Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Field Monitoring Teams consist of at least two people. These teams are formed at the OSC and dispatched as described in Section B.	**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. **Annex Table 2.2.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. Conduct of initial Field Surveys by on-shift personnel can be performed by a single individual as designated in the Site Annex.
Materials and equipment for conducting offsite radiological monitoring are located in the Simulator Building. Typical equipment available for field monitoring is listed in Appendix 4.	**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.
Offsite field monitoring teams normally use company vehicles and have a two-way radio for communications.	**EP F Table 5**	The commitment wording was standardized and relocated to the Site Annex.
It is estimated that teams can be in the field and performing monitoring tasks within approximately 1 hour of the determination of the need for field monitoring.	**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.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Preselected radiological sampling and monitoring locations are designated on the HNP 10-mile EPZ field monitoring map. Offsite field monitoring teams perform sampling at these locations and others as directed by the HP/Chem Supervisor in the TSC or the Dose Assessment Supervisor in the EOF.	**EP I.7**: Samples are taken at predetermined locations as well as those locations specified during and after a release.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A communicator maintains periodic communications contact with all field monitoring teams.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
To facilitate direction of the teams and reporting of results, both the field monitoring teams and the communicator use identical maps showing the sampling locations.	**EP I.7**: Samples are taken at predetermined locations as well as those locations specified during and after a release.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The cartridge and air particulate filter are returned to the laboratory at the plant site for isotopic analysis if the field analysis reading is 100 cpm above background on an HP-210 probe or equivalent. The cartridges can be counted in the field without interference from noble gas (background count rate below 300 cpm on an HP-210 probe or equivalent).	**EP I.9**: Field monitoring equipment has the capability to detect and measure airborne radioiodine in the presence of noble gases.	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 cartridge and air particulate filter are returned to the laboratory at the plant site for isotopic analysis if the field analysis reading is 100 cpm above background on an HP-210 probe or equivalent.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition to direct monitoring and air sampling, the assessment program may utilize the environmental sampling program in which environmental samples (water, air, soil, and vegetation) are collected and analyzed in the laboratory for detailed radionuclide data.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
This program is implemented at the direction of the Dose Assessment Manager or designee.	No direct equivalent Plan/Annex statement. **EP I.7** The environmental monitoring equipment include 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 determining and assessing protective actions for the general public and recovery actions for the plant.	Section B of the SNC Standard Emergency Plan provides specific responsibilities for Dose Assessment/radiological monitoring.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Data obtained from the field monitoring program (including data from offsite agencies) can be utilized to perform or refine dose projections. Any adjustments to dose projections will be considered in the evaluation of protective action recommendations as described in Section J	**EP I.7** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J. PROTECTIVE RESPONSE This section describes the protective actions that were developed to limit radiation exposure of plant personnel and the public following an accident at the plant. This section addresses conditions relative to the Alert, the Site Area Emergency, or the General Emergency classifications. Any protective response taken at the NUE level is done so at the discretion of the ED.	EP 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Protective Response for Onsite Personnel Protective response for onsite personnel (including visitors and contractor personnel) depends upon alerting, assembly and accountability, evacuation, monitoring, and decontamination.	EP 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
1. Alerting Section E of this Plan, Notification Methods and Procedures, describes the methods to be used to alert onsite personnel of emergency conditions.	**Annex 4.3.1** Alerting (SEP E.2.1, J.1) Section E of the Emergency Plan (EP), Notification Methods and Procedures, describes the methods to be used to alert on-site personnel of emergency conditions.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Assembly and Accountability Upon activation of the plant emergency alarm, plant personnel assigned specific emergency responsibilities proceed to their designated respective emergency response locations, where they are logged in and accounted for.	**EP 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. **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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Accountability reports for the Control Room, the OSC, and the TSC are provided by the Security Department ASAP.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Thereafter, personnel emergency assignment tracking will be in place at each of the ERF to account for all onsite individuals throughout the emergency. This accountability may include use of the security computer system, assignment logs, and required periodic communications between emergency teams and the Control Room and the TSC.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel report to their normal reporting area during an Alert for the purpose of assembly and initial accountability.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	**Annex 4.3.2** Assembly (SEP J.4.1) Nonessential plant personnel located within the Protected Area will exit the protected area upon hearing the Site Area or the General Emergency alarm, and report to designated assembly areas. Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel located within the protected area leave upon hearing the Site Area or the General Emergency alarm.	**Annex 4.3.2** Assembly (SEP J.4.1) Nonessential plant personnel located within the Protected Area will exit the protected area upon hearing the Site Area or the General Emergency alarm, and report to designated assembly areas. Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Security Department accounts for each person inside the protected area by using the security computer system, which is provided Emergency Diesel backup power as well as an emergency backup fail-over computer.	**EP J.4.2** : 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
This system is supplemented by the availability of telephone and radio communications capability between the Control Room, the OSC and the TSC. This methodology provides for accountability of all individuals inside the protected area within approximately 30 minutes of the emergency declaration.	**EP J.4.2:** : 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Accountability reports are made periodically to the ED by the Security Department.	No equivalent Plan/Annex statement	The processing of Accountability reports is a procedural action. The SNC Standard Emergency Plan retains the commitment to perform the function in a timely manner.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel, visitors, and contractors located within the protected area proceed to a rally point location outside the protected area [normally, the Plant Entry Security Building (PESB); however, if radiological conditions prohibit its use, Gate 17 or any ED designated gate exiting the protected area may be used as a rally point].	**Annex 4.3.2** Assembly (SEP J.4.1) Personnel assembly is mandatory at the Site Area Emergency or higher level classification. Upon activation of the plant emergency alarm, plant personnel assigned specific emergency responsibilities will proceed to their designated emergency response locations. Assembly of site personnel outside of the Protected Areas is accomplished by non-essential personnel reporting to designated assembly areas. Assembly may be initiated at any time site management deems it appropriate for personnel safety reasons.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A security patrol periodically inspects all offices and work locations outside the protected area to ensure that all personnel have received instructions regarding onsite protective measures.	**EP J.4** 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. **Annex 4.3.3** Security Events (SEP J.4) On-site protection of employees during security events involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. Conduct of the function is more appropriately a procedural level function.
