

- OSC Manager
- OSC Emergency Response Facility (ERF) Communicator
- OSC RP/Chemistry Group Lead

Minimum staffing positions for the EOF Organization are as follows:

- EOF Emergency Director (ED)
- EOF Emergency Response Facility (ERF) Communicator
- EOF Manager
- EOF Dose Assessment Supervisor
- EOF Dose Analyst

- EOF ENN Communicator

Minimum staffing positions for the Joint Information Center (JIC) Organization are as follows:

- Public Information Director (PID)
- JIC Manager
- Media Relations Representative
- Public Response Coordinator

In addition to the functional analysis provided, the key Emergency Response Facilities were analyzed to determine the minimum staffing (both numbers and positions) needed for the facilities to activate the facilities and begin facility operations. Any personnel determined to be required to support the minimum staff activation and initiation of activities were added to the revised augmented ERO.

Program Enhancements

The following section discusses technical changes in plant systems, dose assessment, procedures, and training which have been completed in order to better support on-shift functions and ease operator burden. Additional information regarding on-shift and augmented positions and their responsibilities as identified in NUREG-0654/FEMA REP-01 Revision 1 are outlined in Enclosure 6.

Plant Computer System

At the time of the original approval of the FNP Unit 1 and Unit 2 Emergency Plan, the site used a Westinghouse P2500 Plant Computer System. The operator interface consisted of a small number of printers located in the control room and computer room.

In the mid-1980s, the Westinghouse P2500 Plant Computer System was upgraded to a Gould Encore 32/67 Computer System. The design criteria for the new plant computer were based on the requirements of NUREG-0737, Supplement 1 for a Safety Parameter Display System (SPDS) and the upgrading of ERFs. The requirements specified for the SPDS were met or exceeded by a system of displays provided by the Gould Encore 32/67 Computer System. The parameters on the SPDS displays were provided by integrated software on the plant computer system. The system upgrade included introduction of automatic updates to plant overview and system displays on the computer monitors, consolidated safety parameter displays, and increased frequency of parameter updates.

In 2006 for Unit 1 and 2007 for Unit 2, the site installed a Data Systems and Solutions (DS&S) SAIPMS Integrated Plant Computer System. The new IPC significantly improved plant monitoring capabilities in the control room as well as in the site's ERFs, by integrating other independent standalone systems.

Benefits of the upgraded systems include:

- Programming capability for automated response such as indication of critical parameter alarms.
- Improved plant monitoring capability for ED functions.
- Fewer keystrokes required to switch between graphical displays.
- Real time plant data available through graphical displays.
- Functions are available to any desktop computer through the plant's site-wide intranet.

Computer basic functions are supported by instrument buses with back-up power provided by vital buses.

Dose Assessment

The original FNP dose assessment program used the automated rapid dose assessment (ARDA) software for performing dose assessment. The ARDA model was a Class A dose assessment model with limited user interface. In 1994, the FNP dose assessment capability was upgraded when the MIDAS dose assessment program was installed on the ERF Computer to provide FNP a Class B dose assessment model.

Improvements have been made to the dose assessment program resulting in minimal user interface required to quickly produce results. Radiological dose assessment has benefited from technological advances that make dose assessment simpler and less time-consuming. Dose assessment is currently performed by on-shift Chemistry personnel using the MIDAS-NU program. This program supports multi-unit and multi-accident assessment of radiological releases. The MIDAS-NU program has minimal data entry needs and a minimal number of program windows the user needs to access to perform a dose projection. With the use of the dose assessment program, as well as plant status, meteorological, and radiation monitoring data, one person can easily and rapidly perform dose assessments during emergency conditions.

Specifically designed displays have been developed for obtaining the necessary plant, radiological effluent, area radiation monitor, and meteorological information for dose assessment personnel on-shift using the Meteorological Information Dose Assessment System – Nuclear (MIDAS-NU) program.

Automated Call-Out System

Automated call-out systems have been enhanced to streamline processes for activation of the ERO. A single phone call initiates rapid notification of ERO members, in lieu of individual calls to fill the ERO positions included in the Emergency Plan. The system includes a primary activation location as well as a remotely located back-up capability to ensure uninterrupted operation.

Procedure Improvements

Emergency Operations Procedures (EOPs)/Abnormal Operating Procedures (AOPs)

Since the original emergency plan approval, EOPs have been improved through industry initiatives. EOPs now use a symptom-based approach that demands less assessment and interpretation of plant conditions by the operating crews. EOPs interface well with new technology such as IPC. EOP curves are generated by IPC to graphically display plant conditions relative to limits or required actions.

Emergency Plan Implementing Procedures (EPIPs)

In 2007 (Reference Revision 43.0 of FNP Unit 1 and Unit 2 Emergency Plan) FNP Unit 1 and Unit 2 updated the classification methodology to NEI 99-01, Revision 4. EALs now incorporate guidance that has simplified the classification process, including the use of an overview matrix of EAL initiating conditions and threshold values, which streamlines the process of evaluating EALs against plant conditions.

Training Improvements

Operations Training

Training is used to strategically drive improved performance at FNP Unit 1 and Unit 2. Since

NRC approval of the FNP Unit 1 and Unit 2 Emergency Plan, the application of the Systematic Approach to Training (SAT) has resulted in developing a task list for Operations personnel. The SAT process ensures training is conducted to industry-accepted standards and has led to accreditation of the Operations Training Programs by the National Academy for Nuclear Training.

A dynamic simulator is routinely used during Operations Training. Simulator evaluations include emergency response scenarios that periodically exceed 75 minutes in length and are part of the requalification cycle. Simulator scenarios are designed to be realistic and reflect a wide range of plant conditions, including emergency conditions. During evaluated simulator sessions, the control room staff is taken from normal operation to accident conditions resulting in declaration of at least one event, which can range from Unusual Event to General Emergency. The crew performs critical tasks, classification, accident mitigation, response prioritization, and communications without augmentation from additional responders. The proficiency of the control room staff to perform these functions while maintaining situational awareness, without additional support, is assessed in every training cycle.

The Licensed Operator Continuing (LOCT) Program includes licensed crew performance evaluations that consider the scenario guidance attributes of INPO Operations Department Standing Instruction, ODSI-3, and "Operations Department Guidance."

Attachment C of ODSI-3 provides guidance on the realistic integration of the emergency response into crew performance evaluations. The purpose is to ensure crew performance evaluations realistically represent the additional challenges that the emergency plan responsibilities add to the crew's ability to manage an event. Representing the event as realistically as possible, which includes the additional challenges of emergency plan responsibilities, helps promote the situational awareness necessary during a real event.

STA Training

The Shift Technical Advisor (STA) was originally trained as an advisor to the operating shift per NUREG-0737. In 1990, additional guidelines were developed by INPO for the training of STAs. This is detailed in the document INPO 90-003, Guidelines for Training and Qualifications of Shift Technical Advisors.

The INPO Guidelines describe the role of the STA. The STA performs independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergent conditions, classifications of emergencies, development of recommendations to protect the public, and any other actions related to critical safety functions and plant safety during abnormal and emergency situations. By routinely monitoring equipment and plant operations, the STA can focus on preventive actions to mitigate the consequences of an accident and protect public health and safety.

Increases in On-Shift Staffing

There has been an increase in on-shift staffing since the original approval of the FNP Unit 1 and Unit 2 Emergency Plan, in order to ensure adequate performance of the major emergency plan functions and tasks. A total of 28 persons are identified for on-shift staffing in Revision 64.0 of the FNP Unit 1 and Unit 2 Emergency Plan, which is an increase from the total of 10 persons in the regulatory guidance provided by NUREG-0654/FEMA REP-01 Revision 1. A comparative chart depicting on-shift and augmented staffing based on NUREG-0654/FEMA REP-01 Revision 1, Revision 25.0 of the FNP Unit 1 and Unit 2 Emergency Plan, Revision 64.0.0 of the FNP Unit 1 and Unit 2 Emergency Plan, and proposed revisions are included in Enclosure 6.

Enhancements in Information Sharing with Offsite Agencies

There has been a dramatic increase in the ability of the site to share event-specific information with Offsite Response Organizations (OROs) from the one-to-one telephone systems at the time the original FNP Unit 1 and Unit 2 Emergency Plan was approved. Real-time plant data is communicated to the Nuclear Regulatory Commission using the approved Emergency Response Data System (ERDS). Additionally, local OROs are provided real-time data with automated methods (currently WebEOC). These enhancements provide more timely and accurate information of actual plant conditions than was originally available.

Improvement Summary

The improvements to staffing, equipment, procedures, communication of plant information, and training since initial approval of the FNP Unit 1 and Unit 2 Emergency Plan have resulted in a significant increase in on-shift capabilities and knowledge. The ERO maintains the depth and capability for continuous 24-hour coverage of the Emergency Response for a protracted period.

Summary

Based on overall improvements in technology, procedures, training, and staffing levels available to ERO since the original implementation of the guidance contained in NUREG-0654/FEMA REP-01 Revision 1, the proposed Emergency Response Organization is capable of implementing the Emergency Plan in accordance with the requirements of 10 CFR 47 and 10 CFR 50 Appendix E.

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4

Enclosure 6
Farley Justification Matrix
(Marked-Up Pages and Clean Copy)

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
a. Corporate Duty Manager The Duty Manager is responsible for the overall management of emergency support at FNP. The Duty Manager is the primary contact for support from off-site agencies, and provides assistance, and advice to the EOF Manager and Emergency Director in decisions involving the overall effect of the event. The Duty Manager will serve as the corporate spokesperson until such time as an alternate Duty Manager or other trained individual is available to assume the role of spokesperson. This position will be filled by a qualified individual designated by the Executive Vice President.	**EP B.3.1.1 EOF Emergency Director** The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades. **EP B.3.21.17 EOF Nuclear Spokesperson** The Nuclear Spokesperson speaks on behalf of the company, providing plant status updates during news briefings. The Spokesperson also may do one-on-one media interviews. The position works with the Technical Assistant in keeping abreast of the event status and keeps the Public Information Director (PID) posted on that status.	With the realignment of the EOF description in the SNC Standard Emergency Plan, the EOF Director ~~and Nuclear Spokesperson are now~~is specifically identified as the individual in Command and Control of the respective facilities.
3. Emergency Communication Organization The Emergency Communication Organization (ECO) is discussed in Appendix 10(J).	**EP B.3 Offsite Emergency Response Organization (ERO)** The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company Corporate Offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.	The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision. For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .

Farley Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	Farley (75 min) Rev 25	Farley (75 min) Rev 64	Farley Proposed (75 min)
Emergency Direction and Control						9
Notification / Communication	Notify State/local and federal personnel, maintain communication		2	2	2	11
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager	1	1	1	(a)
	Dose Assessment	HP Expertise				3
	Offsite Surveys	HP Technicians	2	2	6	~~65~~
	On-Site Surveys	HP Technicians	1	2		
	In-Plant surveys	HP Technicians	1	2		
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
Plant System Engineering	Technical Support	Electrical	1	1	1	1
		Mechanical	1	1	1	1
		Engineering Supervision				2
		Core Thermal / Hydraulic	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1		1	
		Electrical Maintenance	1	1	1	1
		I&C Technician		1	1	1
		Maintenance Supervision				2
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2	2	2	3
Total Augmented ERO			**15**	**18**	**19**	**4~~43~~**

(a) EOF Emergency Director counted in Emergency Direction and Control.

FARLEY NUCLEAR POWER PLANT

JUSTIFICATION MATRIX

Purpose

The purpose of this attachment is to identify the commitments in the current Farley Nuclear Power Plant Emergency Plan Revision 64, identify the equivalent or modified commitment in the integrated Fleet Emergency Plan and Farley Site Annex, and justify on a commitment-by-commitment basis the proposed License Amendment.

CHANGE MATRIX

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The purpose of the Joseph M. Farley Nuclear Plant (FNP) Emergency Plan is to protect the health and safety of the general public, persons temporarily visiting or assigned to the plant, and plant employees in accordance with the requirements set forth in Appendix E, "Emergency Plans for Production and Utilization Facilities", of 10CFR50, "Licensing of Production and Utilization Facilities".	**EP INTRODUCTION** Purpose The Southern Nuclear Operating Company's (SNC) Emergency Plan provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to nuclear power plants operated by SNC, and plant employees. SNC operates the Hatch Nuclear Plant (HNP), Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP). Background The SNC Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The SNC Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E, and the intent of NUREG 0654 Revision 1. The SNC Emergency Plan is organized using the structure of NUREG-0654 Revision 1 and that structure provides the cross-reference to the base document.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Introduction: Detailed procedures concerning the implementation of the Emergency Plan are not included here but are included in the Emergency Plan Implementing Procedures. Summary: Southern Nuclear Operating Company corporate management has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public and property from hazards associated with ionizing radiation originating within a company facility.	**EP Introduction:** Detailed procedures concerning the implementation of the EP are in the Emergency Plan Implementing Procedures (EPIPs). SNC has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The SNC EP describes the organization and facilities, training, and maintenance of both onsite and off-site facilities and equipment, that will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Additional detail has been added regarding governmental relationships.
Information submitted in this plan was developed in accordance with the elements outlined in NUREG-0654, FEMA-REP-1, Rev. 1 "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants". Information that describes the Emergency Operations Facility (EOF) for Southern Nuclear is outlined in Appendix 7(G).	**EP Introduction:** The SNC Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The SNC Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E, and the intent of NUREG 0654 Revision 1. The SNC Emergency Plan is organized using the structure of NUREG-0654 Revision 1, and that structure provides the cross-reference to the base document.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
B. SUMMARY Southern Nuclear Operating Company corporate management has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public and property from hazards associated with ionizing radiation originating within a company facility. The authority for planning, developing, and coordinating emergency control measures is discussed in Appendix 9 (I), Responsibility For The Planning Effort. The Farley Plant Emergency Plan describes the organization and facilities both onsite and offsite that will be used to deal with a spectrum of accidents ranging from minor onsite incidents to those that could affect the general public. There are three phases of responsive action contained within the Farley Plant Emergency Plan. The first phase includes initial actions directed toward the protection of personnel and the elimination of the potential for further exposure to the hazard. The second phase includes immediate and planned action directed toward termination of the incident, containment of the effluent, establishment of incident boundaries, establishment of control, channeling of information, and protection of the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively utilizing these phases, emergencies are classified according to increasing severity as Notification of Unusual Event, Alert, Site Area Emergency or General Emergency.	**EP Introduction:** SNC has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The authority for planning, developing, and coordinating emergency control measures is derived from being the Nuclear Regulatory Commission (NRC) license holder for the nuclear power plants operated by SNC. The SNC Emergency Plan describes the organization and facilities, training, and maintenance of both onsite and off-site facilities and equipment, that will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public. There are three phases of responsive action described in the SNC Emergency Plan. The first phase includes initial actions to protect personnel and eliminate the potential for further exposure to the hazard. The second phase includes immediate and planned action to terminate the condition, contain any effluent, establish incident boundaries, establish control, channel information, and protect the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively using these phases, emergencies are classified according to increasing severity: Unusual Event, Alert, Site Area Emergency, or General Emergency.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
II. ORGANIZATION The organization, responsibilities and functions of Southern Nuclear Operating Company onsite and offsite resources are individually discussed below. The onsite and offsite organizations provide emergency response during the activation, emergency, and recovery phases of accident response. Principal federal, state, local and private agencies are also discussed. Figures 12 and 13 illustrate the interrelationships of these organizations before and after Emergency Operations Facility activation respectively.	**EP Introduction:** There are supporting and complementing emergency plans, including those of federal agencies, the states of Alabama, Georgia, South Carolina, and individual counties. SNC has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. There are three phases of responsive action contained within the SNC Emergency Plan. The first phase includes initial actions to protect personnel and eliminate the potential for further exposure to the hazard. The second phase includes immediate and planned action to terminate the condition, contain any effluent, establish incident boundaries, establish control, channel information, and protect the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively using these phases, emergencies are classified according to increasing severity as Unusual Event, Alert, Site Area Emergency, or General Emergency.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
A. ONSITE The normal onsite organization for Farley Nuclear Plant is shown on Figure 1.	**EP B.1 Normal Plant Organization** The normal onsite organization of an SNC-operated nuclear power plant provides a staff capable of providing the initial response to an emergency event. The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. The number and ERO position titles of personnel available within 75 minutes following declaration of an Alert or higher classification are shown in Tables 1, 2 and 3. **ANNEX Table 2.2.A**	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section II.A: Management positions in the onsite organization meet the qualification requirements of ANSI N18.1-1971.	**EP O.4** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned to onsite emergency response positions will receive training specific to their position.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Section II.A: The qualifications for the professional-technical level positions also meet the requirements of ANSI N18.1-1971.	**EP O.4** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position specific responsibilities. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned to onsite emergency response positions will receive training specific to their position.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
1. Technical Support Center (TSC) The emergency onsite organization implemented for events requiring activation of the TSC is described in FNP-0-EIP-0 and is shown in Figure 2. Responsibilities and authorities of personnel in the TSC emergency organization are as follows:	**EP Figure B.2.B** – Technical Support Center organization	Figure B.2.B is provided to address the TSC organization proposed for the SNC Standard Emergency Plan. Individual positions are described below.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Section II.A.1.a: a. Emergency Director (ED) The ED is charged with the responsibility of overall direction of onsite emergency activity including near-site field monitoring team dispatch and control and interfacing with offsite organizations and agencies until the Emergency Operations Facility (EOF) is activated. After the EOF is functional, the ED is responsible for overall direction of all in-plant emergency activity. The ED shall supervise the TSC, and manage the in plant recovery efforts and the in plant recovery organization. The ED shall communicate directly with the EOF Manager when the EOF is activated and shall have full authority to direct the onsite recovery efforts without further consultation when the situation demands such action. Following EOF activation when time permits the ED will consult with EOF personnel prior to initiating major evolutions or changes in plant configuration.	**EP B.1.1:** The **Shift Manager (SM)** is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the position of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. **EP B.2.1.1 TSC Emergency Director (ED)** The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure authorization, and on-site protective actions. **EP B.3.1.1 EOF Emergency Director** The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The ED's general responsibilities include: 1) Staffing the TSC. The TSC will be staffed by plant supervisory personnel supplemented by plant engineering, technical and administrative personnel as necessary to staff the TSC 24 hours a day and discharge the responsibilities discussed below. 2) Evaluating the classification of the emergency and amending as appropriate. Terminating an emergency level will not be delegated to other elements of the emergency organization and will be performed in accordance with approved procedures. 3) Verifying correct control room response to the emergency classification. 4) Determining radiological status and initiating notifications to state agencies (and local agencies for General Emergencies). The decision to notify offsite government agencies may not be delegated to any other element of the emergency organization. 5) Initiating, on initial or upgrade emergency notifications, recommendations to state agencies on advisability of evacuations. Recommendations to local agencies when state authorities cannot be contacted for immediate evacuation may not be delegated to any other element of the emergency organization. 6) Initiating rescue or emergency repair operations as appropriate. 7) Maintaining plant security. 8) Establishing communications with and providing information to the EOF Manager.	**EP B.1.1:** The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the position of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. **EP B.2.1.1 TSC Emergency Director (ED)** The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure authorization, and on-site protective actions. **EP B.3.1.1 EOF Emergency Director** The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
In fulfilling the above listed responsibilities the Emergency Director (ED) is guided by the procedures listed below: FNP-0-EIP-8.1 Emergency Phone Directory FNP-0-EIP-8.3 Communication Equipment Operating Procedures NMP-EP-104 Dose Assessment NMP-EP-110 Emergency Classification Determination and Initial Action NMP-EP-111 Emergency Notifications NMP-EP-112 Protective Action Recommendations	**Annex Appendix C**	The specific procedural reference for the ED has been deleted. Function-based EPIPs to direct overall ERO response will be developed as part of the approval process for this License Amendment Request.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The ED position is initially filled by the Shift Manager until relieved by the on-call ED. It is the intent of SNC that the ED will be transferred from the Control Room as soon as practicable.	**EP B.1.1:** The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the position of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. **EP B.2.1.1 TSC Emergency Director (ED)** The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure authorization, and on-site protective actions. **EP B.3.1.1 EOF Emergency Director** The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The line of succession of individuals who may serve as the ED is as follows: Vice President – Nuclear Plant Site Plant Manager Site Support Manager Operations Director On-call Operations Supervisor Shift Manager Shift Supervisor Other Managers or staff designated by the Plant Manager The above line of succession does not preclude higher level management from assuming the role of Emergency Director (ED) in any circumstance which, in the judgment of the manager, is appropriate or necessary to protect the health and safety of the public. This designation also does not relieve higher level management from the responsibility to be aware of those circumstances that may initiate this action. These individuals will be trained as EDs.	No equivalent Plan/Annex statement	No line of succession is provided in the SNC Standard Emergency Plan. The Plan commits to providing 24-hour staffing coverage for the ERO, with qualified ERO personnel trained for the respective positions in accordance with the approved Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. TSC Manager The on-call TSC Manager reports to the Technical Support Center (TSC) and is responsible for implementing FNP-0-EIP-6, "TSC Setup and Activation", assisting the ED with classification assessment and emergency plan implementation per NMP-EP-110, "Emergency Classification Determination and Initial Action" and coordination of communications between the TSC and other locations per NMP-EP-111, "Emergency Notifications ".	**EP B.2.1.2 TSC Manager** The TSC Manager reports to the TSC ED and is responsible for coordinating activities between the TSC and other emergency response facilities, directing the activities of the TSC staff, and ensuring communications are established with applicable offsite agencies.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage were deleted based on the conversion to function based procedures.
c. Operations Supervisor The on-call Operations Supervisor reports to the Technical Support Center (TSC) and is responsible for coordinating the efforts of the operating crew, advising the ED on emergency operations and facilitating communications between the ED and Shift Supervisor. Supervisory personnel designated by the Plant Manager and holding a Senior Reactor Operator License rotate as the on-call Operations Supervisor.	**EP B.2.1.3 TSC Operations Supervisor** The Operations Supervisor reports to the TSC Manager. Major position functions include evaluating plant conditions and initiating mitigating actions, coordinating TSC efforts in determining the nature and extent of plant conditions affecting plant equipment, actions to limit or contain the emergency, invoking the provisions of 10 CFR 50.54(x) if appropriate, assisting the OSC Manager in determining the priority assigned to OSC activities, and timely completing offsite notifications.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage were deleted based on the conversion to function based procedures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
d. Maintenance Supervisor The on-call Maintenance Supervisor reports to the TSC and is responsible for implementing FNP-0-EIP-5, "Maintenance Support to the Emergency Plan", including coordination of the efforts of Emergency Repair Parties and advising the ED on proposed modifications, alterations or repair to plant systems and on specifics of plant systems and equipment. Supervisory I&C and Maintenance personnel designated by the Plant Manager rotate as the on-call Maintenance Supervisor.	**EP B.2.1.4 TSC Maintenance Supervisor** The Maintenance Supervisor reports to the TSC Manager and is responsible for planning and coordination of repair, damage control, and plant modification activities. The Maintenance Supervisor works closely with the Engineering Supervisor in planning for plant modifications and repairs.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage were deleted based on the conversion to function based procedures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
e. Health Physics Supervisor The Health Physics Supervisor reports to the TSC and is responsible for implementation of FNP-0-EIP-4, "Health Physics Support to the Emergency Plan", including coordination of the efforts of in-plant Field Monitoring Teams, decontamination activities, Health Physics and ALARA support, and advising the ED on the status of onsite and offsite radiation protection activities. This individual is also responsible for coordination of out-of-plant and SNC offsite Field Monitoring Teams until relieved by the Emergency Operations Facility (EOF) staff. The Health Physics Supervisor and other supervisory personnel designated by the Plant Manager and, to the maximum extent possible, meeting the requirements of Regulatory Guide 1.8, September 1975, rotate as the on-call Health Physics Supervisor.	**EP B.2.1.5 TSC Radiation Protection (RP) Supervisor** The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Health Physics Network (HPN) Communicator. The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions, and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage were deleted based on the conversion to function based procedures. The title was changed from Health Physics Supervisor to Radiation Protection Supervisor, to better align with current plant terminology.
f. Security Security supervision is responsible for implementing FNP-0-EIP-7, "Security Support to the Emergency Plan", maintaining site security, and advising the ED.	**EP B.2.1.14 TSC Security Supervisor** The Security Supervisor reports to the TSC Manager. The TSC Security Supervisor is responsible for carrying out the plant security and Access Control program, maintaining personnel accountability onsite, and assisting in evacuation of onsite areas.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage were deleted based on the conversion to function based procedures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
g. Engineering Supervisor The on-call Engineering Supervisor provides engineering expertise for advising the ED in the development of plans for modifications, alterations, or repairs to plant systems. The on-call Engineering Supervisor is responsible for assisting the on call Maintenance Supervisor with plant repair and mitigation activities by coordinating the necessary engineering resources.	**EP B.2.1.7 TSC Engineering Supervisor** The Engineering Supervisor reports to the TSC Manager. The TSC Engineering Supervisor is responsible for the overall direction of Engineering Group activities and assessment. The Engineering Supervisor also directs the analysis of plant problems and core damage, and provides recommendations for plant modifications to mitigate the effects of the accident.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
h. Chemistry Supervisor The on-call Chemistry Supervisor reports to the TSC and is responsible for implementation of FNP-0-EIP-20, "Chemistry and Environmental Support to the Emergency Plan" including coordination of offsite dose projections and in plant sampling. The on-call Chemistry Supervisor is responsible for coordinating offsite dose projections until relieved by the Emergency Operations Facility (EOF) staff.	**EP B.2.1.10 TSC Chemistry Support** The TSC Chemistry Support reports to the RP Supervisor. The TSC Chemistry Support is responsible for directing and evaluating in-plant chemistry and analyses, directing and evaluating post-accident sampling, and assisting in core damage assessment. **EP B.2.1.6 TSC Dose Analyst** The Dose Analyst reports to the RP Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.	Specific references to procedure usage were deleted based on the conversion to function based procedures. The SNC Standard Emergency Plan uses on-shift Chemistry to perform the Dose Assessment function.
i. Emergency Notification Network (ENN) Communicator The on-call ENN Communicator reports to the TSC and is responsible for communications with the state and local government agencies using the guidance found in NMP-EP-111, "Emergency Notifications ".	**EP B.3.1.8 EOF Emergency Notification Network (ENN) Communicator** The ENN Communicator in the EOF reports to the Emergency Communication Coordinator and is responsible for providing offsite agency notifications and periodic updates.	The revised Plan provides for simultaneous activation of the TSC and EOF. The Control Room will be relieved for the ENN function by the EOF ENN Communicator.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
j. Emergency Notification System (ENS) Communicator The on-call ENS Communicator reports to the TSC and is responsible for communications with the Nuclear Regulatory Commission (NRC) using the guidance found in NMP-EP-111, "Emergency Notifications ".	**EP B.2.1.9 EOF Emergency Notification System (ENS) Communicator** The ENS Communicator reports to the Operations Supervisor and is responsible for ensuring NRC notifications are completed in accordance with the requirements of 10 CFR 50.72 and 73.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage were deleted based on the conversion to function based procedures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
k. Shift Manager The Shift Manager is responsible for directing operational activities to classify and combat the emergency as delineated in NMP-EP-110, "Emergency Classification Determination and Initial Action". The Shift Manager acts as the Emergency Director (ED) until relieved by the on-call ED and until relieved has the authority and responsibility to immediately and unilaterally initiate any necessary emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures.	**EP B.1.1** The **Shift Manager (SM)** is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing offsite emergency measures. The ED, at their discretion or when procedurally required, activates the ERO. The Emergency Director's non-delegable duties include: • Event classification in accordance with the emergency classification system. • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination. • Notification of offsite agencies and approval of state, local, and NRC notifications. • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. • Request federal assistance as needed. After being relieved as Emergency Director, the Shift Manager directs the activities of the operating crew and is responsible for the safe operation of the plant. The Shift Manager, after relinquishing duties and responsibilities of the Emergency Director, functionally reports to the Operations Supervisor in the Technical Support Center (TSC).	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
I. Emergency Repair Party The Emergency Repair Party, as shown in Figure 2, is a group of personnel competent in operations and repair work who will be used during an emergency situation to make temporary repairs to systems/components in order to mitigate the effects of the emergency. An Emergency Repair Party for initial re-entry and repair will consist of individuals as required from the following personnel groups: Operations Personnel Maintenance Personnel Instrumentation and Control Personnel Health Physics Personnel Chemistry Personnel	**B.2.2 Operations Support Center (OSC)** B.2.2.1 OSC Manager B.2.2.2 OSC Mechanical Maintenance Group Lead B.2.2.3 OSC Electrical Group Lead B.2.2.4 OSC RP / Chemistry Group Lead B.2.2.5 OSC I&C Group Lead B.2.2.6 OSC Emergency Response Facility (ERF) Communicator B.2.2.7 OSC Personnel • Search and rescue. • Repair. • Post-accident sampling. • Internal survey. • Field monitoring.	Terminology in the SNC Standard Emergency Plan was updated to describe the industry standard OSC organization. The contents of that organization are in Section B.2.2 of the SNC Standard Emergency Plan. The positions by title, without the detailed description from B.2.2, are provided in column 2 to the left.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
m. Field Monitoring Team (FMT) The Field Monitoring Teams, as shown in Figure 2, consisting of permanent plant employees and/or qualified vendor personnel, will perform onsite and offsite monitoring. They will provide radiation protection support at the Southeast Alabama Medical Center, during transport of potentially irradiated and/or contaminated casualties, and at the Assembly Areas, and at any other location onsite or offsite as instructed by the Emergency Director (ED) or EOF Manager. To perform these functions a number of teams will be designated consisting of a Team Leader and an Assistant. Team Leader - A Health Physics Technician or qualified vendor technician. Assistant - Any qualified plant employee or vendor personnel.	**EP Table 2** **EP B.3.1.6 EOF Field Team Coordinator** The Field Team Coordinator reports to the Dose Assessment Supervisor. The Field Team Coordinator develops the environmental sampling strategy in response to potential radiological releases and advises the Dose Assessment Supervisor and Dose Analyst of measured radiological values in the environment. **EP I.7** The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). Field Monitoring Teams are dispatched by SNC-operated plants to perform a variety of functions in situations potentially involving significant releases of radioactive materials from a plant.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The Field Team Coordinator (EOF) was added as the focal point of direction of activities once the EOF is activated.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
n. Dose Assessment Staff The Shift Supervisor is responsible for offsite dose projections until relieved by the Technical Support Center (TSC) staff. Personnel reporting to the Chemistry Supervisor are responsible for making dose projections until the Emergency Operations Facility (EOF) is activated, at which time EOF dose assessment personnel become responsible for making offsite dose projections. These projections may initially be made automatically by a computerized dose projection program described in FNP-0-M-007, Emergency Dose Calculation Manual, using guidance found in FNP-0-EIP-9.1, "Automated Dose Assessment Method". A manual personal computer methodology is provided in NMP-EP-104, Dose Assessment, for long term dose assessment or in the event that the automatic computerized system is inoperable	**Annex Table 2.2.A** **EP B.2.1.6 TSC Dose Analyst** The Dose Analyst reports to the RP Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event. **EP B.3.1.4 EOF Dose Assessment Supervisor** The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies. **EP B.3.1.5 EOF Dose Analyst** The Dose Analyst reports to the Dose Assessment Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Normally, dose projections are transmitted to appropriate state authorities by telecopy, commercial telephone, the Emergency Notification Network (ENN), or by posting dose projections on the SNC Integrated Data Display System. The Emergency Notification System (ENS), Health Physics Network (HPN), and commercial telephone lines are available for transmission of dose assessment data to the NRC. Data will be provided as directed by the NRC at the time of need.	**EP B.3.1.4 EOF Dose Assessment Supervisor** The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies. **EP B.3.1.13 EOF Health Physics Network (HPN) Communicator** The HPN Communicator reports to the Dose Assessment Supervisor and is responsible for providing radiological and environmental information to the NRC using the HPN Line.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
<u>o. Additional Plant Staff Assignments</u> <u>1) Operations Support Center (OSC) Manager</u> The OSC Manager will be considered to be the senior individual in the OSC and will report to the Maintenance Supervisor. The OSC Manager will take the lead in coordinating the activities of the OSC or other location directed by the Emergency Director per FNP-0-EIP-5.0. The senior individual at each of the Assembly Areas will become the supervisor at that location. The Assembly Area senior individual will take the lead in coordinating the activities of the Assembly Area in support of OSC operations as directed by the OSC Manager.	**EP B.2.2 Operations Support Center (OSC)** **EP B.2.2.1 OSC Manager** The OSC Manager reports to the TSC Manager and directs a staff in providing labor, tools, protective equipment, and parts needed for emergency repair, damage control, firefighting, search and rescue, first aid, and recovery.	The wording was standardized and relocated to the SNC Standard Emergency Plan. Specific references to procedure usage was deleted based on the conversion to function based procedures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2) Radiological monitoring The Health Physics Group is responsible for all aspects of applied health physics. Emergency monitoring will be provided by a Health Physics Technician on shift, a qualified/trained vendor technician, or qualified member of the plant staff. Health Physics supervision will be responsible for relocation of access control to both units as necessary, and for implementing procedures for handling highly radioactive samples.	**EP B.2.2.4 OSC RP/Chemistry Group Lead** The RP/Chemistry Group Lead reports to the OSC Manager and provides oversight for RP and Chemistry Technicians. Their responsibilities include onsite radiological surveys, access control, personnel monitoring and decontamination, dosimetry issuance and monitoring, and onsite habitability surveys.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
3) Fire Fighting and Rescue The plant fire brigade and rescue team on all shifts will be composed of personnel described in NMP-ES-035-010. The fire brigade will be directed by the Fire Brigade Chief with the aid of FNP-0-EIP-13.	**Annex Table 2.2.A** **EP B.6.4 Fire Fighting** To supplement the Fire Brigade onsite, agreements are made with local fire departments. Details on the services offered may be found in the SNC plant's site-specific Annex. **Annex 2.3.1 Fire Fighting (SEP B.6.4)** In the event an emergency is declared as a result of a fire at Farley Nuclear Plant, the City of Dothan Fire Department has agreed to provide support to help combat the fire.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
4) First Aid At least one person on each shift will be qualified to perform first aid.	**Annex Table 2.2.A** **EP O.3 First Aid Training** Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
5) Decontamination Personnel decontamination is the responsibility of the Health Physics Group and during an emergency the responsibility of the Field Monitoring Team. Area and equipment decontamination onsite as the result of an accident will be a joint effort of personnel from the Operations, Maintenance, Chemistry and Health Physics Groups.	**EP K.5 Decontamination** The Radiation Protection Group will be responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces, and for determining the extent of contamination in controlled and normally uncontrolled areas. During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program. Facilities and supplies for decontaminating personnel are available at various plant locations. Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination. During emergencies, other onsite personnel will be checked for contamination as necessary. Designated personnel, under the direction of the Radiation Protection Group, are responsible for performing material decontamination. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program. **EP K.7 Offsite Decontamination** Nonessential onsite personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
6) Personnel Accountability Personnel accountability is the responsibility of each plant supervisor or senior individual onsite in the group. That is, each supervisor is responsible for accounting for each person onsite in his group or visiting his group. Details for personnel accountability are provided by FNP-0-EIP-10, "Evacuation, Personnel Accountability, and Site Dismissal". Information pertinent to personnel accountability will be kept by security guards at each access control point.	**EP J.4.2 Accountability** Personnel accountability is mandatory at the Site Area or General Emergency classification. Accountability may be initiated at other times at the discretion of the Emergency Director to support worker safety. Accountability of personnel within the Protected Area is accomplished within 30 minutes of the declaration of Site Area Emergency or higher, and maintained continuously thereafter, using Protected Area(s) boundary access control as described in the Security Plan. If there are station personnel who are unaccounted for, the public address system or other suitable communication methods are used to locate the personnel, or, in extreme cases such as fire, toxic gas release, explosions, or structural damage, trained search and rescue personnel are deployed to search for and assist the missing personnel.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
7) Record Keeping A record of all significant events that occur will be kept by the operating crew in the Plant Operator's Logbook. A log will be kept by a designated plant staff member who will be responsible for maintaining communications with the corporate headquarters, and offsite authorities as directed by the Emergency Director. Radiological information such as radiological survey data, personnel exposures, decontamination activities and information from onsite groups will be maintained by the Health Physics Supervisor.	No equivalent Plan/Annex statement.	Record keeping is a procedural level function of each individual. Plant Operations logbook/log keeping is controlled by Operations procedures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
8) Communications Responsibility for initial offsite communications will be handled by the Shift Supervisor or Emergency Director. After the emergency organization is activated, designated plant staff member(s) may be assigned to maintain communications with the Emergency Operations Facility (EOF) and with offsite authorities. If the Emergency Director is not located in the control room he may maintain communications with the control room through an assigned individual. When the Emergency Operations Facility (EOF) is activated, the EOF staff may handle communication with offsite authorities. Communications interfaces are shown in Figure 3.	**EP B.1.1** The **Shift Manager (SM)** is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR)to state and local government organizations responsible for implementing offsite emergency measures. The ED, at their discretion or when procedurally required, activates the ERO. The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
B. OFFSITE The normal Alabama Power Company (APC) offsite company organization is shown in Figure 5. The normal Southern Nuclear Company Corporate organization and its relationship to the onsite organization is shown in Figure 6. The Emergency Communication Organization is shown and described in the Emergency Communications Plan in Appendix 10(J).	**EP B.3 Offsite Emergency Response Organization (ERO)** The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company corporate offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.	The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision. For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Emergency Operations Facility (EOF) The Emergency Operations Facility (EOF) Emergency Response Organization (ERO) and its relationship to the Technical Support Center (TSC) emergency organization is described in Appendix 7(G).	**EP B.3 Offsite Emergency Response Organization (ERO)** The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company corporate offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.	The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision. For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .
2. Corporate Organization In the event of an emergency condition at FNP that requires activation of the Corporate Emergency Response Organization (ERO) the organization will be activated to notify Emergency Organization personnel and to provide corporate support from SNC.	**EP H.2.1 Emergency Operations Facility** The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
a. Corporate Duty Manager The Duty Manager is responsible for the overall management of emergency support at FNP. The Duty Manager is the primary contact for support from off-site agencies, and provides assistance, and advice to the EOF Manager and Emergency Director in decisions involving the overall effect of the event. The Duty Manager will serve as the corporate spokesperson until such time as an alternate Duty Manager or other trained individual is available to assume the role of spokesperson. This position will be filled by a qualified individual designated by the Executive Vice President.	**EP B.3.1.1 EOF Emergency Director** The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades. **EP B.3.2.1 EOF Nuclear Spokesperson** The Nuclear Spokesperson speaks on behalf of the company, providing plant status updates during news briefings. The Spokesperson also may do one-on-one media interviews. The position works with the Technical Assistant in keeping abreast of the event status and keeps the Public Information Director (PID) posted on that status.	With the realignment of the EOF description in the SNC Standard Emergency Plan, the EOF Director is specifically identified as the individual in Command and Control of the respective facilities.
3. Emergency Communication Organization The Emergency Communication Organization (ECO) is discussed in Appendix 10(J).	**EP B.3 Offsite Emergency Response Organization (ERO)** The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company Corporate Offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.	The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision. For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
4. Recovery Phase Organization Upon termination of the emergency condition and at the discretion of the Emergency Director, the SNC Emergency Organization will shift to the Recovery Phase Organization shown in Figure 10. The Recovery Manager has authority to modify the organization as deemed necessary.	**EP M.1 Recovery** Guidance for determining the transition from Emergency to Recovery Organization is provided in the plant Emergency Plan Implementing Procedures. The composition of the Recovery Organization will depend on the nature of the accident and the conditions following the accident. The SNC Emergency Plan addresses general principles that serve as guides for developing a Recovery Plan. It is the responsibility of the Emergency Director (ED) to determine that the facility and surroundings are safe for reentry. The Emergency Director will designate a recovery manager to constitute the recovery organization. Upon termination of the emergency phase and at the discretion of the Emergency Director, following consultation with offsite authorities, the SNC Emergency Organization will shift to the Recovery Phase Organization. **Figure M.2** provides a typical recovery operation organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan. See SNC Standard Emergency Plan Section M1 for additional direction for determining when to enter the Recovery Phase and the purpose of recovery actions. The actual recovery organization below the recovery manager will be event-specific and determined on the transition to recovery. Section M provides a generic organization and guidance for determination of the specific needs of the event.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
a. Recovery Manager The Recovery Manager shall direct the overall recovery effort. He has the full authority and responsibility to make decisions regarding plant recovery and return to operation. This position will be filled by the Vice President– Nuclear Plant Site or designee.	**EP M.1:** The **Recovery Manager** will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media. **Figure M.2** provides a typical recovery operation organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Recovery Support Director The Recovery Support Director is responsible for all administrative aspects of recovery activity. The line of succession for the Recovery Support Director shall be designated by the Vice President –Nuclear Plant Site, should the Recovery Organization be required.	**EP M.1:** The **Recovery Manager** will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media. **Figure M.2** provides a typical recovery operation organization.	The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
c. Technical Support Director The Technical Support Director is responsible for managing all supplemental engineering, technical and licensing support resources needed in the recovery effort. The line of succession for the Technical Support Director shall be designated by the Vice President – Nuclear Plant Site, should the Recovery Organization be required.	**EP M.1:** The Recovery Manager will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media. **Figure M.2** provides a typical recovery operation organization.	The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
d. Recovery Support Supervisor The Recovery Support Supervisor is responsible for coordinating or monitoring operational support recovery activities as directed by the Recovery Support Director. This position will be filled by a qualified individual designated by the Recovery Support Director.	**EP M.1:** The **Recovery Manager** will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media. **Figure M.2** provides a typical recovery operation organization.	The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
e. Administrative Support Supervisor The Administrative Support Supervisor is responsible for supervising EOF recovery phase administrative activities including: 1) Special communications needs 2) Manpower augmentation 3) Personnel Affairs for temporarily assigned personnel 4) Special Budget Activities 5) Clerical Support 6) Other activities as assigned by the Recovery Support Director This position will be filled by a qualified individual designated by the Recovery Support Director.	**EP M.1:** The **Recovery Manager** will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media. **Figure M.2** provides a typical recovery operation organization.	The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
f. Engineering Supervisor The Engineering Supervisor is responsible for offsite engineering resources directed toward design modification, major repair and engineering evaluations associated with recovery and return to operation. Responsibilities include: 1) Coordination of offsite engineering and technical support for design changes and repairs 2) Interfacing with Architect/Engineering firms for detailed technical support 3) Interfacing with NSSS supplier for detailed analyses and technical support 4) Coordinating and expediting procurement activities. This position will be filled by a qualified individual designated by the Technical Support Director.	**EP M.1:** The Recovery Manager will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media. **Figure M.2** provides a typical recovery operation organization.	The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
g. Licensing Supervisor The Licensing Supervisor is responsible for all recovery phase licensing activities. His responsibilities include: 1) Interfacing with the NRC to resolve license issues 2) Interfacing with Architect/Engineer firms or NSSS supplier to obtain technical and engineering analyses as necessary to resolve licensing issues 3) Coordinating with the Engineering Supervisor on design changes resulting from licensing issue resolution 4) Preparation of NRC required reports associated with the accident or recovery effort. This position will be filled by a qualified individual designated by the Technical Support Director.	**EP M.1:** The **Recovery Manager** will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media.	The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.
C. OUTSIDE ORGANIZATIONS Coordination with Governmental agencies is discussed in Appendix 7(G), section E. The following provides additional site specific details to the Appendix 7(G) discussion.		See the Appendix 7 section of the Justification Matrix for the detailed descriptions. Section A. Assignment of Responsibility contains the description of the major organizations.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Government Agencies The Nuclear Regulatory Commission has published its incident response plan in NUREG-0728, specifying NRC actions, responsibilities, functions and authorities during an emergency.	**EP A.1.1 Nuclear Regulatory Commission (NRC)** The NRC acts as the lead federal agency for technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response. The Chairman can transfer control of emergency response activities when deemed appropriate. Incident Response Centers have been established at the four NRC regional offices and NRC headquarters, to centralize and coordinate NRC's emergency response. Provision is made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Written agreements have been reached with the other offsite agencies listed below with regard to the type of support that will be furnished to the Joseph M. Farley Nuclear Plant in the event of an emergency. These agreements have been developed to ensure that there is a clear understanding of assigned responsibilities and that there will be proper coordination of activities in the event of an emergency. Letters of Agreement on File with offsite support groups are given in Part I, Appendix 2(B).	**EP B.5 Letters of Agreement (LOAs)** The respective nuclear power plants have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOAs are referenced in the site-specific plant Annex and the actual letters are maintained in accordance with Emergency Plan procedures.	The SNC Standard Emergency Plan contains the commitment for the Letter of Agreement in the description of services from the various support agencies. The general statement that LOAs exist is not needed in the Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Corporate and/or plant personnel will be dispatched to principal government agencies on an as needed basis.	**EP B.3.1.15 EOF Liaisons** Liaisons report to the Offsite Response Coordinator and respond to the applicable state Emergency Operations Centers (EOCs) as required by the type and source of the event. Liaisons are assigned to Georgia, Alabama and/or South Carolina state EOCs depending on which SNC site declared the initiating event.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Anticipated offsite federal assistance is discussed in the individual state plans.	**See Section A.1.**	The SNC Standard Emergency Plan in Section A.1 describes the federal agencies providing direct support to the Emergency Plan. Additional support addressed in the existing statement is specific support to the offsite responders. The federal agencies described in the Plan include: A.1.1 Nuclear Regulatory Commission (NRC) A.1.2 Department of Homeland Security (DHS) A.1.3 Federal Emergency Management Agency (FEMA) A.1.4 Department of Energy (DOE) A.1.5 Federal Bureau of Investigation (FBI) A.1.6 National Weather Service (NWS) A.1.7 Environmental Protection Agency (EPA)
<u>a. Department of Energy Savannah River Operations Office</u> In the event of a General Emergency, the DOE Savannah River Operations Office has agreed to provide a DOE Radiological Assistance Team. This assistance team will be limited to advisory assistance in handling radiological emergencies. The Emergency Director is authorized to request this assistance.	**EP A.1.4 Department of Energy (DOE)** The DOE provides radiological assistance on request, and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The Radiological Assistance Team can be expected to respond to SNC operated sites as directed by the Savannah River Operations Office of DOE.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Nuclear Regulatory Commission Upon notification of an emergency condition, the NRC will implement the incident response plan described in NUREG-0728. In addition to fulfilling its regulatory responsibilities, it is expected that the NRC will provide technical assistance and recommendations. For Site Area and General Emergencies, dispatch to SNC facilities of a NRC Region II site team is anticipated with arrival expected 2 to 6 hours following notification. As described in Section III, office space, telephones, etc. have been provided for NRC personnel at the Technical Support Center and Emergency Operations Facility.	**EP A.1.1 Nuclear Regulatory Commission (NRC)** The NRC acts as the lead federal agency for technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response. The Chairman can transfer control of emergency response activities when deemed appropriate. Incident Response Centers have been established at the four NRC Regional Offices and NRC Headquarters, to centralize and coordinate NRC's emergency response. Provision is made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
c. State of Alabama The Alabama Radiation Control Division of the State of Alabama Department of Public Health is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. This plan provides a detailed description of the notification procedures and responsibilities and duties of the local and state agencies involved. Since the primary concern of the Alabama Radiation Control Division is for the welfare and safety of the general public, they will have primary responsibility and authority for handling the offsite aspects of the emergency in Alabama.	**EP A.2.1 State of Alabama** **EP A.2.1.1 Alabama Emergency Management Agency (AEMA)** The Alabama Emergency Management Agency coordinates the Radiological Emergency Plans and offsite operations of affected state agencies and local governments, including notification of state and local agencies of a nuclear incident at a nuclear power plant impacting the state of Alabama, direction of activities at the state Emergency Operations Center, coordination of non-radiological operations with utility and federal authorities, and coordination of news information. **EP A.2.1.2 Alabama Department of Public Health, Office of Radiation Control** Through the Alabama Department of Public Health, the Alabama Office of Radiation Control is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. The state plan provides a detailed description of the notification procedures and the responsibilities and duties of the local and state agencies involved. The Alabama Office of Radiation Control has primary responsibility and authority for handling the offsite aspects of an emergency in Alabama with primary focus on the welfare and safety of the general public. **EP A.2.1.3 Other Alabama State Agencies** Responsibilities of other state agencies are described in the Alabama Radiological Response Plan for Nuclear Power Plants.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
An agreement is in place with the State of Alabama to provide available resources and equipment to support the mitigation and response to an emergency at Plant Farley to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, Fire Fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	**EP A.2.1 State of Alabama** **EP A.2.1.1 Alabama Emergency Management Agency (AEMA)** The Alabama Emergency Management Agency coordinates the Radiological Emergency Plans and offsite operations of affected state agencies and local governments, including notification of state and local agencies of a nuclear incident at a nuclear power plant impacting the state of Alabama, direction of activities at the state Emergency Operations Center, coordination of non-radiological operations with utility and federal authorities, and coordination of news information. **EP A.2.1.2 Alabama Department of Public Health, Radiation Control Division** Through the Alabama Department of Public Health, the Alabama Radiation Control Division is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. The state plan provides a detailed description of the notification procedures and the responsibilities and duties of the local and state agencies involved. The Alabama Radiation Control Division has primary responsibility and authority for handling the offsite aspects of an emergency in Alabama with primary focus on the welfare and safety of the general public. **EP A.2.1.3 Other Alabama State Agencies** Responsibilities of other state agencies are described in the Alabama Radiological Response Plan for Nuclear Power Plants.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
d. State of Georgia Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan". The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident.	**EP A.2.2 State of Georgia** **EP A.2.2.1 Georgia Emergency Management Agency (GEMA)** GEMA is responsible for general state emergency planning and overall direction, and control of emergency or disaster operations as assigned by executive order and in accordance with the Georgia Emergency Operations Plan (GEOP). GEMA has responsibilities for coordinating the state of Georgia response to emergencies at nuclear power plants. **EP A.2.2.2 Department of Natural Resources-Environmental Protection Division (DNR-EPD)** The DNR-EPD has primary responsibility for implementation and administration of the state radiological emergency response function. **EP A.2.2.3 Other Georgia State Agencies** Responsibilities of other state agencies are described in the Georgia Emergency Operations Plan (GEOP).	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
An agreement is in place with the State of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Farley to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, Fire Fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Early County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	**EP A.2.2 State of Georgia** **EP A.2.2.1 Georgia Emergency Management Agency (GEMA)** GEMA is responsible for general state emergency planning and overall direction, and control of emergency or disaster operations as assigned by executive order and in accordance with the Georgia Emergency Operations Plan (GEOP). GEMA has responsibilities for coordinating the state of Georgia response to emergencies at nuclear power plants. **EP A.2.2.2 Department of Natural Resources-Environmental Protection Division (DNR-EPD)** The DNR-EPD has primary responsibility for implementation and administration of the state radiological emergency response function. **EP A.2.2.3 Other Georgia State Agencies** Responsibilities of other state agencies are described in the Georgia Emergency Operations Plan (GEOP).	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
e. State of Florida Upon notification of an emergency condition by SNC or the Alabama Emergency Management Agency, the Florida Department of Community Affairs, Division of Emergency Management, State Warning Point will implement the "State of Florida Radiological Emergency Management Plan for Nuclear Power Plants". The Department of Community Affairs, Division of Emergency Management has the authority and responsibility for coordinating the efforts of local and state agencies in Florida to provide for the health and safety of the general public in the event of a radiological incident. The Department of Health-Bureau of Radiation Control will provide support to the Company in matters related to the Florida ingestion pathway radiological emergency response.	**Annex 1.6 State of Florida** Upon notification of an emergency condition by SNC or the Alabama Emergency Management Agency, the Florida Department of Community Affairs, Division of Emergency Management, State Warning Point will implement the "State of Florida Radiological Emergency Management Plan for Nuclear Power Plants." The Department of Community Affairs, Division of Emergency Management has the authority and responsibility for coordinating the efforts of local and state agencies in Florida to provide for the health and safety of the general public in the event of a radiological incident. The Department of Health-Bureau of Radiation Control will provide support to the Company in matters related to the Florida ingestion pathway radiological emergency response.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
f. Houston County, Alabama The Chairman of the Houston County Commission has the overall responsibility for emergency preparedness and local response in Houston County. Houston County has also accepted responsibility for evacuations in Henry County out to the 10 mile EPZ. The Houston County Emergency Management Agency coordinates planning and operations of all local agencies in support of an incident at Farley Nuclear Plant. A detailed emergency plan is maintained in case of an emergency at the Farley Nuclear Plant. This plan is Part I of the "Alabama Radiological Response Plan for Nuclear Power Plants".	**Annex 1.7.1 Houston County, Alabama (SEP A.2.4)** The Chairman of the Houston County Commission has the overall responsibility for emergency preparedness and local response in Houston County. Houston County also has accepted responsibility for evacuations in Henry County out to the 10 mile EPZ. The Houston County Emergency Management Agency coordinates planning and operations of all local agencies in support of an incident at Farley Nuclear Plant. A detailed emergency plan is maintained in case of an emergency at the Farley Nuclear Plant. An agreement is in place with Houston County, Alabama to provide available resources and equipment to support mitigation and response to an emergency at Plant Farley to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
An agreement is in place with Houston County, Alabama to provide available resources and equipment to support the mitigation and response to an emergency at Plant Farley to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, Fire Fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	**Annex 1.7.1 Houston County, Alabama (SEP A.2.4)** The Chairman of the Houston County Commission has the overall responsibility for emergency preparedness and local response in Houston County. Houston County also has accepted responsibility for evacuations in Henry County out to the 10 mile EPZ. The Houston County Emergency Management Agency coordinates planning and operations of all local agencies in support of an incident at Farley Nuclear Plant. A detailed emergency plan is maintained in case of an emergency at the Farley Nuclear Plant. An agreement is in place with Houston County, Alabama to provide available resources and equipment to support mitigation and response to an emergency at Plant Farley to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
g. Early County, Georgia The Chairman, Early County Board of Commissioners, has responsibility for overall radiological emergency response planning. The actual plan development and coordination of emergency actions is carried out by the Blakely-Early County Emergency Management Agency. The "Blakely-Early County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Joseph M. Farley Nuclear Power Plant" is given as part of the "State of Georgia Radiological Emergency Plan".	**Annex 1.7.2 Early County, Georgia (SEP A.2.4)** The Chairman, Early County Board of Commissioners, has responsibility for overall radiological emergency response planning. The actual plan development and coordination of emergency actions is carried out by the Blakely-Early County Emergency Management Agency. The "Blakely-Early County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Joseph M. Farley Nuclear Power Plant" is given as part of the "State of Georgia Radiological Emergency Plan." An agreement is in place with Early County, Georgia, to provide available resources and equipment to support mitigation and response to an emergency at Plant Farley to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Early County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
h. City of Dothan, Alabama - Fire Department In the event an emergency (Section IV) is declared as a result of a fire at Farley Nuclear Plant, the Dothan Fire Department has agreed to provide support to help combat the fire. The Dothan Fire Department resources are listed in FNP-0-EIP-13, "Fire Emergencies". The estimated response time to Farley Nuclear Plant is 30 minutes. The Emergency Director is authorized to request this assistance. Request for fire support will be made by the control room or site security to the Houston County 911 center, Houston County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.	**Annex 1.7.3 City of Dothan, Alabama (SEP B.6.4)** In the event an emergency is declared as a result of a fire at Farley Nuclear Plant, the Dothan Fire Department has agreed to provide support to help combat the fire. The estimated response time to Farley Nuclear Plant is 30 minutes. The Emergency Director is authorized to request this assistance. Request for fire support will be made by the control room or site security to the Houston County 911 center, Houston County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was relocated and transferred to the Site Annex.
2. Contractor and Private Offsite Organizations a. Southern Nuclear/Southern Company Services Southern Company Services, Incorporated (SCS), an affiliated service company, served as the original architect-engineer. As a result of the consolidation of SCS and SNC nuclear expertise, and in addition to being the licensee, SNC also serves as its own architect-engineer and performs functions previously performed by SCS to include design, licensing, and fuel management support during normal operation.	**EP A.3.1 Southern Nuclear Operating Company (SNC)** Southern Nuclear Operating Company (SNC) serves as the architect-engineer.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Bechtel Power Corporation Bechtel is the architect/engineer for portions of Unit 1 and for Unit 2. Bechtel provides support in the areas of new concept design (including drawings, specifications, safety reviews, etc.); modification design; engineering support for licensing issues; and as advisor on component and system operation. The Engineering Support Manager (Emergency Support Phase) and the Technical Support Director (Recovery Phase) interface directly with Bechtel.	**EP A.3.2. Bechtel Power Corporation** SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
c. Westinghouse Westinghouse is the NSSS supplier for both Farley units. Their support activities associated with the NSSS include installation, testing, and corrective action assistance in their scope of supply; engineering support for licensing issues; new concepts design and modification design; advisor on components and systems; and engineering support related to operation, maintenance, and corrective action. The Engineering Support Manager (Emergency Support Phase) and the Technical Support Director (Recovery Phase) provide interface with Westinghouse either directly or through SCSI.	**EP A.3.3 Westinghouse** SNC has established an agreement with Westinghouse to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. Westinghouse provides the capability to respond on a 24-hour-a-day basis.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
d. Institute of Nuclear Power Operations (INPO), Nuclear Energy Institute (NEI) and Electric Power Research Institute (EPRI). Southern Nuclear Operating Company is a participating member of INPO and as such will have available technical expertise from this organization in areas of nuclear power plant operation in accordance with established agreements (Letter of Agreement - Appendix 2(B)). Also, INPO and EPRI have a plan describing their combined emergency information response capabilities. Their assistance is available to Southern Nuclear Operating Company (Letter of Agreement – Appendix 2(B)).	**EP A.4 Other Utilities** The Institute of Nuclear Power Operations (INPO) aids nuclear utilities in obtaining resources beyond their usual capabilities during recovery from an emergency. As one of its roles, INPO will assist affected utilities by applying the resources of the nuclear industry to meet the needs of an emergency.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
e. Maintenance Assistance Assistance in the area of maintenance and repair is made available by contractor organizations.	No equivalent Plan/Annex statement	The non-specific statement in the current Plan is incorporated into the more detailed description of Support provided in the SNC Standard Emergency Plan and Site Annex.
f. Radiological Monitoring Assistance. Radiological monitoring in the plant and in the environs both onsite and offsite will be augmented by outside vendors as necessary. Initial radiological monitoring will be performed by available Southern Company resources, (e.g., Georgia Power Company (GPC) Central Laboratory).	**EP A.3.5 Radiological Monitoring Assistance** Radiological monitoring in the plant and in the environs, both onsite and offsite, will be augmented by outside vendors as necessary. Initial radiological monitoring will be performed by available Southern Company resources (e.g., Georgia Power Company (GPC) Central Laboratory).	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
g. Other Utilities Southern Nuclear Operating Company is a signatory to the "Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials" and a signatory to the "Nuclear Power Plant Emergency Response Voluntary Assistance Agreement" (see Appendix 2(B)). Although these agreements do not impose an obligation on any signatory to provide assistance, they establish the contractual framework by which assistance may be requested and provided expeditiously.	**EP A.4 Other Utilities** The Institute of Nuclear Power Operations (INPO) aids nuclear utilities in obtaining resources beyond their usual capabilities during recovery from an emergency. As one of its roles, INPO will assist affected utilities by applying the resources of the nuclear industry to meet the needs of an emergency.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
III. FACILITIES AND EQUIPMENT A. CONTROL CENTERS		