Search and Rescue If protected area accountability reveals a missing person, the ED or designee assembles a search and rescue team per the emergency response procedures. The search and rescue team can obtain information on last known location from the security computer system or reports from other personnel. A search of likely areas will be conducted until the missing individual is located.	**EP J.4.2** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Evacuation Evacuation of all nonessential personnel (if feasible) is ordered by the ED whenever: a. It is determined that a threat to the safety of onsite personnel exists. b. A Site Area Emergency or a General Emergency is declared.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED or designee provides evacuation route directions to personnel directed to leave the plant site using the PA system and other communications means. This information, including the evacuation routes (North and/or South on U.S. Highway 1) are included in applicable 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel, visitors, and contractors will be directed to the designated county relocation centers if a radiological release is in progress during the emergency. The appropriate relocation centers are Toombs County High School for northern evacuations and Appling County High School for southern evacuations. Evacuation is generally by individually owned vehicles.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Directions provided to evacuees are based on radiological necessities and specific protective action requirements.	No direct equivalent Plan/Annex statement.	The responsibility to provide for site evacuation is specified in the SNC Standard Emergency Plan and Annex.
Security Events Onsite protection of employees during hostile actions 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.	**Annex 4.3.3** Security Events (SEP J.4) On-site protection of employees during security events involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Monitoring and Decontamination When an Alert is declared but no site evacuation is anticipated, personnel who have left the protected area are monitored by portal monitors.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) When an Alert is declared but no site evacuation is anticipated, personnel who have left the protected area are monitored by portal monitors. If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations. For a Site Area Emergency or a General Emergency, or when site evacuation is expected and a release of radioactivity has occurred, monitoring is performed by portal monitors at the Plant Entry Security Building or by portable monitoring equipment at the rally point areas. The Rally Point Team establishes a control point at the rally point area and monitors evacuees before releasing them. The monitoring teams maintain the appropriate records.	The commitment wording was standardized and relocated to the Site Annex.
If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
For a Site Area Emergency or a General Emergency, or when site evacuation is expected and a release of radioactivity has occurred, monitoring is performed by portal monitors at the PESB or by portable monitoring equipment at the rally point areas. The Rally Point Team establishes a control point at the rally point area and monitors evacuees before releasing them.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) For a Site Area Emergency or a General Emergency, or when site evacuation is expected and a release of radioactivity has occurred, monitoring is performed by portal monitors at the Plant Entry Security Building or by portable monitoring equipment at the rally point areas. The Rally Point Team establishes a control point at the rally point area and monitors evacuees before releasing them. The monitoring teams maintain the appropriate records.	The commitment wording was standardized and relocated to the Site Annex.
The monitoring teams maintain the appropriate records.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) The monitoring teams maintain the appropriate records.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Should decontamination become necessary, the Rally Point Team will conduct decontamination onsite, preferably at the predesignated locations in the Environmental Building or Building 10.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Decontamination and waste disposal are completed in accordance with plant procedures.	**EP K.5** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Use of Onsite Protective Equipment and Supplies Plant emergency kits and other supplies are used to provide dosimetry, monitoring equipment, protective clothing, and respiratory protection gear for individuals arriving or remaining onsite during the emergency.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A supply of potassium iodide is stored in the primary ERF and will be distributed as directed by the ED when thyroid exposures are projected to be above 25 Rem CDE.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. **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. In addition, potassium iodide (KI) is available for use.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant radiation protection procedures dictate the requirements for use of dosimetry, respiratory protection, and protective clothing. A list of the emergency supplies available at ERF and other onsite areas is detailed in the plant procedures.	**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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Protective Response for the Public The licensee is responsible for ensuring that timely recommendations for protective actions reach appropriate State and local officials. These officials (as described in Section A) are responsible for alerting the public and ordering shelter and/or evacuation, if necessary.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. Alerting The means used by HNP to alert local and State agencies and the means used by State and local agencies to alert the public are described in Section E and Appendix 3 of this Plan.	**Annex 4.1.1** Notification Process (SEP E.2.2.1) 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: 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 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. 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 commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section J: The ED is responsible for providing protective action recommendations to State and local officials as part of initial notifications and follow-up communications.	**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 and relocated to the SNC Standard Emergency Plan.
These recommendations are based upon assessment actions described in Section I of this Plan. Using available information regarding plant conditions, projected dose estimates, and any available monitoring data, the ED recommends whether the public should be advised to seek shelter or evacuate.	**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 Emergency Director will be responsible for recommending protective actions for the offsite population.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The mechanism for making these recommendations is described in Section E of this Plan. These recommendations are based upon the Environmental Protection Agency (EPA) Protective Action Guidelines and NUREG-0654 Supplement 3 Rev 1. NMP-EP-112, Protective Action Recommendation, provides detailed guidance on PAR determinations.	**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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Current PARs were developed in coordination with Offsite Response Organizations. Table J-3 provides details regarding the determination of initial protective actions recommendations for the public.	**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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table J-4 provides details for determining followup PARs.	No equivalent Plan/Annex Table.	SNC Standard Emergency Plan Section J.5 maintains the commitment to provide PARs for the population. Specific designation of followup PARs is part of the general requirement. A separate table is no longer necessary.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Plant conditions, plume dose projection calculations, and offsite monitoring results should be evaluated when making protective action recommendations.	**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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
If significant discrepancies exist between field monitoring results and plume dose rate projection calculations, an evaluation should be made. The most conservative valid dose projections based on evaluation results should be used in the determination of protective action recommendations.	**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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Evacuation Determining the benefit of evacuation must take into account the time needed to complete the evacuation.	**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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 5 includes further detail regarding how these estimates were developed and presents information on evacuation routes, evacuation areas, relocation centers, shelter areas, and the population distribution by evacuation areas and zones.	Annex Appendix A	The commitment wording was standardized and relocated to the Site Annex.

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TABLE J-3 INITIAL PROTECTIVE ACTION RECOMMENDATIONS	No equivalent Plan/Annex Table	SNC Standard Emergency Plan Section J.5 maintains the commitment to provide PARs for the population. Specific separation of initial and followup PARs is part of the general requirement. A separate table is no longer necessary.
TABLE J-4 FOLLOW UP PROTECTIVE ACTION RECOMMENDATIONS	No equivalent Plan/Annex Table	SNC Standard Emergency Plan Section J.5 maintains the commitment to provide PARs for the population. Specific separation of initial and followup PARs is part of the general requirement. A separate table is no longer necessary.

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K. RADIOLOGICAL EXPOSURE CONTROL Emergency Exposure Guidelines During an emergency, it may be necessary to authorize radiation exposures above 10 CFR 20 limits. These higher exposures may be necessary to complete protective, corrective, or lifesaving actions. Table K-1 presents the emergency exposure limits for the licensee emergency workers involved in sampling or other assessment actions, protective actions (e.g., first aid, ambulance, or medical treatment), corrective actions (e.g., emergency repair), or lifesaving actions. These limits are based upon EPA-400, "Manual of Protective Action Guides and Protective Action for Nuclear Incidents," Table 2-2, "Guidance on Dose Limits for Workers Performing Emergency Services." Under all such situations, every reasonable effort will be made to minimize exposures. Decisions as to appropriate exposures, considering the action required and relative risks, will be made by the ED in consultation with HP personnel.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Onsite Radiation Protection Program When necessary, the ED can authorize emergency exposures in excess of 10 CFR 20 limits but within the limits given in Table K-1. Declared pregnant individuals exposure will be controlled in accordance with normal plant procedures. Personnel should have a known radiation exposure history.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Where possible, the normal radiation work permit procedure will be used to control exposures. This procedure requires signature approval, prior knowledge of worker past exposures, and guidance on protective actions to be used in the course of the emergency work	**EP K.3.3:** Where possible, the normal radiation work permit procedure will be used to control exposures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
. If time and urgency do not allow this procedure to be followed, HP supervision may approve emergency radiological work permit controls.	**EP K.3.3**: Based on conditions and urgency Radiation Protection supervision may approve emergency radiological work permit controls.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In all cases, a briefing is given to the emergency team by a qualified HP member. Each team is accompanied by a HP technician as directed by HP supervision. This briefing includes a discussion of the hazards involved in the planned action, as well as protective actions to be taken.	**EP 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.	The conduct of Team operations was eliminated from the SNC Standard Emergency Plan to the standardized radiological protection requirements established in Section K. Conduct of team operations was relocated to EPIPs.

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A record of collective exposures incurred during the emergency will be kept by HP supervision. This record of exposure will be used to determine OSC team assignments.	**EP K.3** Exposure Controls **EP 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, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
All emergency exposures are to be included in personnel radiation exposure records.	**EP K.3.1** 24-Hour Capabilities Exposure records will be maintained for emergency response personnel who are issued dosimetry	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Emergency dosimetry in the form of optically stimulated luminescence dosimeter (OSLD) badge and a self-reading dosimeter is provided to each member of the emergency response organization as he or she reports to the response facilities on an as-needed basis	**EP K.3** Exposure Controls **EP 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, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
. Offsite authorities responding to HNP facilities are provided with emergency dosimetry, as required.	**EP K.3.1**: In an emergency situation, on-site personnel, offsite support personnel, and local governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant procedures present information on the types and quantities of dosimetry available in each ERF and other locations.	No direct equivalent Plan/Annex statement	Section H provides the description of equipment/procedures maintained in the ERFs

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There is a capability to read OSLDs within 24 hours. HP supervision ensures that this is done and maintains exposure records for all emergency response personnel.	**EP K.3** Exposure Controls **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Decontamination Plant procedures contain the action levels for determining the need for decontamination of personnel, clothing, and areas.	**EP K.5**: During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Personnel decontamination facilities are located in the control building and other onsite locations. These locations have all necessary monitoring equipment and decontamination supplies.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Waste generated through the use of the decontamination facilities is collected and processed by the plant liquid radwaste system.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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If decontamination activities are required at State/local relocation centers for relocated personnel, a controlled access area will be established in such a way that liquid and solid waste can be collected and returned to the plant for processing as radwaste following normal plant radwaste procedures.	**EP K.7:** Nonessential on-site personnel may be dismissed to an offsite relocation 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 will be sent to designated locations for monitoring and decontamination. Provisions for extra clothing are made and suitable decontaminates are available for the expected type of contaminations, particularly with regard to skin contamination.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Supplies of clean clothing will be transported to the offsite State/local relocation centers to replace any contaminated clothing.	**EP K.7** Offsite Decontamination Nonessential on-site personnel may be dismissed to an offsite relocation 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. Provisions for extra clothing are made and suitable decontaminates are available for the expected type of contaminations, particularly with regard to skin contamination.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Personnel decontamination will be accomplished using water washes or other methods for extreme cases, as described in the plant HP procedures.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Decontamination of serious wounds will be accomplished at the Appling General Hospital or the Meadows Regional Medical Center.	**Annex 2.3.2, 5.8.1**: 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.	The commitment wording was standardized and relocated to the Site Annex.

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Equipment and area decontamination will be accomplished using methods described in the plant HP procedures.	**EP K.5** Decontamination 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 SNC Standard Emergency Plan maintains the commitment to perform the functions. The reference to procedural control is not necessary.
Onsite Radiological Contamination Control During emergency conditions, the Security Department provides access control. Emergency response personnel are allowed to enter the protected area and report to the appropriate ERF for accountability prior to completing any emergency assignments.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Additional personnel may be allowed onsite with the approval of the ED or the Recovery Manager.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan provides for control and protection of those onsite and acquisition of resources (whether equipment or personnel) as needed. The statement is not required.

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Access to in-plant areas that are contaminated is controlled by barriers, signs, locked doors, or personnel stationed for that purpose.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency monitoring teams are responsible for determining the need for onsite radiological access control and establishing the proper method through discussions with TSC personnel.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant procedures used for determining contaminated areas will be used for determining the need for access control	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Food and water in radiation-controlled areas will be considered contaminated. The ED or designee will make arrangements for supplies to be brought in.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
TABLE K-1 EMERGENCY EXPOSURE LIMITS	**EP Table K.1.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Onsite Capability Provisions have been made to assist personnel who are injured, who may have received high-radiation doses, or who have been contaminated.	**EP L.2**: SNC-operated nuclear power plants maintain onsite first aid supplies and equipment necessary for the treatment of contaminated and/or injured persons.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Portable first-aid kits, available at strategic locations throughout the plant, and decontamination materials are brought to the scene by responding First Responders and HP technicians as needed.	**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 Site Annex.
There are selected personnel on shift and in the onsite and offsite emergency organizations trained in first-aid and decontamination procedures	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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. In addition to the onsite first-aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses.	**EP L.1**: 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. **Annex Section 5.8.1**: 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
The first-aid and decontamination area, located in the control building, is equipped with decontamination supplies and other equipment.	**Annex 4.3.4**: If necessary, decontamination is completed using the plant decontamination facilities located in the Control Building or other onsite locations. **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 Site Annex.
Personnel found to be contaminated but not requiring immediate medical attention will undergo decontamination in accordance with plant procedures.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Where contamination of large, open wounds is involved, personnel may be immediately transported to the Appling General Hospital or the Meadows Regional Medical Center, where they receive prompt medical attention.	**EP L.1**: In addition to the onsite first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses. **Annex 5.8.1**: 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.