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Technical Support Center (TSC) During any emergency condition the center for coordinating all in-plant activities will be the TSC. Located immediately north of the Unit 2 control room area, the TSC is designed to accommodate up to 25 people for the evaluation of plant status, coordination of damage assessment and emergency actions, and interface with the NRC, Emergency Operations Facility (EOF) and Operations Support Center (OSC). Provision is also made for control and coordination of communications with offsite agencies and of out-of-plant radiation monitoring activities until the EOF is activated and assumes these functions. The TSC when activated will normally maintain the function of offsite communications for initial and upgrade notifications to federal, state, and local authorities. An overall space of 22 feet x 65 feet, with a 9-foot ceiling height, has been provided. Room layout is as follows: a. Monitoring Area b. Planning and Coordination Area c. Document Room d. Conference Area Figure 14 shows the above layout.	**Annex 5.1.2 Technical Support Center (SEP H.1.2)** Located immediately north of the Unit 2 control room area, the TSC (Figure 5.1.A) is designed for the evaluation of plant status, coordination of damage assessment and emergency actions, and interface with the NRC, Emergency Operations Facility (EOF), and Operations Support Center (OSC). Provision is also made for control and coordination of communications with offsite agencies and of out-of-plant radiation monitoring activities until the EOF is activated and assumes these functions. The TSC is designed to be habitable to the same extent as the control room for postulated radiological accidents. Its ventilation system includes a deep-bed charcoal filter to remove air-borne contamination, and it has the capability of pressurizing the TSC area and recirculating the room air through the charcoal filter. A permanent radiation monitor is provided to continuously indicate radiation dose rates and airborne activity. A radiation alarm in the main control room make-up air supply duct automatically initiates room pressurization and recirculation. Electrical power sources are designed so the HVAC, wall outlets, and lighting can be powered from the diesel generators if offsite power is lost. The TSC maintains access to drawings and records necessary for the response to an emergency event at FNP. These records can be accessed on a digital records system. This system is supplied backup power from an uninterruptible power supply to allow retrieval of records in the event of a loss of power. **Annex Figure 5.1.A**	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The TSC is designed to be habitable to the same extent as the control room for postulated radiological accidents. Its ventilation system includes a deep-bed charcoal filter to remove air-borne contamination, and it has the capability of pressurizing the TSC area and recirculating the room air through the charcoal filter. A permanent radiation monitor is provided to continuously indicate radiation dose rates and airborne activity. A radiation alarm in the main control room make-up air supply duct automatically initiates room pressurization and recirculation. Electrical power sources are such that the HVAC, wall outlets and lighting can be powered from the diesel generators if offsite power is lost.	**Annex 5.1.2 Technical Support Center (SEP H.1.2)** The TSC is designed to be habitable to the same extent as the control room for postulated radiological accidents. Its ventilation system includes a deep-bed charcoal filter to remove air-borne contamination, and it has the capability of pressurizing the TSC area and recirculating the room air through the charcoal filter. A permanent radiation monitor is provided to continuously indicate radiation dose rates and airborne activity. A radiation alarm in the main control room make-up air supply duct automatically initiates room pressurization and recirculation. Electrical power sources are designed so the HVAC, wall outlets, and lighting can be powered from the diesel generators if offsite power is lost.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The TSC contains a set of piping and instrumentation drawings for each unit and technical manuals on selected major equipment. Other technical data are readily available from the document control facility in the plant Service Building which may be reached by intra-plant phone from the TSC. Also available in the TSC are the Emergency Plan, Emergency Plan Implementing Procedures, Abnormal Operating Procedures, Emergency Response Procedures, Severe Accident Management Guidelines, and Unit Operating Procedures along with other general reference material.	**Annex 5.1.2 Technical Support Center (SEP H.1.2)** The TSC maintains access to drawings and records necessary for the response to an emergency event at FNP. These records can be accessed on a digital records system. This system is supplied backup power from an uninterruptible power supply to allow retrieval of records in the event of a loss of power. These records include: • Technical specifications. • Plant operating procedures. • Final safety analysis report. • Emergency Plan. • Emergency Plan Implementing Procedures. • Plant operating records. • System piping and instrumentation diagrams; heating, ventilation, and air-conditioning (HVAC) flow diagrams. • Electrical one-line, elementary, and wiring diagrams. • Control logic and loop diagrams.	The wording was relocated and transferred to the Site Annex.
Should the emergency situation so dictate, the Emergency Director may shift the staff to other locations as designated by the Emergency Director.	No equivalent Plan/Annex statement	The ability to relocate the facility is provided at procedural level. The non-specific statement in the current Plan provides no additional value.
<u>2. Emergency Operations Facility (EOF)</u> The EOF facilities and equipment are described in Appendix 7(G).	**EP H.2 Offsite Emergency Facilities** **EP H.2.1 Emergency Operations Facility** The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP).	The description was standardized and incorporated in the SNC Standard Emergency Plan. See Appendix 7(g) section for the detailed comparative description.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
3. NRC Support Facilities Support facilities for the NRC have been provided at the Site Training Facility. Adequate functional working space and telecommunication capability for up to 10 people (approximately 750 ft^2) has been provided in this near-site facility.	**Annex 5.1.5** A near site location is maintained at the FNP Training Center with space for members of an NRC Site Team.	The wording was relocated and transferred to the Site Annex.
4. Operations Support Center (OSC) The Breakroom (outside the Technical Support Center) will serve as the Operations Support Center (Figure 19), from which emergency operations support will be provided. In the event that the Operations Support Center becomes untenable, it will be relocated onsite or to offsite company facilities in Headland, Alabama (Figure 17) at the discretion of the Emergency Director.	**Annex 5.1.3 Operations Support Center (SEP H.1.3)** The break room (outside the Technical Support Center) will serve as the Operations Support Center (Figure 5.1.B), from which emergency operations support will be provided. The OSC is where operational support personnel such as instrument technicians, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel assemble to aid in the response to an emergency. The OSC will accommodate the support and technical staff to respond to an event on one or both Units. The OSC has the capability to communicate with the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF). Operations at this facility will be directed by the OSC Manager.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
5. Alternative Facility During a security related event or other event that precludes onsite access, the TSC and OSC ERO staff will be directed to an alternative facility. This facility is located in the Alabama Power Company (APC) Old Crew Headquarters Building in Headland, Alabama. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, work planning resources, plant technical data displays, and other SNC specific resources for performing engineering assessment activities, including damage control team planning and preparation for return to the site. Procedural guidance for the alternative facility is provided in NMP-EP-135, Alternative Facility Setup and Operation.	**Annex 5.1.4 Alternative Facility (SEP H.1.4)** During a security-related event or other event that precludes onsite access, the TSC and OSC ERO staff will be directed to an alternative facility. This facility is located in the Alabama Power Company (APC) Old Crew Headquarters Building in Headland, Alabama. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, work planning resources, plant technical data displays, and other SNC-specific resources for performing engineering assessment activities, including damage control team planning and preparation for return to the site. Guidance for the alternative facility activation and operation is provided in implementing procedures.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
5. Joint Information Center The Houston County Juvenile Court Services Building (Figure 17) will serve as a working and briefing center for local, state and national news media (Lease Agreement – Appendix 2(B)). All official information released by SNC and APC regarding the emergency will be released from the Joint Information Center once it has been activated.	**Annex 5.1.6 Joint Information Center (JIC) (SEP H.2.2)** The FNP JIC is located in Dothan, Alabama at the Houston County Juvenile Court Services Building. The JIC is the central location for the coordination and dissemination of information to news media and responses to public and media inquiries. Details of the JIC for FNP are in section H of the Emergency Plan. If the decision is made to activate the JIC, the CMC in Birmingham, Alabama will maintain emergency communications response coordination until the JIC is ready to assume these responsibilities.	The wording was relocated and transferred to the Site Annex.
6. APC Corporate Media Center (CMC) The APC Corporate Media Center will be staffed by the Emergency Communication Organization and serve as the coordination point for APC corporate public information support.	**EP H.2.2 Corporate Media Center (CMC)** Upon notification of an Alert or higher classification, the Public Information Director and corporate staff assigned to JIC functions will assemble at the CMC. The CMC, located at the Atlanta/Birmingham corporate headquarters building of Georgia Power Company/Alabama Power Company, as appropriate, is the official location for coordination of emergency communications response until the site specific JIC has been activated. The Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the site specific JIC. When the decision is made to activate the JIC the CMC will maintain emergency communications response coordination until the site specific JIC is ready to assume these responsibilities. Once overall responsibility for emergency communications response transfers to the site specific JIC the remaining CMC staff will provide support for the JIC as needed.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
	EP H.2.3. Joint Information Center (JIC) After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs). Site specific JIC is provided in the site specific Annexes.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<u>B. COMMUNICATIONS SYSTEMS</u> Several modes of communication are available, during both normal and emergency conditions, to transmit and receive information within the plant and at locations onsite and offsite.	**EP F.1.1** At SNC operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and at other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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1. Commercial Telephones The commercial telephone lines consist of several lines connected through local exchanges to the Bell Telephone system. Access to these lines is available through selected private automatic exchange (PAX) telephones located throughout the plant, including the control room, TSC, and Joint Information Center. Commercial telephone lines servicing the Corporate Office may be accessed through off-premises extensions (OPX) of the Corporate Office PAX which are located in selected plant locations, including the TSC, and in the EOF. Availability of OPX and PAX telephones capable of accessing commercial telephone lines is tabulated in Table 1. Commercial telephone lines are also available at the Birmingham EOF and the Birmingham Corporate Communication Offices. A facility minimum of thirty (30) commercial telephone lines are available at the Joint Information Center.	**EP F.1.1** At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and at other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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2. Private Automatic Exchange The plant private automatic exchange (PAX) consists of a network of telephones located strategically throughout the plant, at various stations on the site (including the Control Room, TSC and OSC) and at selected offsite locations Joint Information Center, the State of Alabama Forward Emergency Operations Center in Houston County, the State of Georgia Forward Emergency Operations Center in Early County, the AEMA EOC in Clanton, Alabama, the ARCD EOC in Montgomery, Alabama, and the GEMA EOC in Atlanta, Georgia. Selected PAX phones are capable of communication with similar private automatic exchanges at the Corporate Office, other APC/SNC facilities, and facilities of Southern Company affiliates (e.g. Southern Company Services and Georgia Power Company).	**Annex 5.2 On-Site Communications (SEP F.1)** Normal on-site communications is provided by the plant telephone system (network and commercial). The plant public address (PA) system also may be used for in-plant communications. The PA system is powered by normal plant power, backed up by uninterruptible power. Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, OSC EOF, and Security. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities. **EP F Table 5**	The wording was relocated and transferred to the Site Annex.

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In addition to the PAX network, selected phones operate as off-premises extensions (OPX) of the APC Corporate Headquarters private automatic exchange and operate independently of the plant PAX system. These phones may be used for calling APC/SNC facilities and offices connected to the APC Corporate Headquarters PAX system or for accessing Bell Telephone System commercial lines in Birmingham. OPX and PAX phone availability is tabulated in Table 1.	**Annex 5.2 On-Site Communications (SEP F.1)** Normal on-site communications is provided by the plant telephone system (network and commercial). The plant public address (PA) system also may be used for in-plant communications. The PA system is powered by normal plant power, backed up by uninterruptible power. Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, OSC EOF, and Security. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities. **EP F Table 5**	The wording was relocated and transferred to the Site Annex.
<u>3. Microwave</u> APC's microwave system provides telephone circuits to all of the company's power plants and major offices including the Alabama Power Office in Headland, Alabama. All primary microwave routes are provided with standby RF equipment with automatic switchover. The microwave telephone circuits available may be used by dialing through the PAX system.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan and Annex provides detailed descriptions of the primary and back-up communications capabilities.

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4. Alabama Control Center (ACC) Link A computer link to the Alabama Control Center network is located in the Switchhouse. The link provides for communications with the ACC for purposes of load dispatch and coordination with the Southern Company Power Control Center and other APC plants.	No equivalent Plan/Annex statement	The load dispatch link provides no capability for implementation of the Site Emergency Plan.
5. Two-Way Radio Two-way radios and base stations are available at the site as follows:	**Annex 5.2 On-Site Communications (SEP F.1)** Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, OSC EOF, and Security. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities.	The wording was relocated and transferred to the Site Annex.
a. Plant operations frequency - This radio frequency provides communication between the Control Room, TSC, EOF, and personnel in the plant equipped with operations frequency radios. This frequency may be used as a backup frequency for communicating with offsite/onsite field monitoring teams.	**EP F Table 5**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
b. Plant security frequency - This radio frequency provides communication between the Control Room, TSC, EOF, Security Offices, mobile units in security vehicles and other selected company owned vehicles and personnel equipped with security frequency walkie-talkies.	**EP F Table 5**	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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c. Plant field monitoring frequency - This radio frequency provides communication between the TSC, EOF, and personnel in the plant equipped with FMT frequency radios. This frequency may be used as a backup for communicating with offsite/onsite field monitoring teams.	**EP F Table 5**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
d. Digital radio system (multi frequency) - This radio system provides both onsite/offsite group and private radio communication. This radio system will be the normal communication system for the field monitoring teams.	**EP F Table 5**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
6. Public Address and Party Lines A plant wide public address system consisting of six separate and independent communications lines (one page and five party lines) exists to provide quick communications between two or more locations, even in high noise level areas. The page channel is used to call personnel over the speakers, issue plant-wide instructions or to communicate between two or more hand-sets. The party lines are used to carry on communication after the paged party has answered. One of the party lines will be dedicated as an emergency communications channel during emergency conditions.	**Annex 5.2 On-Site Communications (SEP F.1)** Normal on-site communications is provided by the plant telephone system (network and commercial). The plant public address (PA) system also may be used for in-plant communications. The PA system is powered by normal plant power, backed up by uninterruptible power.	The wording was relocated and transferred to the Site Annex.

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7. Sound Powered Telephone Sound powered telephone lines are located between critical points in the plant and are normally used primarily for communications during maintenance and refueling.	**EP F Table 5**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
8. Plant Emergency Alarm The Plant Emergency Alarm is a variable tone alarm. The warble tone may be used to alert plant personnel, contractors, and visitors onsite in the event of a Site Area Emergency or General Emergency or other condition requiring all personnel to report to their emergency Assembly Areas. The siren tone may be used to muster the fire brigade or at the discretion of the Shift Supervisor in order to alert personnel. Blue beacon lights located in high noise areas or other locations where the alarms may not be audible are also activated to provide a visual emergency notification.	**EP E.2.1 Notification of Onsite Personnel** The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on-site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system. **EP F Table 5**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
9. NRC Emergency Notification System (ENS) This dedicated Federal Telephone System (FTS) communications line provides a dialup communications link to the NRC operations office in Bethesda, MD and would be used for continuous communications in the event of an emergency. Phones are located in the control room, TSC, EOF, and in the Shift Foreman's office adjacent to the Control Room.	**EP F.1.4.1 NRC Emergency Notification System (ENS)** This communications line provides a communications link to the NRC Operations Center in Rockville, Maryland, and is used for continuous communications in a classified emergency.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability.

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10. NRC Health Physics Network (HPN) This dedicated Federal Telephone System (FTS) communications line provides a dialup communications link with the NRC to provide radiological information. Phones are located in the TSC and in the EOF.	**EP F.1.4.2 NRC Health Physics Network (HPN)** This communications line provides a communications link with the NRC to provide radiological information.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability.

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11. State/Local Agency Emergency Notification Network (ENN) This communications system provides an immediate communications link with the State of Alabama, the State of Georgia and local county personnel in Alabama and Georgia who would possibly be notified in the event of an emergency. Telephones with speakers on this communication network are located at the EOF; TSC; Shift Foreman's Office adjacent to the control room; Alabama Radiation Control Division; Alabama Emergency Management Agency; State of Alabama Department of Public Safety; Houston County (AL) Sheriff's Dispatcher; Houston County Office of Radiological Health; Georgia Emergency Management Agency (GEMA); Early County (GA) Sheriff's Dispatcher; Early County Emergency Management Agency; and GEMA Forward Emergency Operations Center (Early County). The communications system locations listed above for the FNP Shift Support Supervisor's Office; the Alabama Department of Public Safety, the Georgia Emergency Management Agency, the Houston County Sheriff's Dispatcher's Office, and the Early County Sheriff's Dispatcher's Office are staffed 24 hours a day.	**EP F.1.2** SNC-operated plants maintain the capability to make initial notifications to the designated offsite agencies 24 hours per day. Offsite notifications can be made to state and county warning points and Emergency Operations Centers from the Control Room, Technical Support Center, and Emergency Operations Facility using the ENN. Reliable backup methods have been written into procedures. State and county warning points are continuously staffed. **EP F.1.3** Provisions exist for continuous communications with state and local governments within the Emergency Planning Zones, as detailed above. At least one on-site and one offsite communications system is maintained, each with a backup power source to ensure continuous communications.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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12. NRC Reactor Safety Counterpart Link (RSCL) This dedicated FTS communications line provides a dialup communications link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee. Phones are located in the TSC and EOF.	**EP F.1.4.3 NRC Reactor Safety Counterpart Link (RSCL)** This communications line provides a communications link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability
13. Protective Measures Counterpart Link (PMCL) This dedicated FTS communications line provides a dialup communications link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions. Phones are located in the TSC and EOF.	**EP F.1.4.4 Protective Measures Counterpart Link (PMCL)** This communications line provides a communications link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability
14. Management Counterpart Link (MCL) This dedicated FTS communications line provides a dialup communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC Director of Site Operations or top level licensee management at the site. Phones are located in the TSC and EOF.	**EP F.1.4.5 Management Counterpart Link (MCPL) (Executive Bridge Line)** This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability

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15. Local Area Network (LAN) Access This dedicated FTS communications line provides the NRC site team with access to the NRC Operations Center's LAN. Connections are provided in the TSC and EOF.	**EP F.1.4.7 Southern Company Network Access** This communications line provides the NRC site team with access to the NRC Operations Center's LAN. LAN connections are provided on the Southern Company Network.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
16. Telecopier Telecopiers are located at the TSC, EOF, Alabama Radiation Control Division, Alabama Emergency Management Agency, GEMA, Houston County Emergency Management Agency, and Early County Emergency Management Agency.	No equivalent Plan/Annex statement	No specific reference to copying equipment was provided in the SNC Standard Emergency Plan
17. SNC Integrated Data Display System This system provides a direct data link via the internet between Farley Nuclear Plant and at Houston County Emergency Management Agency (EMA), Alabama Radiation Control Division in Montgomery, Georgia EMA in Atlanta, Early County EMA, and the EOF. It may be used to rapidly transmit information on current emergency classification, radiological conditions, and meteorological conditions.	**EP I.1** Select plant parameters are available to state and local authorities on a secure network dedicated to data distribution among the various offsite emergency response facilities.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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18. Emergency Response Data System (ERDS) These communications lines provide channels by which raw reactor parametric data is transmitted from the site to the NRC. The affected Unit ERDS will be activated within one hour following the declaration of an Alert emergency or above.	**EP F.1.4.8 Emergency Response Data System (ERDS)** ERDS is a dedicated network and is a direct near real-time electronic data link between the plant's on-site computer system and the NRC Operations Center. It provides for the automated transmission of a limited data set of selected parameters.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability
19. Other Communication Systems A cellular phone is provided for use by the EOF Manager while in transit to the EOF.	No equivalent Plan/Annex statement	The specific communications systems required to support the functions of the Emergency Plan are provided in the Plan and Site Annex. The proliferation of individual cell phones precluded the need to provide the ED with a specific phone.
C. ASSESSMENT FACILITIES In order to carry out the assessment actions described in Section IV, facilities must be available for initial as well as continuous evaluation of emergency conditions.		Introductory wording in the current Plan was omitted. No change was made to the facilities.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Onsite Systems and Equipment a. Natural Phenomena Monitors The plant is equipped with a meteorological tower instrumented as shown in Table 2, with both primary and secondary instrumentation for wind speed (10m and 45.7m), wind direction (10m and 45.7m), ambient temperature (10m and 60m), and dew point (10m and 60m). There is also a single channel of instrumentation for precipitation with associated data loggers located at the meteorological tower building. The meteorological tower instrumentation feeds wind speed, wind direction, precipitation, dew point, delta temperature, and sigma theta data to the plant computer. This data is utilized for dose calculations. Computer terminals in the TSC and EOF can be utilized to obtain real time or 15 minute average readouts of meteorological data. Should the plant's meteorological equipment become inoperable, information is available from the approved Flight Service, from the Georgia Pacific Paper Company, or from the regional National Weather Service offices.	**Annex 5.6.1 Geophysical Phenomena Monitors (SEP H.5.1)** **Meteorological (SEP H.5.1)** A meteorological monitoring program is in place at FNP. Instruments are mounted on a 60-meter tower located on the plant site. Parameters measured and transmitted to the control room include: • Windspeed (10 m and 45.7 m). • Wind direction (10 m and 45.7 m). • Vertical temperature difference (10m and 60m). • Ambient temperature (10 m and 60 m). • Dewpoint temperature (10 m). • Precipitation (base). The meteorological tower instrumentation feeds wind speed, wind direction, precipitation, dew point, delta temperature, and sigma theta data to the plant computer. This data is used for dose calculations. Computer terminals in the TSC and EOF can obtain real time or 15-minute average readouts of meteorological data. Should the plant's meteorological equipment become inoperable, information is available from the approved Flight Service, from the Georgia Pacific Paper Company, or from the regional National Weather Service offices. The important parameters for characterizing the transport of airborne radioactivity are wind speed, wind direction, and atmospheric stability (derived from the standard deviation of the horizontal wind direction or vertical temperature difference). These meteorological parameters are used in a calculation methodology to assess the offsite radiological consequences of accidental releases of airborne radioactivity.	The wording was relocated and transferred to the Site Annex.

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Various types of seismic instrumentation are located on vital pieces of equipment and structures throughout the site, a number of which have readout and/or annunciation in the control room. A complete discussion of these monitors is given in FSAR Section 3.7.4. Seismic information may also be obtained from the National Earthquake Center in Golden, Colorado.	**Annex 5.6.1 Geophysical Phenomena Monitors (SEP H.5.1)** **Seismic (SEP H.5.1)** Various types of seismic instrumentation are located on vital pieces of equipment and structures throughout the site, a number of which have readout and/or annunciation in the control room. A complete discussion of these monitors is given in FSAR Section 3.7.4. Seismic information may also be obtained from the National Earthquake Center in Golden, Colorado.	The wording was relocated and transferred to the Site Annex.
The plant is equipped with hydrologic monitors to monitor river water level and service water pond level. These monitors have readout and annunciation in the control room. Redundant river water level monitors provide control room indication from 65 to 130 feet MSL river level. A discussion of service water pond level monitors is given in FSAR Section 9.2.1.5.	**Annex 5.6.1 Geophysical Phenomena Monitors (SEP H.5.1)** **Hydrologic (SEP H.5.1)** The plant is equipped with hydrologic monitors to monitor river water level and service water pond level. These monitors have readout and annunciation in the control room. Redundant river water level monitors provide control room indication from 65 to 130 feet MSL river level. A discussion of service water pond level monitors is given in FSAR Section 9.2.1.5.	The wording was relocated and transferred to the Site Annex.

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b. Radiological Monitors Portable monitors and sampling equipment used during normal plant operations are available in the Health Physics Instrument Issue Room on elevation 155 of the auxiliary building for use during emergencies. Portable monitors and/or sampling equipment designated for emergency use are located in various areas of the plant. A general category listing of emergency supplies and equipment is included in Appendix 1(A) and an itemized listing can be found in FNP-0-EIP-16, "Emergency Equipment and Supplies".	**EP H.5.2.1 Radiation Monitoring System (RMS)** Radiation monitoring instruments are located at selected areas within the plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne, and air particulate monitors. • Area monitors respond to gamma radiation. • Airborne monitors detect and measure radioactive gaseous effluent concentrations. Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release, and extent of core damage.	The wording was relocated and transferred to the Site Annex.
Process, area and effluent monitors that may be used for emergency assessment are described in Appendix 3(C). A complete discussion of these monitors is given in FSAR Sections 11.4 and 12.1.4. Monitors on gaseous effluent release points provide input signals to a plant computer utilized for offsite dose calculations; computer terminals in the TSC and EOF can be utilized to obtain one minute or 15 minute average effluent activity data. FNP-0-EIP-30, "Post Accident Core Damage Assessment", provides correlations between containment high range area monitor readings and core damage.	**EP H.5.2.2 Liquid and Gaseous Sampling Systems** The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Pre-designated monitoring and sampling points are listed in site procedures. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The system i can provide information on post-accident plant conditions to allow operator actions to mitigate and control the course of an accident. Various chemical analyses and radiological measurements on these samples can be performed, including the determination of radionuclide concentrations.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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c. Post Accident Sampling Facilities Facilities are provided for obtaining highly radioactive samples while minimizing personnel exposure. Reactor coolant samples, both pressurized (RCS) and unpressurized (RHR/containment sump) may be obtained utilizing a remotely operated sampling panel. The panel provides for obtaining samples of both liquid phase and non-condensable gas phase components. Particulate, iodine and noble gas samples may be obtained from the containment atmosphere or the plant vent stack utilizing remotely operated valves. All systems provide for collection of small aliquots of the sampled media. Sampling capability also exists for the steam generators and steam jet air ejectors. Shielded containers, portable shielding and remote handling apparati allow analysis with minimum exposure.	**EP I.2 Continuing and Post Accident Assessment** The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
d. Fire Detection Fire and smoke detection monitors are located in all vital buildings on the plant site with extensive coverage in the Auxiliary Building, Containment and Turbine Building. A complete description of the fire protection and detection systems is given in FSAR Section 9.5, and fire protection re-evaluation report entitled, "Farley Nuclear Plant Fire Protection Program Re-evaluation".	**EP H.5.4 Fire Detection System** The Fire Detection System is designed to detect products of combustion or heat in designated areas of the plant. The fire alarm communication systems and subsystems are located at strategic points throughout the plant to warn personnel of a fire or other emergency conditions. Additional description of the fire system is provided in the FSAR.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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2. Environs Monitoring Facilities and Equipment A comprehensive environmental monitoring program is established for the Farley Plant covering both onsite and offsite areas	**EP H.10 Collection Point for Field Samples** SNC-operated nuclear power plants have designated a point as the location for receipt and analysis of field monitoring team environmental samples. Sampling and analysis equipment is available for quantitative activity determination of marine and air samples, and qualitative activity determination of terrestrial samples.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Equipment used in this program that may be used for emergency assessment is as follows: a. OSLDs b. Air particulate and iodine monitors c. Portable radiation survey instruments	**EP H.9 Emergency Kits** Emergency kits are available at SNC-operated nuclear power plants. Designated site or department procedures identify the equipment in the various emergency kits. Details as to kit locations are found in the plant-specific procedures.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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Although the OSLDs and the air particulate and iodine samples may be evaluated by an outside vendor, the capability for evaluating the air particulate and iodine samples exists at the plant. FNP-0-RCP-25 provides methodology for utilizing available air sampling and monitoring equipment to measure radioiodine concentrations in air in the plume exposure EPZ as low as 10-7 uCi/ml under field conditions. Interference from noble gas and background radiation will not decrease the minimum detectable activity. A detailed description of the minimum portable and fixed health physics equipment available at the site is given in FSAR Section 12.3. Predesignated monitoring and sampling points are listed in FNP-0-EIP-4, "Health Physics Support to the Emergency Plan".	No equivalent Plan/Annex statement	The counting specific information was maintained in applicable procedures.
The states of Georgia and Florida have mobile laboratory facilities that could be used in case of emergencies. All field monitoring data will be transmitted to and analyzed at the EOF (the TSC until the EOF is staffed). The University of Georgia and Oak Ridge National Laboratories have fixed radiological laboratories in the general geographic area that can aid in radiological analysis. It is estimated that the response time for these organizations will range from 2 to 4 hours.	**EP H.6.3 Laboratory Facilities** External facilities for counting and analyzing samples, and for dosimetry processing, can be provided by other SNC-operated plants including the GPC Central Laboratory, state, federal, or contracted laboratories. Outside analytical assistance may be requested from state and federal agencies, or through contracted vendors. The DOE, through the Radiological Assistance Program (RAP) has access to any national laboratory.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

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The plant is equipped with a computer which utilizes automatically input meteorological data, effluent monitor data and selected plant parameter data (e.g. steam generator pressure, plant vent stack flow rate, etc.) to calculate estimated and projected offsite dose. The system automatically actuates when effluent monitors indicate abnormal release point activity and continues until manually terminated. Calculational results are available at computer terminals located at the TSC, EOF and other selected locations.	**EP I.3 Offsite Dose Assessment** SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies, and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions. The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.

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In the event that the above computer is not available and for long term dose assessment, a manual personal computer method is provided in NMP-EP-104, Dose Assessment ". The system calculates estimated and projected offsite dose, and plume dimensions, location and arrival times out to 50 miles from the plant site. Meteorological data, effluent monitor data and plant parameter data utilized in the manual calculations will usually be obtained from local data systems. In the event that the local data systems are not available then data may be obtained from the control room meteorological data recorder, effluent monitor instruments and control room indicators.	**EP I.3 Offsite Dose Assessment** SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions. The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
A detailed discussion of the automatic offsite dose assessment method is provided in FNP-0-M-007, "Emergency Dose Calculation Manual". A detailed discussion of the manual offsite dose assessment method is provided in the MIDAS (Meteorological Information and Dose Assessment System) Technical Manual.	**EP I.3 Offsite Dose Assessment** SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions. The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all of the existing regulatory requirements, so the ARDA program is no longer needed.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Results of dose estimates and projections are provided to off-site agencies responsible for initiating protective actions using the SNC Integrated Data Display System, telecopy system, ENN, ENS and/or commercial telephones.	**EP I.3 Offsite Dose Assessment** SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions. The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
3. Personnel Monitoring Equipment In addition to the portable radiological monitors discussed in Section III.C.1.b external dosimetry equipment is available for personnel monitoring and dose assessment. Digital alarming dosimeters (DADs) provide immediate dose assessment for emergency personnel. Dose assessment will also be provided by plant OSLDs and vendor OSLDs which can be processed on an emergency basis within 24 hours. All dose results will be retained in permanent records for each individual.	**EP K.3.1** In an emergency situation, on-site personnel, offsite support personnel, and local government emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel who are issued dosimetry.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
D. PROTECTION, DECONTAMINATION AND FIRST AID FACILITIES 1. Protective Facilities and Equipment The Plant Assembly Areas are designated as the Control Room, Technical Support Center (TSC), Operations Support Center (Room 2452 – North of TSC), Support Building Auditorium, Support Building Cafeteria, Maintenance Training Center, PAP (Non-PA side), Visitor's Center Auditorium, Switchhouse, Fabrication Shop, and Warehouse Receiving Area (Figure 19). All personnel on the plant site will report to one of these designated assembly areas when the Plant Emergency Alarm is sounded. All personnel will be instructed in advance as to which assembly area to report in the event that the Plant Emergency Alarm is sounded.	**EP K.5 Decontamination** The Radiation Protection Group will be responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces, and for determining the extent of contamination in controlled and normally uncontrolled areas. During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program. Facilities and supplies for decontaminating personnel are available at various plant locations. Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination. During emergencies, other onsite personnel will be checked for contamination as necessary. Designated personnel, under the direction of the Radiation Protection Group, are responsible for performing material decontamination. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Alternate Assembly Areas designated for use at the discretion of the Emergency Director are the Contractor Parking Lot, Switchhouse Parking Lot, an area between the Unit #2, 2A, and 2B Cooling Towers, the Utility Building, the Southeast corner of the Control Room, the OPS Ready Room, and the Health Physics (HP) Office (Figure 19).	No equivalent Plan/Annex statement	With the incorporation of more detailed protective actions for the HAB event, the commitment to maintain the Assembly ability was maintained in the SNC Standard Emergency Plan, but specifics were eliminated to allow for more effective case-by-case management of the function.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Operations Support Center will provide protection for emergency Operations, Health Physics and Repair Party personnel. An emergency cabinet is provided which contains emergency supplies.	**Annex 5.1.3 Operations Support Center (SEP H.1.3)** The break room (outside the Technical Support Center) will serve as the Operations Support Center (Figure 5.1.B), from which emergency operations support will be provided. The OSC is where operational support personnel such as instrument technicians, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel assemble to aid in the response to an emergency. The OSC will accommodate the support and technical staff to respond to an event on one or both Units. The OSC has the capability to communicate with the control room, the Technical Support Center (TSC) and the Emergency Operations Facility (EOF). Operations at this facility will be directed by the OSC Manager.	The wording was relocated and transferred to the Site Annex.
The Maintenance Shop and Central Security Control have emergency cabinets provided which contain emergency supplies.	**Annex 5.5 Emergency Kits (SEP H.9)** Emergency supplies and equipment are located at various places at the plant. Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Equipment in these kits is calibrated in accordance with the suppliers' recommendations. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Support Building Auditorium will provide for assembly of Maintenance, and Facilities personnel. No protective equipment is provided for this facility; however, if required, all non-essential personnel will be evacuated to a safe location.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan maintains the commitment to support the Assembly function.
The Support Building Cafeteria will provide for assembly of Support Building Personnel, Service Building, and Service Building Annex personnel. No protective equipment is provided for this facility; however, if required, all nonessential personnel will be evacuated to a safe location.	**Annex 5.7 Protective Facilities and Equipment (SEP J)** **Assembly Areas (SEP J.4.1)** In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when the announcement of evacuation is made. Protective actions, including relocation of on-site personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Contractor Personnel, MODS Building, and ES Building Personnel will assemble in the Fabrication Shop. After accountability, these personnel will be evacuated if necessary.	**Annex 5.7 Protective Facilities and Equipment (SEP J)** **Assembly Areas (SEP J.4.1)** In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when the announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
OPS Training Center personnel and personnel training in the OPS Training Center will assemble in the Visitor Center Auditorium.	**Annex 5.7 Protective Facilities and Equipment (SEP J)** **Assembly Areas (SEP J.4.1)** In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Maintenance Training Center Personnel and personnel training in the Maintenance Training Center will assemble in the Maintenance Training Center.	**Annex 5.7 Protective Facilities and Equipment (SEP J)** **Assembly Areas (SEP J.4.1)** In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
If necessary, Alternate Assembly Areas will be utilized to conduct accountability and non-essential personnel will be evacuated from the plant site. In the event that the PAP becomes untenable due to accident conditions, the Switchhouse and/or Maintenance Training Center will become the alternate shelter(s). Protective equipment for these locations is listed in Appendix 1(A). Under extreme conditions, APCo facilities that may be used as a personnel staging area are available approximately eight miles from the plant site.	**Annex 5.7 Protective Facilities and Equipment (SEP J)** **Assembly Areas (SEP J.4.1)** In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2. Decontamination and First Aid A first aid station and a decontamination area are located on the plant site. The decontamination area is located in the Auxiliary Building at elevation 155 near the Health Physics Office. The first aid station is located in the Auxiliary Building at elevation 155 and a Nurses Station is located in the Training/Visitors Center. Personnel decontamination and first aid supplies are provided for each of the two areas. Stretchers and first aid kits are located strategically throughout the plant.	**EP K.1.2.1 Onsite Responsive Action** Selected plant workers at SNC-operated plants have received first aid and decontamination training. If a plant employee cannot be easily decontaminated, the individual is treated as contaminated and measures are taken to prevent the spread of contamination during ambulance transportation and upon arrival at a local hospital. **EP K.5 Decontamination** Facilities and supplies for decontaminating personnel are available at various plant locations. Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination. During emergencies, other onsite personnel will be checked for contamination as necessary.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
There is at least one person on each shift qualified to perform first aid. Plant employees are considered to be first aid qualified upon successful completion of the Company's First Aid Course and are required to be requalified within three years.	**EP K.1.2.1 Onsite Responsive Action** Selected plant workers at SNC-operated plants have received first aid and decontamination training. If a plant employee cannot be easily decontaminated, the individual is treated as contaminated and measures are taken to prevent the spread of contamination during ambulance transportation and upon arrival at a local hospital.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
3. Medical Transportation Request for ambulance support will be made by the control room or site security to the Houston County 911 center, Houston County EOC, or the incident command post, as applicable, based on the nature and timing of the event.	**Annex 5.8.2 Ambulance Service (SEP B.6.2, L.4)** Injured or externally contaminated personnel who require medical attention will normally be transported by ambulance to the cooperating hospitals. Ambulance crews are trained to handle external contamination cases. Ambulance services are coordinated through the Houston County 911 center. Houston County maintains agreements with local fire and ambulance services that may respond to FNP.	The wording was relocated and transferred to the Site Annex.
a. Local Rescue Squads Ashford Rescue Squad Columbia Rescue Squad Dothan Ambulance Service	**Annex 2.3.3.1 Local Ambulance and Rescue Squads** • Ashford Rescue Squad. • Columbia Rescue Squad. • Dothan Ambulance Service (Pilchers Ambulance Service), Inc.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
4.Medical Treatment: The detailed plans for the handling and care of injured personnel potentially contaminated and/or highly irradiated are contained in Part II, Medical Plan and FNP-0-EIP-11, "Handling of Injured Personnel". A brief description of the facilities and services available for medical support is given below. Letters of agreement on file from these facilities.	**EP L.1 Hospital and Medical Services** In addition to the on-site first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses. SNC-operated nuclear power plants have arranged for hospital and medical services having the capability to evaluate radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals. The hospitals are equipped and hospital personnel trained to address contaminated injured individuals. Training of medical support personnel at the agreement hospitals includes basic training on the nature of radiological emergencies, diagnosis and treatment, and follow-up medical care. Plant personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Arrangements, by letter of agreement or contract, are maintained by SNC-operated plants with a qualified hospital located in the vicinity of the nuclear power plant for receiving and treating contaminated persons with injuries requiring immediate hospital care.	The wording was relocated and transferred to the SNC Standard Emergency Plan and Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
a. Southeast Alabama Medical Center The Southeast Alabama Medical Center in Dothan, Alabama, has agreed to receive and care for injured personnel that may be contaminated or irradiated. In addition to routine medical care, space has been provided for a decontamination and emergency treatment facility and for storage of emergency medical equipment, monitoring equipment and dosimeters. Entrance to this facility will not affect the use of the hospital emergency room.	**Annex Section 2.3.2** **Annex 2.3.2.1 Southeast Alabama Medical Center** The Southeast Alabama Medical Center in Dothan, Alabama, has agreed to receive and care for injured personnel that may be contaminated or irradiated. In addition to routine medical care, space has been provided for decontamination and emergency treatment and for storage of emergency medical equipment, monitoring equipment, and dosimeters. Entrance to this facility will not affect the use of the hospital emergency room.	The wording was relocated and transferred to the Site Annex.
b. University of Alabama Hospital The Division of Oncology of the University of Alabama Hospital in Birmingham, Alabama, has agreed to provide, on a priority basis, definitive care for irradiated and/or contaminated casualties. An area of the hospital has been modified to provide for such radiological emergencies. At the physicians discretion, persons who have been exposed may be sent to the University of Alabama Medical Center after receiving treatment at the Southeast Alabama Medical Center.	**Annex 2.3.2.2 University of Alabama Hospital** The Division of Oncology of the University of Alabama at Birmingham (UAB) Hospital in Birmingham, Alabama, has agreed to provide, on a priority basis, definitive care for irradiated and/or contaminated casualties. An area of the hospital has been modified to provide for such radiological emergencies. At the physicians' discretion, persons who have been exposed may be sent to UAB after receiving treatment at the Southeast Alabama Medical Center.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
c. Oak Ridge Institute for Science and Education - REAC/TS The Oak Ridge Institute for Science and Education-REAC/TS team at Oak Ridge, Tennessee, has agreed to accept any type of radiation accident victim in need of hospitalization. At the physician's discretion, persons who have been exposed may be sent to ORISE-REAC/TS after receiving treatment at the Southeast Alabama Medical Center.	**Annex 2.3.2.3 Oak Ridge Institute for Science and Education - REAC/TS** The Oak Ridge Institute for Science and Education-REAC/TS team at Oak Ridge, Tennessee, has agreed to accept any type of radiation accident victim in need of hospitalization. At the physicians' discretion, persons who have been exposed may be sent to ORISE-REAC/TS after receiving treatment at the Southeast Alabama Medical Center.	The wording was relocated and transferred to the Site Annex.
IV. ASSESSMENT ACTIONS AND PROTECTIVE MEASURES A. CLASSIFICATION OF EMERGENCIES CLASSIFICATION OF EMERGENCIES IS DESCRIBED IN APPENDIX 11(k)	**SECTION D: EMERGENCY CLASSIFICATION SYSTEM** **D.1 Classification of Emergencies**	The SNC Standard Emergency Plan incorporated the Classification discussion in Section D. This submittal does not impact the current approved Emergency Action Level Scheme. See Appendix 11(k) Justification section for the details of the Classification Process.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
B. POST ACCIDENT ASSESSMENT ACTIONS Effective coordination and direction of all elements of the emergency organization require continuing assessment through the duration of the emergency situation. In addition to continued monitoring of control room instrumentation and plant parameters, some special assessment actions are, initiated if appropriate. These assessment functions are identified below:	**EP I.1** To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant. **EP I.2 Continuing and Post-Accident Assessment** The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Reactor Coolant Sampling, Containment Atmosphere Sampling and Plant Vent Stack Sampling. RCS, containment atmosphere and/or plant vent stack samples will be taken and analyzed to assess the severity of core damage and the potential radiological consequences. The detailed sampling procedures for each area are provided in FNP-1/2-CCP-1300, "Chemistry and Environmental Activities During a Radiological Accident". FNP-0-EIP-30, "Post Accident Core Damage Assessment" provides a method to estimate the extent of core damage utilizing various plant monitor readings.	**EP I.1** To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant. **EP I.2 Continuing and Post-Accident Assessment** The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2. Surveillance of Control Room Monitors Surveillance of radiological and meteorological monitors in the control room is primarily the responsibility of operations personnel. However, in the event that offsite assessments based on this data are necessary, an individual designated by the Emergency Director will maintain surveillance over effluent monitor readings and dose projections, periodically reporting them to those designated in FNP-0-EIP-6, "TSC Setup and Activation". If the dose assessment computer is inoperable, the designated individual will periodically log the monitor values.	**EP I.1** To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant. **EP I.2 Continuing and Post Accident Assessment** The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, Area and Process Radiation Monitoring Systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
3. In-Plant and Site Surveys During emergency conditions in-plant, site and site boundary surveys will be performed as appropriate by the Field Monitoring Team as described in FNP-0-EIP-4, "Health Physics Support to the Emergency Plan." The Field Monitoring Team will be capable of sampling under field conditions and will be capable of measuring radioiodine in the presence of noble gas and background radiation to as low as 5 x 10-8 uCi/cc.	**EP I.7 Environs Surveys and Monitoring** In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation, and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC-operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
4. Population Exposure Exposure projections shall be periodically estimated in the affected sectors utilizing projected dose and measured dose rates. The Dose Assessment Supervisor will work with the state/local agency representatives to determine the Total Effective Dose Equivalent (TEDE) exposure (resulting from external exposure and inhalation of the plume and external exposure from deposition) and thyroid Committed Dose Equivalent (CDE) exposure (resulting from the inhalation of radio-iodines).	**EP I.3 Offsite Dose Assessment** SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.
5. Environs Surveys and Monitoring a. Short Term Assessment Short term assessment will involve the use of the estimates and projections provided by the emergency dose calculation computer programs performed in accordance with NMP-EP-104, "Dose Assessment".	**EP I.7 Environs Surveys and Monitoring** The initial environmental surveys involve measurements to confirm or modify the dose projections based on plant parameters. Subsequent environmental monitoring efforts will be aimed at further defining the offsite consequences, including instituting an expanded monitoring program to enable prompt assessments of any subsequent releases from the plant.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Onsite and offsite surveys will be performed as necessary to verify release information or as a backup assessment method should the instrumentation used for dose assessment go off-scale or become inoperable.	**EP I.3 Offsite Dose Assessment** SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions.	The wording was relocated and transferred to the SNC Standard Emergency Plan. The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Monitoring teams will normally be dispatched in vehicles and will be equipped with two-way radios for communication with the TSC or EOF.	**EP I.7 Environs Surveys and Monitoring** In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Teams will be equipped with liquid sampling equipment, a GM instrument, an ion chamber instrument, and/or an air sampler as deemed appropriate by the Emergency Director, Health Physics Supervisor or Dose Assessment Supervisor.	**EP I.7 Environs Surveys and Monitoring** In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
An environs survey team could be in the field within one hour. Radiological survey and sampling points will be identified by sector as shown in Figure 20.	**EP I.7 Environs Surveys and Monitoring** In addition to the capabilities and resources described in Section H, SNC operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The correlation of various measured parameters (contamination levels, water and air activities) to dose rates for key isotopes and gross radioactivity levels is provided by FNP-0-RCP-25.	**EP I.7 Environs Surveys and Monitoring** In addition to the capabilities and resources described in Section H, SNC operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Long Term Assessment The long term aspects involving offsite assessments of contamination involving analysis of soil, vegetation, food, milk and water will be primarily handled by the states of Alabama, Georgia, and Florida as discussed in their Radiological Emergency Plans. The response of SNC would be to increase the sampling frequency of its established environmental monitoring program.	No equivalent Plan/Annex statement	Long term assessment will be event-specific and subject to ORO control in conjunction with the FRMAC if required. The statement was not carried forward to the SNC Standard Emergency Plan.
C. PROTECTIVE ACTIONS AND EMERGENCY ACTION LEVELS The nature of protective actions to be implemented, the criteria for application, and the area involved or groups of persons for whom the protective actions would be taken are given here.	**SECTION J: PROTECTIVE RESPONSE** Protective response consists of emergency actions, taken during or after an emergency situation, which are intended to minimize or eliminate hazards to the health and safety of the public and plant personnel. Protective actions have been developed for emergency workers and the general public located in the Plume Exposure Pathway Emergency Planning Zone. Guidelines consistent with federal guidance have been established to aid in choosing protective actions during an emergency. The responsibility for actions outside the owner-controlled area rests with state, county, and other offsite response agencies.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Onsite Protective Action a. Evacuation In the event of a Notification of Unusual Event an area of the turbine building, auxiliary building, or containment may have to be evacuated. Personnel would be notified to evacuate the affected area via the public address system as directed by the Emergency Plan Implementing Procedures.	**EP J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or immediately leave the site. Personnel will be directed to either proceed to their homes or reassemble at designated locations. Visitors to the plant will assemble with and follow the instructions of their escorts. Personal transportation will normally be used and established evacuation routes will be followed. Personnel without transportation will be identified and provided transportation as necessary. Evacuation of personnel is usually conducted immediately after accountability if a Site Area Emergency or General Emergency has been declared and no impediments exist. Evacuation shall commence as directed by the Emergency Director.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Should a Site Area Emergency, General Emergency, or an Alert be declared, immediate notification of all persons onsite may be accomplished by sounding the Plant Emergency Alarm and announcing the condition over the plant public address system. Personnel onsite would report to their pre-assigned assembly area and preparations for evacuation of nonessential persons from the site would begin. Depending on the severity of the emergency condition, these individuals will be held in an assembly area, evacuated, or returned to work.	**EP J.4.1Assembly** Assembly is mandatory following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director. When Accountability of onsite personnel is determined to be necessary by the Emergency Director, personnel within the Protected Area will be accounted for and the names of missing individuals determined within 30 minutes of the emergency declaration.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
If a site evacuation is warranted, personnel will be advised as to which routes should be used. The normal routes are State Highway 95 North or South and County Road 42 West (Figures 17 and 19). All personnel being evacuated from the site will be monitored before being released. Personnel leaving the site would then proceed, in their own vehicles, on one of these major routes, to their residences. Transportation for persons without vehicles will be arranged.	**EP J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or immediately leave the site. Personnel will be directed to either proceed to their homes or reassemble at designated locations. Visitors to the plant will assemble with and follow the instructions of their escorts. Personal transportation will normally be used and established evacuation routes will be followed. Personnel without transportation will be identified and provided transportation as necessary. Evacuation of personnel is usually conducted immediately after accountability if a Site Area Emergency or General Emergency has been declared and no impediments exist. Evacuation shall commence as directed by the Emergency Director.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
The details for evacuation and personnel accountability of all categories of personnel listed above are given in FNP-0-EIP-10, "Evacuation, Personnel Accountability, and Site Dismissal" and FNP-0-EIP-14 "Emergency Response Teams".	**EP J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or immediately leave the site. Personnel will be directed to either proceed to their homes or reassemble at designated locations. Visitors to the plant will assemble with and follow the instructions of their escorts. Personal transportation will normally be used and established evacuation routes will be followed. Personnel without transportation will be identified and provided transportation as necessary. Evacuation of personnel is usually conducted immediately after accountability if a Site Area Emergency or General Emergency has been declared and no impediments exist. Evacuation shall commence as directed by the Emergency Director.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Personnel Accountability Each plant supervisor or the senior individual onsite from his group is responsible for accounting for all persons working in or visiting his group. Accountability within the Protected Area will be determined by the senior individual at the assembly area coordinating with the Security Response Center (SRC) and then will be reported to the Emergency Director by the senior plant security force member at the SRC. Accountability within the Controlled Area will be determined by the senior individual at each assembly area coordinating with the Security Response Center (SRC) Staff and then will be reported to the Emergency Director by the senior individual in the SRC. Contractor personnel assigned to Plant Modification and Maintenance Support (PMMS) report to the Fabrication Shop and will assemble by individual craft. Fitness for Duty Facility personnel outside the Protected Area report to the Visitor's Center Auditorium	**EP J.4.2 Accountability** Personnel accountability is mandatory at the Site Area or General Emergency classification. Accountability may be initiated at other times at the discretion of the Emergency Director to support worker safety. Accountability of personnel within the Protected Area is accomplished within 30 minutes of the declaration of Site Area Emergency or higher, and maintained continuously thereafter, using Protected Area(s) boundary access control as described in the Security Plan. If there are station personnel who are unaccounted for, the public address system or other suitable communication methods are used to locate the personnel, or, in extreme cases such as fire, toxic gas release, explosions, or structural damage, trained search and rescue personnel are deployed to search for and assist the missing personnel.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
No public access areas pass through or are within the owner controlled area. The owner controlled area is fenced and/or posted. Security patrols are conducted at random intervals as a part of daily routine.	No equivalent Plan/Annex statement	The Security Patrols referenced in the current Plan statement are a function of Security Plan not Emergency Plan requirements.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Detailed procedures for determining and reporting accountability and Responsibilities for accountability during local evacuations are given in FNP-0-EIP-10, "Evacuation, Personnel Accountability, and Site Dismissal".	**EP J.4.2 Accountability** Personnel accountability is mandatory at the Site Area or General Emergency classification. Accountability may be initiated at other times at the discretion of the Emergency Director to support worker safety. Accountability of personnel within the Protected Area is accomplished within 30 minutes of the declaration of Site Area Emergency or higher, and maintained continuously thereafter, using Protected Area(s) boundary access control as described in the Security Plan. If there are station personnel who are unaccounted for, the public address system or other suitable communication methods are used to locate the personnel, or, in extreme cases such as fire, toxic gas release, explosions, or structural damage, trained search and rescue personnel are deployed to search for and assist the missing personnel.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Following accountability initiation, security personnel will control site access and egress for the duration of the emergency, maintaining entry/exit logs to allow accountability of all personnel onsite.	**EP J.4.2 Accountability** Personnel accountability is mandatory at the Site Area or General Emergency classification. Accountability may be initiated at other times at the discretion of the Emergency Director to support worker safety. Accountability of personnel within the Protected Area is accomplished within 30 minutes of the declaration of Site Area Emergency or higher, and maintained continuously thereafter, using Protected Area(s) boundary access control as described in the Security Plan. If there are station personnel who are unaccounted for, the public address system or other suitable communication methods are used to locate the personnel, or, in extreme cases such as fire, toxic gas release, explosions, or structural damage, trained search and rescue personnel are deployed to search for and assist the missing personnel.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<u>c. Hostile Action Protective Measures</u> Onsite protection of employees during hostile action involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the hostile event and advance warning. Site procedures provide specific actions to take during hostile action based events. These actions will be communicated to onsite personnel via the plant PA system and other communications means as applicable.	**EP J.4 Onsite Protective Actions** Onsite protection of employees during hostile action involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the hostile event and advance warning. Site-specific procedures provide specific actions to take during hostile action or severe weather events. During a hostile action or severe weather event, Assembly and Accountability actions may be delayed in favor of other onsite protective actions required to ensure the safety of the site and its personnel. In these cases, accountability will be completed once safe conditions have been established.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
c. Contamination and Exposure Control Measures The limits for personnel exposure set forth in 10CFR20 shall not be exceeded without approval of the Emergency Director or his designee.	**EP K.1** Under normal operating conditions, SNC-operated plants maintain personnel exposure control programs in accordance with 10 CFR 20. The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents."	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1) Farley Nuclear Plant personnel who have completed the onsite radiation protection training, may receive o 10 Rem When emergency onsite action is required to eliminate a source or potential source that represents a hazard to the general public or to prevent a substantial loss in property and a lower dose is not practicable. o 25 Rem For life-saving operations such as rescue and search for known missing persons or for protection of large populations when a lower dose is not practicable. o >25 Rem but not to exceed 100 Rem For lifesaving or protection of large populations only on a voluntary basis. The volunteer worker should do so with full awareness of the associated risks for the radiation dose to be incurred.	**EP Table K.1.A**	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2) Hospital and Ambulance Service Personnel, may receive o 3 Rem If there is an adequate number of attendants such that rotation may be accomplished without further endangering the patient(s). o 5 Rem If the number of attendants is limited such that personnel cannot be rotated. o 25 Rem To save a life.	**EP Table K.1.A**	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Dosimetry, respiratory protection equipment and protective clothing will be issued for use in accordance with established Radiological Control Procedures. A supply of radio protective drugs (potassium iodide) is available onsite and, if necessary, will be issued at the direction of the Emergency Director to emergency personnel remaining or arriving onsite.	**EP J.4 Onsite Protective Actions** Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. SNC-operated nuclear power plants maintain an inventory of respiratory protection equipment, anti-contamination clothing, and potassium iodide (KI) that is available to emergency workers remaining on site. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. Measures which would be taken are: • On-shift and emergency response personnel use respiratory protection in any environment involving exposure to high level airborne activity or oxygen deficient atmosphere, or where air quality is in doubt. The criteria for issuance of respiratory protection are described in plant Radiation Protection procedures. • Anti-contamination clothing is available for use by onsite personnel. The criteria for issuance of protective clothing are described in plant Radiation Protection procedures. • The criteria for administering a thyroid-blocking agent (KI - Potassium Iodide) to emergency personnel depends on the projected absorbed dose to the thyroid based on the severity and magnitude of the accident.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The levels of permissible radioactive contamination for personnel and equipment to be released from an RCA during an emergency are as follows: Personnel Equipment <5,000 dpm/100 cm2 ND GMT/100 cm2 (smearable) And < .25 mR/hr (fixed)	**No equivalent Plan/Annex statement**	The release of material will be a function of post emergency plan actions and potentially ORO evaluation.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
However, the Emergency Director may authorize higher levels based on plant conditions and recommendations from the HP Supervisor. When levels above these values are encountered, decontamination will be initiated. Facilities, supplies and waste disposal capability exists to provide for both personnel (emergency or onsite relocated) and equipment decontamination. Methods for equipment decontamination are discussed in NMP-HP-304, "Decontamination of Areas, Tools, and Equipment" and for personnel in NMP-HP-303, "Personnel Decontamination" with particular attention being given to radioiodine contamination of the skin. Extra clothing for personnel will be provided in the event personal clothing is confiscated. Information on personnel decontamination facilities is contained in Section III.	**EP K.1** Under normal operating conditions, SNC-operated plants maintain personnel exposure control programs in accordance with 10 CFR 20. The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents." **EP K.5 Decontamination** The Radiation Protection Group will be responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces, and for determining the extent of contamination in controlled and normally uncontrolled areas. During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program. Facilities and supplies for decontaminating personnel are available at various plant locations. Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination. During emergencies, other on-site personnel will be checked for contamination as necessary. Designated personnel, under the direction of the Radiation Protection Group, are responsible for performing material decontamination. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
To prevent or minimize direct or subsequent ingestion exposure to radioactive materials deposited on the ground or other surfaces, access into the exclusion area will be controlled by security personnel. Additionally, if conditions warrant, the site drinking water will be sampled and analyzed for radioactivity and quarantined, if necessary. If a quarantine is placed on the water, it will not be returned to use until the activity has returned to within acceptable limits as dictated by the State of Alabama Board of Health "Regulations Governing Public Water Supplies".	**EP K.5 Decontamination** The Radiation Protection Group will be responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces, and for determining the extent of contamination in controlled and normally uncontrolled areas. During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Personnel which are found to be contaminated when monitored during evacuation will be returned to the plant for deconning if possible. If the plant is not accessible, the personnel will be transported to the nearest decontamination facility.	**EP K.7 Offsite Decontamination** Nonessential onsite personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Offsite contamination controls are described in the states of Alabama, Georgia, and Florida plans.	**EP K.7 Offsite Decontamination** Nonessential onsite personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2. Offsite Protective Action The states of Alabama, Georgia, and Florida are responsible, in their respective state, for handling the offsite radiological aspects of any emergency that should develop at the Farley Nuclear Plant. The Emergency Plans for Alabama, Georgia, and Florida are given in each states Radiological Emergency Plan.	**Annex 4.4 Protective Actions for the Offsite Public (SEP J.5)** The Emergency Director will recommend the necessary protective actions to offsite authorities, based on predetermined protective actions for a General Emergency Classification or results of offsite dose assessment. Upon activation of the EOF, the EOF Manager will be responsible for recommending protective actions for the offsite population. Responsibility for carrying out the protective actions rests with offsite authorities.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The criteria to be used for offsite protective action recommendations is given below. The basis for protective action guides is the "Manual of Protective Action Guides and Protective Action for Nuclear Incidents", EPA-400-R-92-001. It should be noted that these levels are quite low and are used as guidelines for protective action rather than rigid levels of action. Recommendation of sheltering in residences shall be considered when there is radiological puff release that exceeds the projected dosage for a general emergency listed in section a below or there are hazards on or offsite that would make an evacuation dangerous. Areas within a ten mile radius in which protective action is deemed necessary will be referred to by Evacuation Zone as shown in Figure 21. The population distribution within this ten-mile radius has been predicted for the life of the plant and is summarized graphically in Figure 22.	**EP J.5 Offsite Protective Action Recommendations (PARs)** Plant conditions, projected dose and dose rates, field monitoring data, and evacuation time estimates are evaluated to develop PARs for preventing or minimizing exposure to the public. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. The Emergency Director will approve PARs. The PAR decision-making flowcharts are site-specific in nature, and are provided in the site-specific implementing procedures. SNC-operated plants have the capability to provide state and local agencies a PAR for beyond the 10-mile EPZ. There are various types of protective actions that can be recommended to the state and counties. They may include the following: • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<u>a. Classification of Offsite Incidents SNC</u> Classification Projected Dosage (Organ or Media Involved) GENERAL 1.0 Rem TEDE 5.0 Rem Thyroid CDE SITE AREA 0.1 Rem TEDE 0.5 Rem Thyroid CDE	No equivalent Plan/Annex statement	This section restates numerically the EPA Protective Action Guidelines previously committed to. They are also the trigger for the equivalent radiologically based Emergency Action Levels in the site approved EALs. The data is not needed in the plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Response GENERAL Classification Protective Actions to be Recommended to State Authorities NMP-EP-112, "Protective Action Recommendations," provides detailed guidance on the methodology and determination of protective action recommendations (PARs). PARs were developed in accordance with NUREG-0654 Supplement 3 Rev. 1. Evacuation Time Estimates and Offsite Response Organizations were fully involved in the development of the PARs. The Emergency Director will approve the PAR decision developed by the methodology in the Initial and Follow-Up Flowcharts, shown as Chart 1, Initial and Chart 2, Follow-Up. Recommendations will be based on plant conditions, projected dose estimates, or available monitoring data.	**EP J.5 Offsite Protective Action Recommendations (PARs)** Plant conditions, projected dose and dose rates, field monitoring data, and evacuation time estimates are evaluated to develop PARs for preventing or minimizing exposure to the public. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. The Emergency Director will approve PARs. The PAR decision-making flowcharts are site-specific in nature, and are provided in the site-specific implementing procedures. SNC-operated plants have the capability to provide state and local agencies a PAR for beyond the 10-mile EPZ. There are various types of protective actions that can be recommended to the state and counties. They may include the following: • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
SITE AREA Classification Protective Actions to be Recommended to State Authorities No Protective Action Recommendations are to be made at the Site Area emergency level. The Emergency Director should upgrade to a General Emergency if PARs are determined to be needed and not already in a General Emergency.	**EP J.5 Offsite Protective Action Recommendations (PARs)** Plant conditions, projected dose and dose rates, field monitoring data, and evacuation time estimates are evaluated to develop PARs for preventing or minimizing exposure to the public. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. The Emergency Director will approve PARs. The PAR decision-making flowcharts are site-specific in nature, and are provided in the site-specific implementing procedures. SNC operated plants have the capability to provide state and local agencies a PAR for beyond the 10-mile EPZ. There are various types of protective actions that can be recommended to the state and counties. They may include the following: • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
ALERT Classification Protective Actions to be Recommended to State Authorities No Protective Action Recommendations are to be made at the Alert level. The Emergency Director should upgrade to a General Emergency if PARs are determined to be needed and not already in a General Emergency.	**EP J.5 Offsite Protective Action Recommendations (PARs)** Plant conditions, projected dose and dose rates, field monitoring data, and evacuation time estimates are evaluated to develop PARs for preventing or minimizing exposure to the public. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. The Emergency Director will approve PARs. The PAR decision-making flowcharts are site-specific in nature, and are provided in the site-specific implementing procedures. SNC operated plants have the capability to provide state and local agencies a PAR for beyond the 10-mile EPZ. There are various types of protective actions that can be recommended to the state and counties. They may include the following: • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The authority for initiation or relaxation of protective action recommendations is vested solely with the Emergency Director and may not be delegated to any other member of the emergency organization. Processes for development, approval, and notification of protective action recommendations are described in NMP-EP-111, "Emergency Notifications", and NMP-EP-112 "Protective Action Recommendations".	**EP B.1.1** The Emergency Director's non-delegable duties include: • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Chart 1 Initial Protective Actions Recommendations	No equivalent Plan/Annex chart	Section J5 of the SNC Standard Emergency Plan specifies the requirement to make Protective Action Recommendations consistent with NUREG-0654 Supplement 3. PAR flowcharts are controlled at the procedural level.
Chart 2 Follow Up Protective Action Recommendations	No equivalent Plan/Annex chart	Section J5 of the SNC Standard Emergency Plan specifies the requirement to make Protective Action Recommendations consistent with NUREG-0654 Supplement 3. PAR flowcharts are controlled at the procedural level.
<u>V. ACTIVATION OF EMERGENCY ORGANIZATION</u> <u>A. DECLARATION OF AN EMERGENCY</u> The Shift Manager shall have the authority and responsibility to immediately and unilaterally declare an emergency and initiate emergency response. Section IV of this plan delineates criteria for declaring emergency conditions.	**EP B.1.1** The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing offsite emergency measures.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Upon declaration of an emergency the Shift Manager will immediately notify the on-call Emergency Director (ED). Until the on-call ED arrives onsite and relieves the Shift Manager, the Shift Manager shall complete the duties of the ED prior to the on-call ED taking full responsibility for implementation of the Emergency Plan. Duties of the Shift Manager as an Emergency Director are addressed in NMP-EP-110, "Emergency Classification Determination and Initial Action" and NMPEP-111, "Emergency Notifications".	**EP B.1.1** The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
The ED, Shift Clerk, or designee will notify the EOF Manager of the emergency condition. The EOF Manager will decide on the appropriate level of activation utilizing the criteria shown in Table 4.	**EP B.1.1** The ED, at their discretion or when procedurally required, activates the ERO.	The SNC Standard Emergency Plan fully incorporates EOF activation into the site organization. Activation will be driven by event Classification. The statement determining the need to activate is no longer required.
<u>B. ORGANIZATION ACTIVATION</u> The minimum quantity of personnel available on shift and the quantity of additional personnel available within 75 minutes following declaration of the emergency to staff the emergency organization are shown in Table 3. A copy of the On-Shift Staffing Analysis which forms the technical basis for Minimum Shift Staffing provided in Table 3 is maintained in the SNC document management system. Reference OSA-FNP-001.	**EP B.1** The number and ERO position titles of personnel available within 75 minutes following declaration of an Alert or higher classification are shown in Tables 1, 2 and 3.	The wording was relocated and transferred to the SNC Standard Emergency Plan and Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Each shift shall have a Shift Technical Advisor (STA). The STA will have No duties or responsibilities for manipulation of controls or command of operations during an emergency.	**Annex Table 2.2.A**	The wording was relocated and transferred to the Site Annex.
The normal shift crew will consist of at least those positions listed as "on shift" in Table 3. There will be a licensed operator in each unit's control room at all times when fuel is in the core of the respective unit. There will be a Senior Reactor Operator (SRO) in the control room (shared) at all times when fuel is in either core. Shift staffing for core alterations will also include either a SRO limited to fuel handling or a SRO not assigned any duties concurrent with core alterations.	**EP B.1:** The normal on-site organization of an SNC-operated nuclear power plant provides a staff fully capable of providing the initial response to an emergency event. **Annex Section 2.1:** The normal plant operating crew is staffed and qualified to perform actions that may be necessary to initiate immediate protective actions and implement the emergency plan, and is designated as the responsible group for such actions.	For Emergency Response purposes the operations staff has been validated by the conduct of a staffing analysis meeting the requirements of 10 CFR 50 Appendix E.IV.A.9. Emergency Plan staffing will be controlled by the staffing plan contained in the SNC Standard Emergency Plan and Site Annex. The commitment for positioning of ROs/SROs is not contained in the Fleet Emergency Plan or annex but is a Technical Specification requirement.
Upon receiving notification of an emergency, the Emergency Director will proceed to the site. A shift communicator will coordinate the plant call list to notify those individuals of the Emergency Organization needed to meet initial activation requirements. The EOF Manager will be notified in accordance with NMP-EP-110, "Emergency Classification Determination and Initial Action".	**EP B.1.1** In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED, at their discretion or when procedurally required, activates the ERO.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
During hostile action based events, ERO members would likely not have access to the onsite emergency response facilities. A security related emergency may delay the ordering of facility activation in order to protect plant personnel form the security threat. The decision to delay activation of the facilities will be made by the Emergency Director. In such cases, offsite ERO personnel will be directed to an alternative facility to minimize delays in overall site response by permitting ERO assembly without exposing responders to the danger of hostile action.	**EP H.1.4 Alternative Facilities** An Alternative Facility for staging of ERO personnel has been designated at the sites. In the event of a Security or Hostile Action threat or event, the designated Alternative Facility may also serve as an evacuation location for TSC and OSC personnel. The Alternative Facility is designed to be accessible in the event of an onsite HAB event and has the capability to: • Communicate with the Control Room, Security, and the EOF. • Conduct engineering assessment activities including damage control team planning and preparation. The functions of Notification and PARs will be performed from the EOF should the Alternative Facility be activated. Details of Alternative Facilities can be found in the Site Specific Annex.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Criteria for the activation of the Technical Support Center, Operations Support Center, and Emergency Operations Facility are shown in Table 4.	**EP Figures B.2.B through B.2.E**	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Technical Support Center Activation The onsite emergency response organization which will be directed from the TSC is described in Section II. The TSC will be staffed and ready to receive emergency response functions by the following on-call individuals within 75 minutes following declaration of an emergency requiring TSC activation: Emergency Director TSC Manager Operations Supervisor Health Physics Supervisor Engineering Supervisor Maintenance Supervisor ENN Communicator.	**EP H.1 Onsite Emergency Response Facilities** SNC-operated nuclear power plants have established a Technical Support Center (TSC) and an onsite Operations Support Center (OSC), which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. **EP Figure B.2.B**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Within eight hours of the declaration of the emergency one full complement of personnel as designated above will be available to relieve the TSC personnel.	**EP B.1** SNC plants maintain 24-hour emergency response capability. The normal on-shift complement provides the initial response to an emergency. This group is trained to respond to emergency situations until the augmented Emergency Response Organization (ERO) arrives. The ERO is composed of personnel with specialties in operations, maintenance, engineering, radiochemistry, radiation protection, fire protection, and security.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
There shall be sufficient personnel available within 16 hours of the declaration of the emergency to ensure that the TSC can be staffed on a 24-hour-a-day basis for at least one week	**EP B.1** SNC plants maintain 24-hour emergency response capability. The normal on-shift complement provides the initial response to an emergency. This group is trained to respond to emergency situations until the augmented Emergency Response Organization (ERO) arrives. The ERO is composed of personnel with specialties in operations, maintenance, engineering, radiochemistry, radiation protection, fire protection, and security.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
2. Operations Support Center (OSC) Activation The Operations Support Center will be staffed and ready to provide support to the emergency response effort as directed by the Emergency Director within 75 minutes following declaration of an emergency requiring OSC activation.	**EP H.1 Onsite Emergency Response Facilities** SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. **EP Figure B.2.C**	The wording was relocated and transferred to the SNC Standard Emergency Plan. See separate justification related to augmentation timeliness.
Other members of the Emergency Organization arriving at the plant will report to their assigned assembly areas.	No equivalent Plan/Annex statement	The Plan specifies reporting responsibilities for members of the ERO and assembly/evacuation responsibilities for all others.
Within 8 hours after declaration of an emergency, sufficient personnel shall be available in the OSC to ensure that shift personnel can be relieved by qualified individuals.	**EP H.1 Onsite Emergency Response Facilities** SNC operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. **EP Figure B.2.C**	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Within 16 hours after declaration of an emergency, sufficient personnel shall have been notified and placed on-call to ensure that the OSC can be staffed on a 24-hour-a-day basis for at least one week.	**EP H.1 Onsite Emergency Response Facilities** SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. **EP Figure B.2.C**	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<u>3. Emergency Operations Facility (EOF) Activation</u> The corporate emergency response organization which will be activated to respond from the EOF is described in Appendix 7(G).	**EP H.2.1 Emergency Operations Facility** The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
4. Alternative Facility Activation The ERO staff will be directed to report to the Alternative Facility during a security related event, or other events that preclude onsite access. This facility functions as a staging area for augmentation of emergency response staff and provides the capability for communication with the EOF, control room, and plant security. From this facility the ERO will support event response by performing engineering assessment activities, including damage control team planning and preparation for return to the site. The command and control function will remain with the ED in the control room until relieved by another onsite ED. Dose assessment and offsite notifications will be performed by the EOF. Procedural guidance for the alternative facility is provided in NMP-EP-135, Alternative Facility Setup and Operation.	**EP H.1.4 Alternative Facilities** An Alternative Facility for staging of ERO personnel has been designated at the sites. In the event of a Security or Hostile Action threat or event, the designated Alternative Facility may also serve as an evacuation location for TSC and OSC personnel. The Alternative Facility is designed to be accessible in the event of an onsite HAB event and has the capability to: • Communicate with the Control Room, Security, and the EOF. • Conduct engineering assessment activities including damage control team planning and preparation. The functions of Notification and PARs will be performed from the EOF should the Alternative Facility be activated. Details of Alternative Facilities can be found in the Site Specific Annex.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
C. OFFSITE CORPORATE ORGANIZATION ACTIVATION The corporate emergency response organization which will be directed from the EOF is described in Appendix 7(G). The corporate Emergency Communication Organization activation is described in Appendix 10(J).	**EP H.2.1 Emergency Operations Facility** The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
D. OFFSITE LOCAL, STATE AND FEDERAL AGENCIES Notification of offsite governmental agencies is discussed in Section VI. Activation of the state agencies is discussed in their respective plans.	**EP H.3 State and local Emergency Operations Centers (EOC)** EOCs operated by the state and by local communities allow direction and control of emergency response functions. The states' EOCs are capable of continuous (24-hour) operations for a protracted period. The county EOCs serve as Command and Control headquarters for local emergency response activities as well as a center for the coordination of communications to field units and to the state EOCs. Additional details for state and county EOCs are in the state and county emergency plans.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Section VI: Figure 24 illustrates the order and responsibilities for notification in the event of an emergency.	**EP E.1.1:** SNC, in cooperation with state and county authorities, has established methods and procedures for notification of offsite response organizations consistent with the emergency classification and emergency action level scheme. **Annex Section 4.1.1:** State and local counties surrounding FNP will be notified within 15 minutes of the declaration of an emergency condition State of Alabama: • Alabama Emergency Management Agency (AEMA). Alabama County Authorities • Houston County Sheriff's Dispatcher's Office. State of Georgia: • Georgia Emergency Management Agency (GEMA). Georgia County Authorities: • Early County Sheriff's Dispatcher's Office.	The commitment/process of notification was maintained as currently described in Figure 24 of the Farley Plan. The figure was deleted and the process described in words in the Plan/Annex sections.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Table 3 No title (Facility Staffing)	**EP O.4 ERO Training** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned onsite emergency response positions will receive training specific to their position. **EP O.4.1 Emergency Response Organization (ERO)** ERO members will receive Emergency Plan training on an annual basis. Personnel identified receive training appropriate to their position in the areas of: • Accident assessment. • Accident mitigation. • Notifications. • Emergency Classifications. • Protective Action Recommendations. • Emergency Action Levels. • Emergency Exposure Control.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Table 4: Emergency Facility Activation	**EP B.2 On Site Emergency Response Organization (ERO)** Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), and JIC are detailed below. A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24 hour a day basis for an extended event.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
VI. NOTIFICATION PROCEDURES FNP-0-EIP-8.1, "Emergency Phone Directory", contains a listing (updated quarterly) of the names, addresses, and telephone numbers of the individuals and organizations referred to in this section. A copy of FNP-0-EIP-8.1 will be maintained in the control room and by the on-call Emergency Director.	**EP F.1.1** At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Figure 24 illustrates the order and responsibilities for notification in the event of an emergency.	No equivalent Plan/Annex figure	The Plan provides the commitment for the various notification types and processes required to effectively implement the Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
An authentication method is used to verify any notifications made by FNP utilizing commercial telephones.	**EP E.1.1** SNC, in cooperation with state and county authorities, has established methods and procedures for notification of offsite response organizations consistent with the emergency classification and emergency action level scheme. These notifications include a means of verification or authentication. The methods used for authentication are developed and mutually agreed to by the utility and offsite authorities.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
A. STATE AND LOCAL AGENCY NOTIFICATION The Emergency Director is responsible for notifying the Alabama Emergency Management Agency and the Georgia Emergency Management Agency of all declared emergencies. The Alabama Emergency Management Agency will notify the Alabama Radiation Control Office of the State of Alabama Department of Public Health who will in turn notify the Florida Division of Emergency Management.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, /local, and NRC notifications).	The wording was relocated and transferred to the SNC Standard Emergency Plan.
In addition to these State notifications, the Emergency Director will notify local emergency management agencies in Houston County, Alabama and Early County, Georgia utilizing the Emergency Notification Network or commercial telephone.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications).	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
NMP-EP-111, "Emergency Notifications", contains the initial messages that will be used by the Emergency Director to notify the state and local agencies for the different classifications of emergencies. The content of emergency messages has been mutually agreed upon with State and Local agencies. The procedure to be followed for message authentication is contained in NMP-EP-111, "Emergency Notifications." These initial messages shall contain, at a minimum the following if applicable and available: 1. Class of emergency 2. Actual or potential release information 3. Potentially affected population 4. Advisability of protective measures	**EP E.2.2.2:** In conjunction with state and county authorities, SNC-operated plants have established the contents of the initial and subsequent state notification message forms to be used during an emergency. These forms are described in EPIPs. The content of the forms has been reviewed and agreed on by the respective Offsite Response Organizations.	The description of the initial message was standardized between the SNC sites and expanded to better align with current guidance.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Required follow-up message information has been agreed upon by the states. NMP-EP-111 makes provisions for follow-up messages to be sent to the states. These messages contain the following information as appropriate: 1. Location of incident and name and telephone number (or communications channel identification) of caller 2. Date/time of accident 3. Class of emergency 4. Type of actual or projected release (airborne, liquid) and estimated duration times 5. Estimate of quantity of radioactive material released or being released and the height of release 6. Chemical and physical form of released material, including estimates of the relative quantities and concentrations of noble gases, iodines, and particulates 7. Meteorological conditions (wind speed, direction (from), stability classification; form of precipitation, if any) 8. Projected dose at site boundary 9. Projected dose at about 2, 5, and 10 miles 10. Emergency response actions underway 11. Recommended emergency actions, including protective measures in sector(s) affected 12. Prognosis for worsening or termination of event based on plant information	**EP E.2.2.3:** The Emergency Director is responsible for the completion of a follow-up emergency message. The appropriate support coordinator will ensure the emergency communicator(s) periodically provide follow-up messages to the appropriate offsite federal, state, and local authorities.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
B. PLUME EXPOSURE PATHWAY EMERGENCY PLANNING ZONE PUBLIC NOTIFICATION AND INFORMATION 1. Notification a. Primary Southern Nuclear Operating Company has provided the administrative and physical means for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ by providing an Alert and Notification System (ANS) for the entire plume exposure pathway EPZ. Primary alerting is accomplished by use of a siren system. The siren alerting system consists of 89 pole mounted sirens. Each siren operates on battery power with battery charge maintained through an inverter that receives power from the local electrical grid or from a solar panel. Each siren site contains two radios - one for the primary radio signal frequency operating in the UHF band and one for the backup radio frequency operating in the VHF band. Repeaters for the primary and backup radio frequencies are provided on two separate radio towers with associated power, control, and radio communication provided. Siren system activation, test, and monitoring panels are provided at each for the counties of Houston and Henry County, Alabama; one for Early County, Georgia; and one for the State of Georgia.	**EP E.2.5:** Prompt alerting and notification of the public within the plume exposure pathway EPZ is the obligation of state and local government or other responsible authority. The responsibility for ensuring the means exist to carry out this purpose rests with Southern Nuclear Operating Company. **Annex 4.2:** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. **Annex 4.2:** Siren system activation, test, and monitoring panels are provided for Houston County and Henry County in Alabama, Early County in Georgia, and the state of Georgia.	The wording was standardized and aligned with current wording. Specific requirement for the communities is maintained in the revised description in the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Residents in the plume exposure pathway EPZ have been instructed to tune to specific emergency alert radio or TV stations if the sirens are activated.	**Annex 4.2 Alert and Notification System (ANS) (SEP E.2.5)** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Following activation of the siren system, emergency notifications will be made to the public within the 10 mile plume exposure pathway EPZ by activation of the Emergency Alert System (EAS). State and local Emergency Management Agencies will initiate activation of the local EAS stations through a dedicated EAS activation console. The EAS activation console provides a connection to designated EAS stations that allows for activation of the station through redundant communications pathways. Emergency messages are transmitted from the EAS activation console via phone line, internet, or satellite connections. Activation of the station does not require that the station be manned. Emergency messages are coordinated between the local Emergency Management Agencies and the State Emergency Management Agencies prior to activation of the local radio stations, as specified in the local area plans. A full description of the Farley ANS design is provided in the FEMA approved ANS Design Report (ANS-FNP-001) in the SNC document management system.	**Annex 4.2** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring panels are provided for Houston County and Henry County in Alabama, Early County in Georgia, and the State of Georgia. A full description of the Farley ANS design is provided in the FEMA approved ANS Design located in the SNC document management system.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Special Alerting and System Backup Special alerting is accomplished through the use of a calling system. Special alerting is initiated in the event of a failure of the system to activate multiple sirens resulting in a loss of coverage in any area. Special alerting may be initiated for a predefined area, a user specified area, user defined groups, or the entire Emergency Planning Zone (EPZ). The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations through EAS. Capability for activation of the calling system is provided at each for the counties of Houston and Henry, Alabama, at Early, Georgia, and for the State of Georgia.	**Annex 4.2** Special alerting uses a calling system. Special alerting is initiated in the event of a failure of the system to activate multiple sirens resulting in a loss of coverage in any area. Special alerting may be initiated for a predefined area, a user-specified area, user defined groups, or the entire Emergency Planning Zone (EPZ). The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities of the installed siren system and the notification capability of local radio and television stations through EAS. Capability to activate of the calling system is provided for Houston County and Henry County, Alabama and Early County, Georgia.	The wording was relocated and transferred to the Site Annex.
2. Information Processes for dissemination of information to local news media and the public annually are discussed in the Emergency Communications Plan, Appendix 10(J).	**EP G.8 Public Information and Education Program** The goal of the public information program is to acquaint the general public with the emergency plans for the operation of APC/GPC nuclear plants, as appropriate, and actions they should take in the event of a plant emergency. Emergency information is disseminated each calendar year for residents and transients in the plume exposure pathway Emergency Planning Zone.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
3. News Release Coordination and Rumor Control Processes for news release coordination and rumor control are discussed in the Emergency Communications Plan, Appendix 10(J).	**EP G.3 News Releases** The Utility will issue news releases covering events, conditions, and actions at the Plant. News releases are designed to be a written confirmation of events and are public information. The SNC News Writer will write news releases in the EOF and obtain SNC approval from the EOF Manager, then forward them to the JIC as appropriate. The Facility Manager at that location will obtain communications approval and direct distribution of the release.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
C. NRC OFFICE OF INSPECTION AND ENFORCEMENT The Emergency Director or his designee will notify the Nuclear Regulatory Commission of any emergency condition utilizing the Emergency Notification System.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Section VI.D: If conditions warrant, immediate assistance will be requested by the Emergency Director from the DOE Savannah River Operations Office	**EP A.1.4:** The DOE has agreed to provide radiological assistance on request, and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. The Interagency Radiological Assistance Team can be expected to respond to SNC operated sites as directed by the Savannah River Operations Office of DOE.	Commitment wording was standardized within the three SNC sites and relocated without process change to the SNC Standard Emergency Plan.
F. FIRE		