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Waste fluids and waste from decontamination of personnel or material will be collected and handled as radioactive waste in accordance with the HNP HP Procedures.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Medical Transportation Injured/externally contaminated personnel who require medical attention will normally be transported by ambulance to the cooperating hospitals.	**Annex 5.8.2:** Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Support and backup ambulance service are provided by the Appling County EMS and Toombs Montgomery County EMS, respectively. These crews also receive sufficient training in handling contamination cases.	The commitment wording was standardized and relocated to the Site Annex.
Ambulance crews are trained to handle external contamination cases, and an HP technician accompanies any contaminated patients to the hospital.	**Annex 5.8.2:** Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Support and backup ambulance service are provided by the Appling County EMS and Toombs Montgomery County EMS, respectively. These crews also receive sufficient training in handling contamination cases. EP O.1.1: Annually, training will be offered for hospital personnel, ambulance/rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Support and backup ambulance service are provided by the Appling Ambulance Service and Toombs County Ambulance Service, respectively. These crews also receive sufficient training in handling contamination cases. Arrangements for the use of the local ambulance service are described in Appendix 2, Letters of Agreement.	**Annex 5.8** Medical Support (SEP B, SEP L) **Annex 5.8.1** Hospital and Medical Support (SEP B.6.3.1, 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. **EP O.1.1:** Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the Site Annex.
Offsite Services Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling General Hospital, 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 which is separate from the rest of the complex. Each area contain 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. Noncontamination injuries will be handled by the hospital with its routine facilities.	**EP L.1:** 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. **Annex 5.8.1**: 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 **EP O.1.1**: Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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The medical staff of each hospital is trained to treat externally contaminated patients or individuals who have received high exposures. Trained plant radiation protection personnel assist hospital staff when plant personnel are being evaluated.	**Annex 5.8.2**: Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Support and backup ambulance service are provided by the Appling County EMS and Toombs Montgomery County EMS, respectively. These crews also receive sufficient training in handling contamination cases. **EP O.1.1:** Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Following decontamination, personnel suspected to have ingested radionuclides will undergo bioassay analysis for determination of internal contamination.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A medical consulting group will provide medical support services to coordinate the total radiological management of radiation accident victims.	**Annex 5.8** Medical Support (SEP B, SEP L) **Annex 5.8.1** Hospital and Medical Support (SEP B.6.3.1, 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Training of Medical Support Personnel At least once per calendar year, training will be offered for both onsite and offsite personnel having medical support responsibilities. Retraining typically consists of a repetition of the initial training, with the inclusion of lessons learned from the previous year's drills. In addition, drills and exercises are an integral part of the training program and are conducted as specified in Section N, Exercises and Drills.	**EP O.1.1**: Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M. RECOVERY AND REENTRY PLANNING AND POST-ACCIDENT OPERATIONS The objectives of the licensee following any emergency declaration are to mitigate the consequences of the event and to take those steps described in this Emergency Plan which will minimize any effects upon the health and safety of the public and emergency workers. Once the emergency situation is terminated, the goal is to restore the HNP to normal operating status. For some situations, such as a NUE involving a natural phenomenon that has no effect upon HNP, the emergency situation may not require any change to normal operations; therefore, no formal transition is required. In other circumstances which may involve suspected or actual damage to the plant, a transition is appropriate. This is defined as the recovery phase.	SECTION M: RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS **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 standardized in Section M of the SNC Standard Emergency Plan.

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Commencement of Recovery Phase The ED determines when the recovery phase begins.	**EP M.1**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The following guidelines, as applicable to the specific situation, are observed prior to terminating the emergency: 1. The affected reactor is in a stable condition and can be maintained in that condition indefinitely. 2. Plant radiation levels are stable or are decreasing with time. 3. Releases of radioactive material to the environment have ceased or are being controlled within permissible limits. 4. Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel. 5. Discussions with the licensee's applicable members of the HNP emergency organization, offsite authorities (NRC; Georgia State EMA; and Appling, Jeff Davis, Tattnall, and Toombs County EMA Directors) do not result in identification of any valid reason for not terminating the emergency.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section M: Once the above conditions are satisfied, the ED will announce that the emergency is terminated and the plant is in a recovery mode.	**EP M.1:** 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. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section M: He will direct that all elements of the emergency response organization be advised of the change in status via the Emergency Notifications Network, the ENS, and other pertinent communications systems.	**EP M.1:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section M: At this time, the ED, with the approval of Corporate Management, will designate a Recovery Manager.	**EP M.1**: The Emergency Director will designate a recovery manager to constitute the recovery organization	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section M: He (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 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 via releases to the media.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The Recovery Manager will assign individuals to specific positions depending upon the nature and the extent of damage to the plant. Figure M-1 shows a representative organization for recovery operations.	**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** Typical Long Term Recovery Organization	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The responsibilities and functions of the managers shown on Figure M-1 are summarized as follows: • Recovery Manager: has overall responsibility for restoring the plant to a normal operating configuration.	**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 assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

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Plant Operations Manager: manages day-to-day in-plant operations and, during recovery, is responsible for ensuring that repairs and modifications will optimize post-recovery plant operational effectiveness and safety.	**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 assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

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Design and Construction Support Manager: focuses necessary engineering, design, and construction resources on those aspects of plant recovery requiring redesign, modifications, or new construction; directs and coordinates NSSS and balance-of-plant engineering and construction/repair work.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Radcon/Radwaste Manager: develops plans and procedures to process and control liquid, gaseous, and solid waste to minimize adverse effects on the health and safety of the public and plant recovery personnel. In addition, the Radcon/Radwaste Manager coordinates the activities of staff radiological engineers and radiation protection personnel engaged in waste treatment operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
HP and Chemistry Manager: responsible for as low as reasonably achievable (ALARA) planning, execution, and monitoring; plans and manages decontamination of affected areas and equipment; supervises and directs all special radiological controls, radiochemistry, and chemistry activities required to support the recovery operation.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Technical Support Manager: provides analyses, plans, schedules, and procedures in direct support of plant operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

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Advisory Support (Recovery Review Board): reviews and approves general recovery plans and procedures, as well as reviewing the consequences of specific recovery operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Scheduling/Planning Manager: prepares plans and schedules and tracks/expedites recovery operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Administrative/Logistics Manager: supplies administrative, logistic, communications, and personnel support for the recovery operation.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Public Information Director: coordinates the flow of media information concerning recovery operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Once the organization is established and specific responsibilities are assigned, the Recovery Manager may relocate some or all of the recovery organization staff from the EOF to the plant site.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

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The Recovery Manager will designate, in consultation with management, a Recovery Review Board, which will review and approve recovery plans and procedures. This review will address the impact and consequences, both anticipated and potential, of any given recovery operation. The Recovery Review Board will establish administrative and procedural controls, lines of communication, and functional responsibilities of each segment of the organization. In general, any recovery operation will require Recovery Review Board review and approval.	**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 assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

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Reentry Planning If the accident situation involved a release of radioactivity, appropriate areas of the plant and site will be monitored to determine contamination and radiation levels. Those areas where surface contamination is > 1000 dpm/100 cm2 will be appropriately identified as radiation or contamination areas, and access will be controlled in accordance with normal plant procedures. When reentry to a radiation area is required for inspection or work, the activity will be preplanned, and plant radiation work practices and ALARA program principles will be followed.	**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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Exposure Monitoring All personnel who require access to the plant or to radiation areas onsite during the recovery phase will be issued OSLDs and other dosimetry, as appropriate. These OSLDs will be read at least monthly (or more frequently if work in high-radiation areas is undertaken). The results of the dosimeter readings, including integrated exposures (i.e., man-Rems) will be reported to the Recovery Manager, the Radcon/Radwaste Manager, and others in the plant organization who normally receive such reports.	**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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

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The State of Georgia has the responsibility for determining population exposure of the public via plume exposure and ingestion pathways. HNP will provide information including: the release rate of radioactivity, the quantity of radioactivity released, the isotopic composition of released material, and meteorological data to assist the State in its determinations.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
By determining the affected population and performing dose assessment calculations, including determining the quantity of radioactivity and release rate, HNP personnel can estimate the population exposure rate, if necessary. Use of data from fixed monitoring stations (OSLDs and air samplers) can be used to confirm the exposure estimates.	No equivalent Plan/Annex statement	This intermediate phase function will be conducted under the direction of the state with resource support from the federal government.

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N. EXERCISES AND DRILLS HNP maintains an emergency drill and exercise program in accordance with 10 CFR 50 Appendix E.IV.F to test and evaluate the adequacy of emergency facilities, equipment, procedures, communication links, actions of emergency response personnel, and coordination between the HNP and the offsite emergency response organizations. The exercise program for HNP consists of an 8-year cycle that incorporates the use of both Exercises and Drills.	SECTION N: EXERCISES AND DRILLS **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 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.	The wording was standardized in the SNC Standard Emergency Plan.