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
VII. RECOVERY A. METHODOLOGY Due to the unforeseeable conditions that would exist in an emergency condition, specific recovery criteria and procedures will be developed when required, considering maximum protection for plant personnel and the general public consistent with reasonable efforts to restore the affected Unit and continuing operation of the unaffected unit.	**EP M.1 Recovery** Guidance for determining the transition from Emergency to Recovery Organization is provided in the plant Emergency Plan Implementing Procedures. The composition of the Recovery Organization will depend on the nature of the accident and the conditions following the accident. The SNC Emergency Plan addresses general principles that serve as guides for developing a Recovery Plan. It is the responsibility of the Emergency Director (ED) to determine that the facility and surroundings are safe for reentry. The Emergency Director will designate a recovery manager to constitute the recovery organization.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The decision to relax protective measures will be based upon a comprehensive review of plant system parameters. These shall include but not be limited to the following: 1. Stability of the reactor shutdown condition i.e., successful movement toward a cold shutdown condition. 2. Integrity of the reactor containment building. 3. Operability of radioactive waste systems and decontamination facilities. 4. The availability and operability of a heat sink. 5. The integrity of power supplies and electrical equipment. 6. The operability and integrity of instrumentation including radiation monitoring equipment. In the latter instance this shall include portable equipment assigned to the emergency. 7. Availability of trained personnel and support services.	**EP M.1:** The following guidelines, as applicable to the specific situation, will be addressed prior to terminating the emergency: • The affected reactor is in a stable condition and can be maintained in that condition indefinitely. • Plant radiation levels are stable or are decreasing with time. • Releases of radioactive material to the environment have ceased or are being controlled within permissible limits. • Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel. • For a site area emergency or general emergency, discussions with plant management, applicable members of the SNC emergency organization, or offsite authorities do not result in identification of any valid reason for not terminating the emergency.	The SNC Standard Emergency Plan establishes standard wording for the consideration of the relaxation of protective measures.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Director will analyze the input from his advisors in the areas listed above to determine if plant restoration efforts can begin. The following criteria shall be considered appropriate for the consideration of relaxation of protective measures: 1. Plant parameters of operation no longer indicate a potential or actual emergency exists. 2. The release of radioactivity from the plant is controllable and no longer exceeds permissible levels and no danger to the public from this source is credible. 3. The plant is capable of sustaining itself in a long term shutdown condition. 4. Plant entry and clean-up is possible without workers receiving in excess of their permissible exposures.	**EP M.1** The following guidelines, as applicable to the specific situation, will be addressed prior to terminating the emergency: • The affected reactor is in a stable condition and can be maintained in that condition indefinitely. • Plant radiation levels are stable or are decreasing with time. • Releases of radioactive material to the environment have ceased or are being controlled within permissible limits. • Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel. • For a site area emergency or general emergency, discussions with plant management, applicable members of the SNC emergency organization, or offsite authorities do not result in identification of any valid reason for not terminating the emergency.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
B. ORGANIZATION The recovery organization which will conduct the activities of returning the plant toward its pre-emergency condition to the extent reasonable is described in Section II.B.3.	**EP M.1** The Recovery Manager will structure the recovery organization to accomplish the following general objectives: • Maintain comprehensive radiation surveillance of the site until levels return to normal. • Control access to the affected area of the plant and exposures to workers. • Decontaminate affected areas and equipment. • Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. • Isolate and repair damaged systems. • Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public. • Provide offsite authorities with plant status reports and information concerning the plant recovery organization. • Provide assistance with recovery activities undertaken by state and county authorities, if requested. • Provide public information on the status of recovery operations in releases to the media.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
C. NOTIFICATION The Emergency Director shall notify the Vice President – Nuclear Plant Site and company management that a decision has been reached to initiate a recovery operation. The ED shall then notify offsite agencies' representatives ensuring the NRC, and state and local authorities are provided with the same information. He shall also inform these agencies if any change in the structure of the recovery organization is to occur.	**EP M.3 Recovery Notification** Members of the ERO will be informed when Recovery is initiated. The recovery organization may be structured like the emergency response organization, with additional modifications depending on the nature of the accident, post-accident conditions, and other factors. The State EOC will be advised when the plant deems it safe to begin the reentry phase of the offsite recovery operation. If the Governor ordered an evacuation, the law requires the Governor to officially rescind the order before any return can be made to evacuated areas. The states are responsible for coordinating reentry procedures for the offsite population.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
VIII. MAINTAINING EMERGENCY PREPAREDNESS A. EXERCISES AND DRILLS Periodic drills and exercises will be conducted as described below. The scenarios for use in these drills will include the following elements: • The basic objective, • The date, time, place(s) and participating organizations, • The simulated event, • A time schedule of real and simulated events, • A narrative summary describing conduct of the drill.	**EP N.2.1** SNC-operated nuclear power plants shall ensure adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include: • Management and coordination of emergency response. • Accident assessment; • Event classification. • Notification of offsite authorities. • Assessment of the onsite and offsite impact of radiological releases. • Protective action recommendation development. • Protective action decision making. • Plant system repair and corrective actions.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Monitoring personnel shall be stationed at various locations to observe each individual's ability to perform his assigned emergency function. During drills and Nuclear Regulatory Commission (NRC) non-evaluated exercises, on-the-spot correction of erroneous performance and a demonstration of proper performance may be made by the monitoring personnel.	**EP N.4 Exercise Evaluation and Critique** A critique shall be conducted at the conclusion of the exercise, to evaluate the organization's ability to respond as called for in the SNC Standard Emergency Plan. Qualified personnel will observe and perform a critique of exercises and drills. Provisions will be made for federal, state, and local observers, as well as SNC personnel, to observe and critique required exercises.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
1. Radiation Emergency Exercises a. Exercises simulating radiation emergencies will be conducted on a frequency consistent with 10 CFR 50, Appendix E.IV.F. These scenarios will be varied from exercise to exercise such that all major elements of the plans and emergency organizations are exercised at least once every 8 years. These exercises will be preplanned with the following purposes: 1) To determine the effectiveness of the FNP emergency organization in handling emergencies, 2) To evaluate communications and action support with offsite agencies, 3) To evaluate the interface with and the response of the Company Emergency Organization, 4) Test the adequacy, timing, and content of the EIPs, 5) Test emergency equipment and communications networks, 6) Test the public Alert and Notification System, 7) Keep affected personnel aware of their role in the plan.	**EP N.2.1** SNC-operated nuclear power plants shall ensure adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include activities such as: • Management and coordination of emergency response. • Accident assessment. • Event classification. • Notification of offsite authorities. • Assessment of the onsite and offsite impact of radiological releases. • Protective action recommendation development. • Protective action decision making. • Plant system repair and corrective actions.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Both full-scale and small-scale exercises will be conducted and will include participation by appropriate State and local government agencies as follows: 1) A full scale exercises which tests as much of the Plant Farley, State, and local emergency plans as is reasonably achievable without mandatory public participation will be conducted on a biennial basis and evaluated by NRC and FEMA. (a) Biennial exercise scenarios will be submitted to the NRC under § 50.4 at least 60 days before use in the biennial exercise. (b) Each biennial exercise scenario will provide the opportunity for the ERO to perform their key skills, as applicable, to their emergency response duties in the CR, TSC, OSC, EOF, and joint information center to implement the EP principal functional areas. (c) Biennial evaluated exercises will be varied such that the following scenario elements are demonstrated over the course of an 8-year exercise cycle: • Hostile action directed at the plant site. • No radiological release or an unplanned minimal radiological release that does not require public protective actions. • Initial classification of or rapid escalation to a Site Area Emergency or General Emergency. • Implementation of strategies, procedures, and guidance developed under 10 CFR 50.54 (hh)(2). • Integration of offsite resources with onsite response.	**EP N.3** During the exercise planning cycle described in Section N.1.4, SNC sites vary the content of exercise scenarios to provide ERO members the opportunity to demonstrate proficiency in key skills necessary to respond to several specific scenario elements including: • Hostile Action directed at the plant site. • No radiological release, or unplanned release that does not require public protective actions. • An initial classification of, or rapid escalation to, a Site Area Emergency or General Emergency. • Implementation of strategies, procedures, and guidance developed in 50.54(hh) (i.e., potential aircraft threat, explosion or large fire). • Integration of offsite resources with on-site response. • A drill initiated between the hours of 6 p.m. and 4 a.m. • Drills using essentially 100 percent of Initiating Conditions in the 8- year cycle. Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations. A record of exercises conducted during the 8-year exercise planning cycle that documents the contents of scenarios used during that cycle shall be maintained in accordance with Drill and Exercise procedure guidance. SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
(d) An ingestion pathway exercise will be conducted on a frequency to ensure the States have the opportunity to participate in an ingestion pathway exercise at least once every exercise cycle.	**EP N.1.3 Ingestion Exposure Pathway Exercise** States within an ingestion exposure pathway EPZ are expected to exercise plans and preparedness related to ingestion exposure pathway measures at least once every 8 years. Opportunities are provided to any state or local government located within the plume exposure pathway EPZ to participate in annual drills and biennial exercises when requested by that state or local government.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2) A small scale exercise will be conducted each year that a full scale drill is not conducted. This small scale exercise will include a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities and tests at least one other component (e.g., medical or offsite monitoring) of the offsite emergency response plans for the company and State and local agencies within the plume exposure pathway EPZ. The principal functional areas of emergency response include: • Event classification. • Notification of offsite authorities. • Management and coordination of emergency response. • Accident assessment. • Assessment of the onsite and offsite impact of radiological releases. • Protective action recommendation development. • Protective action decision making. • Plant system repair and mitigative action implementation.	**EP N.2.1** SNC-operated nuclear power plants shall ensure adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include activities such as: • Management and coordination of emergency response. • Accident assessment. • Event classification. • Notification of offsite authorities; • Assessment of the on-site and offsite impact of radiological releases. • Protective action recommendation development. • Protective action decision making. • Plant system repair and corrective actions.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
c. For Nuclear Regulatory Commission (NRC) evaluated exercises, the NRC will be provided with a description of exercise objectives at least 75 days prior to the exercise. Participation in the exercise by the NRC shall be at their discretion.	**EP N.3** SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
d. The Alabama Emergency Management Agency will provide FEMA with a description of exercise objectives at least 90 days prior to a FEMA evaluated exercise. Participation in the exercise by FEMA shall be at their discretion.	No equivalent Plan/Annex statement.	The rule change directing submittal to the Nuclear Regulatory Commission by the site effectively separates the need to identify the offsite requirements for submittal.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
a. Periodic Emergency Drills 1) During each exercise cycle, periodic drills will be conducted to ensure the ERO teams (not necessarily each individual) are provided the opportunity to develop and maintain key emergency response skills within the scope of their duties. The ERO (not necessarily each ERO team) will be provided the opportunity to demonstrate key skills in response to the following scenario elements in drills or exercises. • All functions in each ERF (e.g., all ERFs that are responsible for dose assessment perform those duties in response to a radiological release). • Use of alternative facilities to stage the ERO for rapid activation during hostile action. • Real-time staffing of facilities during off-hours (i.e., 6:00 p.m. to 4:00 a.m.). • Providing medical care for injured, contaminated personnel (every 2 years). • Response to essentially 100 percent of initiating conditions identified in the site emergency plan implementing procedure for classification of emergencies. • Response to actual industry event sequences appropriate for the nuclear plant technology (e.g., PWR). • Use of procedures developed in response to an aircraft threat and in compliance with 10 CFR 50.54 (hh)(1). • Use of the strategies associated with 10 CFR 50.54 (hh)(2) to mitigate spent fuel pool damage scenarios (all strategies, such as makeup, spray, and leakage control, but not every variation of a given strategy). • Use of the strategies associated with 10 CFR 50.54 (hh)(2) to mitigate reactor accidents and maintain containment.	**EP N.3** During the exercise planning cycle described in Section N.1.4, SNC sites vary the content of exercise scenarios to provide ERO members the opportunity to demonstrate proficiency in key skills necessary to respond to several specific scenario elements including: • Hostile Action directed at the plant site. • No radiological release, or unplanned release that does not require public protective actions. • An initial classification of, or rapid escalation to, a Site Area Emergency or General Emergency. • Implementation of strategies, procedures, and guidance developed in 50.54(hh) (i.e., potential aircraft threat, explosion or large fire). • Integration of offsite resources with onsite response. • A drill initiated between the hours of 6 p.m. and 4 a.m. • Drills using essentially 100 percent of Initiating Conditions in the 8-year cycle Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations. A record of Exercises conducted during the 8-year exercise planning cycle that documents the contents of scenarios used during that cycle shall be maintained in accordance with Drill and Exercise procedure guidance.. SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Fire Drills 1) Fire Drills will be conducted with fire brigade members as required by the plant's FSAR. 2) Fire Drills will be conducted annually which will involve the Dothan Fire Department.	**EP N.2.3:** Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures. **Annex 2.3.1:** Fire Drills will be conducted annually and will involve the Dothan Fire Department.9	The commitment was relocated to the SNC Standard Emergency Plan and Site Annex
c. Medical Emergency Drills A medical emergency drill will be conducted annually which will involve ambulance and offsite medical treatment facility participation.	**EP N.2.4:** A medical emergency drill, involving a simulated contaminated individual, and containing provisions for participation by local support services organizations including ambulance response, are conducted annually at the nuclear plants.	The commitment was relocated unchanged to the SNC Standard Emergency Plan.
d. Radiological Monitoring Drills Radiological monitoring drills will be conducted annually which will include initiating onsite and offsite radiological monitoring of vegetation, soil, water, and air.	**EP N.2.5 Environs Drills** Plant environs and radiological monitoring drills are conducted annually. These drills include collection and analysis of sample media and provisions for communications and record keeping. These drills also evaluate the response to, and analysis of, simulated airborne and direct radiation measurements in the environment.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
e. Health Physics Drills Health Physics drills will be conducted semiannually which will involve response to simulated elevated airborne and liquid samples and direct radiation measurements in the plant environment. Analysis of reactor coolant samples including use of the post accident sampling system will be conducted annually.	**EP N.2.6:** Radiation Protection Drills involving a response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements are conducted semi-annually. At least annually, these drills shall include a demonstration of the sampling system capabilities, as applicable.	The commitment was relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
f. Appropriate local, state, and federal agencies will be advised of major drills in advance to allow their observation or participation. All observing or participating agencies will be requested to provide comments on drill evaluation and it will be the responsibility of the Plant Manager to implement corrective action as appropriate.	**EP N.3** The EP group will also coordinate efforts with appropriate federal, state, and local emergency organizations and agencies, schedule a date to conduct the drill or exercise, and assign qualified controllers. **EP N.4 Exercise Evaluation and Critique** Qualified personnel will observe and perform a critique of exercises and drills. Provisions will be made for federal, state, and local observers, as well as SNC personnel, to observe and critique required exercises.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<u>3. Evaluations and Corrective Actions</u> A formal critique will be performed for all exercises, drills, and training that provide performance opportunities to develop, maintain, or demonstrate key skills in order to identify weak or deficient areas that need correction. All observing or participating agencies will be requested to provide comments on drill evaluation. Any weaknesses or deficiencies that are identified in a critique of exercises, drills, or training will be corrected. Corrective action, as appropriate, for company onsite and offsite weaknesses shall be the responsibility of the Vice President-Nuclear Plant Site. Corrective action, as appropriate, for company public information weaknesses shall be the responsibility of the APC Public Relations Senior Vice President and the SNC Vice President and General Counsel.	**EP N.5 Exercise/Drill Corrective Actions** The critique and evaluation process is used to identify areas of the Emergency Preparedness Program that require improvement. The Emergency Preparedness group is responsible for evaluating recommendations and comments, determining which items will be incorporated into the program or require corrective actions, and for scheduling, tracking, and evaluation of item resolution. Whenever exercises or drills indicate deficiencies in the SNC Standard Emergency Plan, site-specific Annexes, corresponding implementing procedures, or training lesson plans, such documents will be revised as necessary. The results of exercise critiques, particularly comments on identified areas that require improvement or reevaluation, will be submitted to the Emergency Preparedness Supervisor or designee, for review. The Emergency Preparedness Supervisor or designee will consult with responsible department heads and assign corrective action activities, as appropriate.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
B. TRAINING 1. Training of the Plant Emergency Organization All Farley Nuclear Plant personnel, including those assigned on a temporary basis or in a training status, will receive a thorough orientation on all emergency plans and procedures required to ensure their safety. Changes in emergency plans and EIPs applicable to all plant personnel will be presented using training notices or other appropriate means.	**EP O.4.8:** General Employee Training (GET). GET will include general training in emergency preparedness for plant and other site personnel.	The SNC Standard Emergency Plan standardizes wording for generic emergency preparedness training and specifies a location for the training without change in intent.
Persons with specific duties during an emergency will receive additional training appropriate to their respective assignments. The responsibility for coordinating their training is that of the Plant Training Manager.	**EP O.1** The ERO Training Program ensures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency. Specific emergency response task training, prepared for response positions, is described in lesson plans and study guides.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Continuing training will be provided to all personnel as described below: Specific training that will be conducted is listed below: a. Emergency Director Training (annually) members of the plant staff who may serve as Emergency Director will receive training in: 1) Supervision of emergency teams, 2) Emergency assessment including interpretation of data and estimation of radiation exposure, 3) Coordination and communication with offsite groups.	**EP O.4 ERO Training** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position specific responsibilities. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned on-site emergency response positions will receive training specific to their position.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Field Monitoring Team Training (annually) This training will be given to plant and vendor personnel that may be required to perform surveys in-plant, on the environment, or at SAMC. It will include instruction in the selection and use of survey instruments and air sampling equipment and in re-entry criteria.	**EP O.4.3 Radiological Field Monitoring Teams** Radiological Field Monitoring Team personnel will receive classroom and hands-on training for the actions they will be expected to perform during an emergency. The following general topics will be included in the training: • Equipment and equipment checks. • Communications. • Plume tracking techniques. • Personnel monitoring. • Emergency exposure criteria. • Locations and use of radiological emergency equipment.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
c. First Aid Training (triennially) Plant personnel will be considered first aid qualified upon successful completion of the Company's - First Aid and CPR Course.	**EP O.4.6 Medical Support** On-site medical personnel receive specialized training in the handling of contaminated victims and hospital interface. Offsite ambulance and hospital personnel are offered annual training as outlined in Section O.1.1.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
d. Fire Control (per FSAR requirements) A training program for the plant employees that serve on fire fighting teams is conducted under the direction of the Plant Training Manager. This course covers methods and equipment for fighting all types of fires that could occur on the site. Appropriate emphasis is placed on the radiological aspects of fire fighting. Drills and critiques are conducted periodically to train Fire Brigade personnel and to maintain their efficiency.	**EP O.4.4 Fire Brigade Training** Individuals assigned to Fire Brigade shall maintain fire brigade qualifications.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
e. Emergency Repair Party Training (annually) Maintenance and I and C personnel who may be assigned to the Emergency Repair Party receive training in Radiation Control Procedures as part of their normal plant training. Personnel selected for Emergency Repair Party work will possess the required journeyman skills for the particular activity.	**EP O.4.5 Operations, Maintenance, Chemistry, and Radiation Protection Training** Operations, Maintenance, Chemistry, and Radiation Protection personnel who would be assigned to Repair and Damage Control Teams are trained as part of their normal job-specific duties to respond to both normal and abnormal plant operations.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
f. Security Personnel (annually) Security personnel will receive training on FNP-0-EIP-7, "Security Support to the Emergency Plan", including personnel evacuation and accountability, access control, vehicle escort, and bomb search activities. Personnel will also receive training on Contingency Implementing Procedure 13 covering security activities during fire, explosion, or other catastrophe.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan maintains the commitment to train all personnel assigned Emergency Plan requirements in addition to those not assigned to the ERO. Security training requirements are also controlled in the Security Plan.
g. Communications Personnel (annually) Personnel responsible for the transmission of emergency information and instructions will receive training in accordance with Appendix 10(J).	**EP O.4.7 News Media Training** Local news media personnel will be offered an annual training opportunity as described in Section G.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
2. Training of the Corporate Emergency Organization Information related to corporate emergency organization training is provided in Appendix 7(G).	**EP O.4 ERO Training** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned on-site emergency response positions will receive training specific to their position.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
3. Training of Local Services Groups Offsite groups, such as fire departments, police and sheriff's departments, and ambulance services, that may participate in onsite activity will be encouraged to attend a training course to ensure that they are familiar with the plant layout and their actions in the event of radiological and non-radiological incidents. The Plant Training Manager is responsible for coordinating this training.	**EP O.1.1 Training of Local Services Groups** A training opportunity will be offered annually for offsite organizations and agencies as specified in respective agreements and understandings. In addition, those offsite organizations and agencies that may provide onsite emergency assistance will be encouraged to become familiar with the general layout of SNC plants, and will be invited to attend applicable Emergency Plan training and orientation courses. Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
4. Training of SNC Emergency Planners The EP Supervisor, Emergency Planning Coordinator, and other individuals with emergency planning responsibilities are trained by self-study and by attending industry seminars, short courses, workshops, etc.	**EP O.5 Emergency Preparedness Staff Training** Training for the Emergency Preparedness Staff at an SNC-operated plant consists of initial and continuing training process. Details can be found in site specific procedures and processes.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
C. INSPECTION, CALIBRATION AND TESTING OF EMERGENCY EQUIPMENT AND SUPPLIES To insure the operational readiness of emergency supplies and equipment the following will be performed: 1. Periodic calibration using manufacturers' recommendations as guidelines on all portable emergency instrumentation designated for emergency use. This includes both onsite equipment and offsite equipment at SAMC supplied by APC/SNC. 2. Inspection quarterly of all onsite and SAMC emergency equipment and supplies designated for emergency use and supplied by APC/SNC. The purpose of the inspection is to ensure that the inventory is correct, that the supplies are functional and that instrument calibration is current. 3. An adequate reserve of emergency equipment will be maintained to allow for equipment taken out of service for repair, calibration, or replacement.	**Annex 5.5 Emergency Kits (SEP H.9)** Emergency supplies and equipment are located at various places at the plant. Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Equipment in these kits is calibrated in accordance with the suppliers' recommendations. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	The wording was relocated and transferred to the Site Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
4. Communications Checks a. Communications checks will be performed monthly with all locations which are part of the Emergency Notification Network.	**Annex 5.4** Communication channels with the state of Alabama, the state of Georgia, the plume exposure pathway EPZ counties, and the NRC (with the exception of ERDS) are tested each calendar month, using the extensions in the Control Room, the TSC, and the EOF. ERDS is tested each calendar quarter. Communications procedures and systems are also tested each calendar year.	The wording was relocated and transferred to the Site Annex.
b. The Emergency Notification System shall be tested at least monthly. c. The telephone numbers of organizations listed in FNP-0-EIP-8.1 will be updated quarterly and verified annually.	**EP F.3 Communications Tests** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages in the test. • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
d. The EOF/TSC/OSC conference capability will be tested at least annually.	**EP F.3 Communications Tests** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages utilized in the test. • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
e. Radio communication equipment for Field Monitoring Team communications will be tested at least annually.	**EP F.3 Communications Tests** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages utilized in the test. • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.	The wording was relocated and transferred to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
e. The public Alert and Notification System will undergo a full activation test at least annually.	**EP F.3Communications Tests** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages utilized in the test. • The fixed siren portion of the Alert and Notification System (ANS) will be tested and verified in accordance with existing FEMA approvals.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<u>D. REVIEW AND UPDATING OF THE PLAN AND PROCEDURES</u> Responsibility for the planning effort, including review and updating of the emergency plans and procedures, is described in Appendix 9(I).	**EP P.3** EPIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.	The wording was relocated and transferred to the SNC Standard Emergency Plan.
APPENDIX 1(A) EMERGENCY SUPPLIES AND EQUIPMENT		The SNC Standard Emergency Plan and Annex maintain the commitment to perform the functions required to implement the Emergency Plan. Equipment and supplies necessary to perform those functions are maintained in the procedure and surveillance processes.
APPENDIX 2(B) INDEX Letters of Agreement on File		The agencies for which LOA are maintained are incorporated in the description of provided services in the respective sections of the SNC Standard Emergency Plan and Site Annex. A separate listing of LOAs is no longer required.
APPENDIX 3(C) **RADIATION MONITORING SYSTEM**		The SNC Standard Emergency Plan and Annex maintain the commitment to perform the functions required to implement the Emergency Plan. Equipment and supplies necessary to perform those functions are maintained in the procedure and surveillance processes.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
APPENDIX 4(D) I. EMERGENCY PLAN PROCEDURES		The SNC Standard Emergency Plan and Annex will be implemented through a function-based procedure scheme developed parallel with the approval and implementation process as part of this submittal.
APPENDIX 5(E) **EVACUATION TIME ESTIMATES FOR THE FARLEY NUCLEAR PLANT**	Annex Appendix A	The wording was relocated and transferred to the Site Annex.
APPENDIX 6(F) SUPPORTING EMERGENCY PLANS	Annex Appendix C	The wording was relocated and transferred to the Site Annex.
APPENDIX 7(G) EMERGENCY OPERATIONS FACILITY	The information is in the Standard SNC Standard Emergency Plan and Farley Annex.	The SNC Standard Emergency Plan incorporates the Central EOF into the overall Plan and addresses EOF functions in the respective Plan areas rather than as a separate appendix.
Appendix 7 A.3: Upon notification of an ALERT or higher classification or as directed by the ED, the EOF will be activated as described in emergency implementing procedures.	**EP H.2.1:** Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 7 A.3: Offsite support personnel and equipment will be dispatched to the site Operations Support Center (OSC) or Technical Support Center (TSC) upon request from the specific site Emergency Director.	**EP B.2.1.15**: The Support Coordinator reports to the TSC Manager and directs the clerical and logistic activities in the TSC, ensures support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers, and ensures office supplies, drawings, and other documents are available to TSC and OSC personnel.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 A.3: The corporate emergency organization will provide offsite emergency response support and resources to SNC sites 24 hours per day until the emergency has been terminated.	**EP B.3.1.3 EOF Support Coordinator** The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the Technical Support Center (TSC) for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan integrates the Corporate response as part of the trained and qualified ERO. A separate statement is not necessary.
Appendix 7 A.3: The EOF will be activated for an ALERT, SITE AREA or GENERAL emergency classifications.	**EP H.2.1:** Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: This facility (EOF) will be operational within about an hour of the initial notification.	**EP B.2:** Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF), and JIC are detailed below.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.
Appendix 7 A.3: SNC's goal is to begin notification of all required on-call Emergency Response Organization (ERO) personnel as soon as practicable, within 15 minutes, following the declaration of an Alert emergency or higher emergency classification at any SNC site.	No equivalent Plan/Annex statement.	The SNC Standard Emergency Plan moves to a commitment to activate facilities within a timeframe of 75 minutes. Notification of the responding ERO is a step in the overall process and not needed as a separate commitment. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 A.3: Upon notification of an ALERT or higher classification or as directed by the ED, the EOF will be activated as described in emergency implementing procedures.	**EP H.2.1:** Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 7 A.3: Offsite support personnel and equipment will be dispatched to the site Operations Support Center (OSC) or Technical Support Center (TSC) upon request from the specific site Emergency Director.	**EP B.2.1.15**: The Support Coordinator reports to the TSC Manager and directs the clerical and logistic activities in the TSC, ensures support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers, and ensures office supplies, drawings, and other documents are available to TSC and OSC personnel.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 7 A.3: The corporate emergency organization will provide offsite emergency response support and resources to SNC sites 24 hours per day until the emergency has been terminated.	**EP B.3.1.3 EOF Support Coordinator** The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the TSC for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan integrates the Corporate response as part of the trained and qualified ERO. A separate statement is not necessary.
Appendix 7 A.3: The EOF will be activated for an ALERT, SITE AREA or GENERAL emergency classifications.	**EP H.2.1:** Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: This facility (EOF) will be operational within about an hour of the initial notification.	**EP B.2:** Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF), and JIC are detailed below.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 A.3: Any outside doors that do not have security guards are accessible only by SNC ID badges.	**EP H.2.1:** Access to the EOF is controlled through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: If an event were to occur during off-normal hours, a guard will be posted at the main entrance to Building 40 to allow access to offsite agency or other responders without pre-designated ID access.	**EP H.2.1:** Access to the EOF is controlled through the use of electronic card readers	No equivalent Plan statement. NRC has indicated Security concerns over buildings accessible to the general public and may want a more positive statement of building control.
Appendix 7 B: The EOF Organization is displayed in Figure 1 and typical duty assignments are shown on Table 1.	**EP Figure B.2.D** EOF Organization Chart. **EP B.3** Listing of typical duty assignments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B: Each of the following EOF positions has site-specific personnel designated: EOF Manager EOF Technical Supervisor	**EP B.3.1.2 EOF Manager** The EOF Manager reports to the EOF ED and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment as necessary, coordination with offsite agencies, and approving news releases. **EP B.3.1.19 EOF Technical Supervisor** The Technical Supervisor reports to the EOF Manager and is responsible for providing engineering expertise during an emergency event at an SNC operated plant. This may include interacting with non-SNC response groups, developing mitigation and recovery plans, and coordinating work performed by SNC and non-SNC engineering groups.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 B: In order to augment additional staff that may be needed in the unlikely event of a multi-site accident, SNC will re-activate its ERO notification system.	**EP B.3.1.3 EOF Support Coordinator** The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the TSC for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.	General statement on activation of the ERO is sufficient for staffing.
Appendix 7 B: When the EOF is activated, all EOF staff pagers are activated, and all EOF personnel are expected to report to the EOF.	**EP B.2:** Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF), and JIC are detailed below.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 B.1: The EOF Managers will typically have either previous plant specific SRO background or long-term supervisory/management experience.	**EP O.1 Training** To achieve and maintain an acceptable level of emergency preparedness, training will be conducted for members of the Emergency Response Organization (ERO) and those offsite organizations that may be called on to provide assistance in the event of an emergency. The ERO Training Program ensures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency. Specific emergency response task training, prepared for response positions, is described in lesson plans and study guides. The lesson plans, study guides, and written tests are contained in the ERO Training Program. Responsibilities for implementing the training program are contained in plant procedures. Offsite training is provided to support organizations that may be called on to provide assistance in the event of an emergency.	The commitment was modified to required qualified personnel.
Appendix 7 B.1: The duties and responsibilities of the EOF Manager are as follows: (As listed in App. 7, 14 items listed)	**EP B.3.1.1:** The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 B.2: The EOF Technical Supervisor will typically have plant specific long-term engineering/design experience.	**EP B.3.1.19 EOF Technical Supervisor** The Technical Supervisor reports to the EOF Manager and is responsible for providing engineering expertise during an emergency event at an SNC operated plant. This may include interacting with non-SNC response groups, developing mitigation and recovery plans, and coordinating work performed by SNC and non-SNC engineering groups.	The commitment was modified to required qualified personnel.
Appendix 7 B.2: The duties and responsibilities of the EOF Technical Supervisor are as follows: (As listed in App. 7, 7 items listed)	**EP B.3.1.19**: The Technical Supervisor reports to the EOF Manager and is responsible for providing engineering expertise during an emergency event at an SNC operated plant. This may include interacting with non-SNC response groups, developing mitigation and recovery plans, and coordinating work performed by SNC and non-SNC engineering groups.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.3: The duties and responsibilities of the EOF Support Coordinator are as follows: (As listed in App. 7, 8 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.3:** The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the TSC for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.4: The TSC will initially be responsible for dose projection and field team control activities.	**EP B.2.1.5:** The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions, and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 B.4: When the EOF is activated and ready to assume functions of dose projection/ assessment activities, then the EOF Dose Assessment Supervisor will coordinate transfer of dose assessment, field team control, and protective action determination from the TSC to the EOF.	**Figure B.2.A** **EP B.3.1.4**: The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies.	Figure B.2.A describes the transfer of non-delegable responsibilities between the ERFs. Section B.3 provides the overall responsibility of EOF responders. The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.4: The duties and responsibilities of the EOF Dose Assessment Supervisor are as follows: (As listed in App. 7, 7 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.4:** The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.5: The duties and responsibilities of the Security Coordinator are as follows: (As listed in App. 7, 3 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.11:** The Security Coordinator reports to the EOF Manager. The duties and responsibilities of the Security Coordinator will be assumed by SNC corporate security personnel. Responsibilities include supporting the plant security manager, keeping the EOF Manager informed of any security events or issues, communication of security-related information to the NRC using the Security Bridge line, and establishing and maintaining access control for the EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.6: The duties and responsibilities of the Offsite Response Coordinator are as follows: (As listed in App. 7, 2 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.12:** The Offsite Response Coordinator reports to the EOF Manager. The duties and responsibilities of the Offsite Response Coordinator include coordination of activities for the dispatch and update of technical liaisons to state and local authorities, and monitoring EOF functional areas to facilitate coordination between the licensee and state and local agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 C: Initial notifications or emergency response personnel will follow the guidelines specified in the site specific Emergency Plan and Emergency Plan Implementing Procedures.	**EP E.2.1:** Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 C.1: The On-call EOF Manager will be notified of all emergencies classified at any SNC site.	**EP E.2.1:** Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: The EOF is located in Birmingham, Alabama and serves as the EOF for all SNC sites (VEGP, FNP, and HNP).	**EP H.2.1:** The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: The EOF will be activated as prescribed in the site specific Emergency Plan implementing procedures.	**EP H.2.1:** Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Plant systems information, radiological data, and meteorological data are provided via the SNC Integrated Data Display System to EOF personnel.	**EP H.5.1:** A permanent meteorological monitoring station is located near the plant for the acquisition and recording of wind speed, wind direction, and ambient and differential temperatures for use in making offsite dose projections. Meteorological information is displayed in the CR, TSC, and EOF. **EP H.5.3.2:** The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Data displays are located in the main caucus area of the EOF, dose assessment area, plant status area, and engineering area within the facility.	**EP H.5.1:** Meteorological information is displayed in the CR, TSC, and EOF using the plant computer system **EP H.5.3.2:** The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 D.1: Data is also available to all state agencies responding to the EOF.	**EP H.2.1 Emergency Operations Facility** The EOF is capable of accommodating designated SNC personnel and offsite local, state, and federal responders including NRC and FEMA. It is anticipated that representatives from the state(s) of Georgia, South Carolina, Alabama, or Florida may be dispatched to the EOF for an event at specific SNC site(s). Responders from state and local agencies have access to plant parameters through the various data displays available in the EOF. See Figure H.2.A.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: This data is available to state and local authorities via a secure network dedicated to data distribution among the various offsite emergency response facilities.	**SECTION I: ACCIDENT ASSESSMENT** **EP I.1 Systems and Parameters Monitored** Select plant parameters are available to state and local authorities on a secure network dedicated to data distribution among the various offsite emergency response facilities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Data may also be obtained manually via telephone from the Control Room and the TSC to the EOF.	**EP F.1.1:** At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and other locations on-site and offsite including the Joint Information Center near the SNC site.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Contained within the facility will be the manpower and equipment necessary to provide dedicated direct communication links to the plant site(s).	**EP F.1.1:** At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and other locations onsite and offsite including the Joint Information Center near the SNC site. **EP Section B: Emergency Response Facility (ERF) Communicators**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 D.1: In addition, there are commercial and company wide phone systems to and from the site(s).	**EP F.1.1:** Reliable primary and backup means of communication have been established. **Annex Section 5.3.2:** Commercial telephones or land lines provide backup for the ENN.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: A communication link will be established and maintained between the Emergency Operations Facility and the Technical Support Center (TSC) until the emergency director determines that the communication link is no longer needed.	**EP F.1.1:** At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and other locations onsite and offsite including the Joint Information Center near the SNC site	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Computer workstations are dedicated for performing dose assessment for multiple sites.	No equivalent Plan statement.	Dose Assessment (Section I) describes the dose assessment function and equipment needed to support that function. Section B identifies required personnel.
Appendix 7 D.1: The EOF is sized to accommodate 35 persons, including 25 pre-designated persons, 9 persons from the NRC, and 1 person from the Federal Emergency Management Agency (FEMA).	**EP H.2.1:** The EOF is capable of accommodating designated SNC personnel and offsite local, state, and federal responders including NRC and FEMA.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Table 4 provides additional information concerning EOF communications capabilities.	**EP F Table 5**	The SNC Standard Emergency Plan and Annex provide commitments to maintain the communications capabilities within the ERO, for required offsite responders, and to the public through the Joint Information System. The detailed physical description of equipment maintaining those commitments is subject to change and not necessary to ensure the effective implementation of the Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 D.1: Upon activation of the EOF, Corporate personnel will provide staffing 24 hours per day until directed otherwise by the Emergency Director.	**EP B.3.1.3 EOF Support Coordinator** The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the Technical Support Center (TSC) for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.	The SNC Standard Emergency Plan incorporates the EOF as part of the general ERO supporting ongoing operations. The separate statement is not required.
Appendix 7 D.1: The EOF is a dedicated facility.	**EP H.2.1:** The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Back-up power for the EOF is supplied by onsite diesel generation. All essential equipment is backed up by the diesel generation system.	**EP H.2.1:** Backup power for the EOF is supplied by onsite diesel generation. Essential equipment is backed up by the diesel generation system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: The following records or information are available: Technical Specifications. Selected plant operating procedures. Emergency Plans. Emergency Plan Implementing Procedures. FSARs. State and local emergency response plans. Savannah River Site Emergency Plan.	**EP H.2.1:** The EOF is located at SNC Corporate Headquarters with the document management section for SNC. The following records or information are available: • Technical Specifications. • Selected plant operating procedures. • Emergency Plans. • Emergency Plan Implementing Procedures. • Final Safety Analysis Reports (FSARs). • System piping and instrumentation diagrams and HVAC flow diagrams. • Electrical one-line, elementary, and wiring diagrams.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 D.2: In the unlikely event that individuals should need to respond to the EOF from within the 10 mile EPZ of any SNC plant, they would be surveyed prior to release by local emergency authorities.	No equivalent Plan/Annex statement	Egress of personnel from the EPZ falls under the provisions of the State Plan. A statement in the SNC Standard Emergency Plan is not required.
Appendix 7 D.2: In the unlikely event that the EOF becomes uninhabitable, resources and personnel will be transferred to the Corporate Headquarters of Alabama Power Company.	No equivalent Plan/Annex statement	The corporate EOF is located outside the reasonable expectation for damage based on a naturally occurring event beyond the design basis of the site. Should the EOF be so damaged, the site can re-assume control of the event.
Appendix 7 E.1: Provisions have been made to have direct NRC FTS lines in the TSC and the EOF during an emergency.	**EP F.1.4:** Communication with the Nuclear Regulatory Commission (NRC) is on the Federal Telephone System (FTS) telephone network, which connects the SNC plant site and EOF with the NRC Operations Center.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 F.2.4: The GPC Central Laboratory has personnel and facilities available to provide offsite monitoring, sample analysis, and dosimetry processing for the affected site.	**EP H.6.3:** External facilities for counting and analyzing samples and for dosimetry processing can be provided by other SNC-operated plants including the GPC Central Laboratory, state, federal or contracted laboratories. Outside analytical assistance may be requested from state and federal agencies, or through contracted vendors. The DOE, through the Radiological Assistance Program (RAP) has access to any national laboratory.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.1: Corporate personnel identified in the Emergency Response Organization receive training.	**EP O.4:** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 G.1.1: The training consists of familiarization with the Site Emergency Plans and applicable emergency implementing procedures required to carry out their specific functions.	**EP O.4:** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.1: A training matrix for corporate personnel assigned to the ERO is shown in Table 2, and training course summaries are presented in Table 3. Training will be documented in accordance with established practices.	**EP O.4:** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities. **EP O.4.**1: ERO members will receive Emergency Plan training on an annual basis. Personnel identified receive training appropriate to their position in the areas of: • Accident assessment. • Accident mitigation. • Notifications. • Emergency Classifications. • Protective Action Recommendations. • Emergency Action Levels. • Emergency Exposure Control.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.1: The corporate emergency planning coordinator(s) are responsible for assuring that training is conducted for corporate emergency response personnel each calendar year.	**EP O.4:** SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E and position-specific responsibilities.	The SNC Standard Emergency Plan maintains the commitment to conduct the training for corporate personnel. Who conducts the training may depend on specific areas of expertise and has no purpose in the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 G.1.2: Drills/ exercises will be conducted each calendar year to test the performance of implementing procedures, personnel, and emergency equipment. These drills/exercises will be conducted with each SNC site.	**EP N.1 Exercises** SNC-operated nuclear power plants will conduct a biennial exercise and additional periodic drills. An exercise is an event that tests integrated capability and a major portion of the basic elements of emergency preparedness plans and organizations. Drills or exercises shall: • Test the adequacy of timing and content of implementing procedures and methods. • Test emergency equipment and communications networks. • Test the public notification system. • Ensure emergency organization personnel are familiar with their duties. SNC-operated nuclear power plants conduct an emergency response exercise to demonstrate the effectiveness of the SNC Standard Emergency Plan on a frequency determined by the NRC. Exercises may include mobilization of state and local personnel and resources, and are intended to verify their capability to respond to an accident.	The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.
Appendix 7 G.1.2: EOF activation is required at least 3 times annually (1 scenario per site per year).	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.
Appendix 7 G.1.2: At least 1 activation every 5 years will require a concurrent EOF support response for more than one SNC site.	N.2.11 Multi-Site Drill At least once in every five years, a drill involving more than one SNC site will be conducted demonstrating the ability of the Common EOF to effectively implement the Emergency Plan for an event involving more than one site.	The SNC Standard Emergency Plan incorporates the EOF multi-site drill into the base Plan response.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Appendix 7 G.1.2: Each drill/exercise will test, as a minimum, the communication links and notification procedures.	**EP N.1:** Drills and exercises shall: • Test the adequacy of timing and content of implementing procedures and methods. • Test emergency equipment and communications networks. • Test the public notification system. • Ensure that emergency organization personnel are familiar with their duties.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.2: Provisions are made for critique of all drills/exercises.	**EP N.4:** A critique shall be conducted at the conclusion of the exercise, to evaluate the organization's ability to respond as called for in the SNC Standard Emergency Plan.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.2: Critique items will be forwarded to the site emergency preparedness coordinator for processing in the site specific corrective action program.	**EP N.5:** The Emergency Preparedness group is responsible for evaluating recommendations and comments, determining which items will be incorporated into the program or require corrective actions, and for scheduling, tracking, and evaluating item resolution. Whenever exercises or drills indicate deficiencies in the SNC Standard Emergency Plan, site-specific Annexes, corresponding implementing procedures, or training lesson plans, such documents will be revised as necessary.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 8: FARLEY NUCLEAR PLANT EMERGENCY PLAN NUREG 0654 CROSS REFERENCE INDEX	No equivalent Plan/Annex cross reference	The SNC Standard Emergency Plan and Annex are structured in the same manner as NUREG-0654 Revision 1. The Plan/Annex as reflected in the Table of Contents functions as the cross-reference.
APPENDIX 9(I) RESPONSIBILITY FOR THE PLANNING EFFORT	**SECTION P: RESPONSIBILITY FOR THE PREPAREDNESS EFFORT**	The commitment was relocated to the SNC Standard Emergency Plan as described below.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Responsibility for the Planning Effort The Executive Vice President/Chief Nuclear Officer (CNO) Southern Nuclear Operating Company(SNC)has overall responsibility and authority for all nuclear activities, including the emergency planning (EP) programs. Reporting to the Executive Vice President is the Vice President Fleet Operation Support and the Vice President - Nuclear Plant Site.	**EP Section P Introduction:** The Executive Vice President/Chief Nuclear Officer (CNO) Southern Nuclear Operating Company (SNC) has overall responsibility and authority for all nuclear activities, including the Emergency Planning (EP) program.	The commitment was relocated to the SNC Standard Emergency Plan.
The SNC Emergency Planning program is comprised of two distinct and integral functions; emergency planning and emergency preparedness. Responsibility for the performance of these functions is assigned to various members of the SNC Organization and coordinated as follows.	No direct equivalent Plan/Annex statement	The SNC Standard Emergency Plan integrates the overall Emergency Planning/Preparedness effort. The distinction previously separating corporate and site responsibilities is eliminated.
The Vice President Regulatory Affairs has Fleet responsibility for emergency planning.	**EP P.1:** The Vice President Regulatory Affairs has Fleet responsibility for emergency planning.	The commitment was relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager has overview management responsibility for the Fleet SNC Emergency Planning program effort. The Fleet Emergency Preparedness Manager is responsible for overseeing emergency planning activities offsite and coordinating those activities with Licensee, Federal, State and local response organizations.	**EP P.1:** The Fleet Emergency Preparedness Manager is responsible for the oversight of Emergency Planning activities and coordinating those activities with Licensee, federal, state, and local response organizations.	The commitment was relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Planning Coordinator(s) reports to the Fleet Emergency Preparedness Manager in support of this effort.	**EP P.1** Strategic direction for the emergency preparedness program and maintenance of the SNC Emergency Plan(s) is provided by the SNC Fleet Emergency Preparedness Director. Emergency Preparedness Coordinator(s) coordinate functional elements of the emergency preparedness program for the SNC fleet under the direction of the Fleet Emergency Preparedness Director.	The commitment was relocated to the SNC Standard Emergency Plan.
The Emergency Plans are maintained by the Fleet Security and Emergency Preparedness Manager.	**EP P.1** The Fleet Emergency Preparedness Director is responsible for the oversight of Emergency Preparedness activities and coordinating those activities with Licensee, federal, state, and local response organizations. The Fleet Emergency Preparedness organization in the SNC Corporate office provides oversight and support for site and corporate functions.	The commitment was relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager provides strategic direction for SNC emergency planning and coordinates with site management through the Vice President – Fleet Operations Support.	**EP P.1:** The Vice President Regulatory Affairs has Fleet responsibility for emergency planning. **EP P.1:** The Fleet Emergency Preparedness Manager is responsible for the oversight of Emergency Planning activities and coordinating those activities with Licensee and federal, state, and local response organizations.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Planning Coordinator(s) coordinate site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor.	**EP P.2** The Emergency Preparedness Supervisor is responsible for coordinating on-site emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.	The commitment was relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Planning Coordinator(s) review Emergency Plan changes to determine if the effectiveness of the specific plans have been reduced. Emergency Plan changes which are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	**EP P.1** Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	The commitment was relocated to the SNC Standard Emergency Plan.
Emergency Preparedness: The Vice President – (Nuclear Plant Site) is responsible for the site Emergency Preparedness aspects of the program..	**EP P.2:** The Vice President-(Site) is responsible for the site Emergency Preparedness aspects of the program.	The commitment was relocated unchanged to the SNC Standard Emergency Plan.
The Emergency Preparedness Supervisor is responsible for coordinating emergency preparedness activities onsite and supports offsite emergency preparedness activities in the vicinity of the plant.	**EP P.2** The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President – (Nuclear Plant Site).	**EP P.2** The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President-(Site) for Plants Hatch and Farley. During project construction for Vogtle 3 and 4, the Vogtle 1-2 Emergency Preparedness Supervisor reports to the Site Integration Director. The Vogtle 3-4 Emergency Preparedness Supervisor reports to the Emergency Preparedness/Security Project Manager, who reports to the Site Integration Director.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Planning Supervisor is responsible to the Regulatory Affairs Manager for implementation of emergency planning strategies.	**EP P.3** EPIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Coordination: The Fleet Emergency Preparedness Manager coordinates site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor. The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and procedure development and maintenance.	**EP P.3** The Fleet Emergency Preparedness Director coordinates site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor. The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and program maintenance activities.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Figure 1 shows the EP Organization.	**EP Figure P.1**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager, Emergency Planning Coordinator, Emergency Preparedness Supervisor, and other individuals with emergency planning responsibilities are trained by self-study and by attending industry seminars, short courses, workshops, etc.	**EP O.5 Emergency Preparedness Staff Training** Training for the Emergency Preparedness Staff at an SNC-operated plant consists of initial and continuing training process. Details can be found in site specific procedures and processes.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Onsite Emergency Plan Implementing Procedures (EIPs) are maintained by the Regulatory Affairs Manager with the Emergency Preparedness Supervisor being the principal site contact.	**EP P.3** EPIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
EIPs for the corporate emergency response organization and procedures governing fleet emergency planning activities are maintained by the Fleet Emergency Preparedness Manager.	**EP P.1** Emergency Preparedness Coordinator(s) coordinate functional elements of the emergency preparedness program for the SNC fleet under the direction of the Fleet Emergency Preparedness Director.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager or designee performs a review of the site specific emergency plan annually and all onsite EIPs biennially. The review includes the letters of agreement, which are updated as necessary.	**EP P.3** Once per calendar year, the designated Emergency Planning staff performs a review of the emergency plans for Southern Nuclear.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager performs a review of the emergency plans for Southern Nuclear once each calendar year. The review includes a comparison for consistency of all emergency plans for the specific sites including the Security Plan, State, County, and the Savannah River Site plan, as appropriate.	**EP P.3** Once per calendar year, the designated Emergency Planning staff performs a review of the emergency plans for Southern Nuclear. This review includes a comparison for consistency of emergency plans for a specific site including the Security Plan, and state and county plans as appropriate.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency plans and EIPs are revised in accordance with applicable site procedures.	**EP P.3** Approved changes to the Emergency Plan are forwarded to key organizations and appropriate individuals who are responsible for implementing the Plan. The Emergency Plan, agreements and the EPIPs are reviewed once per calendar year and updated as needed. These updates take into account changes identified by drills and exercises, and the independent review described below.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Emergency Plan changes which are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	**EP P.1** Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Planning Coordinator will review Emergency Plan changes to determine if the effectiveness of the site specific plan has been reduced prior to submitting the proposed change for departmental review and subsequently to the PRB for approval.	**EP P.1** Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
As required by 10CFR50.54(t). An annual independent audit of the emergency preparedness program is conducted by the SNC Nuclear Oversight Department. This audit is conducted as part of the standard audit program and will include a review of the Emergency Plan, its implementing procedures and practices, emergency preparedness training, annual exercises, equipment, and emergency response facilities. In addition, an audit of the interfaces with offsite agencies is performed by the SNC Nuclear Oversight department.	**EP P.3:** An independent review of the EP program is conducted as required by 10 CFR 50.54(t).	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Each audit is nominally conducted every 12 months.	**EP P.3:** An independent review of the EP program is conducted as required by 10 CFR 50.54(t).	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Audits are performed in accordance with SNC Nuclear Oversight department procedures. Audit reports are written and distributed to management and, in addition, applicable portions of the corporate audit reports are made available to affected Federal, State, and local agencies, as appropriate, in accordance with 10CFR50.54(t).	**EP P.3:** An independent review of the EP program is conducted as required by 10 CFR 50.54(t).	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Appropriate departments are responsible for implementing corrective actions resulting from the audit findings. Records of these audits and exercise findings are maintained in accordance with plant procedures.	**EP P.3** The results of the review, along with recommendations for improvements, are documented and reported to plant management and to appropriate offsite agencies. Management controls are implemented for evaluation and correction of the review findings. Records of these audits and recommendations are maintained for at least 5 years.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition to this Plan, several other formal emergency plans have been developed to support the overall emergency response effort. These supporting plans and their sources are listed in procedure NMP-EP-300, SNC Corporate Emergency Preparedness, Conduct of Operations.	**EP P.3** In addition to this Plan, several other formal emergency plans have been developed to support the overall emergency response effort. Once per calendar year, the designated Emergency Planning staff performs a review of the emergency plans for Southern Nuclear. This review includes a comparison for consistency of emergency plans for a specific site including the Security Plan and state and county plans as appropriate.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
APPENDIX 10(J) EMERGENCY COMMUNICATIONS PLAN	**SECTION G: PUBLIC EDUCATION AND INFORMATION**	The appendix describing the Emergency Communications Plan has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H, the Emergency Communications portion of Section G of the SNC Standard Emergency Plan and Section 5.1.6 of the Farley Annex.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
APPENDIX 11(K) ASSESSMENT ACTIONS	**EP Section D** **Annex Section 3**	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex
ASSESSMENT ACTIONS 1. CLASSIFICATION OF EMERGENCIES The classification system is based on the four emergency classes described in 10CFR50 Appendix E and NUREG 0654, established by the Nuclear Regulatory Commission (NRC), for grouping off-normal nuclear power plant conditions according to (1) their relative radiological seriousness, and (2) the time-sensitive onsite and off-site radiological emergency preparedness actions necessary to respond to such conditions	**EP D.1.1.2 Emergency Classification Level Descriptions** There are three considerations related to emergency classification levels. These are: (1) The potential impact on radiological safety, either as known now or as can be reasonably projected. (2) How far the plant is beyond its predefined design, safety, and operating envelopes. (3) Whether or not conditions that threaten health are expected to be confined to within the site boundary.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The existing radiological emergency classes, in ascending order of seriousness, are called: • Notification of Unusual Event (NOUE) • Alert • Site Area Emergency (SAE) • General Emergency (GE) The classes, therefore, determine initial steps to be taken by on site and by corporate emergency response personnel. The emergency classes are used by offsite authorities to determine which of the preplanned actions to be taken by their emergency organizations.	**EP D.1.1.2** The Initiating Conditions (ICs) deal explicitly with radiological safety impact by escalating from levels corresponding to releases within regulatory limits to releases beyond EPA Protective Action Guideline (PAG) plume exposure levels. The four emergency classification levels are described as follows: UNUSUAL EVENT (UE) ALERT SITE AREA EMERGENCY (SAE) GENERAL EMERGENCY	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
An emergency classification is indicative of the status of the plant. Inputs to the emergency classification system include the status of various plant systems, radiation levels in and around plant areas, and the rate of release of radioactivity from the plant. These are termed Initiating Conditions which are a predetermined subset of nuclear power plant conditions where either the potential exists for a radiological emergency, or such an emergency has occurred.	**EP D.1.1.1** Emergency Action Levels (EALs), based on indications available in the control room and correlated to the emergency classifications, are provided to the operator. **EP D.1.1.2** The Initiating Conditions (ICs) deal explicitly with radiological safety impact by escalating from levels corresponding to releases within regulatory limits to releases beyond EPA Protective Action Guideline (PAG) plume exposure levels.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The SNC classification scheme is based on NEI 99-01, Rev 4, Methodology for Development of Emergency Action Levels, January 2003 endorsed by Reg Guide 1.101, Rev 4, Emergency Planning and Preparedness for Nuclear Power Reactors. The Initiating Conditions lead each plant to a classification Implementing Procedure which contains the Threshold values for each Initiating Condition.	**EP D.1.1.1** Emergency classification is divided into four classification levels described in 10 CFR 50 Appendix E and NUREG 0654 and based on NEI 99-01 and 07-01 methodologies.	This submittal does not change the current approved EAL scheme for Plant Farley.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
Each Initiating Condition has specific conditions associated that are termed Threshold Values. When an Initiating Condition is observed and the criteria of it's associated Threshold Values are met, an Emergency Action Level is met and the event is then classified and declared at the appropriate level.	**EP D.2.1** An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant conditions. The ICs are segregated into Recognition Categories. With each IC are Threshold Values (TV) that provide the criteria for classification associated with the appropriate classification level. When the IC is observed to exist, the TV must also be met, exceeded, or in some cases imminent to become a classifiable Emergency Action Level.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The SNC Classification procedures are written to classify events based on meeting the Initiating Condition (IC) and a Threshold Value (TV) for an EAL considering each Unit independently. During events, the ICs and TVs are monitored and if conditions meet another higher EAL, that higher emergency classification is declared and appropriate notifications made. Notifications are made on a site basis. If both units are in concurrent classifications, the highest classification would be used for the notification and the other unit classification noted on the notification form.	**EP D.2.1** An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant conditions. The ICs are segregated into Recognition Categories. With each IC are Threshold Values (TV) that provide the criteria for classification associated with the appropriate classification level. When the IC is observed to exist, the TV must also be met, exceeded or in some cases imminent to become a classifiable Emergency Action Level.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
At all times, when conditions present themselves that are not explicitly provided in the EAL scheme the Emergency Director has discretion to declare an event based on his knowledge of the emergency classes and judgment of the situation or condition.	**EP D.2.1** Although the majority of the EALs provide very specific thresholds, the Emergency Director must remain alert to events or conditions that lead to the conclusion that exceeding the EAL is imminent. If, in the judgment of the Emergency Director, an imminent situation is at hand, the classification should be made as if the threshold has been exceeded.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Once an emergency classification is made, it cannot be downgraded to a lower classification. All the actions associated with the emergency classification level must be completed and then a termination of the event can be affected. At termination, on an event specific basis, the site can either enter normal operating conditions or enter a recovery condition with a recovery organization established for turnover from the ERO.	**EP D.2.5 Emergency Classification Level Downgrading and Termination** The SNC policy is that once an emergency classification is made, it cannot be downgraded to a lower classification. Termination criteria contained in the Emergency Plan Implementing Procedures shall be completed for an event to be terminated. At termination, on an event-specific basis, the site can either enter normal operating conditions or enter a recovery condition with a recovery organization established for turnover from the ERO.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The described emergency classes and the emergency action levels which determine them are agreed on by SNC and State and local authorities. The emergency action levels will be reviewed by these officials annually.	**EP D.1.1.1** The classification scheme is provided to and discussed by Southern Nuclear Company, agreed upon by state and county governmental authorities, and approved by the NRC. The classification scheme and specific Emergency Action Levels are reviewed with the State and local governmental authorities on an annual basis.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
a. Notification of Unusual Event 1. Description The classification of Notification of Unusual Event applies to situations in which events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.	**EP D.1.1.2 UNUSUAL EVENT (UE)** Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
2. Response In the event of a Notification of Unusual Event, the Shift Manager will assesses the conditions and implement the Classification EIP.	No equivalent Plan/Annex statement	The responsibilities of the Shift Manager with respect to Classification are provided in Section B of the Plan.
The Emergency Organization will perform the following: 1) Inform State and local offsite authorities of the nature of the unusual event within 15 min. of classifying the emergency. Notify the Nuclear Regulatory Commission (NRC) as soon as possible (ASAP) but no later than 1 hour following classification of the emergency. 2) Augment on-shift resources, as needed. 3) Assess and respond to the event. 4) Escalate to a more severe class, if appropriate, or close out with a verbal summary to offsite authorities followed by a written summary within 24 hours.	No equivalent Plan/Annex statement	Section B provides the position specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
b. Alert 1. Description The classification of Alert applies to situations in which events are in process or have occurred which involve an, actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of hostile action. Any releases of radioactive material for the Alert classification are expected to be limited to small fractions of the U.S. Environmental Protection Agency (EPA) Protective Action Guideline (PAG) exposure levels. The purpose of offsite alert is to assure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required and to provide offsite authorities current status information.	**ALERT** Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life-threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be limited to small fractions of the EPA PAG exposure levels.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
2. Response In the event of an Alert the Shift Manager will assess the conditions and implement the Classification EIP.	No equivalent Plan/Annex statement.	Section B provides the position specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Organization will then perform the following: 1) Within 15 min. of classification, inform State and local offsite authorities of Alert Emergency and reasons for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) Augment resources and activate the emergency response facilities (e.g. Technical Support Center (TSC), Operational Support Center (OSC) and the Emergency Operations Facility (EOF)). These actions may be delayed for security based events at the discretion of the emergency director. 3) Assess and respond to the emergency. 4) Mobilize, and dispatch if necessary, onsite survey teams. 5) Provide periodic plant status updates to offsite authorities. 6) Provide periodic meteorological assessments to offsite authorities and, if any emergency releases are occurring, field monitoring team readings or dose estimates for actual releases. 7) Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the Alert. 8) Escalate to a more severe class, if appropriate, or close out the emergency class by verbal summary to offsite authorities followed by written summary within 8 hours of closeout.	No equivalent Plan/Annex statement.	Section B provides the position specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
c. Site Area Emergency 1. Description The classification of Site Area Emergency applies to those events which are in progress or have occurred that involve actual or likely major failures of plant functions needed for protection of the public from radiation or contamination or security events that result in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevent effective access to, equipment needed for the protection of the public. Any releases of radioactive material for the Site Area Emergency classification are not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.	**SITE AREA EMERGENCY (SAE)** Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts toward site personnel or equipment that could 1) lead to the likely failure of, or 2) prevent effective access to equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA PAG exposure levels beyond the site boundary.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
2. Response In the event of a Site Area Emergency, the Shift Manager will assess the conditions and implement the Classification EIP.	No equivalent Plan/Annex statement	Section B provides the position-specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Organization will perform the following: 1) Within 15 min. of classification, inform State and local offsite authorities of Site Area Emergency and reasons for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) If necessary, provide protective action recommendations to State and local authorities. 3) Augment resources and activate the emergency response facilities (e.g. Technical Support Center (TSC), Operational Support Center (OSC), and the Emergency Operating Facility (EOF)). These actions may be delayed for security based events at the discretion of the emergency director. 4) Assess and respond to the emergency. 5) Dispatch as necessary onsite and offsite survey teams. 6) Dedicate individuals for plant status updates to offsite authorities and periodic press briefings. 7) On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. 8) Provide meteorological information and dose estimates to offsite authorities for actual releases via a dedicated individual. 8) Provide release and dose projections based on available plant condition information and foreseeable contingencies.	No equivalent Plan/Annex statement	Section B provides the position-specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Organization will perform the following: (cont) 10) Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the Site Area Emergency. 11) Escalate to General Emergency, if appropriate, or close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.	No equivalent Plan/Annex statement	Section B provides the position-specific duties related to Classification Notification. Section E provides notification information.
d. General Emergency 1. Description The classification of General Emergency applies to those events which are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential loss of containment integrity or security events that result in an actual loss of physical control of the facility. Release of radioactive material for the General Emergency classification can reasonably be expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.	**GENERAL EMERGENCY** Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity, or hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels off-site for more than the immediate site area.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
2. Response In the event of a General Emergency the Shift Manager will assess the conditions and implement the Classification EIP.	No equivalent Plan/Annex statement	Section B provides the position specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Organization will then perform the following: 1) Within 15 min. of classification, inform State and local offsite authorities of General Emergency and reason for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) Provide protective action recommendations to State and local authorities based upon plant conditions and/or actual or projected releases of radioactive material. 3) Augment resources and activate the emergency response facilities (e.g. Technical Support Center (TSC), Operational Support Center (OSC), and the Emergency Operating Facility (EOF)). These actions may be delayed for security based events at the discretion of the emergency director. 4) Assess and respond to the emergency 5) Dispatch onsite and offsite survey teams. 6) Dedicate an individual for plant status updates to offsite authorities and periodic press briefings. 7) On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials.. 8) Provide meteorological data and field monitoring team readings or dose estimates to offsite authorities for actual releases. 9) Provide release and dose projections based on plant condition and foreseeable contingencies.	No equivalent Plan/Annex statement	Section B provides the position specific duties related to Classification Notification. Section E provides notification information.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The Emergency Organization will then perform the following: (cont) 10) Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the General Emergency. 11) Close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.	No equivalent Plan/Annex statement	Section B provides the position specific duties related to Classification Notification. Section E provides notification information.
2. CLASSIFICATION PROCESS The Classification Emergency Plan Implementing Procedure is used to classify the emergency condition upon recognition of an off- normal condition relative to an Initiating Condition.	SECTION D: EMERGENCY CLASSIFICATION SYSTEM **EP D.1 Classification of Emergencies** **EP D.1.1 Emergency Conditions**	Section D provides the description of the Classification process
Two Initiating Condition Matrices and a Fission Product Barrier Evaluation table are used depending on the initial mode of the unit. The Hot Initiating Condition matrix and the Fission Product Barrier Evaluation table are used when the unit is in the Technical Specification defined modes of Hot Shutdown, Hot Standby, Startup and Power Operation. A Cold Initiating Condition matrix is used when the unit is in the Cold Shutdown, Refueling, or Defueled modes. The IC Matrices are human factored to read from top to bottom General Emergency to Notification of Unusual Event within a category or subcategory.	**EP D.2.1** The Fission Product Barrier and System Malfunction criteria are only applicable when in the hot operating modes. The Cold Shutdown /Refueling System malfunctions are only applicable in cold shutdown and Defueled modes or as specifically designated in each EAL. The EALs associated with the Radiological, ISFSI, and Hazards categories are applicable in all modes of operation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
To facilitate the expeditious classification of emergencies, the various initiating conditions which may result in an emergency class are grouped into six recognition categories as follows: • Radiological (Hot and Cold – R series) • Fission Product Barriers (Hot – F series) • System Malfunctions (Hot – S series) • System Malfunctions (Cold – C series) • ISFSI (Hot and Cold – E series) • Hazards (Hot and Cold – H series)	**EP D.2.1** An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant conditions. The ICs are segregated into Recognition Categories. The Recognition Categories are: • **R** – Abnormal Radiological Levels/Radiological Effluent. • **C** – Cold Shutdown / Refueling System Malfunctions. • **E** – Independent Spent Fuel Storage Installations (ISFSI). • **F** – Fission Product Barrier. • **H** – Hazards and Other Conditions Affecting Plant Safety. • **S** – System Malfunction.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Within each category, sub categories and specific Initiating Conditions are identified. Each Initiating Condition has specific conditions associated that are termed Threshold Values. These Initiating Conditions, Threshold Values, and bases are provided in this Appendix.	**EP D.2.1** With each IC are Threshold Values (TV) that provide the criteria for classification associated with the appropriate classification level. When the IC is observed to exist, the TV must also be met, exceeded or in some cases imminent to become a classifiable Emergency Action Level.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL has been exceeded has been established and is outlined in applicable procedures. Emergency conditions are classified promptly upon identification that an emergency action level (EAL) threshold has been exceeded.	**EP D.1** SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
The 15-minute period encompasses all assessment, classification, and declaration actions associated with making an emergency declaration from the first availability of a plant indication or receipt of a report of an off-normal condition by plant operators up to and including the declaration of the emergency. If classifications and declarations are performed away from the CR, all delays incurred in transferring information from the CR (where the alarms, indications, and reports are first received) to the ERF (at which declarations are made) are included within the 15-minute criterion.	**EP D.1** SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Hot Initiating Conditions Matrix	**Annex Appendix B**	The approved EALs are not affected by this submittal.
Cold Initiating Conditions Matrix	**Annex Appendix B**	The approved EALs are not affected by this submittal.
Fission Product Barrier Evaluation Modes	**Annex Appendix B**	The approved EALs are not affected by this submittal.
Emergency Action Level Description (Rev. 63 pages K-10 to K-100	**Annex Appendix B**	The approved EALs are not affected by this submittal.
EMERGENCY PLAN Part II **MEDICAL PLAN**	**SNC Standard Emergency Plan Sections A.2, B.5, F.2 and L (entire section)** **Annex Sections 1.7.1.10, and 2.3**	The commitment was standardized and relocated to the SNC Standard Emergency Plan and Annex.

Farley On-Shift Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 on-shift*	Farley Rev 25	Farley Rev 64	Farley Proposed
Plant Operation and Assessment of Operation Aspects		Shift Supervisor (SRO)	1	1	1	1
		Shift Foreman (SRO)	1	1	2	2
		Control Room Operators	2 (per unit)	2	4	4
		Auxiliary Operators	2 (per unit)	2	3	7
		Shift Support Supervisor				1
Emergency Direction and Control (Emergency Coordinator) ***		STA. Shift Supervisor or facility manager	1**	1**	1	1**
Notification / Communication ****	Notify State/local and federal personnel, maintain communication		1****	2	2**	1**
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Senior CHM & Env		1	1	1
	Offsite surveys On-site surveys	HP/CHM technicians and other trained personnel		2	2	1
	In-Plant surveys	HP Technicians	1	2	2	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	1
Plant System Engineering	Technical support	Shift Technical Advisor	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Maintenance Supervisor				1
		Mechanical Maintenance	1**	1**	1	1
		Electrical Maintenance	1**	1	1	1
		I&C Maintenance		1	1	1
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2**	2	2	1
Firefighting		Fire Brigade per Tec Specs			5	5**
Rescue Operations and First-Aid			2**	2**	2**	2**
Site Access Control and Personnel Accountability	Security, firefighting communications, personnel accountability	Security personnel per security plan				
Total On-Shift			**10**	**19**	**28**	**25**

*For each unaffected unit, maintain at least 1 SF, 1 CRO, 1 AO
**May be provided by shift personnel assigned other functions
***Overall direction to be assumed by EOF Dire when ERFs are fully manned
****May be performed by engineering aid to shift supervisor

Farley Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	Farley (75 min) Rev 25	Farley (75 min) Rev 64	Farley Proposed (75 min)
Emergency Direction and Control						9
Notification / Communication	Notify State/local and federal personnel, maintain communication		2	2	2	11
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager	1	1	1	(a)
	Dose Assessment	HP Expertise				3
	Offsite Surveys	HP Technicians	2	2	6	6
	On-Site Surveys	HP Technicians	1	2		
	In-Plant surveys	HP Technicians	1	2		
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
Plant System Engineering	Technical Support	Electrical	1	1	1	1
		Mechanical	1	1	1	1
		Engineering Supervision				2
		Core Thermal / Hydraulic	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1		1	
		Electrical Maintenance	1	1	1	1
		I&C Technician		1	1	1
		Maintenance Supervision				2
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2	2	2	3
Total Augmented ERO			**15**	**18**	**19**	**44**

(a) EOF Emergency Director counted in Emergency Direction and Control.

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4

Enclosure 7
Hatch Staffing - Detailed Description and Technical Evaluation
(Marked-Up Pages and Clean Copy)

There would be no undue burden on the Control Room staff or impact on the notification function from an addition of the EOF ED. (See table below.)

CONTROL ROOM	TSC	EOF
Shift Manager / Emergency Director	**TSC Emergency Director**	**EOF Emergency Director**
Classification →	Classification	
Notifications →		Notifications
PARs~~S~~ →		PARs~~S~~
Emergency Exposure Controls →	Emergency Exposure Controls	

Finally, the proposed revision to the HNP Unit 1 and Unit 2 Emergency Plan requires augmentation of the following TSC and EOF positions, which support activation of the TSC and EOF, within 75 minutes of event classification:

- TSC Emergency Director
- TSC Manager
- TSC Operations Supervisor
- TSC Emergency Notification System (ENS) Communicator
- TSC Health Physics Network (HPN) Communicator
- TSC ERF Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Chemistry Support
- TSC Engineering Supervisor
- TSC Reactor Engineer
- TSC Engineering Support
- TSC Maintenance Supervisor
- EOF Emergency Director
- EOF Manager
- EOF Field Team Coordinator
- EOF Emergency Communications Coordinator
- EOF Security Coordinator
- EOF Offsite Response Coordinator
- EOF Emergency Notification Network (ENN) Communicator
- EOF ENS Communicator
- EOF HPN Communicator
- EOF ERF Communicator
- ~~EOF Nuclear Spokesperson~~
- ~~EOF Technical Assistant~~
- EOF News Writer
- EOF Field Team Communicator
- EOF Dose Assessment Supervisor

- EOF Dose Analyst
- EOF Technical Supervisor

Notification and Communication

NUREG-0654/FEMA REP-01 Revision 1 guidance addresses the~~requires one~~ Communicator function ~~to be assigned~~ on-shift. Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for one Communicator or other trained personnel to perform this function. In the proposed SNC Fleet Emergency Plan staffing for HNP, this function will be modified by a note that indicates this function may be fulfilled by individuals assigned other functions. However, an additional Reactor Operator will be added to the HNP control room staff to ensure there will be sufficient appropriately trained personnel on-shift for the Communications function to be assigned to a member of the control room staff with no conflicting~~collateral~~ tasks. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In addition, the proposed SNC Fleet Emergency Plan provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the EOF from the control room. The proposed change includes both sufficient communications personnel to perform the communications and an ED with the authority to approve the content of the notification. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel will be available in the EOF within 75 minutes from time of declaration of an Alert or higher emergency classification to assume the Communications function t and minimize the burden on the Shift Manager/ED.

The ability to transfer the Communications function directly to the EOF, and provision of sufficient augmented personnel in the EOF to perform the Communicator function within 75 minutes ensure no additional burden is incurred by the on-shift staff.

Radiological Accident Assessment and Chemistry/Radio-Chemistry

The function of on-site radiological assessment is to: review radiological conditions onsite using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures.

Classification is performed by the Shift Manager/ED using NMP-EP-110, Emergency Classification Determination and Initial Action procedure, which uses readily available and easily recognized plant instrumentation to determine the appropriate emergency classification. Off-site and onsite surveys provide additional information, such as direct radiation measurements that can be directly applied to emergency classification. The on-shift Radiation Protection (RP) Technician takes direction from the Control Room to provide radiological assessment support until the OSC is activated.

As part of the Plant Operations and Assessment of Operational Aspects function, the operating crew uses symptom-based emergency operating procedures (EOPs) which minimize the need for specific accident assessment. The operating crew performs actions based on symptoms that are described in the EOPs, not based on specific accident assessment.

Similarly, the Shift Manager/ED uses flowcharts in NMP-EP-112, Protective Action Recommendations procedure, which prescribes the decision-making processes for directing on-site protective measures. The simple information needed to accomplish this for rapid decision making by the Shift Manager/ED using readily available information.

Offsite Dose Assessment (ODA) / Chemistry

NUREG-0654/FEMA REP-01 Revision 1 does not specify a resource~~provide~~ for the on-shift dose assessment task~~capability~~. The current version of the HNP Unit 1 and Unit 2 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to a Reactor Operator. In the proposed change, on-shift dose assessment will be assigned to ~~appropriately trained~~an on-shift ~~personnel (typically a c~~Chemistry individual~~technician)~~ appropriately trained~~who will be dedicated~~ for~~to~~ this task with no other conflicting~~collateral~~ emergency response duties. This will in turn free the Reactor Operator to perform other control room related tasks.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can easily and rapidly perform dose assessments during emergency conditions. Enhancements in dose assessment software have reduced to the time required to perform dose assessment runs and provide the results to the ED. In addition, the dose assessment software is operational in a Windows operating system on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A second Chemistry individual is provided as part of the minimum on-shift staffing so that any required chemistry samples may be collected without impacting the chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), HNP Unit 1 and Unit 2 Emergency Plan, and the procedures used by Operations for off-normal plant conditions did not identify any conflicts between completion of dose assessment and other on-shift Chemistry functions within the 75 minute augmentation time frame~~. An additional Chemistry support individual will be augmented in the TSC within 75 minutes, who will provide oversight for chemistry sampling and analysis activities.~~ An additional Chemistry technician will be augmented in the OSC within 75 minutes to assist in performing chemistry sampling and analysis.

Augmentation by the RP Supervisor TSC within 75 minutes will relieve the Shift Manager/ED of the role of oversight of the on-shift dose assessor. The TSC will retain this task until relieved by the EOF dose assessment staff, which consists of the Dose Assessment Supervisor and Dose Analyst. There is no loss of function or impact on the timing for performing either of the tasks of dose assessment or required radiochemistry sampling by the proposed on-shift staffing provided in the SNC Fleet Emergency Plan.

Offsite/Onsite Surveys, In-Plant surveys and Radiation Protection (RP)

NUREG-0654/FEMA REP-01 Revision 1 identifies one on-shift RP Technician who is responsible for performing in-plant surveys. NUREG-0654/FEMA REP-01 Revision 1 does not provide for any on-shift personnel for on-site out of plant surveys or for off-site surveys. NUREG-0654 / FEMA REP-01 Revision 1 further identifies two RP technicians under the Protective Actions function for performing the tasks of Access Control, Radiation Protection coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry. However, a note modification provides that these individuals may be assigned other functions, for example, the RP technician assigned to the in-plant surveys task and the individual assigned to the Chemistry/Radio-chemistry task under the Radiological Accident Assessment and Support of Operational Accident Assessment function.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides two individuals for the task of off-site survey and an additional individual for the task of on-site (out of plant) survey. Collectively, these individuals include one individual qualified to perform the survey, an

assistant to drive the team vehicle, and an individual is to coordinate communications between the survey team and the dose assessor.

As part of the proposed SNC Fleet Emergency Plan the HNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained personnel. SNC currently uses predesignated, readily accessible survey points around the HNP Unit 1 and Unit 2 plant site for collecting on-site survey data. Prior to dispatch of the on-site out of plant monitoring technician the dose assessor will brief the survey technician on the event conditions, direction of potential/actual plume path, potential radiological conditions, and so forth. The technician will be dispatched to one of the predesignated sample points in the downwind direction of the potential/actual plume path. The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location. The dose assessor and the survey technician will have the capability to maintain near continuous communications, which will allow the dose assessor to redirect the technician while in route if needed. Since the designated sample points are on-site and readily accessible from the HNP Unit 1 and Unit 2 plant site road system, there will be no immediate need for the survey technician to travel off-site and this survey can be performed by a single individual without impacting the accuracy or timeliness of the survey.

Additionally, the proposed SNC Fleet Emergency Plan HNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor. This will expedite communication of field survey readings to the dose assessor for input into the dose assessment program, resulting in a shorter completion time of dose assessment runs using actual field survey results.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for augmentation of two off-site survey teams as well as a Field Team Coordinator and Field Team Communicator at the EOF. The proposed staffing for the SNC Fleet Emergency Plan augments a single off-site survey team within 75 minutes of an Alert or higher declaration as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided. A third augmented individual, together with the on-site out of plant technician will make up the second off-site field monitoring team. On-site monitoring will become a function of the OSC.

Installed effluent radiation monitors and in-plant radiation monitors are able to detect any radioactive release quickly and accurately. The enhanced technology provided by the Safety Parameters Display System (SPDS) and the dose assessment computer model provides reliable visual indication of any radioactive plume and its calculated direction. Quantification of a radioactive release is determined by dose assessment, which is performed by dedicated on-shift personnel then augmented by additional dose assessment personnel in the TSC and EOF. On-site, out of plant field teams and off-site field teams are typically used to verify the status of a potential release and validate the dose assessment model. Dose assessment model validation strategies developed and implemented by the EOF staff typically include directing one team to track the leading edge of the radiological plume and one team to define the lateral edges of the plume and determine plume centerline radiological conditions. If the field team survey data indicates a departure from the dose assessment model, the radiation surveys and air samples collected by these two field teams can be used to perform dose assessment back calculations. SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys. ~~To better support performing surveys off-site, the on-shift field team, which initially consisted of a single RP technician or appropriately trained individual, can be augmented by the on-shift~~

~~dose assessor as a vehicle driver (once relieved by the EOF Dose Analyst).~~ Sufficient instrumentation, communication equipment, and transportation will be maintained on-site for augmenting and dispatching additional teams if needed.

Regarding in-plant surveys, Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for two RP technicians to perform in-plant surveys. The proposed SNC Fleet Emergency Plan HNP on-shift staffing provides one RP technician assigned to the task of in-plant surveys under the Radiological Accident Assessment and Support of Operational Accident Assessment function. An additional RP technician will be provided for the Protective Actions function discussed later. However, since both of these individuals are qualified RP technicians, they will be available to collectively support either of these functions as needed. An additional two Radiation Protection technicians will respond within 75 minutes to support Radiological Accident Assessment (in-plant) function. This will provide sufficient Radiation Protection resources to address the Radiological Accident Assessment needs of both the on-shift and augmented ERO personnel.

With improved installed instrumentation, dose calculation computer modeling, and dedicated on-shift staffing for dose assessment and on-site out of plant surveys, there is no more than minimal impact to the performance of these tasks as a result of the proposed staffing alignments in the SNC Fleet Emergency Plan.

Plant System Engineering

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

NUREG-0654/FEMA REP-01 Revision 1 guidance provided for a Shift Technical Advisor (STA) to be available on-shift to perform the Technical Support task including core/thermal hydraulics in response to the NUREG-0737 requirements resulting from the Three Mile Island accident. Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides an individual to fulfill the STA task. The performance of the Technical Support task includes use of the SPDS computer, which graphically displays the pertinent parameters with trending and graphing capabilities, alarm functions, and color-coded indication for changes in state for various critical safety parameters. This enhances critical parameter monitoring and the rapid identification and assessment of in plant conditions. This remains unchanged for HNP in the SNC Fleet Emergency Plan.

Repair and Corrective Actions

NUREG-0654/FEMA REP-01 Revision 1 Table B-1 specifies the functional area of Repair and Corrective Actions is to be provided on-shift by a total of two individuals who also "may be provided by shift personnel assigned other functions." It further states that the "position title or expertise" for the Repair and Corrective Actions task could be filled by Mechanical Maintenance / Radwaste Operator, Electrical Maintenance, or I&C Technician.

Due to the time needed to stabilize the plant and assess the event, the initial phase of an accident is not expected to involve a significant need for maintenance personnel. Once plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities.

Typically, the initial stages of Corrective Actions will be minor or of limited scope, such as:

- Mechanical – Identification and operation of faulty valves, clogged filters, packing and seal adjustments, or troubleshooting,

- Electrical – Identification and correction of tripped breakers and overloads, or hands-off troubleshooting,
- I&C – Identification and correction of controller and set point adjustment, calibration, or hands-off troubleshooting.

Until the reactor is stabilized and the causal agents identified, actual repairs or realignment of plant equipment would not require large-scale maintenance support. The current version of the HNP Unit 1 and Unit 2 Emergency Plan provides for one mechanical journeyman, two electrical journeymen, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. The proposed SNC Fleet Emergency Plan on-shift maintenance staffing numbers will be reduced to one on-shift electrical journeyman. In addition to these personnel, a maintenance supervisor will be added to on-shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability. A 10 CFR 50 Appendix E shift staffing evaluation demonstrated that no maintenance personnel were assigned tasks during the 75 minutes prior to augmentation. Additionally, the proposed SNC Fleet Emergency Plan provides for augmentation of maintenance discipline specific leads in the OSC as well as an overall OSC Manager within 75 minutes of an Alert or higher emergency classification. With the described on-shift maintenance staffing, there is no impact on the repair and corrective action tasks described under the Plant System Engineering, Repair and Corrective actions function as the result of removing the one electrical journeyman.

The NRC Public Meeting on July 16, 2015, discussing proposed changes to guidance regarding ERO staffing and augmentation (ML15174A309) identified that the proposed change primarily meets or exceeds the current regulatory guidance of NUREG-0654/FEMA REP-01 Revision 1 Table B-1 and the proposed NUREG-0654/FEMA REP-01 Revision 2 (ML14246A519). Based on HNP Unit 1 and Unit 2 licensing basis (FSAR), the design philosophy with respect to Emergency Safety Features (ESF), and guidance for restoration, it is unnecessary to have additional Mechanical Maintenance, Electrical Maintenance and I&C Maintenance augmented within the 75 minute timeframe. ESF systems are redundant in trains (physical separation) and have diversity of subsystems. Therefore, the inoperability of different system components in different trains is not anticipated to result in a loss of function of the ESF. This allows flexibility in plant operations under circumstances where components in redundant subsystems may be inoperable.

Protective Actions (In-Plant)

For the Protective Actions (In-Plant) function, NUREG-0654/FEMA REP-01 Revision 1 specifies providing two personnel on-shift who "may be provided by shift personnel assigned other functions." The major tasks of this function are access control, RP coverage for repair, corrective actions, search and rescue, first aid, and firefighting, personnel monitoring, and dosimetry.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides four individuals for performing this function. However, this number is modified by a note stating "may be provided by shift personnel assigned other functions." Under the proposed SNC Fleet Emergency Plan staffing a single RP technician will support this function.

System Operators are typically dispatched prior to the call-out of augmented personnel. Normally the initial response phase involves search and rescue operations or manual manipulation of equipment. Maintenance actions in the initial response phase are anticipated to be minimal as discussed previously. Installed plant area radiation monitors are used to provide indication of in-plant radiation levels prior to dispatch of personnel into the plant. This allows for

TSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control		Emergency Director (ED)
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification/Communication	Notify licensee, state, local, and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		HPN Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Radiation Protection (RP) Supervisor
		Dose Analyst*
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

*Security Supervisor filled by one of the on-shift Security Supervisors. Dose Analyst filled by the on-shift chemistry technician.

** Support Coordinator does not have a 75 minute augmentation time.

OSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Tasks**	**Position Title**
Emergency Direction and Control		OSC Manager
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Lead (1) Field Monitoring Team Assistant~~Personnel~~ (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP / Chemistry Group Lead
	• RP coverage for repair, corrective actions, search and rescue, first aid & firefighting • Personnel monitoring • Dosimetry	RP Technicians (2)

EOF 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control	EOF Director	ED
		EOF Manager
		Support Coordinator*
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff *
		Liaisons (at EOCs)* - GA - AL - SC
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		~~Nuclear Spokesperson~~
		~~Technical Assistant~~
		News Writer
		Field Team Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
	Chemistry/Radio Chemistry	Not required in this facility
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

* Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute augmentation time.

JIC Staff*		
Functional Area	**Major Task**	**Position Title**
Media Response	Media Response	Public Information Director
		Nuclear Spokesperson
		Technical Assistant
		JIC Manager
		JIC Assistant
		Facility Coordinator
		Clerical Staff
		Security
		Public Response Coordinator
		Public Response Staff
		Media Relations Representative

* JIC Staff do not have a 75 minute augmentation time.

Minimum staff positions have been identified for each facility. The minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. Facility activation may be completed upon filling of minimum staffing positions and completion of a briefing on the event to ensure personnel in these positions are ready to accept responsibility for their functions. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

Minimum staffing positions for the TSC Organization are as follows:

- TSC Emergency Director (ED)
- TSC Emergency Response Facility (ERF) Communicator
- TSC Manager
- TSC Operations Supervisor
- TSC ENS Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Reactor Engineer~~ing Supervisor~~

Minimum staffing positions for the Operations Support Center (OSC) Organization are as follows:

- OSC Manager
- OSC Emergency Response Facility (ERF) Communicator
- OSC RP / Chemistry Group Lead

Minimum staffing positions for the EOF Organization are as follows:

- EOF Emergency Director (ED)
- EOF Emergency Response Facility (ERF) Communicator
- EOF Manager
- EOF Dose Assessment Supervisor

This License Amendment Request (LAR) revises the current on-shift and augmented Emergency Response Organization (ERO) for Hatch Nuclear Plant (HNP) Unit 1 and Unit 2 Emergency Plan to incorporate a standard on-shift and augmented ERO staffing plan for the Southern Nuclear Operating Company (SNC) Fleet. This proposed change to the ERO will result in an SNC Fleet standard definition of ERO augmentation time as well as an SNC Fleet standard complement of emergency response positions, titles, duties, and responsibilities.

EP Functions Impacted by the Proposed Change

The proposed change impacts the ERO as outlined in 10 CFR 50.47(b) Planning Standards 1 and 2. This change addresses the following Planning Standard Functions:

- 10 CFR 50.47(b) (1): The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the Emergency Plan.
- 10 CFR 50.47(b) (2): Process for timely augmentation of on-shift staff is established and maintained.

The proposed change has been reviewed and continues to perform the functions required of 10 CFR 50.47(b) and the related requirements of 10 CFR 50 Appendix E.

Emergency Response Organization (ERO) Activation

HNP Unit 1 and Unit 2 Emergency Plan Revision 36.0 requires staffing of the augmented ERO at the Alert or higher classification "...ASAP, but not later than approximately 1 hour following the initial notification." It also states, "SNC's goal is to begin notification of all required on-call Emergency Response Organization (ERO) personnel as soon as practicable, within 15 minutes, following the declaration of an Alert emergency or higher emergency classification at any SNC site."

The proposed SNC Fleet standard definition for ERO augmentation is 75 minutes from declaration. This proposed change redefines the SNC Fleet augmentation time without extension, since the 15-minute notification period will be incorporated in the overall definition of augmentation time. The proposed SNC Fleet definition also removes ambiguous wording such as "about" and "approximately" in order to clearly define the augmentation requirement.

Assignment of Responsibility/Organizational Control

The HNP Unit 1 and Unit 2 Emergency Plan maintains an on-shift organization as documented in the site Emergency Plan Revision 36.0. This Plan identifies the authority and responsibilities for emergency response and assigns major functional areas to on-site and offsite response facilities for augmented response. In the following analysis, the impact of consolidating ERO positions and reassigning responsibilities is assessed based on the capacity of on-shift staff to perform major tasks for each major functional area of HNP.

Plant Operations and Assessment of Operational Aspects

NUREG-0654/FEMA REP-01 Revision 1 guidance assumes the on-shift staff will provide the Plant Operations and Assessment of Operational Aspects functions throughout the emergency. The on-shift operations staffing as provided in the current HNP Unit 1 and Unit 2 Emergency Plan Revision 36.0 meets the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the HNP Unit 1 and Unit 2 Technical Specifications. In addition to these requirements, the HNP Unit 1 and Unit 2 Emergency Plan provides for a dedicated Shift Manager position to perform

the NUREG-0654/FEMA REP-01 Revision 1 function of Emergency Direction and Control. Per NUREG-0654/FEMA REP-01 Revision 1, this function may be performed as a collateral duty of one of the individuals performing the Plant Operations and Assessment of Operational Aspects function. However, providing a Shift Manager to fill this function as a standalone position enhances the ability of the HNP Unit 1 and Unit 2 control room staff to fulfill the Plant Operations and Assessment of Operational Aspects function while the dedicated ED addresses aspects of the Emergency Direction and Control function. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In accordance with the current HNP Unit 1 and Unit 2 Emergency Plan, the on-shift staffing exceeds the requirements of NUREG-0654/FEMA REP-01 Revision 1 Table B-1, as well as those prescribed in the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan. The proposed SNC Fleet Emergency Plan will add another Reactor Operator to the HNP shift staff, ensuring further support of the Plant Operations and Assessment of Operational Aspects function at the start of an event and until the on-shift staff is properly augmented.

Emergency Direction and Control

NUREG-0654/FEMA REP-01 Revision 1 guidance provides that the Emergency Direction and Control function may be fulfilled by personnel assigned other functions. Per the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan, the Emergency Director (ED) function is was a collateral duty of an ED-qualified individual assigned to the Plant Operations and Assessment of Operational Aspects function until relieved by an augmented ED in the TSC within approximately one hour of notification of an emergency.

As provided in the current version of the HNP Unit 1 and Unit 2 Emergency Plan, the Shift Manager is designated as the on-shift ED to fulfill the function of Emergency Direction and Control until relieved by the Technical Support Center (TSC) ED within approximately one hour of notification of an Alert or higher emergency. With the proposed changes, the Shift Manager/ED is relieved within 75 minutes of declaration of an Alert or higher emergency by the ED in the TSC, who then assumes overall control of the response efforts. This remains unchanged in the proposed SNC Fleet Emergency Plan with the exception of redefining the augmentation time to include the time provided for notification of the ERO.

In addition to the augmentation of an ED in the TSC within 75 minutes of an Alert or higher declaration the proposed SNC Fleet Emergency Plan provides an additional ED will be augmented in the Emergency Operations Facility (EOF) within 75 minutes of an Alert or higher declaration. The aspects of the Emergency Direction and Control function assigned to the TSC and EOF EDs are clearly defined in the proposed SNC Fleet Emergency Plan. The primary role of the EOF ED will be to assume responsibility for state and local notifications and to approve of Protective Action Recommendations (PARs). This ensures that in the unlikely event of a Hostile Action Based (HAB) event in which the site is not accessible to the ERO, an ED would be available in the EOF within 75 minutes of an Alert or higher declaration to assume these aspects of the Emergency Direction and Control function to minimize the burden on the Shift Manager/ED.

There would be no undue burden on the Control Room staff or impact on the notification function from an addition of the EOF ED. (See table below.)

CONTROL ROOM	TSC	EOF
Shift Manager / Emergency Director	**TSC Emergency Director**	**EOF Emergency Director**
Classification →	Classification	
Notifications →		Notifications
PARs →		PARs
Emergency Exposure Controls →	Emergency Exposure Controls	

Finally, the proposed revision to the HNP Unit 1 and Unit 2 Emergency Plan requires augmentation of the following TSC and EOF positions, which support activation of the TSC and EOF, within 75 minutes of event classification:

- TSC Emergency Director
- TSC Manager
- TSC Operations Supervisor
- TSC Emergency Notification System (ENS) Communicator
- TSC Health Physics Network (HPN) Communicator
- TSC ERF Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Chemistry Support
- TSC Engineering Supervisor
- TSC Reactor Engineer
- TSC Engineering Support
- TSC Maintenance Supervisor
- EOF Emergency Director
- EOF Manager
- EOF Field Team Coordinator
- EOF Emergency Communications Coordinator
- EOF Security Coordinator
- EOF Offsite Response Coordinator
- EOF Emergency Notification Network (ENN) Communicator
- EOF ENS Communicator
- EOF HPN Communicator
- EOF ERF Communicator
- EOF News Writer
- EOF Field Team Communicator
- EOF Dose Assessment Supervisor
- EOF Dose Analyst
- EOF Technical Supervisor

Notification and Communication

NUREG-0654/FEMA REP-01 Revision 1 guidance addresses the Communicator function on-shift. Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for one Communicator or other trained personnel to perform this function. In the proposed SNC Fleet Emergency Plan staffing for HNP, this function will be modified by a note that indicates this function may be fulfilled by individuals assigned other functions. However, an additional Reactor Operator will be added to the HNP control room staff to ensure there will be sufficient appropriately trained personnel on-shift for the Communications function to be assigned to a member of the control room staff with no conflicting tasks. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In addition, the proposed SNC Fleet Emergency Plan provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the EOF from the control room. The proposed change includes both sufficient communications personnel to perform the communications and an ED with the authority to approve the content of the notification. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel will be available in the EOF within 75 minutes from time of declaration of an Alert or higher emergency classification to assume the Communications function t and minimize the burden on the Shift Manager/ED.

The ability to transfer the Communications function directly to the EOF, and provision of sufficient augmented personnel in the EOF to perform the Communicator function within 75 minutes ensure no additional burden is incurred by the on-shift staff.

Radiological Accident Assessment and Chemistry/Radio-Chemistry

The function of on-site radiological assessment is to: review radiological conditions onsite using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures.

Classification is performed by the Shift Manager/ED using NMP-EP-110, Emergency Classification Determination and Initial Action procedure, which uses readily available and easily recognized plant instrumentation to determine the appropriate emergency classification. Off-site and onsite surveys provide additional information, such as direct radiation measurements that can be directly applied to emergency classification. The on-shift Radiation Protection (RP) Technician takes direction from the Control Room to provide radiological assessment support until the OSC is activated.

As part of the Plant Operations and Assessment of Operational Aspects function, the operating crew uses symptom-based emergency operating procedures (EOPs) which minimize the need for specific accident assessment. The operating crew performs actions based on symptoms that are described in the EOPs, not based on specific accident assessment.

Similarly, the Shift Manager/ED uses flowcharts in NMP-EP-112, Protective Action Recommendations procedure, which prescribes the decision-making processes for directing on-site protective measures. The simple information needed to accomplish this for rapid decision making by the Shift Manager/ED using readily available information.

The Safety Parameter Display System (SPDS) provides the control room with a display of plant parameters from which the status of plant operation can be assessed. The SPDS has the following functions:

- Aids the control room operators in the rapid detection and identification of abnormal operating conditions.

- Provides additional specific information to analyze and diagnose the cause of abnormal operating conditions.
- Monitors plant response to corrective actions.
- Provides grouping of parameters to enhance the operators' capability to assess plant status quickly without surveying all control room displays concurrently.
- Directs the operators' attention to other specific confirmatory non-SPDS control room displays.
- Provides human factors engineered display formats in simple and consistent display patterns and coding.
- Provides display information on a real-time basis, along with validation of data.
- Provides generated selectable trend displays on a real-time basis for monitoring reactivity control, reactor core cooling and heat removal from the primary system, reactor coolant system integrity, radioactivity control, containment integrity, and other selected parameters.

Therefore, with the proposed changes, the ERO structure continues to meet the intent of the requirements of Appendix E to 10 CFR Part 50 and the standards of 10 CFR 50.47(b).

This Functional Area includes three tasks: EOF Emergency Director; Off-Site Dose Assessment and Chemistry/Radiochemistry; and Off-site, On-Site (out of plant), In-Plant Surveys, and Radiation Protection.

Emergency Operations Facility (EOF) Emergency Director (ED)

The TSC ED is not assigned to the on-shift complement. In the current plan, the TSC ED arrives within approximately 60 minutes of notification of an Alert or higher emergency classification, and relieves the on-shift ED of overall emergency management as well as all off-site responsibilities including PARs and emergency notifications. The EOF is also staffed within this timeframe; however, there is currently no ED provided in the Emergency Operations Facility (EOF).

Under this proposal, within 75 minutes of classification the Shift Manager/ED is relieved in the TSC by the ED who then assumes overall control of the response efforts. The EOF ED arrives and relieves the TSC ED of overall emergency management and off-site responsibilities including PARs, dose assessment, and emergency notifications. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel to perform the Radiological Accident Assessment and Support of Operational Accident Assessment function will be available in the EOF within 75 minutes from time of an Alert or higher declaration and minimize the burden on the Shift Manager/ED.

As discussed earlier, the overall function is enhanced by providing a Shift Manager to fill this function as a standalone position beyond the collateral assignment as designated by NUREG-0654/FEMA REP-01 Revision 1 Table B-1, during the period prior to augmentation.

The proposed change presents no adverse impact to the ERO staffing because the TSC and EOF EDs will continue to provide timely relief to the on-shift ED from the duties and responsibilities for offsite functions.

Offsite Dose Assessment (ODA) / Chemistry

NUREG-0654/FEMA REP-01 Revision 1 does not specify a resources for the on-shift dose assessment task. The current version of the HNP Unit 1 and Unit 2 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to a Reactor Operator. In the proposed change, on-shift dose assessment will be

assigned to an on-shift Chemistry individual appropriately trained for this task with no other conflicting emergency response duties. This will in turn free the Reactor Operator to perform other control room related tasks.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can easily and rapidly perform dose assessments during emergency conditions. Enhancements in dose assessment software have reduced to the time required to perform dose assessment runs and provide the results to the ED. In addition, the dose assessment software is operational in a Windows operating system on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A second Chemistry individual is provided as part of the minimum on-shift staffing so that any required chemistry samples may be collected without impacting the chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), HNP Unit 1 and Unit 2 Emergency Plan, and the procedures used by Operations for off-normal plant conditions did not identify any conflicts between completion of dose assessment and other on-shift Chemistry functions within the 75 minute augmentation time frame An additional Chemistry technician will be augmented in the OSC within 75 minutes to assist in performing chemistry sampling and analysis.

Augmentation by the RP Supervisor TSC within 75 minutes will relieve the Shift Manager/ED of the role of oversight of the on-shift dose assessor. The TSC will retain this task until relieved by the EOF dose assessment staff, which consists of the Dose Assessment Supervisor and Dose Analyst. There is no loss of function or impact on the timing for performing either of the tasks of dose assessment or required radiochemistry sampling by the proposed on-shift staffing provided in the SNC Fleet Emergency Plan.

Offsite/Onsite Surveys, In-Plant surveys and Radiation Protection (RP)

NUREG-0654/FEMA REP-01 Revision 1 identifies one on-shift RP Technician who is responsible for performing in-plant surveys. NUREG-0654/FEMA REP-01 Revision 1 does not provide for any on-shift personnel for on-site out of plant surveys or for off-site surveys. NUREG-0654 / FEMA REP-01 Revision 1 further identifies two RP technicians under the Protective Actions function for performing the tasks of Access Control, Radiation Protection coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry. However, a note modification provides that these individuals may be assigned other functions, for example, the RP technician assigned to the in-plant surveys task and the individual assigned to the Chemistry/Radio-chemistry task under the Radiological Accident Assessment and Support of Operational Accident Assessment function.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides two individuals for the task of off-site survey and an additional individual for the task of on-site (out of plant) survey. Collectively, these individuals include one individual qualified to perform the survey, an assistant to drive the team vehicle, and an individual is to coordinate communications between the survey team and the dose assessor.

As part of the proposed SNC Fleet Emergency Plan the HNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained personnel. SNC currently uses predesignated, readily accessible survey points around the HNP Unit 1 and Unit 2 plant site for collecting on-site survey data. Prior to dispatch of the on-site out of plant monitoring technician the dose assessor will brief the survey technician

on the event conditions, direction of potential/actual plume path, potential radiological conditions, and so forth. The technician will be dispatched to one of the predesignated sample points in the downwind direction of the potential/actual plume path. The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location. The dose assessor and the survey technician will have the capability to maintain near continuous communications, which will allow the dose assessor to redirect the technician while in route if needed. Since the designated sample points are on-site and readily accessible from the HNP Unit 1 and Unit 2 plant site road system, there will be no immediate need for the survey technician to travel off-site and this survey can be performed by a single individual without impacting the accuracy or timeliness of the survey.

Additionally, the proposed SNC Fleet Emergency Plan HNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor. This will expedite communication of field survey readings to the dose assessor for input into the dose assessment program, resulting in a shorter completion time of dose assessment runs using actual field survey results.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for augmentation of two off-site survey teams as well as a Field Team Coordinator and Field Team Communicator at the EOF. The proposed staffing for the SNC Fleet Emergency Plan augments a single off-site survey team within 75 minutes of an Alert or higher declaration as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided. A third augmented individual, together with the on-site out of plant technician will make up the second off-site field monitoring team. On-site monitoring will become a function of the OSC.

Installed effluent radiation monitors and in-plant radiation monitors are able to detect any radioactive release quickly and accurately. The enhanced technology provided by the Safety Parameters Display System (SPDS) and the dose assessment computer model provides reliable visual indication of any radioactive plume and its calculated direction. Quantification of a radioactive release is determined by dose assessment, which is performed by dedicated on-shift personnel then augmented by additional dose assessment personnel in the TSC and EOF. On-site, out of plant field teams and off-site field teams are typically used to verify the status of a potential release and validate the dose assessment model. Dose assessment model validation strategies developed and implemented by the EOF staff typically include directing one team to track the leading edge of the radiological plume and one team to define the lateral edges of the plume and determine plume centerline radiological conditions. If the field team survey data indicates a departure from the dose assessment model, the radiation surveys and air samples collected by these two field teams can be used to perform dose assessment back calculations. SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys. Sufficient instrumentation, communication equipment, and transportation will be maintained on-site for augmenting and dispatching additional teams if needed.

Regarding in-plant surveys, Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for two RP technicians to perform in-plant surveys. The proposed SNC Fleet Emergency Plan HNP on-shift staffing provides one RP technician assigned to the task of in-plant surveys under the Radiological Accident Assessment and Support of Operational Accident Assessment function. An additional RP technician will be provided for the Protective Actions function discussed later. However, since both of these individuals are qualified RP technicians, they will be available to collectively support either of these

functions as needed. An additional two Radiation Protection technicians will respond within 75 minutes to support Radiological Accident Assessment (in-plant) function. This will provide sufficient Radiation Protection resources to address the Radiological Accident Assessment needs of both the on-shift and augmented ERO personnel.

With improved installed instrumentation, dose calculation computer modeling, and dedicated on-shift staffing for dose assessment and on-site out of plant surveys, there is no more than minimal impact to the performance of these tasks as a result of the proposed staffing alignments in the SNC Fleet Emergency Plan.

Plant System Engineering

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

NUREG-0654/FEMA REP-01 Revision 1 guidance provided for a Shift Technical Advisor (STA) to be available on-shift to perform the Technical Support task including core/thermal hydraulics in response to the NUREG-0737 requirements resulting from the Three Mile Island accident. Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides an individual to fulfill the STA task. The performance of the Technical Support task includes use of the SPDS computer, which graphically displays the pertinent parameters with trending and graphing capabilities, alarm functions, and color-coded indication for changes in state for various critical safety parameters. This enhances critical parameter monitoring and the rapid identification and assessment of in plant conditions. This remains unchanged for HNP in the SNC Fleet Emergency Plan.

Repair and Corrective Actions

NUREG-0654/FEMA REP-01 Revision 1 Table B-1 specifies the functional area of Repair and Corrective Actions is to be provided on-shift by a total of two individuals who also "may be provided by shift personnel assigned other functions." It further states that the "position title or expertise" for the Repair and Corrective Actions task could be filled by Mechanical Maintenance / Radwaste Operator, Electrical Maintenance, or I&C Technician.

Due to the time needed to stabilize the plant and assess the event, the initial phase of an accident is not expected to involve a significant need for maintenance personnel. Once plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities.

Typically, the initial stages of Corrective Actions will be minor or of limited scope, such as:

- Mechanical – Identification and operation of faulty valves, clogged filters, packing and seal adjustments, or troubleshooting,
- Electrical – Identification and correction of tripped breakers and overloads, or hands-off troubleshooting,
- I&C – Identification and correction of controller and set point adjustment, calibration, or hands-off troubleshooting.

Until the reactor is stabilized and the causal agents identified, actual repairs or realignment of plant equipment would not require large-scale maintenance support. The current version of the HNP Unit 1 and Unit 2 Emergency Plan provides for one mechanical journeyman, two electrical journeymen, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. The proposed SNC Fleet Emergency Plan on-shift maintenance staffing numbers will be reduced to one on-shift electrical journeyman. In

addition to these personnel, a maintenance supervisor will be added to on-shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability. A 10 CFR 50 Appendix E shift staffing evaluation demonstrated that no maintenance personnel were assigned tasks during the 75 minutes prior to augmentation. Additionally, the proposed SNC Fleet Emergency Plan provides for augmentation of maintenance discipline specific leads in the OSC as well as an overall OSC Manager within 75 minutes of an Alert or higher emergency classification. With the described on-shift maintenance staffing, there is no impact on the repair and corrective action tasks described under the Plant System Engineering, Repair and Corrective actions function as the result of removing the one electrical journeyman.

The NRC Public Meeting on July 16, 2015, discussing proposed changes to guidance regarding ERO staffing and augmentation (ML15174A309) identified that the proposed change primarily meets or exceeds the current regulatory guidance of NUREG-0654/FEMA REP-01 Revision 1 Table B-1 and the proposed NUREG-0654/FEMA REP-01 Revision 2 (ML14246A519). Based on HNP Unit 1 and Unit 2 licensing basis (FSAR), the design philosophy with respect to Emergency Safety Features (ESF), and guidance for restoration, it is unnecessary to have additional Mechanical Maintenance, Electrical Maintenance and I&C Maintenance augmented within the 75 minute timeframe. ESF systems are redundant in trains (physical separation) and have diversity of subsystems. Therefore, the inoperability of different system components in different trains is not anticipated to result in a loss of function of the ESF. This allows flexibility in plant operations under circumstances where components in redundant subsystems may be inoperable.

Protective Actions (In-Plant)

For the Protective Actions (In-Plant) function, NUREG-0654/FEMA REP-01 Revision 1 specifies providing two personnel on-shift who "may be provided by shift personnel assigned other functions." The major tasks of this function are access control, RP coverage for repair, corrective actions, search and rescue, first aid, and firefighting, personnel monitoring, and dosimetry.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides four individuals for performing this function. However, this number is modified by a note stating "may be provided by shift personnel assigned other functions." Under the proposed SNC Fleet Emergency Plan staffing a single RP technician will support this function.

System Operators are typically dispatched prior to the call-out of augmented personnel. Normally the initial response phase involves search and rescue operations or manual manipulation of equipment. Maintenance actions in the initial response phase are anticipated to be minimal as discussed previously. Installed plant area radiation monitors are used to provide indication of in-plant radiation levels prior to dispatch of personnel into the plant. This allows for personnel to be assigned the appropriate dose and dose rate alarms for their electronic personal dosimetry prior to dispatch and to assign additional Radiation Protection technician support as needed.

Personnel accessing the Radiological Control Areas (RCA) at HNP Unit 1 and Unit 2 are required by procedure to obtain electronic personal dosimetry prior to entry. The same dosimetry is also used as a "key" to unlock turnstiles for access to the RCA. Radiation work permits (RWPs) establish the necessary preset warnings/alarms associated with the dosimetry. During a declared emergency, the normal RCA entry process may use pre-prepared emergency RWPs using the Digital Alarming Dosimeters DADs. In the event the normal access system is non-functional an emergency reentry process has been developed to use the pre-prepared emergency RWP dose and dose rate alarms manually programed into the DADs. This ensures

the teams dispatched to in-plant areas to perform any function during a declared emergency will be afforded ample warning/alarm prior to exceeding their allowed dose or dose rate. In-plant teams are briefed on radiological conditions prior to being dispatched, including plant event conditions, radiological conditions, dose and dose rate turn back values/alarms, and communications methods to be used if radiological conditions change or if unexpected radiological conditions are encountered. Thus, under emergency conditions, responding personnel will be knowledgeable of dose rates in the area, and radiation protection personnel may not be required to accompany all teams into the plant areas. Dosimeters also can be programmed at the OSC by RP personnel as needed prior to team dispatch. The proposed SNC Fleet Emergency Plan HNP on-shift staffing provides for a total of two Radiation Protection technicians between the Protective Actions (in-plant) and Radiological Accident Assessment (in-plant surveys) to ensure appropriate radiological protective measures are available to the on-shift staff.