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Exercises EP exercises that test integrated response capabilities are conducted in accordance with NRC and FEMA guidance. Exercises are conducted every calendar year and are designed to include the demonstration of a major portion of the basic elements of the EP plans of the participating organizations. The planning and execution of each exercise is coordinated with Federal, State, and local agencies, as appropriate.	**EP N.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The exercise program for HNP consists of an 8-year cycle that incorporates the following features: 1. A full participation exercise which tests as much of the Plant Hatch, 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. 2. Biennial exercise scenarios will be submitted to the NRC under § 50.4 at least 60 days before use in the biennial exercise. 3. 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. 4. 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. 5. An ingestion pathway exercise will be conducted on a frequency to ensure the State of Georgia has the opportunity to participate in an ingestion pathway exercise at least once every exercise cycle.	**EP 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. **EP N.3** Scenarios 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. **EP N.1.3** Ingestion Exposure Pathway Exercise **EP N.3** SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The exercise program for HNP consists of an 8-year cycle that incorporates the following features: (cont) 6. During the interval between biennial exercises HNP will maintain emergency response capabilities by conducting an exercise 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: • 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** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Drills A drill is a supervised instruction period aimed at testing, developing, and maintaining skills. Activation of all of the emergency response facilities (TSC, OSC, EOF, and JIC) may not be necessary in a particular drill. Drills may be incorporated into an exercise that is supervised and evaluated by a controller organization.	**EP N.2** Drills A drill in this context is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation **EP N.2.1** During these drills, activation of all of the licensee's emergency response facilities (Technical Support Center (TSC), Operations Support Center (OSC), and the Emergency Operations Facility (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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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1. Periodic Emergency Drills 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., BWR). • 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** Scenarios 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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1. Communication Drills To ensure emergency communication channels between HNP and offsite authorities are operable, periodic communication drills are conducted. For drills, the communication is initiated at HNP using the actual message format in accordance with the applicable plan and procedure. By using the standard message format, the drill tests understanding of message content, as well as the communication systems hardware.	**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 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The following test and drills are conducted: a. Communication drills among the Control Room personnel, the TSC, the OSC, the EOF, and the Joint Information Center (JIC) are conducted at least once per calendar year. These drills may be conducted in conjunction during an exercise.	**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 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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b. Communication drills with the State of Georgia EOC; the Appling, Jeff Davis, Tattnall, and Toombs Counties EOCs; and the licensee field monitoring teams are conducted annually. These drills may be conducted in conjunction with an exercise.	**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 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
2. Fire Drills Fire drills are conducted in accordance with HNP plant procedures. Quarterly drills are scheduled so that every member of the shift fire brigade participates in at least two drills per year.	**EP N.2.3** Fire Drills Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition, an annual practice that requires extinguishing a fire is conducted.	**EP N.2.3** Fire Drills Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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3. Medical Emergency Drills A medical emergency drill involving a simulated contaminated person is conducted one per calendar year. The drill script identifies the simulated injuries and contamination levels of the individual. The simulated injured individual is given initial treatment, as appropriate, by the HNP personnel transported by ambulance to the hospital, and given subsequent treatment by the hospital staff. Throughout the medical drill, the simulated injured person is treated as though he or she were contaminated until decontamination is demonstrated. A medical drill of this scope is conducted at least once each calendar year and may be included as part of an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The medical drill should be rotated between the agreement hospitals.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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4. Radiological Monitoring Drills Plant environs and radiological monitoring drills (onsite and offsite) are conducted at least once each calendar year. For these drills, a team is dispatched to obtain the required measurement or sample. Demonstration of the proper use of monitoring equipment and sampling of environmental media (water, vegetation, soil, and air) are included. Data are recorded in accordance with the applicable procedure, and communications with the appropriate emergency facility are established. The communication portion of the drill includes direction of the monitoring team and reporting of results. This drill may be conducted in conjunction with an exercise.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
5. HP Drills Semi-annual HP drills involve response to, and analysis of, simulated elevated airborne or liquid samples and direct radiation in or about the plant environment. Use of protective clothing and respirators will be demonstrated, as appropriate, during the drills but may not be used throughout the drill (e.g., field monitoring teams do not wear protective clothing or respirators for drill purposes). Exposure control considerations are also used during the drills. Semi-annual drills may be conducted, in whole or in part, jointly with an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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6. Post-Accident Sampling Drills Post-Accident sampling, under simulated accident conditions, is demonstrated at least once each calendar year. A sample is taken and an analysis performed. Controlled data are used to simulate the potential high-radiation levels that may be encountered during accident conditions. This drill may be conducted in conjunction with an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Scenarios Each drill and exercise is conducted in accordance with a scenario. The drill scenarios are considerably less extensive than exercise scenarios. The preparation of drill and exercise scenarios is directed by the Emergency Preparedness Supervisor (EPS) or designee, who enlists the assistance of personnel from other departments, as required, to assist in this task.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The scenario for the biennial exercise is prepared under the direction of the EPS or designee and coordinated with offsite authorities.	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Biennial exercise scenarios are submitted to the NRC and FEMA in accordance with available guidance.	**EP N.3** SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Scenarios include the following information: • Basic objectives and appropriate evaluation criteria. • Date, time period, place, and participating organizations. • Simulated events. • Time schedules of real and simulated initiating events. • Narrative summary describing the conduct of the drill or exercise, including such items as simulated casualties, offsite firefighting assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities. • Description of arrangements for and advance materials to be provided to official observers.	**EP N.3** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The exercise program is structured with sufficient flexibility to allow free play for decision-making processes.	**EP N.2.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The exercise scenario package identifies a specific accident sequence, a set of messages, and a set of procedural response actions that parallel the accident sequence. The exercise control organization receives general instructions concerning the deviation of plant personnel from procedural response.	**EP N.3** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
The exercise control organization may restrict player action if the response will interfere with the time sequence, restrict player action if the response would prevent demonstration of an exercise objective, and introduce free-play items to the scenario to maintain player interest.	No equivalent Plan/Annex statement	Procedural control of the exercise is more appropriately handled in controller training process.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Specific elements that allow free-play in the decision-making process during the exercise include: • Damage control. • Accident mitigation. • Manpower augmentation actions. • Exposure control actions. • Communication with offsite authorities. • Recommendation of protective actions.	No equivalent Plan/Annex statement	Procedural control of the exercise is more appropriately handled in controller training process.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Evaluations and Corrective Actions All drills and exercises, with the exception of fire drills, are evaluated via the following steps: 1. The exercise or drill controllers/evaluators assemble the players at the conclusion of activities for a critique. Players are encouraged to identify areas where improvements are required. The exercise or drill controllers/evaluators also present their observations to the players. Each controller/evaluator submits his/her comments regarding the drill/exercise to the Exercise Manager. Following the exercise, an overall critique is presented to key players and the controller organization. 2. A report, summarizing the drill/exercise and identifying items for improvement and/or corrective actions, is provided to plant management by the EPS. These items will be tracked in accordance with the plant's corrective action program.	**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. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
In addition to the internal critique and evaluation, Federal observers observe, evaluate, and critique the biennial exercise. Corrective actions resulting from this critique will be tracked in accordance with the plant's corrective action program.	**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. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Fire drills are evaluated in accordance with the plant Fire Protection Program.	**EP N.2.3** Fire Drills Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING All badged HNP workers receive general training in EP.	**EP O.4.8**: General Employee Training (GET). GET will include general training in emergency preparedness for plant and other site personnel.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Topics include emergency classes, response to emergency conditions, methods of personnel notification, and plant accountability and evacuation procedures.	**EP O.4.8**: GET will include classification, individual response, signals, accountability and site dismissal procedures	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Selected individuals onsite and offsite receive specialized training at least once each calendar year to respond to an emergency situation.	**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.
The extent of general training for all badged personnel is documented in HNP procedures.	**EP O.4.8**: General Employee Training (GET). GET will include general training in emergency preparedness for plant and other site personnel.	The conduct and documentation of GET training is a regulatory requirement and governed by site Training Procedures. The statement in the current Plan is not necessary.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The specialized radiological emergency response training is outlined herein; however, full details are provided in the HNP procedures and appropriate training lesson plans.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.
Training for EOF emergency responders is outlined in Appendix 7.	**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.	With the incorporation of the EOF into the base Plan as outlined in the SNC Standard Emergency Plan, Section O of the SNC Standard Emergency Plan includes the EOF training descriptions. See the Justification Matrix for Appendix 7 for specific comparison.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Initial Emergency Response Training Various personnel receive initial emergency response training in the subject areas identified in HNP procedures according to the respective emergency response position to which they will be assigned. It should be noted that these subject areas do not necessarily represent specific course titles, since several individual courses may be used to implement the training in each area. Also, both the content and the depth of training may be varied slightly, depending upon the particular audience, to tailor the presentation to the specific needs of the group. Initial emergency response training is offered on an as-needed basis to fill various emergency response positions.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The training is conducted in accordance with lesson plans.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section O: Classroom lectures, demonstration and use of equipment, and walk-through of facilities are incorporated into the lesson plans, as appropriate.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A written examination will be administered at the conclusion of a lesson, as appropriate.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Records of the attendance and the examination scores are retained in accordance with plant procedures.	**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 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.	Site Training Requirements maintain the overall responsibility for record keeping. The record keeping statement is not required in the Emergency Plan.