An additional two Radiation Protection technicians and an RP/Chemistry OSC lead will be augmented in the OSC within 75 minutes to support the Protective Actions (in-plant) function. This will provide sufficient Radiation Protection resources to address the needs of both the on-shift and augmented ERO personnel for the Protective Actions (in-plant) function.

Fire Fighting

There are no proposed changes to this area. The on-shift Fire Brigade is assigned this task throughout the emergency with off-site support provided by local fire departments.

A staffing analysis meeting the requirements of 10 CFR 50 Appendix E.IV.A.9 for the proposed organization was performed. The results of that analysis showed that the required response functions could be conducted with parallel activation of the fire brigade for the subject scenarios.

Rescue Operations and First Aid

Per NUREG-0654/FEMA REP-01 Revision 1, the Rescue Operations and First Aid function "may be provided by shift personnel assigned other functions." There are no proposed changes to this area. The HNP Unit 1 and Unit 2 Emergency Plan provides appropriately trained on-shift personnel to fulfill this function as a collateral duty. There are no additional personnel augmented for this task. Local off-site support provides for any additional assistance. There are no proposed changes to this area.

Site Access Controls and Personnel Accountability

There are no proposed changes to this area. This function is part of the Security Contingency Plan and is staffed accordingly.

Onsite Emergency Response Organization (ERO) – 10 CFR 50.47(b) (2)

The current ERO provided in Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan was developed in response to NUREG-0654/FEMA REP-01 Revision 1. The ERO developed by NUREG-0654/FEMA REP-01 Revision 1 was developed without a specific technical basis. The Emergency Preparedness Enhanced Rulemaking of November 23, 2011 required the capabilities of the on-shift staff to be validated by a formal analysis. This requirement was documented in 10 CFR 50 Appendix E.IV.A.9. In support of this submittal, the proposed ERO for the HNP Unit 1 and Unit 2 Site was analyzed and it was determined that the on-shift staff proposed is capable of performing the response functions required of the revised rule.

Reason for the Change

The proposed ERO in the SNC Fleet Emergency Plan provides a standard complement of emergency response positions, titles, duties, and responsibilities. This will result in a more effective interface between ERO members at the sites and their counterparts at the SNC Fleet EOF. Having a common ERO organization for the SNC Fleet will also support sharing of ERO resources between affected and non-affected stations during emergencies.

Establishing an appropriately staffed SNC Fleet standard on-shift and an augmented ERO staffing model with an SNC Fleet standard definition for ERO augmentation time is a practical and prudent alternate method to ensure effective and timely emergency response augmentation.

Details associated with the on-shift ERO, revised augmented ERO, and revised key responsibilities and tasks as identified in NUREG-0654/FEMA REP-01 Revision 1, are included in Enclosure 9.

Planning Basis for Augmented Emergency Response Organization (ERO)

Positions have been designated as 75 minutes responders in the TSC, OSC, EOF, and JIC. These positions perform major functions and supporting functions in each facility. The tables below outline these positions and functions as provided in the proposed HNP Unit 1 and Unit 2 Emergency Plan.

TSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control		Emergency Director (ED)
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification/Communication	Notify licensee, state, local, and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		HPN Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Radiation Protection (RP) Supervisor
		Dose Analyst*
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

*Security Supervisor filled by one of the on-shift Security Supervisors. Dose Analyst filled by the on-shift chemistry technician.

** Support Coordinator does not have a 75 minute augmentation time.

OSC 75 Minute Augmentation ERO		
Major Functional Area	**Major Tasks**	**Position Title**
Emergency Direction and Control		OSC Manager
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Lead (1) Field Monitoring Team Assistant (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP / Chemistry Group Lead
	• RP coverage for repair, corrective actions, search and rescue, first aid & firefighting • Personnel monitoring • Dosimetry	RP Technicians (2)

EOF 75 Minute Augmentation ERO		
Major Functional Area	**Major Task**	**Position Title**
Emergency Direction and Control	EOF Director	ED
		EOF Manager
		Support Coordinator*
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff *
		Liaisons (at EOCs)* - GA - AL - SC
Notification/Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		News Writer
		Field Team Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
	Chemistry/Radio Chemistry	Not required in this facility
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

* Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute augmentation time.

JIC Staff*		
Functional Area	**Major Task**	**Position Title**
Media Response	Media Response	Public Information Director
		Nuclear Spokesperson
		Technical Assistant
		JIC Manager
		JIC Assistant
		Facility Coordinator
		Clerical Staff
		Security
		Public Response Coordinator
		Public Response Staff
		Media Relations Representative

* JIC Staff do not have a 75 minute augmentation time.

Minimum staff positions have been identified for each facility. The minimum staff identified in Standard Plan figures B.2.1.A, B.2.2.A, B.3.1.A are not intended to further reduce the augmentation requirements, but instead delineate a subset of the 75 minute responders that, if available prior to full staffing, can 'activate' the facility and reduce the event management burden on the Control Room through transfer of command and control functions to the ERFs. Facility activation may be completed upon filling of minimum staffing positions and completion of a briefing on the event to ensure personnel in these positions are ready to accept responsibility for their functions. This criteria was developed to comport with the guidance in NSIR/DPR/ISG-01, Emergency Planning for Nuclear Power Plants.

Minimum staffing positions for the TSC Organization are as follows:

- TSC Emergency Director (ED)
- TSC Emergency Response Facility (ERF) Communicator
- TSC Manager
- TSC Operations Supervisor
- TSC ENS Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Reactor Engineer

Minimum staffing positions for the Operations Support Center (OSC) Organization are as follows:

- OSC Manager
- OSC Emergency Response Facility (ERF) Communicator
- OSC RP / Chemistry Group Lead

Minimum staffing positions for the EOF Organization are as follows:

- EOF Emergency Director (ED)
- EOF Emergency Response Facility (ERF) Communicator
- EOF Manager
- EOF Dose Assessment Supervisor

- EOF Dose Analyst
- EOF ENN Communicator

Minimum staffing positions for the Joint Information Center (JIC) Organization are as follows:

- Public Information Director (PID)
- JIC Manager
- Media Relations Representative
- Public Response Coordinator

In addition to the functional analysis provided, the key Emergency Response Facilities were analyzed to determine the minimum staffing (both numbers and positions) needed for the facilities to activate the facilities and begin facility operations. Any personnel determined to be required to support the minimum staff activation and initiation of activities were added to the revised augmented ERO.

Program Enhancements

The following section discusses technical changes in plant systems, dose assessment, procedures, and training which have been completed in order to better support on-shift functions and ease operator burden. Additional information regarding on-shift and augmented positions and their responsibilities as identified in NUREG-0654/FEMA REP-01 Revision 1 are outlined in Enclosure 9.

Plant Computer System

At the time of the original approval of the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan, the site used an Emergency Response Facility Computer System. The operator interface consisted of a small number of printers located in the control room and computer room.

In 1986, the Emergency Response Facility Computer System was housed in the TSC. The design criteria were based on the requirements of NUREG-0737, Supplement 1, for a Safety Parameter Display System (SPDS) and the upgrading of ERFs. The requirements were met or exceeded by a system of grouped displays of parameters from which plant safety status can be rapidly assessed, provided by Proteus software. The system upgrade included introduction of automatic updates to plant overview and system displays on the computer monitors, consolidated safety parameter displays, and increased frequency of parameter updates.

In 2008/2009, the site integrated SPDS into the plant process computer. This significantly improved plant monitoring capabilities in the control room as well as in the site's ERFs by integrating other independent standalone systems.

Benefits of the upgraded systems include:

- Programming capability for automated response such as indication of critical parameter alarms.
- Improved plant monitoring capability for ED functions.
- Fewer keystrokes required to switch between graphical displays.
- Real time plant data available through graphical displays.
- Functions are available to any desktop computer through the plant's site-wide intranet.

Computer basic functions are supported by instrument buses with back-up power provided by vital buses.

Dose Assessment

The original HNP dose assessment software used manual entry of basic meteorological data and either manual entry of radiological data or use of internally stored source terms. The HNP dose assessment capability was upgraded in the mid-1990s when the MIDAS dose assessment program was installed on the ERF Computer to provide HNP a full Class B dose assessment model.

Improvements have been made to the dose assessment program resulting in minimal user interface required to quickly produce results. Radiological dose assessment has benefited from technological advances that make dose assessment simpler and less time-consuming. Dose assessment is currently performed by on-shift operations personnel using the prompt dose assessment mode of the MIDAS-NU program, which is a Class A model. Once the TSC and EOF staff arrive, a full Class B model of the MIDAS-NU program is employed to perform dose assessment. This program supports multi-unit and multi-accident assessment of radiological releases. The MIDAS-NU program has minimal data entry needs and a minimal number of program windows the user needs to access to perform a dose projection. With the use of the dose assessment program, as well as plant status, meteorological, and radiation monitoring data, one person can easily and rapidly perform dose assessments during emergency conditions.

Specifically designed displays have been developed for obtaining the necessary plant, radiological effluent, area radiation monitor, and meteorological information for dose assessment personnel on-shift using the Meteorological Information Dose Assessment System – Nuclear (MIDAS-NU) program.

Automated Call-Out System

Automated call-out systems have been enhanced to streamline processes for activation of the ERO. A single phone call initiates rapid notification of ERO members, in lieu of individual calls to fill the ERO positions included in the Emergency Plan. The system includes a primary activation location as well as a remotely located back-up capability to ensure uninterrupted operation.

Procedure Improvements

Emergency Operations Procedures (EOPs)/Abnormal Operating Procedures)AOPs)

Since the original emergency plan approval, EOPs have been improved through industry initiatives. EOPs now use a symptom-based approach that demands less assessment and interpretation of plant conditions by the operating crews. EOPs interface well with new technology such as IPC. EOP curves are generated by IPC to graphically display plant conditions relative to limits or required actions.

Emergency Plan Implementing Procedures (EPIPs)

In 2008 (Reference NL-08-0160; Revision 27.0 of HNP Unit 1 and Unit 2 Emergency Plan) HNP Unit 1 and Unit 2 updated the classification methodology to NEI 99-01, Revision 4. EALs now incorporate guidance that has simplified the classification process, including the use of an overview matrix of EAL initiating conditions and threshold values, which streamlines the process of evaluating EALs against plant conditions.

Training Improvements

Operations Training

Training is used to strategically drive improved performance at HNP Unit 1 and Unit 2.

Since NRC approval of the HNP Unit 1 and Unit 2 Emergency Plan, the application of the Systematic Approach to Training (SAT) has resulted in developing a task list for Operations personnel. The SAT process ensures training is conducted to industry-accepted standards and has led to accreditation of the Operations Training Programs by the National Academy for Nuclear Training.

A dynamic simulator is routinely used during Operations Training. Simulator evaluations include emergency response scenarios that periodically exceed 75 minutes in length and are part of the requalification cycle. Simulator scenarios are designed to be realistic and reflect a wide range of plant conditions, including emergency conditions. During evaluated simulator sessions, the control room staff is taken from normal operation to accident conditions resulting in declaration of at least one event, which can range from Unusual Event to General Emergency. The crew performs critical tasks, classification, accident mitigation, response prioritization, and communications without augmentation from additional responders. The proficiency of the control room staff to perform these functions while maintaining situational awareness, without additional support, is assessed in every training cycle.

The Licensed Operator Continuing Training (LOCT) Program includes licensed crew performance evaluations that consider the scenario guidance attributes of INPO Operations Department Standing Instruction, ODSI-3, and "Operations Department Guidance."

Attachment C of ODSI-3 provides guidance on the realistic integration of the emergency response into crew performance evaluations. The purpose is to ensure the crew performance evaluations realistically represent the additional challenges that the emergency plan responsibilities add to the crew's ability to manage an event. Representing the event as realistically as possible, which includes the additional challenges of emergency plan responsibilities, helps promote the situational awareness necessary during a real event.

STA Training

The Shift Technical Advisor (STA) was originally trained as an advisor to the operating shift per NUREG-0737. In 1990, additional guidelines were developed by INPO for the training of STAs. This is detailed in the document INPO 90-003, Guidelines for Training and Qualifications of Shift Technical Advisors.

The INPO Guidelines describe the role of the STA. The STA performs independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergent conditions, classifications of emergencies, development of recommendations to protect the public, and any other actions related to critical safety functions and plant safety during abnormal and emergency situations. By routinely monitoring equipment and plant operations, the STA can focus on preventive actions in order to mitigate the consequences of an accident and protect public health and safety.

Increases in On-Shift Staffing

There has been an increase in on-shift staffing from what was required in the 1981 Revision of the HNP Unit 1 and Unit 2 Emergency Plan, in order to ensure adequate performance of the major emergency plan functions and tasks. A total of 25 persons are identified for on-shift staffing in Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan, which is an increase from the total of 10 persons in the regulatory guidance provided by NUREG-0654/FEMA REP-01 Revision 1. A comparative chart depicting on-shift and augmented staffing based on NUREG-0654/FEMA REP-01 Revision 1, the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan, Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan, and proposed

revisions are included in Enclosure 9.

Enhancements in Information Sharing with Offsite Agencies

There has been a dramatic increase in the ability of the site to share event-specific information with Offsite Response Organizations (OROs) from the one-to-one telephone systems at the time of the 1981 Revision of the HNP Unit 1 and Unit 2 Emergency Plan. Real-time plant data is communicated to the Nuclear Regulatory Commission using the approved Emergency Response Data System (ERDS). Additionally, local OROs are provided real-time data with automated methods (currently WebEOC). These enhancements provide more timely and accurate information of actual plant conditions than was originally available.

Improvement Summary

The improvements to staffing, equipment, procedures, communication of plant information, and training since initial approval of the HNP Unit 1 and Unit 2 Emergency Plan have resulted in a significant increase in on-shift capabilities and knowledge. The ERO maintains the depth and capability for continuous 24-hour coverage of the Emergency Response for a protracted period.

Summary

Based on overall improvements in technology, procedures, training, and staffing levels available to ERO since the original implementation of the guidance contained in NUREG-0654/FEMA REP-01 Revision 1, the proposed Emergency Response Organization is capable of implementing the Emergency Plan in accordance with the requirements of 10 CFR 47 and 10 CFR 50 Appendix E.

Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4

Enclosure 9
Hatch Justification Matrix
(Marked-Up Pages and Clean Copy)

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The principal licensee contacts for the media are the Public Information Director and the designated Company Spokesperson. The Company Spokesperson has access to the ED through the EOF Manager. The Company Spokesperson briefs the media on plant status and company emergency activities. In addition, technical briefers who can provide general and background information, as appropriate, to reporters at the JIC have been designated.	**EP B.3.2.8** EOF Nuclear Spokesperson The Nuclear Spokesperson speaks on behalf of the company, providing plant status updates during news briefings. The Spokesperson also may do one-on-one media interviews. The position works with the Technical Assistant in keeping abreast of the event status and keeps the Public Information Director (PID) posted on that status. **EP B.3.2.1** JIC Public Information Director (PID) The PID is responsible for coordination of emergency information between the utility and responding offsite organizations participating in the Joint Information Center (JIC). Additional duties include managing approval and dissemination of utility news bulletins, facilitating news briefings, overseeing public response, serving as liaison to the media and coordinating off-site agencies. The PID is responsible for evaluating the emergency's severity in terms of public interest and safety.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.
Further information relative to the public information organization and information flow to the public during an emergency is available in the HNP Emergency Communications Plan.	No equivalent Plan/Annex statement.	The REP requirements previously located in the Emergency Communications Plan have been incorporated in Section G of the SNC Standard Emergency Plan and Site Annex.

Hatch Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	Hatch (60 min) 1981	Hatch (60 min) Rev 36	Hatch Proposed (75 min)
Emergency Direction and Control					1	9
Notification / Communication	Notify State/local and federal personnel, maintain communication		2	3	2	11
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager	1	1	1	(a)
	Dose Assessment	HP Expertise		1	1	3
	Offsite Surveys	HP Technicians	2	4	4	~~5~~6
	On-Site Surveys	HP Technicians	1	2		
	In-Plant surveys	HP Technicians	1	2		
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
Plant System Engineering	Technical Support	Electrical	1	1	1	1
		Mechanical	1	1	1	1
		Engineering Supervision				2
		Core Thermal / Hydraulic	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1	1		
		Electrical Maintenance	1	2	1	1
		I&C Technician		1	1	1
		Maintenance Supervision				2
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2	4	2	3
Total Augmented ERO			**15**	**26**	**18**	**4~~4~~3**

(a) EOF Emergency Director counted in Emergency Direction and Control.

HATCH NUCLEAR POWER PLANT

JUSTIFICATION MATRIX

Purpose

The purpose of this attachment is to identify the commitments in the current Hatch Nuclear Power Plant Emergency Plan Revision 36, identify the equivalent or modified commitment in the integrated Fleet Emergency Plan and Hatch Site Annex, and justify on a commitment-by-commitment basis the proposed License Amendment.

CHANGE MATRIX

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Hatch Nuclear Plant (HNP) is a two-unit boiling water reactor operated by Southern Nuclear Operating Company (SNC) (hereafter referred to as the licensee). The plant is on a 2100-acre site located in Appling County, Georgia, approximately 11 miles north of Baxley, Georgia, on U.S. Highway 1 (Figure i).	**Annex 1.1** Facility Description The Hatch Nuclear Plant (HNP) is a two-unit boiling water reactor. The plant is on a 2,100-acre site located in Appling County, Georgia, approximately 11 miles north of Baxley, Georgia, on U.S. Highway 1.	The words were standardized and relocated to the Site Annex.
Figure ii shows the site and locations of the buildings onsite.	**Annex Figure 1.1.B**	The figure was maintained with a new figure designation without change.
The locations of the HNP emergency facilities and rally points are shown on Figure ii.	**Annex Figure 1.1.B**	The figure was maintained with a new figure designation without change.
This Emergency Plan is applicable to HNP, Units 1 and 2, and to its environs as specified by the emergency planning zones (EPZs): a plume exposure pathway EPZs, which nominally consists of the area within approximately 10 miles of the plant, and an ingestion exposure pathway EPZ, which extends to approximately 50 miles. These distances are taken from the plant stack. The two EPZs are shown in Figures iii and iv.	**Annex 1 Introduction** This document serves as the Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2 Annex and contains information and guidance that is unique to HNP. This includes Emergency Action Levels (EALs) and facility geography. **Annex Figures 1.2.A and 1.2.B**	The words were standardized and relocated to the Site Annex

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The geographical boundaries of the plume exposure pathway EPZ are shown on Figure iii. These evacuation zones are further detailed in the State Base Plan, Annex A, Table D-1, of each county section (Toombs, Appling, Jeff Davis, and Tattnall). These zones are presented in Tables i through iv.	**Annex 1.2.1** Plume Exposure Pathway (SEP J.7) The 10-mile Emergency Planning Zone (EPZ) for HNP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Located within the EPZ are the Georgia counties of Appling, Jeff Davis, Tattnall, and Toombs. **Annex Figure 1.2.A**	The words were standardized and relocated to the Site Annex
The EPZ for ingestion exposure includes an area within 50 miles of the plant stack, except for portions of Brantley and McIntosh Counties which were excluded to prevent crossing any additional jurisdictional boundaries. Planning for the ingestion exposure pathway is a responsibility of the State of Georgia. More information about the ingestion exposure pathway EPZ can be obtained from the State's Radiological Emergency Plan.	**Annex 1.2.2** Ingestion Pathway (SEP J.7) The area between the 10-mile and 50-mile radius is considered the Ingestion Pathway Zone (IPZ). The 50-mile IPZ is depicted in Figure 1.2.B. Planning for the ingestion exposure pathway is a responsibility of the state of Georgia. More information about the IPZ can be obtained from the state's Radiological Emergency Plan. **Annex Figure 1.2.B**	The words were standardized and relocated to the Site Annex
The order of the presentation provided herein follows that of the 16 standards delineated in Title 10 Code of Federal Regulations (CFR) Part 50, Section 50.47(b). Appropriate criteria from NUREG-0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans (RERPs) and Preparedness in Support of Nuclear Power Plants," are addressed approximately in the sequence presented in that document.	**EP Background** The SNC Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The SNC Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E, and the intent of NUREG 0654 Revision 1. The SNC Emergency Plan is organized using the structure of NUREG-0654 Revision 1 and that structure provides the cross-reference to the base document.	The words were standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Although this Plan is designed to stand on its own, additional plans expand on matters mentioned here, as identified in Section C. It is to be recognized that this is only a plan and not a prescriptive document. Each incident is a unique event; therefore, this Plan is designed to incorporate the flexibility to tailor the response and meet the emergency.	**EP Scope** There are supporting and complementing emergency plans, including those of federal agencies, the states of Alabama, Georgia, and South Carolina, and individual counties. The SNC Emergency Plan describes the organization, facilities, training, and maintenance of both onsite and off-site facilities and equipment that will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public.	The words were standardized and relocated to the SNC Standard Emergency Plan
This Plan is supported by a set of implementing procedures. A typical list of these procedures is included as Appendix 6.	**EP Scope** Detailed procedures concerning the implementation of the SNC Emergency Plan are in the Emergency Plan Implementing Procedures (EPIPs). Those documents describe the duties of individuals and groups in the event of emergencies and also serve as the interface between the SNC Emergency Plan, plant operations, security, and radiological control programs. SNC also has procedures in place that implement onsite protective actions and personnel accountability during hostile action threats or events that are appropriate for plant and environmental conditions. These procedures are available for use at the plants. **Annex Appendix C**	The words were standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A. ASSIGNMENT OF RESPONSIBILITIES In the event of a situation at the HNP which requires activation of the emergency response organizations, various Federal, State, local, and private sector organizations may be required to contribute to the emergency response. This section describes the responsibilities of these organizations.	**EP Section A** **Annex 1.3 State of Georgia** **Annex 1.4 Local Organizations**	The words were standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Table A-1 lists primary response organizations and the emergency title of the individual in charge.	No Equivalent Plan/Annex Table	The primary response organizations are described in the SNC Standard Emergency Plan and Site Annex. No agencies responding to a Classified Event were impacted by this change.
Section A: The licensee accepts the responsibility of developing and maintaining an effective emergency plan and of maintaining proper preparedness through the development of formal procedures for implementing the Plan as identified in Appendix 6, the training of personnel in accordance with Section O, the procurement of necessary equipment, and the development of relationships with various governmental agencies and private organizations as identified in this section and in Appendix 2.	**EP Introduction:** Detailed procedures concerning the implementation of the SNC EP are in the Emergency Plan Implementing Procedures (EPIPs). SNC has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company	The commitment wording was standardized within the SNC system. The commitment assuming overall responsibility for maintaining the state of readiness for emergency preparedness is unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section A: The following tasks are part of the licensee's responsibility: 1. Recognize and declare the existence of an emergency condition. 2. Take corrective actions to mitigate the severity of the accident. 3. Classify the event in accordance with the methodology described in Section D of this Plan. 4. Notify appropriate plant and corporate personnel and offsite authorities. 5. Request additional support, as deemed necessary. 6. Establish and maintain effective communications within HNP and with offsite response groups, as described in Section F. 7. Continuously assess the status of the accident and periodically communicate the status information to the appropriate response groups. This includes the collection and evaluation of onsite and offsite radiological monitoring data. 8. Take protective measures onsite and recommend protective measures to offsite authorities. 9. Monitor and control radiation exposures of all personnel responding to the emergency, under the direction of the licensee. 10. Provide timely and accurate emergency information to the public through press briefings in conjunction with State and local officials.	**EP Introduction:** SNC has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The SNC EP describes the organization, facilities, training, and maintenance of both onsite and off-site facilities and equipment that will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public.	The Introduction was standardized and modified. The existing Plan wording stating the performance of the Planning Standards from the current Plan is addressed in the appropriate sections of the SNC Standard Emergency Plan and Annex. The intent to maintain the program consistent with the Planning Standards was maintained in the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section A: The following tasks are part of the licensee's responsibility: (cont)	Extracted from SNC Standard Emergency Plan TABLE OF CONTENTS SECTION A: ASSIGNMENT OF RESPONSIBILITY SECTION B: ONSITE EMERGENCY RESPONSE ORGANIZATION (ERO) SECTION C: EMERGENCY RESPONSE SUPPORT AND RESOURCES SECTION D: EMERGENCY CLASSIFICATION SYSTEM SECTION E: NOTIFICATION METHODS AND PROCEDURES SECTION F: EMERGENCY COMMUNICATIONS SECTION G: PUBLIC EDUCATION AND INFORMATION SECTION H: EMERGENCY FACILITIES AND EQUIPMENT SECTION I: ACCIDENT ASSESSMENT SECTION J: PROTECTIVE RESPONSE SECTION K: RADIOLOGICAL EXPOSURE CONTROL SECTION L: MEDICAL AND PUBLIC HEALTH SUPPORT SECTION M: RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS SECTION N: EXERCISES AND DRILLS SECTION O: RADIOLOGICAL EMERGENCY RESPONSE TRAINING SECTION P: RESPONSIBILITY FOR THE PLANNING EFFORT	The SNC Standard Emergency Plan introduction was standardized. The organization of the Plan was aligned to the Planning Standards/NUREG-0654 Revision 1. The commitment to perform in accordance with the standards was maintained unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The licensee emergency response is carried out under the control of the Emergency Director (ED).	**EP B.1.1**: The **Shift Manager (SM)** is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the position of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED.	The commitment wording was standardized for the SNC sites. The intent of the commitment was maintained.
State of Georgia Georgia has developed a RERP on a statewide basis as an integral part of the Georgia Emergency Operations Plan. The Georgia Emergency Operations Plan is an emergency operations plan for all natural disasters, accidents, and incidents, including radiological emergencies at fixed nuclear facilities. It is a plan of action developed for use by State and local government officials in preparing for, responding to, and dealing with situations throughout the State.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment wording was standardized for the SNC sites and relocated to the Site Annex for those responders applicable to the site. No change in the overall expectations of response from the state of Georgia was made as a result of this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
In accordance with Annex No. 12 of the Governor's Executive Order dated June 3, 1983, the Georgia Department of Natural Resources (DNR) has the lead agency responsibility for responding to all peacetime radiological emergency situations throughout Georgia. Under the procedure established by the Georgia Emergency Operations Plan, which was developed pursuant to the Governor's Executive Order, the DNR radiological emergency response team assesses the radiological conditions of an incident at the site and confirms or determines whether a state of emergency exists.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment wording was standardized for the SNC sites and relocated to the Site Annex for those responders applicable to the site.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Upon being advised that a radiological emergency exists, the Governor declares an emergency condition, which then activates the Georgia Emergency Management Agency (GEMA) authorities to deal with the situation. Under the statutory authority granted to the GEMA, the pre-established plans and procedures of all State agencies and applicable local government organizations are automatically activated and coordinated by the GEMA State Emergency Operations Center (EOC) in Atlanta. In the event of a radiological emergency, GEMA has broad legal authority to take whatever actions are deemed necessary to protect the health and safety of Georgia citizens. This authority includes, but is not limited to, evacuation of people from private property, control of public and private transportation corridors, and utilization of all public facilities in support of efforts to protect life and property.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment wording was standardized for the SNC sites and relocated to the Site Annex for those responders applicable to the site.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The fundamental legislation providing the basis for emergency response by civil authorities is the Georgia Emergency Management Act of 1981, as amended. This Act in part creates a State Emergency Management Agency (EMA); authorizes the creation of local organizations for emergency management; confers upon the Governor and the executive heads of governing bodies of the State certain emergency powers; and provides the rendering of mutual aid among the political subdivisions of the State, and with other states, and with the Federal Government.	No equivalent Plan/Annex statement.	The paragraph in the current Plan is historic in nature and provides no specific direction to response to the current Plan. The Site Annex clearly specifies the responsibilities of the respective OROs.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Other documents providing bases for emergency response are: 1. Governor's Executive Order, August 25, 1981: Recognizes the Georgia Emergency Management Act of 1981, which redesignates the State Civil Defense Agency as the GEMA. 2. Georgia Emergency Disaster Operations Plan: Contains the rules and regulations for operations, should an emergency or disaster occur in the State. The Plan is binding on all local governments authorized or directed to conduct emergency management operations and on all State departments or agencies. 3. Radiation Control Act, Georgia Code Annex 88-1301 et seq.: Delegates emergency powers during radiation emergencies to the DNR, Division of Environmental Protection. 4. Georgia Water Quality Control Act of 1974, as amended, Act No. 870. 5. Georgia Air Quality Control Act of 1978, as amended, Act No. 794. 6. Georgia Transportation of Hazardous Materials Act of 1979, Act No. 487.	No equivalent Plan/Annex statement.	The paragraph in the current Plan is historic in nature and provides no specific direction to response to the current Plan. The Site Annex clearly specifies the responsibilities of the respective OROs.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The duties and responsibilities of the principal and support agencies of the State of Georgia are summarized below. A detailed discussion of the State's response is contained in the Georgia RERP. Principal Agencies of the State of Georgia The following State agencies are assigned lead responsibility for radiological emergencies and for overall State preparedness, respectively:	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. GEMA a. GEMA is responsible for general State emergency planning and exercises, and overall direction and control of emergency or disaster operations as assigned by Executive Order. b. The Director of Emergency Management as the State Disaster Coordinator coordinates DNR emergency activities with overall State response efforts. c. On behalf of the Governor, activate all or portions of the Georgia Emergency Operations Plan to provide the necessary overall coordinated response. d. Provide communications for the State EOC, as required, through the 24-hour radio net, commercial telephone, National Warning System (NAWAS), teletype, or other communications systems. Communication links will be established, in accordance with existing procedures, with the State EOC, as well as with additional State and local emergency response personnel within the plume exposure pathway and 50-mile radius EPZs. These functions will initially be handled from the State EOC in Atlanta and once activated will be transferred to the Forward Emergency Operations Center (FEOC) in Vidalia. e. Maintain liaison with the DNR Radiation Emergency Coordinator (REC).	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the State of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
GEMA (cont) f. Activate public emergency warning and/or evacuation procedures, as needed, pursuant to the Georgia Emergency Operations Plan. g. Assist in performing radiological monitoring and provide radiological monitoring instrumentation. h. Provide radiological monitoring training assistance. i. In accordance with the Georgia Emergency Operations Plan, coordinate public information releases in cooperation with State and local agencies. j. Contact the Governor for National Guard assistance.		The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
DNR a. DNR is assigned primary responsibility by Executive Order for implementation and administration of the State radiological emergency response function. b. An REC in the Environmental Protection Division (EPD) interacts with appropriate State, local, and Federal agencies and private organizations to direct all necessary radiation control actions. The REC is on call 24 hours a day and will be notified by the GEMA Duty Officer. c. In situations beyond local government control, DNR provides program assistance in the application of available personnel, equipment, and technical expertise, as required. d. DNR requests State support agency(s) and Federal assistance pursuant to the Georgia Emergency Operations Plan, as required. e. DNR will escort media personnel within the plume exposure pathway EPZ as conditions allow, if access controls have been established. f. Dispatch radiation emergency teams, as needed. g. Perform radiation survey and monitoring, and provide protective equipment, as necessary. h. Provide technical advice and assist in substance identification.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
State Support Agencies The following State agencies are prepared to provide related support of this function as indicated pursuant to the Georgia Emergency Operations Plan: 1. Department of Human Resources Coordinate emergency health and social assistance pursuant to the Georgia Emergency Operations Plan.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Public Safety a. As applicable, assume control over the situation until the arrival of radiation safety personnel. b. Maintain liaison with the DNR REC. c. Provide communication linkage, as required. d. Provide land or air transportation, or escort, as available, for radiation safety personnel, other necessary personnel, or equipment. e. Assist in radiological monitoring, as required. f. Provide law enforcement assistance for area security or recovery of lost or stolen radioactive material. g. Coordinate with DNR law enforcement and local police. h. Assist in public warning or evacuation, as required, including ground and airborne means as available. i. Assist in area security and control. j. Provide land or air transportation, as requested, for radiation safety personnel, other necessary personnel, or equipment.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Agriculture a. Collect samples of food products, livestock, produce, and dairy products, as necessary. b. Restrict the sale, production, distribution, and warehousing of livestock, produce, dairy, and processed food products contaminated beyond safe consumption. c. Assist in disposal of contaminated products. d. Coordinate these activities with United States Department of Agriculture (USDA) personnel. e. Maintain liaison with the DNR REC for assessing degree of contamination.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Transportation a. Assist in traffic control and routing, accident assessment, and recovery operations in transportation incidents. b. As requested, provide land, air, or water transportation for radiation safety personnel, other necessary personnel, or equipment. c. Provide communications linkage, as required. d. Assist State Patrol and DNR law enforcement in security and radioactive material escort, as requested. e. Provide heavy equipment and personnel, as required.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Forestry Commission a. Provide land or air transportation, as requested, for radiation safety personnel, other necessary personnel, or equipment. b. Provide personnel and heavy equipment, as required, to assist in recovery operations. c. Provide communication linkage, as necessary. d. Assist with public warning or evacuation, as required, including ground and air operations.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Administrative Services a. Provide for expedient approval and purchase of equipment and supplies essential to emergency operations. b. Provide land transportation vehicles for emergency personnel. c. Provide emergency communications equipment and repair.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
County Emergency Response The area within the plume exposure pathway in the State of Georgia falls within Appling, Jeff Davis, Tattnall, and Toombs Counties. The responsibility for radiological emergency response planning rests with each Chairman of the County Board of Commissioners or the Mayor of his respective jurisdiction. It is this individual's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within each county which have a primary role in radiological emergency planning and response include the EMA, and local law enforcement agencies.	**Annex 1.4.1** Georgia Counties (SEP A.2) The area in the plume exposure pathway in the state of Georgia falls within Appling, Jeff Davis, Tattnall, and Toombs Counties. The responsibility for radiological emergency response planning rests with the Chairman of each County Board of Commissioners, or the Mayor of a respective jurisdiction. It is this individual's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within each county that have a primary role in radiological emergency planning and response include the EMA and local law enforcement agencies.	The wording was relocated to the Site Annex.

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Local Emergency Management Agencies (LEMAs) Principal activities include the following: 1. Receive notification from HNP and GEMA. 2. Activate county resources, as necessary, to respond to the emergency. 3. Maintain communications with HNP on emergency situation status. 4. Provide information to other county response elements, the media, and the public. 5. Activate the public notification system, if required. 6. Activate the county EOC. 7. Coordinate the county emergency response activities. 8. Activate and direct operations at the designated reception and care facility.	**Annex 1.4.1** Principal activities of the LEMAs include the following; • Receive notification from HNP and GEMA. • Activate county resources, as necessary, to respond to the emergency. • Maintain communications with HNP on emergency situation status. • Provide information to other county response elements, the media, and the public. • Activate the public notification system, if required. • Activate the county EOC. • Coordinate the county emergency response activities. • Activate and direct operations at the designated reception and care facility.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.
Local Law Enforcement Agencies Principal activities include the following: 1. Control access to the plume exposure pathway EPZ. 2. Provide traffic control and law enforcement measures in the event of an evacuation. 3. Act as receiver of notification from HNP and GEMA.	**EP B.6.1** Local Law Enforcement Agencies Local law enforcement agencies may be called upon to lend assistance during the response to emergencies at any of the SNC-operated nuclear power plants. Details on the services offered are in the SNC plant's site-specific **Annex 1.4** Local Organizations (SEP A.2, B.6.1) Principal activities of Local Emergency Management Agencies (LEMA) and Local Law Enforcement Agencies (LLEA) in Georgia are described in the respective Emergency Operations Plans.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

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Others Other county resources, including the Fire Department, Health Department, and Public Works Department, may be mobilized as described in Annex A to the Georgia RERP.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

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Medical Support Plant Hatch has established agreements with the Appling Ambulance Service and the Meadows Regional Medical Center for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Agreements with the Appling General Hospital in Baxley, the Meadows Regional Medical Center in Vidalia, and a contract with a medical consulting group have also been established for treatment of injured and contaminated/irradiated individuals. Support provided includes, but is not limited to, emergency medical services, ambulances, and emergency medical technicians.	**EP B.6.2**: Agreements with ambulance services are in place to transport injured personnel from the plants to the designated medical facility. **Annex Section 2.3.3**: Plant Hatch has established agreements with the Appling County EMS and Toombs-Montgomery County EMS for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Request for medical support will be made by the control room or site security to the Appling County 911 center, Toombs County 911, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment was relocated to the SNC Standard Emergency Plan and Annex unchanged.
Request for medical support will be made by the control room or site security to the Appling County 911 center, Appling or Toombs County EOCs, or the Incident Command Post, as applicable, based on the nature and timing of the event. Copies of these agreements are maintained in the SNC document management system and are included by reference in Appendix 2.	**Annex 2.3.3** Plant Hatch has established agreements with the Appling County EMS and Toombs-Montgomery County EMS for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Request for medical support will be made by the control room or site security to the Appling County 911 center, Toombs County 911, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Fire Support Plant Hatch has established an agreement with the Appling County EMA to provide, upon request, offsite fire support to the HNP Fire Brigade. Support provided includes, but is not limited to, firefighters and firefighting equipment. Request for fire support will be made by the control room or site security to the Appling County 911 center, Appling County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event. A copy of this agreement is maintained in the SNC document management system and is included by reference in Appendix 2.	**Annex 2.3.1** Fire Fighting (SEP B.6.4) Plant Hatch has established an agreement with the Appling County EMA to provide, upon request, offsite fire support to the HNP Fire Brigade. Support provided includes, but is not limited to, firefighters and firefighting equipment. Request for fire support will be made by the control room or site security to the Appling County 911 center, Appling County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.
Private Sector Organizations 1. Bechtel Power Corporation The licensee has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident. Bechtel's assistance will not be required during the early stages of the emergency response but is more likely to be requested during recovery activities.	**EP A.3.2**: SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.	The commitment was relocated to the SNC Standard Emergency Plan unchanged.
2. General Electric Company (GE) The licensee has established an agreement with GE to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. GE provides a capability to respond on a 24-hour-a-day basis.	**EP A.3.4**: The licensee has established an agreement with GE to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. GE provides a capability to respond on a 24-hour-a-day basis.	The commitment was relocated to the SNC Standard Emergency Plan unchanged.

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3. Voluntary Assistance Group The licensee is a signatory to two comprehensive agreements among electric utility companies: the Nuclear Power Plant Emergency Response Voluntary Assistance Agreement and the Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials.	**EP A.4** Other Utilities The Institute of Nuclear Power Operations (INPO) aids nuclear utilities in obtaining resources beyond their usual capabilities during recovery from an emergency. As one of its roles, INPO will assist affected utilities by applying the resources of the nuclear industry to meet the needs of an emergency.	The SNC Standard Emergency Plan updated wording related to industry support from the Institute of Nuclear Power Operations. The intent of the commitment is unchanged.
Federal Government Support The resources of the Federal agencies appropriate to the emergency condition will be made available in accordance with national response plans. The ED is specifically authorized to request Federal assistance on behalf of the licensee under the provisions of this Plan. In addition to the Nuclear Regulatory Commission (NRC), other agencies which may become involved are the Department of Energy (DOE), the Federal Emergency Management Agency (FEMA), the Environmental Protection Agency (EPA), the Department of Health and Human Services, the Department of Transportation, and the Department of Agriculture.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Request federal assistance as needed	The SNC Standard Emergency Plan was standardized and the commitment moved without change in intent to the responsibilities section or the ED.

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Concept of Operations The emergency preparedness (EP) program for HNP requires the coordinated response of several organizations. The emergency organization for HNP is described in detail in Section B of this Plan. The ED is the key individual in the HNP emergency organization; one of his nondelegable responsibilities is the decision to notify the NRC and those authorities responsible for offsite emergency measures.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Notification of offsite agencies and approval of state, local, and NRC notifications.	The SNC Standard Emergency Plan was standardized and the commitment moved without change in intent to the responsibilities section or the ED.
The interfaces among the emergency organizations are shown on Figure A-1.	No equivalent Plan/Annex figure	The responsibilities of the agencies were described in the SNC Standard Emergency Plan and Site Annex. The Figure was no longer informative in the organization of the Plan/Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Continuous Communication Capability The ED initiates the activation of various emergency response organizations by contacting the State of Georgia, county EMAs, and the NRC. All of these organizations can be contacted 24 hours a day. The State of Georgia and counties surrounding HNP have a continuously manned communication link, the Emergency Notification Network (ENN), for the purpose of receiving notification of a radiological emergency. The preferred contact for the county is the EMA Director. In the event of inability to contact the EMA Director, the designated 24-hour point of contact for each county will be contacted so the county officials can be notified.	**EP E.2.1** Notification of Onsite Personnel The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on-site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system. Notification procedures include notification of Emergency Response Organization Personnel (ERO) not on site or during backshift hours. ERO members will be notified by means of an automated callout system activated by on-shift personnel. **EP E.2.2** Notification of State and local Authorities A dedicated ENN will normally be used to accomplish state and local notifications. Backup means of communication are described in Section F, Emergency Communication, of this plan.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Federal agencies which may be requested by HNP to provide assistance can be notified by contacting the NRC on a dedicated communication link, the Emergency Notification System (ENS).	**EP E.2.3** Notification of the Nuclear Regulatory Commission (NRC) The NRC is notified via the ENS. If the ENS is inoperative, the required notification will be made using alternate means in accordance with regulatory requirements. The Emergency Response Data System (ERDS), will be initiated within one hour of the declaration of an Alert or higher classification. Specific information on the notifications to the NRC for emergency events is detailed in the reporting requirements of 10 CFR 50.72.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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The capability for 24-hour-per-day alerting and notification of offsite response organizations and plant emergency personnel is further described in Section E.	**EP F.1.2** SNC-operated plants maintain the capability to make initial notifications to the designated offsite agencies 24 hours per day. Offsite notifications can be made to state and county warning points and Emergency Operations Centers from the Control Room, Technical Support Center, and Emergency Operations Facility using the ENN. Reliable backup methods have been written into procedures. State and county warning points are continuously staffed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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State and County Operations The State and County responses are conducted in accordance with the following framework, as presented in the Georgia RERP: 1. As the lead radiation emergency response agency, the DNR is involved in virtually all peacetime radiation emergencies, regardless of severity, due to its assigned responsibility and the probable requirements for special techniques, equipment, and expert personnel. 2. As the designated agency to administer NRC Agreement State Programs, the Department of Natural Resources is the principal radiation emergency response support agency due to the probable requirements for special techniques, equipment, and expert personnel. 3. As the overall State coordinating agency, GEMA coordinates the DNR emergency response activities with State, County, and municipal agencies and departments, as stated in the Georgia Emergency Operations Plan. 4. To the extent available, local resources, personnel authority, and emergency plans are employed in response to radiation emergencies.	**EP A.2.2** State of Georgia **EP A.2.2.1** Georgia Emergency Management Agency (GEMA) GEMA is responsible for general state emergency planning and overall direction and control of emergency or disaster operations as assigned by executive order and in accordance with the Georgia Emergency Operations Plan (GEOP). GEMA has responsibilities for coordinating the state of Georgia response to emergencies at nuclear power plants. **EP A.2.2.2** Department of Natural Resources Environmental Protection Division (DNR-EPD) The DNR-EPD has primary responsibility for implementation and administration of the state radiological emergency response function. **EP A.2.2.3** Other Georgia State Agencies Responsibilities of other state agencies are described in the Georgia Emergency Operations Plan (GEOP).	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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State and County Operations (cont) 5. When requested to assist in response and recovery efforts to radiation emergencies, personnel from local and other State agencies are normally expected to perform functions and activities in which they have expertise but may perform limited radiation safety functions under the guidance of the DNR REC. 6. In the case of occurrences of limited severity and complexity, direction and control of response and recovery operations will be assumed by the DNR REC; GEMA will be kept informed of conditions in order to facilitate GEMA response and Georgia Emergency Operations Plan activation, as deemed necessary. 7. When necessitated by the magnitude and severity of an occurrence, GEMA will activate the Georgia Emergency Operations Plan and coordinate overall response and recovery operations, with the DNR REC coordinating radiation protection activities through the State Disaster Coordinator.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.

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The organizational structures for State and County operations are illustrated on Figures A-2 and A-3, respectively. The Georgia RERP and Annex A to the Plan provide the bases for a 24-hour-a-day radiological emergency response capability for extended periods.	No equivalent Plan/Annex figures **EP F.1.2** SNC-operated plants maintain the capability to make initial notifications to the designated offsite agencies 24 hours per day. Offsite notifications can be made to state and county warning points and Emergency Operations Centers from the Control Room, Technical Support Center, and Emergency Operations Facility using the ENN.	The specific organizational structures for state and county operations are in their respective Plans. The SNC Standard Emergency Plan and Site Annex contain the description of support expected of the agencies.
TABLE A-1 RESPONSIBLE INDIVIDUALS OF PRIMARY RESPONSE ORGANIZATIONS	No equivalent Plan/Annex figure	The specific organizational structures for state and county operations are in their respective Plans. The SNC Standard Emergency Plan and Site Annex contain the description of support expected of the agencies.
B. ONSITE EMERGENCY ORGANIZATION Initial staffing of the onsite HNP emergency organization is provided from personnel normally stationed at the site.	**EP B.1** The normal on-shift complement provides the initial response to an emergency. This group is trained to respond to emergency situations until the augmented Emergency Response Organization (ERO) arrives.	The commitment was revised in the SNC Standard Emergency Plan to allow qualified personnel from other nuclear sites to be integrated into the site ERO should their skills be needed.
For reference throughout this section, the organizational chart for the HNP staff is presented in Figure B-1	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.
If the need arises, this staff is augmented substantially by the addition of other licensee personnel and by personnel from other organizations.	**EP B.2** On Site Emergency Response Organization (ERO) Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). **EP Tables 1-4**	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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This section includes a description of the emergency duties of the normal shift complement, a discussion of the manner in which emergency assignments are to be made, a listing of additional support personnel upon whom the licensee can rely, and a description of the relationships between onsite and offsite response activities.	**EP Section B.1** The normal onsite organization of an SNC-operated nuclear power plant provides a staff capable of providing the initial response to an emergency event. The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site Specific Annex.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Normal Plant Organization The organizational structure shown on Figure B-1 represents the pool of personnel normally available, approximately 900 people.	**EP B.1** Normal Plant Organization The normal onsite organization of an SNC-operated nuclear power plant provides a staff capable of providing the initial response to an emergency event. The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site Specific Annex. **Annex Table 2.2.A**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The operating crew for each unit includes one Shift Supervisor (SS), two Nuclear Plant Operators (NPOs), and two System Operators (SOs). A Shift Manager (SM) and a Shift Technical Advisor (STA) are also on shift during operation.	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.
In addition, personnel from the Health Physics (HP) Chemistry, Maintenance, and Security Departments are continuously onsite.	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.

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Section B: Once an emergency condition is determined and initial mitigating actions are underway, the ED has the responsibility to classify the event in accordance with the emergency classification system (described in Section D). Classification of an event into one of the four emergency categories [Notification of Unusual Event (NUE), Alert, Site Area Emergency, or General Emergency]	**EP B.1.1:** The Emergency Director's non-delegable duties include: • Event classification in accordance with the emergency classification system.	The commitment wording was standardized in the SNC system and the commitment relocated to the SNC Standard Emergency Plan description of responsibilities for the Emergency Director.
The extent to which the onsite HNP emergency organization is activated depends upon the severity of the situation.	**EP B.1** SNC plants maintain 24-hour emergency response capability. The normal on-shift complement provides the initial response to an emergency. This group is trained to respond to emergency situations until the augmented Emergency Response Organization (ERO) arrives. **EP B.2** Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF), and JIC are detailed below. A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24-hour-a-day basis for an extended event.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B: Table B-1 provides a summary of personnel available on shift and those who would be available within approximately 60 min. of notification.	**EP Tables 1-4** **Annex Table 2.2.A**	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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A copy of this On-Shift Staffing Analysis, which forms the technical basis for Table B-1, Minimum Shift Staffing, is maintained in the SNC document management system. Reference OSA-HNP-001.	**EP B.1** The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. **Annex 2.2** An On-Shift Staffing Analysis was completed in accordance with the requirements of 10 CFR 50 Appendix E IV.A.9. This analysis forms the basis for the on-shift staff as described in Table 2.2.A. A copy of the analysis is maintained in the SNC document management system.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
For an NUE, the ED assigns responsibility for making the appropriate notifications and directing the proper response; but no further activation of the emergency organization is required.	**EP B.1.1**: The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing off site emergency measures.	The commitment wording was standardized. The SM acting as Emergency Director maintains the authority for all actions of Section B.
If the event is classified as an Alert, the Technical Support Center (TSC) and the Operations Support Center (OSC) are activated.	**EP H.1:** SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification..	The commitment wording was standardized within SNC and the activation at Alert or higher transferred to the SNC Standard Emergency Plan unchanged. This License Amendment Requests includes the request to modify augmentation times to 75 minutes and is justified in the technical analysis section of this LAR

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Figure B-2 shows the emergency organization when fully activated.	**EP Figure B.2.B, B.2.C, B.2.D, and B.2.E:** Illustrates the standard Emergency Organization at all three sites.	The Emergency Response Organization was standardized within the three SNC sites. This License Amendment Requests includes approval of the standardized ERO. The ERO re-organization is justified in the technical analysis section of this LAR
Corporate personnel who may report to the plant site are provided the necessary training and are integrated into the HNP emergency organization, as necessary.	**EP O.4.1**: ERO members will receive Emergency Plan training on an annual basis. **EP O.4**: SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E, and position-specific responsibilities.	The commitment wording was standardized in the SNC Standard Emergency Plan. The SNC Standard Emergency Plan provides the equivalent commitment for Corporate personnel participating in the ERO to receive initial and annual retraining.
Relationships among the HNP emergency organization and other elements of emergency response are shown on Figure A-1.	No equivalent Plan/Annex figure	The SNC Standard Emergency Plan and Annex describe the elements of response. The Figure is no longer needed in the Plan.

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During hostile action, ERO members would likely not have access to the onsite emergency response facilities. A security related emergency may delay the ordering of facility activation in order to protect plant personnel from the security threat. The decision to delay activation of the facilities will be made by the Emergency Director. In such cases, offsite ERO personnel will be directed to an alternative facility to minimize delays in overall site response by permitting ERO assembly without exposing responders to the danger of hostile action.	**Annex 5.1.4** Alternative Facility (SEP H.1.4) During a security-related event or other event that precludes onsite access, the TSC and OSC ERO will be directed to an alternative facility. This facility is located adjacent to the Georgia Power Company operating headquarters in Vidalia, Georgia and is approximately 22 miles from HNP. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, and to work planning resources for performing engineering assessment activities including damage control team planning, and preparation for return to the site. Guidance for use of the facility is in site procedures.	The wording was standardized and relocated to the Site Annex.
Emergency Organization Responsibilities Following an Alert or higher emergency declaration, the positions shown on Figure B-2 will be filled by emergency response personnel as discussed below.	**EP Figure B.2.B, B.2.C, B.2.D, and B.2.E:** Illustrates the standard Emergency Organization at all three sites. **EP H.1:** SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification..	The Emergency Response Organization was standardized within the three SNC sites. The intent to activate facilities at an Alert or higher was relocated without change to the SNC Standard Emergency Plan. This License Amendment Requests includes approval of the standardized ERO. The ERO re-organization is justified in the technical analysis section of this LAR.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. ED The ED has the authority, management ability, and knowledge to assume the overall responsibility for directing HNP staff in an emergency situation.	**EP B.1.1**: The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing off site emergency measures.	The commitment wording is standardized and relocated to the SNC Standard Emergency Plan without change in intent.
Initially this position is filled by the SM or any ED qualified SS.	**EP B.1.1**: The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing off site emergency measures.	The commitment wording is standardized and relocated to the SNC Standard Emergency Plan without change in intent.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section B.1: Any of these persons will assume the ED position until the Plant Manager, the Site Support Manager, the Operations Manager, the Engineering Director, the Maintenance Manager, the Vice President-Hatch, or other qualified EDs can arrive onsite and receive an adequate turnover.	**EP O.1** The ERO Training Program ensures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency. Specific emergency response task training, prepared for response positions, is described in lesson plans and study guides.	The commitment wording was standardized with the SNC Standard Emergency Plan. Specific titles were modified to allow flexibility in assignment of management resources. The intent of the commitment is maintained unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED manages the following activities for the duration of the emergency: • Notification and communication: directs the notification of HNP and licensee personnel and communications with offsite authorities regarding all aspects of emergency response. • Emergency response facilities (ERF): oversees the activation and staffing and requests additional assistance, as needed. • Emergency operations: has authority over those actions taken to mitigate the emergency condition or reduce the threat to the safety of plant personnel or the public, including the recommendation of protective actions to offsite authorities. • Emergency services: provides overall direction for management of procurement of site-needed materials, equipment, and supplies; documentation; accountability; and security functions. • Emergency operations planning: provides overall direction for the management of planning for procedure, equipment, and system development to support emergency operations. • Discretionary authority: may tailor the emergency organization to fit the specific staffing needs on a case-by-case basis.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Event classification in accordance with the emergency classification system. • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination. • Notifications of offsite agencies and approval of state, local, and NRC notifications. • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. • Request federal assistance as needed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED may not delegate the following responsibilities: • The decision to notify offsite emergency response agencies. • The decision to recommend protective actions to offsite authorities. • Declaration of emergency classifications. • Authorization for plant personnel to exceed 10 CFR 20 radiation exposure limits. • The decision to terminate the emergency. • The decision to request Federal assistance. • The decision to dismiss nonessential personnel from the site at an Alert classification level or higher. • Authorization of the use of potassium iodide.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Event classification in accordance with the emergency classification system.; • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination. • Notifications of offsite agencies and approval of state, local, and NRC notifications. • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. • Request federal assistance as needed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The ED may operate from the Control Room or the TSC at his discretion. He may act as the TSC Manager during the early phases of emergency response, as needed. It is the intent of SNC that the ED will be transferred from the Control Room as soon as practicable.	**EP B.1.1** The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. EP Figure B.2.A	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
It is the intent of SNC that the ED will be transferred from the Control Room as soon as practicable.	**EP B.1.1** The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. EP Figure B.2.A	The wording was standardized and relocated to the SNC Standard Emergency Plan.
TSC Staff a. TSC Manager The TSC Manager performs the following activities: • Coordinates inputs and recommendations from technical and corrective action advisors. • Directs onsite HNP emergency personnel involved in restoration of the plant to a safe condition. • Provides technical assistance and operations guidance to Control Room personnel. • Directs TSC staff in analysis of problems, design and planning for temporary modifications, and development of temporary emergency operating procedures (EOP). • Recommends protective actions to the ED based on plant conditions. • Provides the ED recommendations on emergency classifications.	**EP B.2.1.2** TSC Manager The TSC Manager reports to the TSC ED and is responsible for coordinating activities between the TSC and other emergency response facilities, directing the activities of the TSC staff, and ensuring communications are established with applicable offsite agencies.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
b. Support Coordinator (TSC) The Support Coordinator in the TSC directs the clerical and logistic activities in the TSC. He ensures support staff, including Clerks and Communicators/Recorders, are available in sufficient numbers and that office supplies, drawings, and other documents are available to TSC personnel. He ensures transportation and communication needs are satisfied. When the EOF is activated, the Support	**EP B.2.1.15** TSC Support Coordinator The Support Coordinator reports to the TSC Manager and directs the clerical and logistic activities in the TSC, ensures support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers, and ensures office supplies, drawings, and other documents are available to TSC and OSC personnel.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
c. Engineering Supervisor The Engineering Supervisor directs a staff of engineers with expertise in reactor engineering, thermal and hydraulic analysis, instrumentation and control, and mechanical and electrical systems. He directs the analysis of plant problems and provides recommendations for plant modifications to mitigate the effects of the accident.	**EP B.2.1.7** TSC Engineering Supervisor The Engineering Supervisor reports to the TSC Manager. The TSC Engineering Supervisor is responsible for the overall direction of Engineering Group activities and assessment. The Engineering Supervisor also directs the analysis of plant problems and core damage, and provides recommendations for plant modifications to mitigate the effects of the accident.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
d. Maintenance Supervisor The Maintenance Supervisor manages the planning and coordination of repair, damage control, and plant modification activities. He works closely with the Engineering Supervisor in planning for plant modifications and repairs.	**EP B.2.1.4** TSC Maintenance Supervisor The Maintenance Supervisor reports to the TSC Manager and is responsible for planning and coordination of repair, damage control, and plant modification activities. The Maintenance Supervisor works closely with the Engineering Supervisor in planning for plant modifications and repairs.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
e. Operations Supervisor The Operations Supervisor analyzes problems associated with systems operations and provides recommendations for procedures for mitigating the emergency situation.	**EP B.2.1.3** TSC Operations Supervisor The Operations Supervisor reports to the TSC Manager. Major position functions include evaluating plant conditions and initiating mitigation actions, coordinating TSC efforts in determining the nature and extent of plant conditions affecting plant equipment, actions to limit or contain the emergency, invoking the provisions of 10 CFR 50.54(x) if appropriate, assisting the OSC Manager in determining the priority assigned to OSC activities, and timely completing offsite notifications.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
f. HP/Chem Supervisor The HP/Chem Supervisor makes radiological accident assessments and provides support for analyzing radiological changes during the event.	**EP B.2.1.5** TSC Radiation Protection (RP) Supervisor The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Health Physics Network (HPN) Communicator. The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The title was changed to reflect current site terminology.
g. Security Supervisor The Security Supervisor has the following responsibilities: • Processing of personnel who require authorization to enter the site. • Requesting assistance through the ED from civic law enforcement authorities, if required. • Ensuring site accountability and access control are maintained.	**EP B.2.1.14** TSC Security Supervisor The Security Supervisor reports to the TSC Manager. The TSC Security Supervisor is responsible for carrying out the plant security and Access Control program, maintaining personnel accountability onsite, and assisting in evacuation of onsite areas.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
OSC Staff a. OSC Manager The OSC Manager receives direction from the TSC to dispatch emergency teams (e.g., firefighting, rescue, first aid, repair, etc.) to prescribed areas of the plant or site. The OSC Manager directs composition of the teams to ensure appropriately qualified personnel are assigned. In particular, he ensures proper HP coverage is provided. The OSC Manager ensures specific instructions are provided to the team leaders and maintains communications with the teams to monitor the status of their activities.	**EP B.2.2.1** OSC Manager The OSC Manager reports to the TSC Manager and directs a staff in providing labor, tools, protective equipment, and parts needed for emergency repair, damage control, firefighting, search and rescue, first aid, and recovery.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
b. OSC Personnel Selected personnel report to the OSC, as directed. Emergency personnel from the Maintenance, the Operations, and the HP/Chemistry Departments are directed to report to the OSC. The following emergency teams are formed, as necessary: • Fire brigade. • Search and rescue. • Repair. • Post-accident sampling. • Internal survey. • Field monitoring. • Rally point.	**EP B.2.2.7** OSC Personnel Selected personnel report to the OSC, as directed. Emergency personnel from the Maintenance, Operations, and RP/Chemistry Departments are directed to report to the OSC. OSC teams are headed by a designated team leader, who maintains communication with the OSC. The following emergency teams may be formed by OSC personnel, as necessary: • Search and rescue. • Repair. • Post-accident sampling. • Internal survey. • Field monitoring.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The fire brigade is identified as part of the on-shift functional capabilities subsequently supported by offsite response.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Each OSC team is headed by a designated team leader, who maintains communication with the OSC.	**EP B.2.2.7** OSC Personnel Selected personnel report to the OSC, as directed. Emergency personnel from the Maintenance, Operations, and RP/Chemistry Departments are directed to report to the OSC. OSC teams are headed by a designated team leader, who maintains communication with the OSC.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The field monitoring teams are dispatched to the Simulator Building to prepare for field monitoring activities.	**EP I.7** Field Monitoring Teams are dispatched by SNC-operated plants to perform a variety of functions in situations potentially involving significant releases of radioactive materials from a plant.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
These teams are under the control of the on-shift HP/Chem Foreman until relieved by the HP/Chem Supervisor in the TSC or the Dose Assessment Supervisor in the EOF.	**EP B.2.1.5** TSC Radiation Protection (RP) Supervisor The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Health Physics Network (HPN) Communicator. The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The title was changed to reflect current site terminology.
EOF Staff The description of the EOF staff positions is contained in Appendix 7.	**EP B.3.1** EOF Organization	The SNC Standard Emergency Plan integrates the EOF organization into the overall ERO. See Appendix 7 section of the Justification Matrix for the detailed evaluation of the EOF positions.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Emergency Organization Assignments Table B-2 identifies by title the individuals who will fill the key emergency positions. No individual listed in Table B-2 is identified as the primary candidate for more than one emergency position. Some primary candidates are identified as alternates for other emergency positions. It is expected that one person may occupy up to two emergency positions within the same emergency.	**EP B.2:** A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24-hour-a-day basis for an extended event. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
During the first 6 hours of an emergency, the emergency response positions will be manned by qualified available personnel. A sufficient number of people are identified to ensure that all emergency positions listed on Table B-2 will be filled on a 24-hour-a-day basis.	**EP B.2:** A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24-hour-a-day basis for an extended event. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Alternative Facility Staff The ERO staff will be directed to report to the Alternative Facility during a security related event or other events that preclude onsite access. This facility functions as a staging area for augmentation of emergency response staff and provides the capability for communication with the EOF, control room, and plant security. From this facility the ERO will support event response by performing engineering assessment activities, including damage control team planning and preparation for return to the site. The command and control function will remain with the ED in the control room until relieved by another onsite ED. Dose assessments and offsite notifications will be performed by the EOF.	**Annex 5.1.4** Alternative Facility (SEP H.1.4) During a security-related event or other event that precludes onsite access, the TSC and OSC ERO will be directed to an alternative facility. This facility is located adjacent to the Georgia Power Company operating headquarters in Vidalia, Georgia and is approximately 22 miles from HNP. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, and to work planning resources for performing engineering assessment activities including damage control team planning and preparation for return to the site. Guidance for use of the facility is in site procedures.	The wording was standardized and relocated to the Site Annex.
Other Support Services 1. Contractor Support Arrangements have been made to obtain support services from Bechtel Power Corporation, and GE, if required.	**EP A.3.2:** SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Support capability has been available through the joint efforts of the SNC corporate office staff and Southern Company Services (SCS) architect-engineering and service company. As a result of the consolidation of SCS and SNC nuclear expertise, and in addition to being the licensee, SNC also serves as its own architect/engineer and performs the functions previously performed by SCS.	**EP A.3.1** Southern Nuclear Operating Company (SNC) Southern Nuclear Operating Company (SNC) serves as the architect-engineer. **EP B.4.1** Vendors and Contractors Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation, General Electric Corporation, and Bechtel Power Corporation, which can provide the following assistance in an emergency: • Trained personnel. • Technical analysis. • Operational analysis. • Accident and transient analysis.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The EOF Support Coordinator initially contacts these organizations to arrange for the required assistance.	**EP B.3.1.12** EOF Offsite Response Coordinator The Offsite Response Coordinator reports to the EOF Manager. The duties and responsibilities of the Offsite Response Coordinator include coordination of activities for the dispatch and update of technical liaisons to state and local authorities and monitoring EOF functional areas to facilitate coordination between the licensee and state and local agencies.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The title was changed to better describe the expected responsibilities.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
2. Medical Assistance Agreements are in place with the Appling General Hospital, the Meadows Regional Medical Center, and the Appling and Toombs Counties Ambulance Services (Appendix 2) and a contract with a medical consulting group to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance is requested whenever necessary in accordance with plant procedures.	**EP B.6.3** Medical Services Prior arrangements have been made for medical treatment at a variety of facilities. SNC-operated nuclear power plants are supported, and sites offer training to the medical staff in dealing with contaminated injured personnel. Details on the services offered are in the SNC plant's site-specific Annex. **Annex 5.8.1** Hospital and Medical Support (SEP B.6.3, L.1) Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site, and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex. Each area contains facilities and equipment for emergency surgery, personnel dosimetry, decontamination, radioactive waste recovery, and portable shields for attendant exposure control. These facilities enable the emergency treatment and the handling of contaminated individuals. Non-contamination injuries will be handled by the hospital with its routine facilities.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
3. Offsite Fire Assistance Agreements are in place with the Appling County EMA to provide onsite HNP Fire Brigade in the unlikely event of a fire requiring offsite assistance. This assistance is requested according to plant procedures.	**Annex 2.3.1** Fire Fighting (SEP B.6.4) Plant Hatch has established an agreement with the Appling County EMA to provide, upon request, offsite fire support to the HNP Fire Brigade. Support provided includes, but is not limited to, firefighters and firefighting equipment. Request for fire support will be made by the control room or site security to the Appling County 911 center, Appling County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.
4. Agency Support Assistance may be requested from the State of Georgia or the Federal agencies. Section A of this Plan describes the assistance that may be requested. Any requests for aid are made by the ED.	**EP Section C** Once an emergency has been declared, the Emergency Director (ED) has the authority and responsibility to request aid from offsite organizations, whether they are other SNC-operated nuclear power plants, federal, state, local, or private organizations.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
<u>Interfaces Among Response Groups</u> Section A, Figure A-1, illustrates the integrated organization for response to an emergency at HNP.	No equivalent Plan/Annex figure	The SNC Standard Emergency Plan and Annex now specifically describe the responsibilities of the various response groups. Figure A-1 is no longer required.
TABLE B-1 MINIMUM STAFFING CAPACITY FOR EMERGENCIES	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
TABLE B-2 EMERGENCY ORGANIZATION ASSIGNMENTS	**EP O.1** To achieve and maintain an acceptable level of emergency preparedness, training will be conducted for members of the Emergency Response Organization (ERO) and those offsite organizations that may be called on to provide assistance in the event of an emergency. The ERO Training Program ensures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE B-1 TYPICAL HNP ORGANIZATION CHAR	**EP Figure P.1**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE B-2 TYPICAL ALERT, SITE AREA OR GENERAL EMERGENCY RESPONSE ORGANIZATION	**EP B.2:** Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
C. EMERGENCY RESPONSE SUPPORT AND RESOURCES State and Local Governmental Support The State of Georgia through the GEMA has the lead agency responsibility for responding to emergency situations throughout Georgia. Under the procedure established by the Natural Disaster Operation Plan, which was developed pursuant to the Governor's Executive Order, the DNR radiological emergency response team, under the direction of GEMA, assesses the radiological conditions at the site of an incident and determines whether a state of emergency exists. Upon GEMA's advising the Governor of the State of Georgia that a radiological emergency exists, the Governor declares an emergency condition which activates the GEMA. The LEMAs may activate independently or prior to the Governor's declaration of a state of emergency. However, the LEMA must be activated in conjunction with the GEMA activation. [(Reference the State of Georgia RERP).]	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The concept of operations for which the State of Georgia discharges this responsibility, together with a discussion of action responsibilities assigned to various State/County governmental agencies is contained in the State of Georgia REP, and Annex A to the REP, HNP. For a complete discussion of authority, assigned responsibilities, capabilities, and activation and communication arrangements, refer to these plans.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.

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Agreements are in place with the State of Georgia, Appling County, Toombs County, Tattnall County, and Jeff Davis County to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, Fire Fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Appling County 911 center, the county EOCs, or through the Incident Command Post, as applicable, based on the nature and timing of the event. Copies of these agreements are maintained in the SNC document management system and are included by reference in Appendix 2	**Annex 1.5** Hostile Action Based Events (SEP H.1.4) Agreements are in place with the state of Georgia and counties of Appling, Jeff Davis, Tattnall, and Toombs to provide available resources and equipment to support mitigation and response to an emergency at Edwin I. Hatch Nuclear Plant, including Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room or site security to Appling County 911 Center, the county EOCs, or through the Incident Command Post as applicable based on the nature of the event. Copies of these agreements are maintained in accordance with Emergency Plan procedures.	The wording was standardized and relocated to the Site Annex.
It is expected that a few State representatives, including one skilled in making dose calculations and radiological assessments, will be dispatched to the EOF. The licensee will send a technical representative to the offsite governmental centers, as needed or as requested.	**EP B.3.1.15** EOF Liaisons Liaisons report to the Offsite Response Coordinator and respond to the applicable state and county Emergency Operations Centers (EOCs) as required by the type and source of the event. Liaisons are assigned to Georgia, Alabama and/or South Carolina state EOCs depending on which SNC site declared the initiating event. **EP H.2.1** SNC will maintain space for members of an NRC Site Team.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Federal Governmental Support In addition to coordination with State/County governmental entities in an emergency situation, the licensee may require assistance from certain Federal agencies in the areas of communications, radiological monitoring and laboratory analysis, transportation, and disaster relief.	No direct statement in Plan/Annex. **EP A.1** Primary Federal Organizations **EP A.3.5** Radiological Monitoring Assistance Radiological monitoring in the plant and in the environs, both onsite and offsite, will be augmented by outside vendors as necessary. Initial radiological monitoring will be performed by available Southern Company resources (e.g., Georgia Power Company (GPC) Central Laboratory). **EP A.3.6** Contract Laboratories SNC-operated plants maintain contracts with offsite laboratories to assist with emergency analytical services. Copies of these contracts are maintained in accordance with Emergency Plan procedures.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Requests for Federal assistance are directed, as needed, by the ED, and usually these requests are channeled through GEMA. The exceptions to this procedure are direct contacts between the licensee Emergency Organization and the NRC.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Request federal assistance as needed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
In the event of an incident in which Federal assistance is needed to supplement State/County emergency response capabilities, principal points of contact for State government are as follows: • The FEMA, Region Headquarters in Atlanta. • The DOE, Region Operations Office in Aiken, South Carolina. • The EPA, Region Headquarters in Atlanta.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Request federal assistance as needed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The FEMA is assigned lead responsibility for Federal offsite nuclear emergency planning and response (per Title 44 CFR 351). FEMA is also delegated responsibility for development and promulgation of the Federal Radiological Emergency Response Plan (FRERP) which assumes states will be responsible for overall management of offsite emergency response. The Federal government's role consists of providing technical and/or logistical resource support at the request of State emergency management.	**EP A.1.3** Federal Emergency Management Agency (FEMA) The primary role of FEMA is to support the states by coordinating the delivery of federal non-technical assistance. FEMA coordinates state requests for federal assistance, identifying which federal agency can best address specific needs. If deemed necessary, FEMA will establish a nearby Joint Field Office from which it will manage its assistance activities.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Federal emergency response consists of technical and nontechnical components. The NRC and FEMA jointly coordinate federal emergency response actions.	No direct statement in Plan/Annex. **EP A.1.1** Nuclear Regulatory Commission (NRC) The NRC acts as the lead federal agency for technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response. **EP A.1.3** Federal Emergency Management Agency (FEMA) The primary role of FEMA is to support the states by coordinating the delivery of federal non-technical assistance. FEMA coordinates state requests for federal assistance, identifying which federal agency can best address specific needs. If deemed necessary, FEMA will establish a nearby Joint Field Office from which it will manage its assistance activities.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The NRC coordinates technical aspects, and FEMA coordinates nontechnical aspects of Federal response.	No direct statement in Plan/Annex. **EP A.1.1** Nuclear Regulatory Commission (NRC) The NRC acts as the lead federal agency for technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response. **EP A.1.3** Federal Emergency Management Agency (FEMA) The primary role of FEMA is to support the states by coordinating the delivery of federal non-technical assistance.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The NRC and FEMA have stated that they each expect to have a representative at HNP within approximately 3 hours after receiving notification. DOE can give assistance within approximately 2 hours.	No equivalent Plan/Annex statement.	Section H of the SNC Standard Emergency Plan and Site Annex describe the space made available to federal responders.
Airfields within the plant vicinity that may be used to support the Federal response, as well as that of other response groups, include a commercial airport with scheduled service and nearby municipal airports that can accommodate small aircraft. The approximate distance and direction to these airfields are as follows: (List of Airfields and distance from site not included for simplicity)	No equivalent Plan/Annex statement.	Section H of the SNC Standard Emergency Plan and site annex describe the space made available to federal responders.

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Licensee Support The licensee provides space, telephone communications, and administrative services for up to five NRC personnel at the TSC.	**EP H.1.2**: SNC operated nuclear power plants have established a TSC for use during emergency situations by plant management, technical, and engineering support personnel. **Annex 5.1.2**: The TSC provides plant management and technical support personnel, including NRC personnel, with adequate space to assist plant operating personnel located in the Control Room during an emergency. **Annex Figure 5.1.A**: TSC Layout	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Accommodations for the NRC, State of Georgia, and FEMA representatives in the EOF are described in Appendix 7.	**EP H.2.1** The EOF is capable of accommodating designated SNC personnel and offsite local, state, and federal responders including NRC and FEMA. It is anticipated that representatives from the state(s) of Georgia, South Carolina, Alabama, or Florida may be dispatched to the EOF for an event at specific SNC site(s).	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Other Support The licensee expects services to be available from qualified organizations to provide radiochemical laboratory analysis, environmental monitoring assistance, and medical support services should a serious emergency occur.	**EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services **EP C.4.1** This provides a mechanism to draw on industry resources during an emergency. Support may also be requested from neighboring utilities for the following: • Personnel and equipment to assist with in-plant and emergency field monitoring. • Engineering, design, and technical expertise to assist in determining the cause of the accident and to support recovery. • Personnel and equipment to assist in maintenance and repairs to the facility.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Other private organizations that supply engineering, HP, and general emergency support are as follows: • GE, Wilmington, NC and San Jose, California.	**EP C.4.2.3** Nuclear Steam Supply System Vendor Under established contracts, the following will supply available engineering expertise, specialized equipment, and other services identified as needed and deemed appropriate to provide in an emergency situation: • General Electric (GE) Nuclear Energy, • Westinghouse Electric Company,	The wording was standardized and relocated to the SNC Standard Emergency Plan.
• Institute of Nuclear Power Operations (INPO), Atlanta, Georgia.	**EP C.4.1** SNC-operated plants are a signatory to two comprehensive agreements among electric utility companies: • Nuclear Power Plant Emergency Response Voluntary Assistance Agreement. • Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The NSSSs for the plant were purchased from GE, who continues to provide operations support to the company in plant modifications, licensing, and engineering.	**EP C.4.2.3** Nuclear Steam Supply System Vendor Under established contracts, the following will supply available engineering expertise, specialized equipment, and other services identified as needed and deemed appropriate to provide in an emergency situation: • General Electric (GE) Nuclear Energy. • Westinghouse Electric Company.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
As a member of INPO, the licensee is provided with INPO's Emergency Response Manual. This manual identifies the various organizations (utilities, service companies, and reactor vendor) that could be expected to provide resources in response to a request for emergency support.	**EP C.4.1** SNC-operated plants are a signatory to two comprehensive agreements among electric utility companies: • Nuclear Power Plant Emergency Response Voluntary Assistance Agreement. • Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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As referenced throughout this Plan, a number of offsite licensee departments and the Southern Company companies may be involved in the emergency response effort. These departments have, where appropriate, developed separate nuclear emergency response plans and procedures governing their emergency functions. Coordination of these plans to ensure a consistent integrated response is the responsibility of the SNC.	**EP C.4.2** Offsite resources SNC supports the sharing of personnel and resources among SNC-operated nuclear power plants, providing a large personnel and equipment base.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
These specific plans include: • HNP Emergency Communication Plan, controlled by the GPC Corporate Communications Department. • HNP Security Plan, controlled by the Security Department. • HNP Fire Hazards Analysis and Fire Protection Plan, controlled by Engineering Support.	**Annex Appendix C** - Supporting Plans & Implementing Procedures (SEP P.3) Supporting Plans • State of Georgia Radiological Emergency Response Plan • HNP Security Plan • HNP Fire Protection Plan	The wording was standardized and relocated to the SNC Standard Emergency Plan.
D. ASSESSMENT ACTIONS Classification of Emergencies The classification system is based on the four emergency classes described in 10 CFR 50 Appendix E and NUREG 0654, established by the NRC, for grouping off-normal nuclear power plant conditions according to (1) their relative radiological seriousness and (2) the time-sensitive onsite and offsite radiological emergency preparedness actions necessary to respond to such conditions.	**EP D.1.1.1** Emergency classification is divided into four classification levels described in 10 CFR 50 Appendix E and NUREG 0654 and based on NEI 99-01 and 07-01 methodologies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan unchanged.

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The existing radiological emergency classes, in ascending order of seriousness, are called: • Notification of Unusual Event (NUE) • Alert • Site Area Emergency (SAE) • General Emergency (GE)	**EP D.1.1.2** The four emergency classification levels are described as follows: Unusual Event Alert Site Area Emergency General Emergency	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan unchanged.
The classes, therefore, determine initial steps to be taken by onsite and corporate emergency response personnel. The emergency classes are used by offsite authorities to determine which of the preplanned actions are to be taken by their emergency organizations.	**EP D.1.1.2** The Initiating Conditions (ICs) deal explicitly with radiological safety impact by escalating from levels corresponding to releases within regulatory limits to releases beyond EPA Protective Action Guideline (PAG) plume exposure levels.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
An emergency classification is indicative of the status of the plant. Inputs to the emergency classification system include the status of various plant systems, radiation levels in and around plant areas, and the rate of release of radioactivity from the plant. These are termed Initiating Conditions (ICs), which are a predetermined subset of nuclear power plant conditions where either the potential exists for a radiological emergency or such an emergency has occurred.	**EP D.1.1.2** The Initiating Conditions (ICs) deal explicitly with radiological safety impact by escalating from levels corresponding to releases within regulatory limits to releases beyond EPA Protective Action Guideline (PAG) plume exposure levels.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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The SNC classification scheme is based on NEI 99-01, Revision 4, Methodology for Development of Emergency Action Levels, January 2003, endorsed by Reg. Guide 1.101, Revision 4, Emergency Planning and Preparedness for Nuclear Power Reactors. The ICs lead each plant to a classification implementing procedure which contains the Threshold Values (TVs) for each IC.	**EP D.1.1.1** Emergency classification is divided into four classification levels described in 10 CFR 50 Appendix E and NUREG 0654 and based on NEI 99-01 and 07-01 methodologies.	The wording was standardized and relocated to the SNC Standard Emergency Plan. This submittal does not change the existing approved EAL scheme.
Each IC has specific conditions associated that are termed TVs. When an IC is observed and the criteria of its associated TVs are met, an Emergency Action Level (EAL) is met and the event is then classified and declared at the appropriate level.	**EP D.2.1** With each IC are Threshold Values (TV) that provide the criteria for classification associated with the appropriate classification level. When the IC is observed to exist, the TV must also be met, exceeded or in some cases imminent to become a classifiable Emergency Action Level.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The SNC classification procedures are written to classify events based on meeting the IC and a TV for an EAL considering each unit independently. During events, the ICs and TVs are monitored and, if conditions meet another higher IC and EAL, then the higher emergency classification is declared and appropriate notifications are made. Notifications are made on a site basis. If both units are in concurrent classifications, the highest classification will be used for the notification and the other unit's classification events are noted on the notification form.	**EP D.2.4** Treatment of Multiple events and Classification Level Upgrading When multiple simultaneous events occur, the emergency classification level is based on the highest EAL reached. Emergency classification level upgrading considers the potential for radioactive release from the entire site due to the event or simultaneous events.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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At all times, when conditions present themselves that are not explicitly provided in the EAL scheme, the ED has discretion to declare an emergency based on his knowledge of the emergency classes and judgment of the situation or condition.	No equivalent Plan/Annex statement.	The approved EAL scheme provides for Emergency Director judgment in Classification with specific Emergency Action Levels.
Classification Timeliness The emergency declaration process starts with information being available to plant operators to recognize an off-normal plant condition via indications on plant instrumentation, including alarms, or via reports from other plant personnel (e.g., reports of fire) or from persons outside of the plant (e.g., severe weather warnings). The plant operators assess the validity of these indications or reports by checking instruments, comparing indications on redundant instruments, or dispatching personnel to confirm reports. After validating the indication or report, the plant operators then compare the off-normal condition to the EAL thresholds in the emergency classification scheme. Not all off-normal conditions are immediately obvious, and not all indications are unambiguous. While some conditions can be classified upon recognition, others require further assessment.	**EP D.1.1.1** Emergency Action Levels (EALs), based on indications available in the control room and correlated to the emergency classifications, are provided to the operator. SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL has been exceeded has been established and is outlined in applicable procedures. Emergency conditions are classified promptly upon identification that an emergency action level (EAL) threshold has been exceeded.	**EP D.1.1.1** Emergency Action Levels (EALs), based on indications available in the control room and correlated to the emergency classifications, are provided to the operator. SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The 15-minute period encompasses all assessment, classification, and declaration actions associated with making an emergency declaration from the first availability of a plant indication or receipt of a report of an off-normal condition by plant operators up to and including the declaration of the emergency. If classifications and declarations are performed away from the CR, all delays incurred in transferring information from the CR (where the alarms, indications, and reports are first received) to the ERF (at which declarations are made) are included within the 15-minute criterion.	**EP D.1.1.1** Emergency Action Levels (EALs), based on indications available in the control room and correlated to the emergency classifications, are provided to the operator. SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Once an emergency classification is made, it cannot be downgraded to a lower classification. Actions associated with the emergency classification level will normally be completed and then a termination of the event can be affected. At termination, on an event specific basis, the site can either enter normal operating conditions or enter a recovery condition with a recovery organization established for turnover from the ERO.	**EP D.2.5** Emergency Classification Level Downgrading and Termination The SNC policy is that once an emergency classification is made, it cannot be downgraded to a lower classification. Termination criteria contained in the Emergency Plan Implementing Procedures shall be completed for an event to be terminated. At termination, on an event specific basis, the site can either enter normal operating conditions or enter a recovery condition with a recovery organization established for turnover from the ERO.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The described emergency classes and the emergency action levels (EAL) which determine them are agreed on by SNC and State and local authorities. The EAL will be reviewed by these officials annually.	**EP D.1.1.1** The classification scheme is provided to and discussed by Southern Nuclear Company, agreed upon by state and county governmental authorities and approved by the NRC. The classification scheme and specific Emergency Action Levels are reviewed with the State and local governmental authorities on an annual basis.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
1. Notification of Unusual Event (NUE) a. Description The classification of a NUE applies to situations in which events are in process or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.	**EP D.1.1.2** UNUSUAL EVENT (UE) Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring off-site response or monitoring are expected unless further degradation of safety systems occurs.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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b. Response In the event of a NUE, the SM will assess the conditions, assume the ED duties, and implement the classification Emergency Implementing Procedure (EIP).	No direct equivalent Plan/Annex Statement	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.
The Emergency Organization will perform the following: 1) Inform State and local offsite authorities of the nature of the unusual event within 15 min of classifying the emergency. Notify the NRC as soon as possible (ASAP), but no later than 1 hour following classification of the emergency. 2) Augment on-shift resources, as needed. 3) Assess and respond to the event. 4) Escalate to a more severe class, if appropriate, or close out with a verbal summary to offsite authorities followed by a written summary within 24 hours.	**EP E.1.1** SNC-operated plants maintain the capability of notifying state and local agencies within 15 minutes of a declared emergency as required by 10CFR50 Appendix E, section IV(D)(3). NRC will be notified by the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.1** Notification procedures include notification of Emergency Response Organization Personnel (ERO) not on site or during backshift hours. ERO members will be notified by means of an automated callout system activated by on-shift personnel.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Alert a. Description The classification of Alert applies to situations in which events are in process or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of intentional malicious dedicated efforts of hostile action. Any releases of radioactive material for the Alert classification are expected to be limited to small fractions of the U.S. Environmental Protection Agency (EPA) Protective Action Guideline (PAG) exposure levels. The purpose of offsite notification is to assure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required and to provide offsite authorities current status information.	**EP D.1.1.2** ALERT Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of hostile action. Any releases are expected to be limited to small fractions of the EPA PAG exposure levels.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
b. Response In the event of an Alert, the SM will assess the conditions, assume the ED duties, and implement the classification EIP.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

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The Emergency Organization will then perform the following: 1) Within 15 min. of classification, inform State and local offsite authorities of Alert and reasons for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) Augment resources and activate the emergency response facilities [e.g., Technical Support Center (TSC), Operational Support Center (OSC) and the Emergency Operations Facility (EOF)]. These actions may be delayed for security based events at the discretion of the ED. 3) Assess and respond to the emergency. 4) Mobilize, and dispatch if necessary, onsite survey teams. 5) Provide periodic plant status updates to offsite authorities. 6) Provide periodic meteorological assessments to offsite authorities and, if any emergency releases are occurring, field monitoring team readings or dose estimates for actual releases. 7) Activate the Emergency Response Data System (ERDS) for the affected unit within 1 hour following declaration of the Alert. 8) Escalate to a more severe class, if appropriate, or close out the emergency class by verbal summary to offsite authorities followed by written summary within 8 hours of closeout.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Emergency Organization. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Site Area Emergency (SAE) a. Description The classification of a SAE applies to those events which are in progress or have occurred that involve actual or likely major failures of plant functions needed for protection of the public from radiation or contamination or hostile action that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevent effective access to, equipment needed for the protection of the public. Any releases of radioactive material for the SAE classification are not expected to exceed EPA PAG exposure levels except near the site boundary.	**EP D.1.1.2** SITE AREA EMERGENCY (SAE) Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts toward site personnel or equipment that could 1) lead to the likely failure of, or 2) prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA PAG exposure levels beyond the site boundary.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
b. Response In the event of a SAE, the SM will assess the conditions, assume the ED duties and implement the classification EIP.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Organization will perform the following: 1) Within 15 min of classification, inform State and local offsite authorities of SAE and reasons for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) If necessary, provide protective action recommendations to State and local authorities. 3) Augment resources and activate the emergency response facilities (e.g., TSC, OSC, and the EOF). These actions may be delayed for security based events at the discretion of the ED. 4) Assess and respond to the emergency. 5) Dispatch, as necessary, onsite and offsite survey teams. 6) Dedicate individuals for plant status updates to offsite authorities and periodic press briefings. 7) On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. 8) Provide meteorological information and dose estimates to offsite authorities for actual releases via a dedicated individual. 9) Provide release and dose projections based on available plant condition information and foreseeable contingencies. 10) Activate the ERDS for the affected unit within 1 hour following declaration of the SAE. 11) Escalate to GE, if appropriate, or close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Emergency Organization. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
General Emergency (GE) a. Description The classification of GE applies to those events which are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Release of radioactive material for the GE classification can reasonably be expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	**EP D.1.1.2** GENERAL EMERGENCY Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels off-site for more than the immediate site area.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
b. Response In the event of a GE the SM will assess the conditions, assume the ED duties and implement the classification EPIP.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Organization will then perform the following: 1) Within 15 min of classification, inform State and local offsite authorities of GE and reason for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) Provide protective action recommendations to State and local authorities based upon plant conditions and/or actual or projected releases of radioactive material. 3) Augment resources and activate the emergency response facilities (e.g. TSC, OSC, and the EOF). These actions may be delayed for security based events at the discretion of the ED. 4) Assess and respond to the emergency 5) Dispatch onsite and offsite survey teams. 6) Dedicate an individual for plant status updates to offsite authorities and periodic press briefings. 7) On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. 8) Provide meteorological data and field monitoring team readings or dose estimates to offsite authorities for actual releases. 9) Provide release and dose projections based on plant condition and foreseeable contingencies. 10) Activate the ERDS for the affected unit within 1 hour following declaration of the GE. 11) Close out the emergency class by briefing offsite authorities, followed by a written summary within 8 hours of closeout.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Emergency Organization. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Classification Process The classification EIP is used to classify the emergency condition upon recognition of an off-normal condition relative to an IC.	No direct equivalent Plan/Annex statement	The site responsibility for Classification is described throughout Section D of the SNC Standard Emergency Plan and individually assigned in Section B.
To facilitate the expeditious classification of emergencies, the various ICs which may result in an emergency class are grouped into six recognition categories as follows: • Radiological (Hot and Cold – R series) • Fission product barriers (Hot – F series) • System malfunctions (Hot – S series) • System malfunctions (Cold – C series) • ISFSI (Hot and Cold – E series) • Hazards (Hot and Cold – H series)	**EP D.2.1**: The ICs are segregated into Recognition Categories. The Recognition Categories are: • **R** – Abnormal Radiological Levels/Radiological Effluent. • **C** – Cold Shutdown/Refueling System Malfunctions. • **E** – Independent Spent Fuel Storage Installations (ISFSI). • **F** – Fission Product Barrier. • **H** – Hazards and Other Conditions Affecting Plant Safety. • **S** – System Malfunction.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Within each category, subcategories and specific ICs are identified. The EAL, ICs, TVs, and bases are provided in Appendix 8.	**Annex Appendix B**	The wording was standardized and relocated to the Site Annex.

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The 15-minute period encompasses all assessment, classification, and declaration actions associated with making an emergency declaration from the first availability of a plant indication or receipt of a report of an off-normal by plant operators up to and including the declaration of the emergency. If classification and declarations are performed away from the CR, all delays incurred in transferring information from the CR (where the alarms, indications, and reports are first received) to the ERF (at which declarations are made) are included within the 15-minute criterion.	**EP D.1.1.1** SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE D-1 – "HOT" INITIATING CONDITION MATRIX	**Annex Appendix B**	The approved EAL scheme is not impacted by this submittal.
FIGURE D-2 – "COLD" INITIATING CONDITION MATRIX	**Annex Appendix B**	The approved EAL scheme is not impacted by this submittal.
E. NOTIFICATION METHODS AND PROCEDURES This section describes the plan for notification of onsite and offsite licensee emergency response personnel for HNP, State, local, and NRC emergency response centers. Actual methods and sequencing of notifications are covered in appropriate implementing procedures. Table E-1 presents the initial notification concept for normal working hours and backshift hours.	**EP E.1.1** SNC-operated plants maintain the capability of notifying state and local agencies within 15 minutes of a declared emergency as required by 10CFR50 Appendix E, IV.D.3. The methods and forms used for notifying state and county authorities are site-specific, and detailed in plant specific Emergency Plan Implementing Procedures (EPIPs). NRC will be notified by the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Notification of HNP Personnel The ED is responsible for classifying an event (Section D) into the appropriate emergency class and ensuring onsite personnel are notified accordingly. This notification involves sounding the appropriate plant emergency alarm signal, making appropriate announcements over the plant public address (PA) system, and using the plant telephone system.	**EP E.2.1:** The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The primary means for notification of personnel within the controlled area is the PA system. Upon declaration of an Emergency, personnel will be notified by a page announcement. For declaration of an Alert, a Site Area Emergency, or a General Emergency, this notification will be preceded by a warning tone. Likewise, page announcements for a Fire will be preceded by a specific tone. During security related events, the ED may elect to not sound a warning tone and, in such cases, will provide event specific instructions for onsite personnel over the PA system as well as other available communications means as needed.	**EP E.2.1:** The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Notification of persons who are in the public access areas, on or passing through the site, or within the controlled area will be performed by the Security Department. All such notifications would be accomplished in accordance with the Emergency Plan implementing procedures.	**EP E.2.1:** Notification of persons who are in the public access areas, on or passing through the site, or within the controlled area, will be performed by the Security Department. Such notifications will be in accordance with the Emergency Plan Implementing Procedures.	The commitment to warn plant personnel has been relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Visitors within the protected area are escorted by a permanently badged individual who is responsible for informing the visitors of emergencies when they occur and for taking action to evacuate the visitors from the site, as necessary.	**EP E.2.1** Visitors within the protected area are escorted by a permanently badged individual. This individual is responsible for informing the visitors of emergencies when they occur and for taking action to evacuate the visitors from the site, as necessary.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The ED is responsible for notifying the Hatch Duty Manager (who is on call 24 hours a day). This Duty Manager contacts Corporate. These notifications may be made utilizing available communications systems.	No Equivalent Plan/Annex Statement.	The commitment to warn plant personnel has been relocated to the SNC Standard Emergency Plan.
Selected plant management can also be reached utilizing available communications systems.	No equivalent Plan/Annex statement.	The lack of specificity in the existing Plan statement provides no benefit to the Plan. Notification responsibilities for the ORO and ERO are specifically laid out. Additional notifications are an administrative decision and not needed in the Emergency Plan.
During normal working hours, emergency response personnel report to their assigned locations at the TSC and the OSC, as required by the specific emergency classification. Notification of EOF personnel will be accomplished utilizing available communications systems in accordance with Appendix 7.	**EP E.2.1** Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level. In the event of a Design Basis Threat, personnel may be directed to respond to alternative facilities.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
During backshift hours, the Operations SM is responsible for initiating the notification process to required emergency response personnel, directing them to report to their designated ERF. These notifications may be made utilizing available communications systems.	**EP E.2.1** Notification procedures include notification of Emergency Response Organization Personnel (ERO) not on site or during backshift hours. ERO members will be notified by means of an automated callout system activated by on-shift personnel.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Notification of State and Local Response Personnel The ED is responsible for ensuring that the State and local counties surrounding HNP are notified in a timely and accurate manner of an emergency condition.	**EP E.2.1:** The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
This notification consists of the information on the Emergency Notification Form (Figure E-1) being given within approximately 15 min of declaring an emergency to the following agencies: Georgia EMA. The 24-hour warning points of Appling, Jeff Davis, Tattnall, and Toombs Counties.	**EP E.1.1:** SNC, in cooperation with state and county authorities, has established methods and procedures for notification of offsite response organizations consistent with the emergency classification and emergency action level scheme. **Annex 4.1.1**: State and local warning points are staffed 24 hours per day. State and county authorities to be notified within 15 minutes of the declaration of an emergency condition are: • Georgia Emergency Management Agency (GEMA). Georgia county authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
These agencies are responsible for notifying appropriate response personnel in accordance with their emergency plans and procedures. The ENN is a dedicated communications system that is normally used to accomplish these notifications. Commercial telephone, microwave, or land lines provide backup for the ENN.	**EP E.2.2** Notification of State and local Authorities A dedicated ENN, will normally be used to accomplish State and local notifications. Backup means of communication are described in Section F, Emergency Communication, of this plan.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Figure E-1 presents the sample Emergency Notification Form for making notifications to these response centers. This form has been developed in conjunction with appropriate agencies. The Emergency Notification Form may be revised upon receipt of State and utility approval. Any revisions to the Notification Form are incorporated into the applicable implementing procedure are included in the next revision to the Emergency Plan.	**EP E.2.2.2**: Initial Notification Message Form In conjunction with state and county authorities, SNC operated plants have established the contents of the initial and subsequent state notification message forms to be used during an emergency. These forms are described in EPIPs. The content of the forms has been reviewed and agreed on by the respective Offsite Response Organizations. **Annex 4.1.1**: State and local warning points are staffed 24 hours per day. State county authorities to be notified within 15 minutes of the declaration of an emergency condition are: • Georgia Emergency Management Agency (GEMA). Georgia County Authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Verification of Notification Messages All ENN notification messages must be verified as being received by the State of Georgia and Appling, Jeff Davis, Tattnall, and Toombs Counties. Verification is normally accomplished by roll call.	**EP E.2.7** Verification of Notification Messages The SNC emergency notification form is transmitted electronically to the responsible state and local agencies using a secure data sharing system provided by SNC. Once transmitted to the OROs, the receipt of this information is confirmed using a dedicated communications link.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Notification of Federal Agencies The ED is responsible for ensuring notification calls are made to the NRC Operations Center by the ENS or commercial telephone as backup within the prescribed time constraints from the declaration of an emergency. A sample of the form used to provide the notification to the NRC Operations Center is shown in Figure E-2.	**EP E.2.3** Notification of the Nuclear Regulatory Commission (NRC) The NRC is notified via the ENS. If the ENS is inoperative, the required notification will be made using alternate means in accordance with regulatory requirements. The Emergency Response Data System (ERDS), will be initiated within one hour of the declaration of an Alert or higher classification.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Notification of the Public Administrative and physical means have been established for providing early notification and clear instruction to the populace within the plume exposure pathway EPZ. (See Appendix 3.) The prompt notification system has a capability to complete the initial notification within 15 min.	**EP E.2.5** Notification of the Public Prompt alerting and notification of the public within the plume exposure pathway EPZ is the obligation of state and local government or other responsible authority. The responsibility for ensuring the means exist to carry out this purpose rests with Southern Nuclear Operating Company. An overview of these means excluding the Savannah River Site is listed in the site specific Annex of this Plan. **Annex 4.2** The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations through EAS. Capability for activation of the calling system is provided for Appling County, Georgia, and for the state of Georgia.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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The initial notification, when appropriate, of the affected population within the plume exposure pathway EPZ is to be completed by the State and/or local authorities in a manner consistent with assuring the public health and safety.	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The wording was standardized and relocated to the Site Annex.
The primary means for alerting and providing instructions to the public is by a siren system and Emergency Alert System (EAS). The prompt notification system (PNS) is described in Appendix 3.	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia	The wording was standardized and relocated to the SNC Standard Emergency Plan. See detailed description of the Siren System was relocated to the Site Annex. See the details of Justification in the Appendix 3 section of this document.
The licensee will provide offsite authorities with supporting information for their messages to the public. Such messages, consistent with the emergency classification scheme, will provide the public with instructions in regard to specific protective actions to be taken by occupants of affected areas.	**EP E.2.5.1** Detailed information and instructions will be provided on local EAS radio and television stations.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
F. EMERGENCY COMMUNICATIONS This section describes the provisions for communications among the principal response organizations and among the licensee ERF.	SECTION F: EMERGENCY COMMUNICATIONS	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Communications with the State of Georgia The primary means of communication between the HNP and the State of Georgia is the ENN, which is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia and the FEOC in Vidalia, Georgia. Extensions for this system are located in the Control Room, the TSC, and the EOF. The ENN system is available and manned 24 hours per day. The ENN provides the licensee the capability to notify State and local authorities of an emergency within 15 min. of declaration. Commercial telephones, microwave, or land lines provide backup for the ENN.	**Annex 4.1.1** Notification Process (SEP E.2.2) State and local warning points are staffed 24 hours per day. State and county authorities to be notified within 15 minutes of the declaration of an emergency condition are: State of Georgia: • Georgia Emergency Management Agency (GEMA). Georgia County Authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point. **Annex 5.3.1** Communications with the State and Local Counties (SEP F.1.2) The primary means of communication between HNP, the State of Georgia, and the local counties (Appling, Jeff Davis, Tattnall, and Toombs) is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the state and local warning points, which are staffed 24 hours per day. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Communication with contiguous local governments in the Ingestion Planning Zone (IPZ) will be coordinated through the State of Georgia.	No equivalent Plan/Annex statement.	Communication requirements for the site are specified in the Site Plan and Annex. ORO communication is controlled by offsite plans and procedures.

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Communications with Plume Exposure Pathway EPZ Counties The primary means of communication between HNP and each EPZ county is the ENN, which is a dedicated communications system from the plant to each county EOC and 24-hour point of contact. Commercial telephones, microwave or land lines discussed above provide backups for the ENN. Radio contact between the plant and the Appling County Sheriff's Office can also be established, if necessary.	**Annex 5.3.1** Communications with the State of and Local Counties (SEP F.1.2) The primary means of communication between HNP, the State of Georgia, and the local counties (Appling, Jeff Davis, Tattnall, and Toombs) is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the state and local warning points, which are staffed 24 hours per day. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The wording was standardized and relocated to the Site Annex.
The ENN is available and manned 24 hours per day. At the plant, the ED is responsible for ensuring contact with each of the plume exposure pathway EPZ counties.	**Annex 4.1.1** Notification Process (SEP E.2.2.1) State and local warning points are staffed 24 hours per day. State and local county authorities to be notified within 15 minutes of the declaration of an emergency condition are: <u>State of Georgia</u>: • Georgia Emergency Management Agency (GEMA). <u>Georgia County Authorities</u>: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point.	The wording was standardized and relocated to the Site Annex.