In addition, drills and exercises are an integral part of the training program and are conducted as specified in Section N of this Plan.	SECTION N: EXERCISES AND DRILLS **EP N.1** Exercises SNC-operated nuclear power plants will conduct a biennial exercise and additional periodic drills.	The specific sentence in Section O is not needed to specify the commitment to the function outlined in Section N of the existing and proposed Emergency Plan(s).
During practical drills, on-the-spot corrections are made if the situation and time allow; however, if not, the corrections are pointed out in the critique.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section O: Upon completion of each training session or drill, the participants are asked to critique the training to ensure continued improvement.	SECTION N: EXERCISES AND DRILLS **EP N.1** Exercises 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.	The commitment to conduct formal critiques is documented in Section N of the SNC Standard Emergency Plan.
Section O: Continuing training for emergency responders is offered throughout the year for persons currently holding an emergency response position.	**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.
Continuing Emergency Response Training Continuing training for emergency responders is offered throughout the year for persons currently holding an emergency response position.	**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.
Continuing training will consist of information regarding any EP equipment and procedure changes which could affect job performance in an emergency.	**EP O.5**: 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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Practical and theoretical EP concepts, industry standards, industry events and lessons learned are reviewed to reinforce previous training and to provide a broader scope and increased depth of knowledge.	**EP O.5**: 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.
Applicable critique items resulting from previous training and exercises are reviewed.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Selected objectives from the initial training program may be presented and evaluated if determined to be necessary based on task difficulty, drill critique items and participant feedback.	**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.
Qualification Initial emergency response personnel qualification is obtained by successful completion of the applicable EP Initial Training course(s) as identified in HNP procedures.	**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.
Each emergency responder is required each calendar year to complete the applicable EP Continuing Training course(s) for each of his/her emergency response positions as identified in HNP procedures.	**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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Also, some positions have additional prerequisites for qualification based on their normally assigned duties. These are as follows: 1. All personnel expected to work in areas that potentially could have excessive airborne radioactivity in emergency conditions should be qualified to wear respiratory protection. This includes the radiological monitoring teams, the operations personnel, the onsite firefighting team, the repair teams, and search and rescue personnel.	**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. The specific commitment for respiratory training will be evaluated as part of the position specific training and retraining and is not required as a standalone statement in the Plan.
2. Any personnel expected to serve on the search and rescue team should have completed the equivalent of the Red Cross Multimedia First-Aid Course.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Offsite Emergency Response Training Offsite emergency response training consists of training provided to medical support personnel, as described in Section L of this Plan, and upon the request of State and LEMAs for any pertinent training necessary for emergency response.	**EP O.1**: Personnel from nuclear power plants shall 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. **EP O.1.1:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Additionally, other Southern Company personnel will be trained on an as-needed basis if responding to the plant site.	**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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
P. 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) program.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Reporting to the Executive Vice President is the Vice President Fleet Operations Support and the Vice President-(Plant).	**EP P** 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.	The commitment wording was standardized and 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.	**EP P.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Emergency Planning: The Vice President Regulatory Affairs reports to the president/CEO. This individual is responsible for licensing through: providing organizational support and management oversight of the sites to assure prompt and proper disposition or regulatory issues; the development of regulatory positions; advising senior management on priorities and activities affecting regulatory at the nuclear sites; and interfacing with NRC management on behalf of the sites. Other responsibilities include: developing policies, standardized processes, and procedures for the maintenance of the licensing basis; the preparation of submittals to the NRC and other regulatory organizations; and the dissemination of regulatory information.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Reporting to the vice president-regulatory affairs is the fleet emergency preparedness manager, the fleet performance improvement manager, the regulatory affairs director-fleet, and the regulatory affairs director-nuclear development.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The regulatory affairs director-nuclear development is functionally independent of SNC's operating fleet and is noted here for completeness only.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Accordingly, the vice president-regulatory affairs is responsible for administration of the corrective action program in the corporate headquarters, the overall coordination of the corporate emergency preparedness programs (including the common Emergency Operations Facility), Emergency Plans, and site emergency response communication.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
His direct report, the fleet Emergency Preparedness Manager, has the overall governance, oversight, and support of fleet emergency preparedness activities and programs.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
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 Director is responsible for the oversight of Emergency Preparedness activities and coordinating those activities with Licensee, federal, state, and local response organizations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Planning Coordinator(s) reports to the Fleet Emergency Preparedness Manager in support of this effort. The Emergency Plans 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Planning Manager provides strategic direction for SNC emergency planning and coordinates with site management through the Vice President-Fleet Operations Support.	**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.	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 Emergency Planning Coordinator(s) coordinate site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor. 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 Preparedness Coordinator(s) coordinate functional elements of the emergency preparedness program for the SNC fleet under the direction of the Fleet Emergency Preparedness Director. **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. Figure P.1 shows the EP organization.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency Preparedness: The Vice President-(Plant) is responsible for the site Emergency Preparedness aspects of the program. The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.	**EP P.2** 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 commitment 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-(Plant).	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Preparedness Supervisor is responsible to the Regulatory Manager for implementation of emergency planning strategies.	**EP P.2** The Emergency Preparedness Supervisor is responsible for the implementation of emergency planning strategies provided by the Fleet Emergency Preparedness Director.	The commitment 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 Emergency Preparedness Supervisor.	**P.3** Coordination The Fleet Emergency Preparedness Director coordinates site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan procedure development and program maintenance activities.	**P.3** Coordination The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and program maintenance activities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Figure P-1 shows the EP organization.	Figure P.1 shows the EP organization.	The commitment 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 delegated EP responsibilities are trained by self-study, attending industry seminars, short courses, and workshops.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Onsite Emergency Plan Implementing Procedures (EIP) 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
EIPs for the corporate emergency response organization are maintained by the Fleet Emergency Preparedness Manager.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Approved changes to the Emergency Plan are forwarded to key organizations and appropriate individuals who are responsible for implementing the Plan.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Plan, agreements, and the Emergency Implementing Procedures are reviewed once each calendar year and updated, as needed.	**EP P.3** The Emergency Plan, agreements, and the EPIPs are reviewed once per calendar year and updated as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
These updates take into account changes identified by drills and exercises, and the independent review described below.	**EP P.3** These updates take into account changes identified by drills and exercises, and the independent review described below.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
An independent review of the EP program is conducted, as required by 10 CFR 50.54(t). The review includes the Emergency Plan; its implementing procedures and practices, training, annual exercises, readiness testing, equipment and emergency response facilities and interfaces with offsite agencies..	**EP P.3** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The results of the review, along with recommendations for improvements, are documented and reported to plant management and to appropriate offsite agencies.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Management controls are implemented for evaluation and correction of the review findings.	**EP P.3** Management controls are implemented for evaluation and correction of the review findings.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Records of these audits and recommendations are maintained for at least 5 years.	**EP P.3** Records of these audits and recommendations are maintained for at least 5 years.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition to this Plan, several other formal emergency plans were developed to support the overall emergency response effort. Once each calendar year, the Emergency Planning Coordinator performs a review of the emergency plans for Southern Nuclear. This review includes a comparison for consistency of all emergency plans for a specific site including the Security Plan, State, and County plans as appropriate.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
These supporting plans and their sources are as follows: Emergency Communications Plan – Southern Nuclear Operating Company		Appropriate Sections of the Emergency Communications Plan have been incorporated into Section G of the SNC Standard Emergency Plan and facilities described in Section H. A separate justification for conduct of Emergency Communications is provided.
Georgia RERP • Base Plan • Annex A, Appling, Jeff Davis, Tattnall, and Toombs Counties • Annex F, Ingestion Pathway	**EP Appendix C**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE P-1 TYPICAL EMERGENCY PREPAREDNESS ORGANIZATION	**EP Figure P.1**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
APPENDIX 1 GLOSSARY	**EP Definitions**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 2, Letters of Agreement: All	No equivalent Plan/Annex list of agreements.	The commitment wording was standardized and relocated to the Site Annex. This submittal has no impact on the number or specific type of agencies for which Letters of Agreement were maintained for the Site.
APPENDIX 3 MEANS FOR PROVIDING PROMPT ALERTING AND NOTIFICATION OF THE PUBLIC (PNS)	**EP Section E.2.5** **Annex 4.2**	The commitment wording was standardized and relocated to the Site Annex.
A. INTRODUCTION Prompt alerting and notification of the public within the plume exposure pathway EPZ are the obligation of State and local government or other responsible authority. The responsibility that means exist for this purpose rests with the licensee.	**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 capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
An overview of these means is given in this Appendix. A full Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report (ANS-HNP-001) located in the SNC document management system.	**Annex 4.2** A full description of the Hatch ANS design is provided in the FEMA approved ANS Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex.