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Communications with NRC and Other Federal Agencies The primary means of communication between HNP and the NRC is the ENS, a dedicated communications system from the plant to the NRC Operations Center. The NRC Region II office in Atlanta, Georgia, may also be connected to the ENS through the NRC Operations Center. Additional dedicated telephone circuits [known as the Federal Telecommunications System (FTS)] are installed in the TSC and the EOF.	**EP F.1.4.1** NRC Emergency Notification System (ENS) This communications line provides a communications link to the NRC Operations Center in Rockville, Maryland, and is used for continuous communications in a classified emergency.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability.
The Emergency Response Data System (ERDS), which provides specific plant parameters to the NRC via internet connection, is installed in the Computer Room and the TSC.	**EP F.1.4.8** Emergency Response Data System (ERDS) ERDS is a dedicated network and is a direct near real-time electronic data link between the plant's on-site computer system and the NRC Operations Center. It provides for the automated transmission of a limited data set of selected parameters.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability.
Commercial telephone lines and the microwave system serve as backups to the ENS. Communications with other Federal emergency response organizations would be by telephone; such communications would normally be completed by GEMA from the State EOC.	**EP F.1.4** Commercial telephone lines serve as the backup to the ENS and other FTS lines.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Communications Among HNP ERF Communications among the Control Room, the TSC, the OSC, and the EOF can be completed using various communications systems including dedicated telephone circuits, normal plant telephones, and radios.	**EP F Table 5.**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
A radio system is also used for communications with the radiological monitoring teams.	**Section F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Communications available at each ERF are as follows: 1. Control Room • Dedicated Voice Over Internet Protocol (VOIP) phones to the TSC, the OSC, and the EOF. • One extension to the ENN. • One extension to the NRC ENS. • ERDS to the NRC. • Normal plant phones (network or commercial). • Base station radio console (multiple frequencies). • Sound-powered phones (internal to Control Room only). • Plant PA system. • One facsimile line.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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TSC • Dedicated Voice Over Internet Protocol (VOIP) phones to the Control Room, the OSC, and the EOF. • One extension to the ENN. • One extension to the NRC ENS. • ERDS to the NRC. • One facsimile line. • Normal plant phones (network or commercial). • Base station radio console (multiple frequencies). • Plant PA system.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
OSC • Dedicated Voice Over Internet Protocol (VOIP) phones to the Control Room, the TSC, and the EOF. • Normal plant phones (network or commercial). • Base station radio console. • Plant PA system.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
EOF • Dedicated Voice Over Internet Protocol (VOIP) phones to the Control Room, the TSC, and the OSC. • One extension to the ENN. • An extension to the NRC ENS. • Multiple facsimile lines. • Normal phones (network or commercial). • Southern LINC radio equipment.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Medical Support Facility Communications Communication between HNP and the Appling General Hospital or the Meadows Regional Medical Center is by commercial telephone. The Appling Ambulance Service and the Meadows Regional Medical Center Ambulance Service are equipped with radio for communications with the hospitals. Normally, ambulance services and hospitals within the State are interconnected in a statewide hospital radio network.	**EP F.2** Medical Emergency Communications Communications have been established between the primary and backup medical hospitals and transportation services with SNC-operated plants.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Alerting Emergency Response Personnel As described in Section E, notification of onsite personnel at HNP is completed utilizing available communications systems. HNP personnel not onsite at the time of the emergency are also notified utilizing available communications systems.	**EP E.2.1** Notification of Onsite Personnel The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Communications System Tests Communication channels with the State of Georgia, the plume exposure pathway EPZ counties, and the NRC (with the exception of ERDS) are tested each calendar month, using the extensions in the Control Room, the TSC, and the EOF.	**EP F.3** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages in the test. • Communications with state and local governments within the plume exposure pathway will be tested monthly. • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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ERDS is tested each calendar quarter.	**EP F.3** The Emergency Response Data System (ERDS) will be tested on a quarterly basis.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
All communications procedures and systems are also tested each calendar year during a communications drill. This drill is normally conducted in an exercise each calendar year.	**Annex 5.4** Communications procedures and systems are also tested each calendar year.	The wording was standardized and relocated to the Site Annex.
G. PUBLIC EDUCATION AND INFORMATION The detailed planning for public information actions during an emergency, including rumor control, is contained in the GPC HNP Emergency Communication Plan.	No equivalent Plan/Annex statement.	The SNC Standard Emergency Plan and Site Annex in Section G outline the Public Education and Information responsibilities of SNC and the site.
A general description of the public education and information program follows. Each calendar year, information is provided to the public regarding how they will be notified and what their actions should be in an emergency. The means for disseminating this information includes, but is not limited to, information in local telephone books, posting in public areas, and/or publications distributed by mail.	**EP G.8** Public Information and Education Program The goal of the public information program is to acquaint the general public with the emergency plans for the operation of APC/GPC nuclear plants, as appropriate, and actions they should take in the event of a plant emergency. Emergency information is disseminated each calendar year for residents and transients in the plume exposure pathway Emergency Planning Zone.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Each calendar year, information is distributed to residents in the plume exposure pathway EPZ through various publications. Information includes the following: • Instructions in response to the SNC siren system including the annual audible test. • How the emergency notification will take place. • Discussions of protective measures such as sheltering and evacuation and actions to take in either case. • Radio stations where additional information will be broadcast. • Evacuation routes and reception centers including a map and instructions. • Educational information on radiation. • Special needs and considerations for the handicapped. • Contacts to obtain additional information.	**Annex 2.3.4** Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated on providing information to the public by written material that is likely to be available in local residences and in locations frequented by transients. The information will also provide instructions on which local media will be providing additional information in the event of an emergency.	The commitment wording was standardized and relocated to the Site Annex.
A Visitors Center is operated onsite. The center is staffed with public information personnel who provide public education programs to the community and any other visitors. These programs typically focus on plant operational concepts, plant safety considerations, and radiation.	No equivalent Plan/Annex Statement.	Section G of the SNC Standard Emergency Plan and Site Annex provide the specific responsibilities for Public Education for implementation of the Emergency Plan. The educational aspects of the Visitor Center may be beneficial but are not germane to implementation of the Emergency Plan.

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Information for Transients Posted "Emergency Information" signs and a notice published in the local telephone books are used to provide the transient population with appropriate emergency information and instructions. The information/instructions advise the public on how they will be notified in the event of an emergency; indicate the actions to take if notified; and refer the public to designated broadcast stations for information in the event of a serious emergency.	**Annex 2.3.4** Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated on providing information to the public by written material that is likely to be available in local residences and in locations frequented by transients. The information will also provide instructions on which local media will be providing additional information in the event of an emergency.	The commitment wording was standardized and relocated to the Site Annex.
Method of Emergency Information Dissemination Any proposed change in the method of dissemination of emergency information to the public must be coordinated and discussed with, and agreed upon by appropriate State and local offsite emergency officials prior to implementation of the change. The Emergency Plan may be changed with regard to the manner in which the information is provided to the public under 10 CFR 50.54 (q) provided the requisite emergency information remains the same as currently approved by the NRC and FEMA as contained in the Hatch Emergency Plan and the FEMA-43 Report for the Edwin I. Hatch Nuclear Plant.	**EP G.8** Public Information and Education Program The goal of the public information program is to acquaint the general public with the emergency plans for the operation of APC/GPC nuclear plants, as appropriate, and actions they should take in the event of a plant emergency. Emergency information is disseminated each calendar year for residents and transients in the plume exposure pathway Emergency Planning Zone.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Joint Information Center (JIC) Operations The JIC is the point of contact with the news media during an emergency. The JIC facilities used to coordinate the dissemination of information to the media will be established to accommodate public information representatives from the licensee, Federal, State, and local response agencies. News releases and media briefings are coordinated to the maximum extent possible.	**EP H.2.2** Corporate Media Center (CMC) Upon notification of an Alert or higher classification, the Public Information Director and corporate staff assigned to JIC functions will assemble at the CMC. The CMC, located at the Atlanta/Birmingham corporate headquarters building of Georgia Power Company/Alabama Power Company, as appropriate, is the official location for coordination of emergency communications response until the site specific JIC has been activated. The Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the site specific JIC. When the decision is made to activate the JIC the CMC will maintain emergency communications response coordination until the site specific JIC is ready to assume these responsibilities. Once overall responsibility for emergency communications response transfers to the site specific JIC the remaining CMC staff will provide support for the JIC as needed. **Annex 5.1.6** The HNP JIC is located in Vidalia, Georgia, adjacent to the Georgia Power Company operating headquarters. The JIC is the central location for the coordination and dissemination of information to news media, and responses to media inquiries. Details of the JIC for HNP are in section H of the Emergency Plan. If the decision is made to activate the JIC, the CMC in Atlanta, Georgia will maintain emergency communications response coordination until the JIC is ready to assume these responsibilities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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	EP H.2.3 Joint Information Center (JIC) After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs). Site specific JIC is provided in the site specific Annexes.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The licensee utilizes the GPC Corporate Headquarters Building located in Atlanta, Georgia, to serve as a temporary information center until the JIC located next to the GPC Operating Headquarters in Vidalia can be activated. The JIC is located approximately 22 miles from the plant and is large enough to accommodate a large number of reporters. Once activated, the JIC becomes the principal location for the dissemination of information relative to the emergency. News media who may arrive at the plant site during a declared emergency will be directed to the Joint Information Center to obtain approved news release information.	**EP H.2.2** Corporate Media Center (CMC) Upon notification of an Alert or higher classification, the Public Information Director and corporate staff assigned to JIC functions will assemble at the CMC. The CMC, located at the Atlanta/Birmingham corporate headquarters building of Georgia Power Company/Alabama Power Company, as appropriate, is the official location for coordination of emergency communications response until the site specific JIC has been activated. The Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the site specific JIC. When the decision is made to activate the JIC the CMC will maintain emergency communications response coordination until the site specific JIC is ready to assume these responsibilities. Once overall responsibility for emergency communications response transfers to the site specific JIC the remaining CMC staff will provide support for the JIC as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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	EP H.2.3 Joint Information Center (JIC) After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs). Site specific JIC is provided in the site specific Annexes.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The principal licensee contacts for the media are the Public Information Director and the designated Company Spokesperson. The Company Spokesperson has access to the ED through the EOF Manager. The Company Spokesperson briefs the media on plant status and company emergency activities. In addition, technical briefers who can provide general and background information, as appropriate, to reporters at the JIC have been designated.	**EP B.3.2.8** EOF Nuclear Spokesperson The Nuclear Spokesperson speaks on behalf of the company, providing plant status updates during news briefings. The Spokesperson also may do one-on-one media interviews. The position works with the Technical Assistant in keeping abreast of the event status and keeps the Public Information Director (PID) posted on that status. **EP B.3.2.1** JIC Public Information Director (PID) The PID is responsible for coordination of emergency information between the utility and responding offsite organizations participating in the Joint Information Center (JIC). Additional duties include managing approval and dissemination of utility news bulletins, facilitating news briefings, overseeing public response, serving as liaison to the media and coordinating off-site agencies. The PID is responsible for evaluating the emergency's severity in terms of public interest and safety.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.
Further information relative to the public information organization and information flow to the public during an emergency is available in the HNP Emergency Communications Plan.	No equivalent Plan/Annex statement.	The REP requirements previously located in the Emergency Communications Plan have been incorporated in Section G of the SNC Standard Emergency Plan and Site Annex.

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Offsite Agency Coordination Timely and accurate information is provided to Federal, State, and local agencies. The licensee seeks reciprocal information from these agencies. Efforts are made to coordinate periodic press briefings and to issue public statements in conjunction with these government agencies. A joint public information center operation at the JIC provides ample opportunity for all parties represented to review all information prior to public release.	**EP G.4** Press Briefings Press briefings will be conducted to keep the media informed of events and activities relating to the emergency. Briefings will provide the most current, up-to-date information about events and response to the incident. Public Information Officers (PIOs) from all offsite agencies responding to the emergency will be encouraged to participate in the briefings to discuss their particular activities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.
Rumor Control Providing timely, accurate, and consistent information to the public is considered the most effective method of dispelling rumors. Rumors are controlled by having a single source of information. In an emergency, a rumor control network is activated. News media are monitored to detect and respond to misinformation. Offsite information is the responsibility of offsite agencies; however, rumor control is coordinated between the State and licensee.	**EP B.3.2.5** Public Response Coordinator The Public Response Coordinator reports to the PID and is responsible for directing the facility's public response activities, keeping staff informed of the most current plant status and obtaining responses for rumors and public inquiries. **EP B.3.2.6** Public Response Staff The Public Response Staff reports to the Public Response Coordinator and is responsible for coordinating and developing responses to rumors and public inquiry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. .

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Media Education Information is provided and a program is offered each calendar year to acquaint the news media with the methodology for obtaining information during an emergency and background about overall EP at HNP. Included is information about the plant, radiation and the role of the JIC.	**EP G.2** News Media Training A program will be offered each calendar year to acquaint the news media with the methodology for obtaining information during an emergency and with overall emergency preparedness at APC/GPC nuclear plants, as appropriate. Training will include information about the plant, emergency response, and the role of the JIC, as well as opportunities to participate in drill activities	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H. EMERGENCY FACILITIES AND EQUIPMENT Following the declaration of an emergency, response activities will be coordinated at a number of facilities. These facilities and the equipment which will be used for assessment and monitoring functions are described in this section.	**EP H.1** Onsite Emergency Response Facilities SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification.. Emergency Response Facilities may be activated at an Unusual Event at the discretion of the Emergency Director. Until the TSC and OSC are activated, required functions of these facilities are performed in the Control Room.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The justification for augmentation of the ERO and activation of respective ERFs is provided separately.

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Emergency Facilities 1. TSC The TSC, which is shared by both units, is located adjacent to the service building annex. The layout of the TSC is shown in Figure H-1. Walking time from the TSC to the Control Room is approximately 2 min. The TSC covers approximately 2620 ft2.	**Annex 5.1.2**: The TSC, which is shared by both units, is located adjacent to the service building annex. A sample layout of the TSC is shown in Figure 5.1.A. The TSC provides plant management and technical support personnel, including NRC personnel, with adequate space to assist plant operating personnel located in the Control Room during an emergency. The TSC is equipped with technical data displays and has ready access to plant records to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any release of radioactivity to the environment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
Section H.1: The TSC provides plant management and technical support personnel [including five NRC personnel] with adequate space to assist plant operating personnel located in the Control Room during an emergency.	**EP H.1.2**: The TSC is sized to accommodate ERO responders and NRC Representatives	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
The TSC is equipped with technical data displays and has ready access to plant records.	**Annex 5.1.2**: The TSC maintains access to drawings and records necessary for the response to an emergency event at HNP.	The commitment wording was standardized and relocated to the Site Annex.
The TSC structure and ventilation system are designed to ensure that TSC personnel are protected from radiological hazards similar to that of the Control Room.	**EP H.1.2**: Personnel in the TSC are protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions, with similar radiological habitability standards as Control Room personnel. **Annex 5.1.2**: The TSC structure and ventilation system are designed to ensure that TSC personnel are protected from radiological hazards similar to that of the Control Room.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.

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An ARM which alarms on abnormal radiation levels is provided in the TSC.	**EP H.1.2**: To ensure adequate radiological protection, radiation monitoring equipment has been installed in the TSC, or periodic radiation surveys are conducted. These systems indicate radiation dose rates while in use. **Annex 5.1.2**: An area radiation monitor, which alarms on abnormal radiation levels, is provided in the TSC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
Portable radiation monitors are available for personnel in transit from the TSC to other areas.	**Annex 5.1.2**: In addition, portable radiation monitors are available for personnel in transit from the TSC to other areas.	The commitment wording was standardized and relocated to the Site Annex.
Self-contained breathing apparatus (SCBA) are provided in the TSC.	**Annex 5.1.2**: Self Contained Breathing Apparatus (SCBA) are provided in the TSC.	The commitment wording was standardized and relocated to the Site Annex.
Anticontamination clothing is available at the nearby OSC.	**Annex 5.1.2**: Anticontamination clothing is available at the nearby OSC.	The commitment wording was standardized and relocated to the Site Annex.
The TSC normal lighting is supplied from normal site power through a motor control center backed up by the security DG.	**Annex 5.1.2**: The TSC normal lighting is supplied from normal site power through a motor control center backed up by the security DG.	The commitment wording was standardized and relocated to the Site Annex.
Power for the TSC vital equipment is provided from either the motor control center backed up by the security DG or from a battery-backed uninterruptible power supply system.	**Annex 5.1.2**: Power for the TSC vital equipment is provided from either the motor control center backed up by the security DG, or from a battery backed uninterruptible power supply system.	The commitment wording was standardized and relocated to the Site Annex.
Power to the dc system is provided via battery chargers, one of which is powered from this same motor control center.	**Annex 5.1.2**: Power to the DC system is provided by battery chargers, one of which is powered from this same motor control center.	The commitment wording was standardized and relocated to the Site Annex.

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The TSC records area maintains copies of the following documents: TS. Plant Operating Procedures. EOP. Final Safety Analysis Reports (FSARs). System piping and instrumentation diagrams and heating, ventilation, and air-conditioning (HVAC) flow diagrams. Piping area drawings. Electrical one-line, elementary, and wiring diagrams. Control logic and loop diagrams. Emergency Plan and implementing procedures.	**Annex 5.1.2**: The TSC records area maintains copies of the following documents: • Technical Specifications. • Plant Operating Procedures. • Final Safety Analysis Reports (FSARs). • Emergency Plan. • Emergency Plan Implementing Procedures. • Plant Operating Records. • System piping and instrumentation diagrams; heating, ventilation, and air-conditioning (HVAC) flow diagrams. • Electrical one line, elementary, and wiring diagrams. • Control logic and loop diagrams.	The commitment wording was standardized and relocated to the Site Annex.
Section H.1: The above records are available in current form and are updated, as necessary.	**Annex 5.1.2:** The above records are updated as necessary to ensure the content is accurate and complete.	The commitment wording was standardized and relocated to the Site Annex.
Section H.1: In the event the TSC becomes uninhabitable during an emergency, the Control Room will serve as an alternate location for TSC management.	No equivalent Plan Statement.	Relocation of the TSC will be controlled procedurally on an event-specific basis. The Control Room is a potential relocation point. The alternative facility developed as part of the November Emergency Preparedness rulemaking provides another option.
Operations at the TSC are directed by the TSC Manager.	**EP B.2.1.2** TSC Manager The TSC Manager reports to the TSC ED and is responsible for coordinating activities between the TSC and other emergency response facilities, directing the activities of the TSC staff, and ensuring communications are established with applicable offsite agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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OSC The OSC consists of the service building breakroom and other areas, as necessary, to stage support personnel.	**Annex 5.1.3** Operations Support Center (SEP H.1.3) The OSC consists of the service building break room and other areas available for staging of support personnel.	The commitment wording was standardized and relocated to the Site Annex
The OSC includes groups such as Instrument Technicians, Mechanics, Electricians, Nuclear Chemistry and HP Technicians, System Operators, and oncoming shift personnel who assemble to aid in the response to an emergency.	**EP B.2.2.7**: Selected personnel report to the OSC as directed. Emergency personnel from the Maintenance, Operations, and RP/Chemistry Departments are directed to report to the OSC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition, the OSC is the initial assembly point for all radiological emergency team (RET) members.	**Annex 5.1.3** Operations Support Center (OSC) This includes groups such as Instrument and Control Technicians, Mechanics, Electricians, Nuclear Chemistry and Radiation Protection (RP) Technicians, System Operators, and oncoming shift personnel who assemble to aid in the response to an emergency.	The commitment wording was standardized and relocated to the Annex
Briefings will be held with each team prior to being dispatched. Work to be performed, cautions, plant conditions, and radiological information will be included in the briefings.	**Annex 5.1.3** Operations Support Center (OSC) Briefings will be held with each team prior to being dispatched.	The SNC Standard Emergency Plan and Annex maintain the commitment to assemble and dispatch event response teams from the OSC. The details of team management will be relocated to EPIPs.
Status boards containing plant conditions and emergency classification will be available in the OSC.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan and Annex maintain the commitment to assemble and dispatch event response teams from the OSC. The details of team management will be relocated to EPIPs.
Emergency kits containing radiation monitoring equipment, first-aid supplies, decontamination supplies, breathing apparatus, portable lighting, and hand-held radios are available to the OSC.	**EP H.1.3**: Emergency supplies are maintained in the OSC. When an emergency condition exists at one SNC-operated nuclear power plant, additional supplies can be obtained from other unaffected plants and SNC resources upon request.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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In the event the OSC becomes uninhabitable during an emergency, OSC functions will be conducted from the alternate OSC located in the Simulator Building.	**EP H 1.3**: Alternate locations are available should the OSC become uninhabitable. **Annex Section 5.1.3:** If the OSC is deemed uninhabitable, the OSC may be moved to other locations as deemed appropriate by the OSC Manager	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Operations at the OSC are directed by the OSC Manager.	**EP B.2.2.1** OSC Manager The OSC Manager reports to the TSC Manager and directs a staff in providing labor, tools, protective equipment, and parts needed for emergency repair, damage control, firefighting, search and rescue, first aid, and recovery.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
EOF Description of EOF operations and staffing is contained in Appendix 7.	**EP H.2** Offsite Emergency Facilities **EP H.2.1** Emergency Operations Facility The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The details of the EOF have been incorporated into Section H of the SNC Standard Emergency Plan. The comparative analysis is included in the justification section for Appendix 7.

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Available (Simulator Building) classrooms and conference rooms will be utilized for field monitoring team assembly and dispatch activities and for the alternate OSC.	**EP H.1.3** Operations Support Center (OSC) The OSC has been established to provide an area for coordinating and planning activities and staging personnel and equipment. The OSC responders include groups such as Instrument and Control Technicians, Mechanics, Electricians, Nuclear Chemistry and RP Technicians, Operations personnel, and oncoming shift personnel. Additional space is available to accommodate personnel as required. If the OSC is deemed uninhabitable, the OSC may be moved to other locations as deemed appropriate by the OSC Manager.	The SNC Standard Emergency Plan and Annex maintain the commitment to assemble and dispatch event response teams from the OSC. The details of team management will be relocated to EPIPs.
This area of the Simulator Building has a ventilation system that is functionally similar to the system used in the TSC without charcoal filtration. During normal mode of operation, a slight positive pressure is maintained. During emergency operation, no outside air is allowed and positive pressure is not maintained. The ventilation system has recirculation through high-efficiency particulate air filters during emergency mode only. Section H.4: This location is designed to provide a radiation protection shielding factor of 5. Dedicated portable radiation monitors are available for surveillance.	**EP H 1.3**: Alternate locations are available should the OSC become uninhabitable. **Annex Section 5.1.3:** If the OSC is deemed uninhabitable, the OSC may be moved to other locations as deemed appropriate by the OSC Manager.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Normal power to the simulator building is from offsite power. Emergency lighting is provided by 3-hour wall packs.	No equivalent Plan/Annex statement	The simulator building is an alternative location for the OSC. The description of power is not required in the Plan.
Kits containing equipment for conducting offsite radiological monitoring are located in the Simulator Building on plant site.	**Annex 5.1.3** Emergency kits containing radiation monitoring equipment, first-aid supplies, decontamination supplies, breathing apparatus, portable lighting, and portable radios are available to the OSC.	The commitment wording was standardized and relocated to the Site Annex.

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Alternative Facility During a security related event or other event that precludes onsite access, the TSC and OSC ERO staff will be directed to an alternative facility. This facility is located in the Plant Hatch JIC building across the hall from the Public Information Workroom and adjacent to the Public Response Workroom. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources and work planning resources for performing engineering assessment activities, including damage control team planning and preparation for return to the site.	**EP H.1.4** Alternative Facilities An Alternative Facility for staging of ERO personnel has been designated at the sites. In the event of a Security or Hostile Action threat or event, the designated Alternative Facility may also serve as an evacuation location for TSC and OSC personnel. The Alternative Facility is designed to be accessible in the event of an onsite HAB event and has the capability to: • Communicate with the Control Room, Security, and the EOF. • Conduct engineering assessment activities including damage control team planning and preparation. The functions of Notification and PARs will be performed from the EOF should the Alternative Facility be activated. Details of Alternative Facilities can be found in the Site Specific Annex. **Annex 5.1.4** Alternative Facility (SEP H.1.4) During a security-related event or other event that precludes onsite access, the TSC and OSC ERO will be directed to an alternative facility. This facility is located adjacent to the Georgia Power Company operating headquarters in Vidalia, Georgia and is approximately 22 miles from HNP. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, and to work planning resources for performing engineering assessment activities including damage control team planning and preparation for return to the site. Guidance for use of the facility is in site procedures.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Joint Information Center (JIC) Description of the JIC resides in the HNP Emergency Communications Plan.	**EP H.2.2** Corporate Media Center (CMC) Upon notification of an Alert or higher classification, the Public Information Director and corporate staff assigned to JIC functions will assemble at the CMC. The CMC, located at the Atlanta/Birmingham corporate headquarters building of Georgia Power Company/Alabama Power Company, as appropriate, is the official location for coordination of emergency communications response until the site specific JIC has been activated. The Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the site specific JIC. When the decision is made to activate the JIC the CMC will maintain emergency communications response coordination until the site specific JIC is ready to assume these responsibilities. Once overall responsibility for emergency communications response transfers to the site specific JIC the remaining CMC staff will provide support for the JIC as needed.	The Emergency Communications Plan has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H, the Emergency Communications portion of Section G of the SNC Standard Emergency Plan and Section 5.1.6 of the Hatch Annex.

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	EP H.2.3 Joint Information Center (JIC) After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs). Site specific JIC is provided in the site specific Annexes.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Activation and Staffing of Emergency Facilities During the initial stages of an emergency, activities at HNP are directed from the Control Room. For a NUE, no other facilities are activated.	**EP H.1**: SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification..	The wording was standardized to address the levels activation would occur. The statement of non-activation for the NUE was eliminated.
Upon declaration of an Alert or higher level classification, the TSC is activated and becomes fully operational ASAP, but not later than approximately 1 hour following the initial notification.	**EP H.1**: SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification..	The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan. The activation time commitment is justified in the Technical Analysis Section of this LAR.
Overall direction and control are exercised from the TSC for an Alert or Higher situation.	**EP H.1.2** Technical Support Center (TSC) TSC functions include: • Support for the Control Room's emergency response efforts. • Performance of response management functions when in Command & Control.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Activation of the OSC is initiated at an Alert or higher level classification.	**EP H.1** SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification..	The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan.
The OSC becomes operational ASAP, but not later than approximately 1 hour following initial notification.	**EP H.1:** SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification..	The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan. The activation time commitment is justified in the Technical Analysis Section of this LAR.
Activation and staffing of the EOF is contained in Appendix 7.	**EP H.2** Offsite Emergency Facilities **EP H.2.1** Emergency Operations Facility The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	EOF activation has been incorporated into Section H of the SNC Standard Emergency Plan. The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan. The activation time commitment is justified in the Technical Analysis Section of this LAR.

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For security related events, the activation of emergency facilities may be delayed as described in section B. Activation of ERO members will be performed for hostile action based events to promptly staff alternative facilities, in order to minimize delays in overall site response. The ERO will be staged in a manner that supports rapid response to limit or mitigate site damage or the potential for an offsite radiological release.	**EP H.1.4** Alternative Facilities An Alternative Facility for staging of ERO personnel has been designated at the sites. In the event of a Security or Hostile Action threat or event, the designated Alternative Facility may also serve as an evacuation location for TSC and OSC personnel. The Alternative Facility is designed to be accessible in the event of an onsite HAB event and has the capability to: • Communicate with the Control Room, Security, and the EOF. • Conduct engineering assessment activities including damage control team planning and preparation. The functions of Notification and PARs will be performed from the EOF should the Alternative Facility be activated. Details of Alternative Facilities can be found in the Site Specific Annex.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant Monitoring and Data Handling Systems 1. Geophysical Phenomena Monitors a. Meteorological Meteorological monitoring is in place at HNP. The instruments are mounted on a 100-meter primary tower located to the south of the power block and on a 45-meter backup tower located to the southeast of the power block.	**EP H.5.1:** Meteorological Instrumentation: A permanent meteorological monitoring station is located near each plant for the acquisition and recording of wind speed, wind direction, and ambient and differential temperatures for use in making offsite dose projections. Meteorological information is displayed in the CR, TSC, and EOF. **Annex Section 5.6.1:** Meteorological monitoring is in place at HNP. The instruments are mounted on a 100-meter primary tower located to the south of the power block and on a 45-meter backup tower located to the southeast of the power block.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.

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Section H: Parameters measured and transmitted to the Control Room include: • Windspeed. • Wind direction. • Vertical temperature difference. • Ambient temperature.	**Annex 5.6.1**: Parameters measured and transmitted to the Control Room include: • Windspeed. • Wind direction. • Vertical temperature difference. • Ambient temperature.	The commitment wording was standardized and relocated to the Site Annex.
A building that houses meteorological equipment is located near the base of each tower. The system is powered by an uninterruptible power supply.	**Annex 5.6.1:** A building that houses meteorological equipment is located near the base of each tower. The system is powered by an uninterruptible power supply for high availability.	The commitment wording was standardized and relocated to the Site Annex.
Additionally, meteorological information can be obtained from the National Weather Service to supplement onsite data and provide a backup to the plant meteorological monitoring program.	**Annex 5.6.1:** Additionally, meteorological information can be obtained from the National Weather Service to supplement onsite data and provide a backup to the plant meteorological monitoring program on an as-needed basis.	The commitment wording was standardized and relocated to the Site Annex.
The important parameters for characterizing the transport of airborne radioactivity are windspeed, wind direction, and atmospheric stability (e.g., derived from the standard deviation of the horizontal wind direction or vertical temperature difference).	**Annex 5.6.1** The important parameters for characterizing the transport of airborne radioactivity are wind speed, wind direction, and atmospheric stability (e.g., derived from the standard deviation of the horizontal wind direction or vertical temperature difference).	The commitment wording was standardized and relocated to the Site Annex.
These meteorological parameters are used in a calculational methodology to assess the offsite radiological consequences of accidental releases of airborne radioactivity. The methodology is described in Section I, Accident Assessment.	**Annex 5.6.1** These meteorological parameters are used in a calculation methodology to assess the offsite radiological consequences of accidental releases of airborne radioactivity. The methodology is described in Section I, Accident Assessment, of the SNC Standard Emergency Plan.	The commitment wording was standardized and relocated to the Site Annex.

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b. Hydrologic The normal and emergency source of plant cooling water is the Altamaha River, which provides makeup to the cooling towers. The probable maximum flood level is approximately 105 ft msl.	**Annex 5.6.1** Hydrologic (SEP H.5.1) The normal and emergency source of plant cooling water is the Altamaha River, which provides makeup to the cooling towers. The probable maximum flood level is approximately 105 ft msl.	The commitment wording was standardized and relocated to the Site Annex.
c. Seismic Seismic monitoring instrumentation for HNP consists of time-history accelerographs, peak recording accelerographs (PRAs), a response-spectrum recorder, and seismic switches.	**EP H.5.1**: Seismic Monitoring: The seismic monitoring system measures and records the acceleration of the structure if activated by an earthquake of sufficient magnitude. It also provides signals for immediate remote indication that specific preset response accelerations have been exceeded. **Annex Section 5.6.1:** Seismic monitoring instrumentation for HNP consists of time history accelerographs, peak recording accelerographs (PRAs), a response spectrum recorder, and seismic switches. Activation of the seismic switches causes an audible and visual annunciation in the Control Room to alert the plant operator (PO) that an earthquake has occurred. These initial set points are based on experience in existing plants and may be changed once significant plant operating data, which indicate that a different set point will provide better strong-motion accelerometer (SMA) system operation, are obtained.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
One triaxial seismic switch, with a horizontal setpoint of 0.08 g, is installed on the drywell pedestal on the 87 ft level of the Unit 2 reactor building.	**Annex 5.6.1:** One triaxial seismic switch, with a horizontal set point of 0.08g, is installed on the drywell pedestal on the 87 ft level of the Unit 2 reactor building.	The commitment wording was standardized and relocated to the Site Annex.

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A second seismic switch is located outside the biological shield on the 185 ft level of the Unit 2 reactor building and has a vertical setpoint of 0.063 g.	**Annex 5.6.1:** A second seismic switch is located outside the biological shield on the 185 ft level of the Unit 2 reactor building and has a vertical set point of 0.063g.	The commitment wording was standardized and relocated to the Site Annex.
They are backup devices which actuate visual and audible annunciators in the Control Room.	**Annex 5.6.1:** They are backup devices which actuate visual and audible annunciators in the Control Room.	The commitment wording was standardized and relocated to the Site Annex.
Activation of the seismic switches causes an audible and visual annunciation in the Control Room to alert the plant operator (PO) that an earthquake has occurred. These initial setpoints are based upon experience in existing plants and may be changed once significant plant operating data, which indicate that a different setpoint will provide better strong-motion accelerometer (SMA) system operation, are obtained.	**Annex 5.6.1** Activation of the seismic switches causes an audible and visual annunciation in the Control Room to alert the plant operator (PO) that an earthquake has occurred. These initial set points are based on experience in existing plants and may be changed once significant plant operating data, which indicate that a different set point will provide better strong-motion accelerometer (SMA) system operation, are obtained.	The commitment wording was standardized and relocated to the Site Annex.
d. Fire Detection The fire detection system at HNP includes smoke and thermal detectors and manual fire alarms. Fire detection systems are provided in all areas with safe shutdown equipment, as well as other locations throughout the plant. In addition to initiating fire suppression systems, indications from the fire detection system are transmitted to the Control Room.	**EP H.5.4:** The Fire Detection System is designed to quickly detect products of combustion or heat in designated areas of the plant. The fire alarm communication systems and subsystems are located at strategic points throughout the plant to warn personnel of a fire or other emergency conditions. Additional description of the fire system is provided in the FSAR.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Radiation Monitoring System (RMS) The RMS receives and processes radiological input readings during normal and abnormal operating and accident conditions; measures, evaluates, and reports radioactivity in designated areas; and monitors releases of radioactive materials in liquid and gaseous effluents. Data from the RMS are available in the Control Room. A more detailed description of the RMS is provided in the HNP-2-FSAR, Section 11.4.	**EP H.5.2.1** Radiation Monitoring System (RMS) Radiation monitoring instruments are located at selected areas within the plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne and air particulate monitors. • Area monitors respond to gamma radiation. • Airborne monitors detect and measure radioactive gaseous effluent concentrations. Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H: The post-accident radiation monitors provide radiation monitoring after an accident.	**EP H.5.2.2:** The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Pre-designated monitoring and sampling points are listed in site procedures. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The system can provide information on post-accident plant conditions to allow operator actions to mitigate and control the course of an accident. Various chemical analyses and radiological measurements on these samples can be performed, including the determination of radionuclide concentrations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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There are three types of radiation monitors in the RMS: airborne and air particulate radiation monitors, liquid radiation monitors, and post-accident radiation Backup power to the post-accident monitors is supplied by a DG to ensure against interruption of monitor operation and loss of data.	**EP H.5.2.1** Radiation Monitoring System (RMS) Radiation monitoring instruments are located at selected areas within the plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne and air particulate monitors. • Area monitors respond to gamma radiation. • Airborne monitors detect and measure radioactive gaseous effluent concentrations. Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The post-accident radiation monitors provide radiation monitoring after an accident.	**EP I.2** Continuing and Post Accident Assessment The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring Systems, and Accident Radiation Monitoring Systems.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The monitors are comprised of area, airborne, and air particulate monitors.	**EP H.5.2.1**: The monitors are comprised of area, airborne, and air particulate monitors	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Area monitors respond to gamma radiation photons within any energy range from 60 KeV to 3 MeV.	**EP H.5.2.1:** Area monitors respond to gamma radiation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Airborne monitors are capable of detecting and measuring radioactive gaseous effluent concentrations with compositions ranging from fresh equilibrium noble gas fission product mixtures to 10-day-old mixtures.	**EP H.5.2.1**: Airborne monitors detect and measure radioactive gaseous effluent concentrations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Backup power to the post-accident monitors is supplied by a DG.	No equivalent Plan/Annex statement	
SPDS The SPDS provides a display of plant parameters from which the status of operation can be assessed, in the Control Room, the TSC, and the EOF.	**EP H 5.3.2**: The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The SPDS performs the following functions: • Aids Control Room operators in the rapid detection and identification of abnormal operating conditions. • Provides additional specific information used to analyze and diagnose the cause of abnormal operating conditions. • Monitors plant response to corrective actions. • Provides grouping of parameters to enhance the operators' capability to quickly assess plant status without surveying concurrently all Control Room displays. • Directs the operators' attention to other specific confirmatory non-SPDS Control Room displays. • Provides human factors engineered display formats in simple and consistent display patterns and codings. • Provides display information on a real-time basis, along with validation of data. • Provides generated selectable trend displays on a real-time basis for monitoring reactivity control, reactor core cooling and heat removal from the primary system, RCS integrity, radioactivity control, containment integrity, and other selected parameters.	**EP H.5.3.2** Safety Parameter Display System (SPDS) The SPDS parameters are available is in operation during normal and abnormal operating conditions in the Control Room, TSC, and EOF. **EP I.1** Some of the key plant parameters monitored in the Control Room are assembled into a single display on the Safety Parameter Display System (SPDS). The SPDS monitors such parameters as: reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level, and effluent monitor readings. The instrumentation and equipment capabilities available for emergency facilities are described in Section H	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The SPDS in the Control Room consists of displays of sets of concentrated parameters from which plant safety status can be rapidly assessed.	**EP I.1** Some of the key plant parameters monitored in the Control Room are assembled into a single display on the Safety Parameter Display System (SPDS). The SPDS monitors such parameters as: reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level, and effluent monitor readings. The instrumentation and equipment capabilities available for emergency facilities are described in Section H.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
SPDS can also be displayed in the TSC and the EOF to maximize the exchange of information between these facilities and the Control Room.	**EP H.5.3.2** Safety Parameter Display System (SPDS) The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The SPDS is in operation during normal and abnormal operating conditions.	**EP H.5.3.2** Safety Parameter Display System (SPDS) The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The selection of parameters to be displayed on the SPDS is based on the parameters required to monitor the critical safety functions identified by the General Electric Owners Group (GEOG). These parameters will aid Control Room operators in determining the safety status of the plant. The justification for selecting these parameters is contained in the analyses and background information generated by the GEOG to support the critical safety function restoration guidelines. The emergency response guidelines, which contain the critical safety function restoration guidelines and identify the parameters used to monitor the critical safety functions, have been submitted to the NRC by the GEOG.	**EP I.1** Some of the key plant parameters monitored in the Control Room are assembled into a single display on the Safety Parameter Display System (SPDS). The SPDS monitors such parameters as: reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level, and effluent monitor readings. The instrumentation and equipment capabilities available for emergency facilities are described in Section H.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Post-accident Sampling Capability Capability exists for obtaining grab samples of reactor coolant samples (RCS), suppression pool coolant samples, and primary containment atmosphere samples. Various chemical analyses and radiological measurements on these samples can be performed, including the determination of radionuclide concentrations.	**EP I.2** Continuing and Post Accident Assessment The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring Systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Analysis may be performed onsite if radiological conditions allow; otherwise, analysis will be performed at an offsite laboratory facility.	**EP A.3.5** Radiological Monitoring Assistance Radiological monitoring in the plant and in the environs both, onsite and offsite, will be augmented by outside vendors as necessary. Initial radiological monitoring will be performed by available Southern Company resources (e.g., Georgia Power Company (GPC) Central Laboratory). **EP A.3.6** Contract Laboratories SNC-operated plants maintain contracts with offsite laboratories to assist with emergency analytical services. Copies of these contracts are maintained in accordance with Emergency Plan procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The results from these analyses are used to assess the extent of core damage and the potential source term.	**EP C.3.1** Onsite Laboratory The onsite laboratory/counting rooms at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of marine and air samples, and qualitative analysis of terrestrial samples. Additional facilities for counting and analyzing samples are available at the other SNC-operated nuclear plants or state and federal laboratory services. These laboratories can act as backup facilities in the event that the affected nuclear power plant's counting room and laboratory become unusable or the capacity or capability of the plant's laboratory is exceeded. **EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Laboratory Facilities HNP has a laboratory facility for analysis of radioactive samples. The major pieces of equipment include a solid-state gamma spectrometer and a beta/gamma gas proportional counter.	**EP H.5.2.3**: SNC sites have a laboratory facility for analysis of radioactive samples.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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The training section of the simulator building includes a laboratory which can be used for analysis of environmental media.	**EP C.3.1** Onsite Laboratory The onsite laboratory/counting rooms at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of marine and air samples, and qualitative analysis of terrestrial samples. Additional facilities for counting and analyzing samples are available at the other SNC-operated nuclear plants or state and federal laboratory services. These laboratories can act as backup facilities in the event that the affected nuclear power plant's counting room and laboratory become unusable or the capacity or capability of the plant's laboratory is exceeded. **EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Analysis instrumentation suitable for analyzing environmental samples is available at that location.	**EP C.3.1** Onsite Laboratory The onsite laboratory/counting rooms at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of marine and air samples, and qualitative analysis of terrestrial samples. Additional facilities for counting and analyzing samples are available at the other SNC-operated nuclear plants or state and federal laboratory services. These laboratories can act as backup facilities in the event that the affected nuclear power plant's counting room and laboratory become unusable or the capacity or capability of the plant's laboratory is exceeded. **EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Backup laboratory facilities are available at Plant Vogtle. This backup capability would be used if facilities at HNP were not available.	**EP H.6.3**: External facilities for counting and analyzing samples, and for dosimetry processing, can be provided by other SNC-operated plants including the GPC Central Laboratory, state, federal or contracted laboratories.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Additionally, arrangements have been made for commercial offsite laboratory analysis, as needed.	**EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Other Process Parameters Several other process parameters, including RCS pressure and temperature, containment pressure and temperature, liquid levels and other system indications, are useful both for the initiation phase and continued assessment. Several of these are used in the classification process as discussed in Section D, Emergency Classification System.	**EP H.5.3** Process Monitors The Control Room and redundant backup locations are equipped with extensive plant process monitors for use in both normal and emergency conditions. These indications include reactor coolant system pressure and temperatures, containment pressure and temperature, and various liquid levels, flow rates, status, or lineup of equipment components. **EP H.5.3.1** Plant Monitoring/Information System A plant monitoring/information system provides the data acquisition and database capability for performing plant monitoring and functions. The system is designed to scan, convert to engineering units, make sensor range and alarm limit checks, apply required transformations, store for recall and analysis, and display the reading of transformed data from plant instrumentation. The system scans flows, pressures, temperatures, fluid levels, radiation levels, equipment, and valve status at required frequencies. **EP H.5.3.2** Safety Parameter Display System (SPDS) The SPDS is in operation during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Offsite Radiological Monitoring HNP has sufficient portable equipment and trained personnel to field a minimum of three field monitoring teams. These teams are dispatched to offsite locations and are also utilized for site boundary and owner-controlled area surveys. Each team obtains emergency monitoring materials and equipment including dosimetry, two-way radio equipment, meters for measuring gamma and beta/gamma dose rates, and air samplers for collecting particulates and iodines.	**EP H.6.2**: SNC-operated nuclear power plants maintain a sufficient supply of portable offsite radiological monitoring equipment. These supplies are located at each staging point for Field Monitoring Teams.	The Fleet Commitment wording is standardized to support initial deployment of two environmental field teams. The two field teams deployment is based on existing industry standards and practices.
Emergency Supplies and Equipment Emergency supplies and equipment are located in the Control Room, the TSC, the OSC, and the Simulator Building.	**EP H.9**: Emergency kits are available at each SNC-operated nuclear power plant. Designated site or department procedures identify the equipment in the various emergency kits. **Annex 5.5**: Emergency supplies and equipment are located at various plant locations. Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Equipment in these kits is calibrated in accordance with the suppliers' recommendations. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use.	**EP H.8**: Emergency facilities and equipment are inspected and inventoried using appropriate administrative or department procedures. These procedures provide information on location and availability of emergency equipment and supplies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section H: Spare equipment is also maintained to replace inoperative or out-of-calibration equipment.	**EP H.8**: Sufficient reserves of instruments and equipment are maintained to replace those removed from emergency kits or lockers for calibration or repair	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Typical listings of the emergency supplies and equipment are included in Appendix 4.	No direct equivalent Plan/Annex kit statement. **EP H.9** Emergency Kits Emergency kits are available at SNC-operated nuclear power plants. Designated site or department procedures identify the equipment in the various emergency kits. Details as to kit locations are found in the plant-specific procedures.	The SNC Standard Emergency Plan and Site Annex retain the commitment to provide emergency supplies and equipment. Appendix 4 was deleted. The specific equipment and supplies is a procedural level step. Elimination allows more flexibility in maintaining current equipment and supporting the needs of the ERO.
I. ACCIDENT ASSESSMENT This section describes the methods, systems, and equipment available for assessing and monitoring actual or potential offsite consequences of a radiological emergency.	SECTION I: ACCIDENT ASSESSMENT **I.1** Systems and Parameters Monitored SNC-operated nuclear power plants have a comprehensive set of plant system and effluent monitors, as required by the plants' Final Safety Analysis Report. Sites have identified values characteristic of off-normal values and accidents, and identified the plant parameter values that correspond to the example initiating conditions in the Nuclear Energy Institute (NEI) 99-01 and 07-01 Emergency Action Levels (EALs). These are described in Section D of this plan, and detailed in the site-specific Annexes.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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Initial assessment actions are the responsibility of the Operations SOS and/or the SS, using available shift personnel.	**EP B.2.1.1** TSC Emergency Director (ED) The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure Authorization, and on-site protective actions. **EP B.3.1.1** EOF Emergency Director The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I: Subsequent assessment actions are directed by the ED.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Event classification in accordance with the emergency classification system. • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination. • Notifications of offsite agencies and approval of state, local, and NRC notifications. • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. • Request federal assistance as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Plant Parameters Plant system and effluent parameter values characteristic of the spectrum of off-normal conditions and accidents and the manner in which these values are used to classify an emergency are provided in Section D	**EP I.1** Plant system and effluent parameter values are used to determine accident severity and subsequent emergency classification. Environmental and meteorological events are also determining factors in emergency classification. An emergency condition can be the result of just one parameter or condition change, or the combination of several. The specific symptoms, parameter values, or events for emergency classification levels are detailed in the plant's site-specific Annex.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
. Some of the parameters monitored include: RCS pressure, reactor water level, drywell pressure, drywell radiation level, effluent monitor readings, and ARM readings.	**EP I.1** Some of the key plant parameters monitored in the Control Room are assembled into a single display on the Safety Parameter Display System (SPDS). The SPDS monitors such parameters as: reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level, and effluent monitor readings. The instrumentation and equipment capabilities available for emergency facilities are described in Section H.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency response procedures include methods for quickly assessing plant system and effluent parameter values and classifying the emergency condition. Additional information relative to plant instrumentation is provided in Section H.	**EP D.1.1.1** SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Radiological Monitors In-plant radiological measurements provide information helpful in assessing emergency conditions. Systems are installed to permit reactor coolant and drywell atmosphere sampling under emergency conditions. Post-accident sampling capability and the RMS are described in Section H of this Plan.	**EP H.5.2.1** Radiation Monitoring System (RMS) Radiation monitoring instruments are located at selected areas within the plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne, and air particulate monitors. • Area monitors respond to gamma radiation. • Airborne monitors detect and measure radioactive gaseous effluent concentrations. Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The drywell wide-range radiation monitor and the drywell hydrogen monitor are used to provide an early indication of the quantity of radioactivity available for release from the containment.	**EP H.5.2.1:** Radiation monitoring instruments are located at selected areas within each plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne, and air particulate monitors. • Area monitors respond to gamma radiation. • Airborne monitors detect and measure radioactive gaseous effluent concentrations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant procedures include a correlation between the monitor reading and the extent of core damage. Estimates derived from these monitor readings are used until a sample using PASS has been obtained and analyzed.	**EP H.5.2.1** Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Determination of Release Rate Section H of this Plan describes RMS and PASS. These systems, in combination with procedures located in the Control Room, the TSC, and the EOF can provide the information needed to determine the radiological source term.	**EP I.3** Offsite Dose Assessment SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies, and can be used to assist in making protective action determinations The system supplements assessments based on plant conditions.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency response procedures provide methods for determining relationships between monitor readings and releases and/or material available for release.	**EP H.5.2.1**: Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Dose Projection System The Meteorological Information Dose Assessment System (MIDAS) is the dose calculation computer model used at HNP. Dispersion is computed using either a straight line or the variable trajectory dispersion model. Both models are time-dependent and provide integrated doses, as well as dose rates, using EPA 400 dose factors.	**EP I.3** Offsite Dose Assessment SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The dose calculation model will be provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses.	**EP I.3**: The dose calculation model is provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The TSC will assume responsibility for this function from the Control Room after the TSC is activated.	**EP B.2.1.5**: The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
This function will be transferred to the EOF as soon as practicable from the TSC, to relieve the TSC of unnecessary burden; however, the TSC will maintain the capability of dose projections should the EOF not be available. Backup calculations will be performed in the TSC, as needed.	**EP B.3.1.4**: The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Meteorological data are obtained and evaluated, as described in Section H. The meteorological data collection system can be accessed directly from the Control Room, the TSC, and the EOF. The EOF will be able to provide this information upon request to any offsite organization.	**H.5.1** Geophysical Monitors Meteorological Instrumentation: A permanent meteorological monitoring station is located near the plant for the acquisition and recording of wind speed, wind direction, and ambient and differential temperatures for use in making offsite dose projections. Meteorological information is displayed in the CR, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Up to three teams will be deployed for field monitoring. These teams are available for offsite field monitoring within the plume exposure pathway EPZ, as described in Section H	**EP I.7** Environs Surveys and Monitoring In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs).	The wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms.

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Initially at least two persons can be dispatched from on-shift personnel for offsite surveys. The on-shift HP/Chem department foreman will provide for field monitoring coordination until the TSC is activated.	**EP I.7** Environs Surveys and Monitoring In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs).	The wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms. The justification for response in 75 minutes is provided separately in this License Amendment request.
Once the emergency facilities are activated, the HP/Chem Supervisor in the TSC or the Dose Assessment Supervisor in the EOF can request monitoring teams from support personnel located at the OSC.	**EP B.2.1.5** TSC Radiation Protection (RP) Supervisor The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Health Physics Network (HPN) Communicator. The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation. **EP B.3.1.4** EOF Dose Assessment Supervisor The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms. The justification for response in 75 minutes is provided separately in this License Amendment request.