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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 this Appendix. 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 objective in all cases.	**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. 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 for Appling County, Georgia, and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.

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The ED at HNP is responsible for notifying appropriate State and local response organizations, as well as plant emergency personnel, in the event of an emergency.	**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 capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
The ICs for each emergency class are delineated in Section D in the main body of this Emergency Plan.	**Appendix B Hatch Annex**	The commitment wording was standardized and relocated to the Site Annex.
The capability for 24-hour-per-day alerting and notification of offsite response organizations and plant emergency personnel is described in Section E.	**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. A full description of the Hatch ANS design is provided in the FEMA approved ANS Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex.
In the event of a declared emergency at HNP, initial alerting of the public would be by the siren system and EAS.	**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 commitment wording was standardized and relocated to the Site Annex.

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The State of Georgia or Appling County EMA will activate the siren system when it is appropriate to alert individuals within the 10 mile EPZ of an emergency at Plant Hatch	**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 commitment wording was standardized and relocated to the Site Annex.
Following activation of the siren alerting system, notification will be performed via local radio and television stations (Emergency Alert System).	**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 commitment wording was standardized and relocated to the Site Annex.
B. CONCEPT OF OPERATIONS The ANS consists of a primary ANS and a backup system should there be a failure of the primary system: • Primary - Sirens and Emergency Alert System (EAS) stations • System Backup - Reverse calling system	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The concept of operation for the system is as follows: The Primary ANS has two communication pathways. The first pathway is through the primary agency (on site) via the UHF or VHF radio.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Should the primary agency fail to activate the system, the secondary pathway will be utilized by the secondary agency (off site in Toombs County).	**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 commitment wording was standardized and relocated to the Site Annex.
If neither agency can activate the system, the backup system will be utilized to notify the residents of the 10 mile EPZ.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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The siren alerting system consists of Whelen Model 2900 series electronic omnidirectional sirens. The siren system sound coverage is such that a loss of a single speaker-driver can be tolerated on any siren without reducing siren coverage below the minimum required for populated areas within the EPZ.	**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 capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
The EAS provides government officials the capability to provide immediate communications and information to the general public at the State and local area levels during periods of emergency. EAS activation procedure will be in accordance with State EAS plans.	**EP E.2.5.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Special Alerting and System Backup Special alerting will be accomplished through the use of a calling system. Special alerting will be 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 EPZ.	**EP E.2.5.1** Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The calling system will serve as a complete backup to the ANS. The system will provide 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.	**EP E.2.5.1** Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The calling system is designed to be able to contact residents within the EPZ via telephone or cellular phone with a custom message specific to the event. Thus, it meets or exceeds the relevant criteria for backup notification of area residents and businesses.	**EP E.2.5.1** Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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C. CRITERIA FOR ACCEPTANCE The minimum acceptable objectives for coverage by the system are: • Capability for both alerting signal and an information or instructional message to the population on an area-wide basis throughout the 10-mile EPZ, within 15 min. • The alerting system will assure direct coverage of essentially 100 percent of the population within 10 miles of the site. • The Acceptance Testing Plan (ATP) focused on demonstrating the operational features of the siren alerting system such as diagnostic tests, silent tests, and full sound volume tests. • A detailed account of the testing process is available in the ANS Design Report.	**EP 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. 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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D. PHYSICAL IMPLEMENTATION In the event of an emergency, the licensee has developed and will maintain plans, systems, procedures, and relationships that are effective in notifying appropriate governmental and other responsible authorities. These authorities will have available to them the means for alerting and notifying the general public and for advising of appropriate responses by the public.	**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 capability are provided for Appling County, Georgia and for the state of Georgia	The commitment wording was standardized and relocated to the Site Annex.
The communications network utilized between the plant and the responsible authorities is described in section E.	No equivalent Plan/Annex statement.	Section E of the SNC Standard Emergency Plan and Site Annex has the description of Communication and Notification requirements for the ANS system.
Notification of the licensee's emergency response personnel is described in Section E of the main body of this Emergency Plan.	No equivalent Plan/Annex statement.	Section E of the SNC Standard Emergency Plan and Site Annex has the description of Communication and Notification requirements for the ANS system.
Notification of State and local response organization personnel would be described in their respective emergency plans.	No equivalent Plan/Annex statement.	Section E of the SNC Standard Emergency Plan and Site Annex has the description of Communication and Notification requirements for the ANS system.
APPENDIX 4 TYPICAL EMERGENCY EQUIPMENT LISTS	No equivalent Plan/Annex appendix/list.	The SNC Standard Emergency Plan provides commitments to perform the functions for which the Emergency Equipment is used. The specific equipment needed to perform those functions varies as equipment/vendors changes. The Plan retains the commitment to perform the function, which eliminates the need to provide the specific equipment listings.

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APPENDIX 5 EVACUATION TIME ESTIMATES FOR HNP PLUME EXPOSURE PATHWAY EPZ	**Appendix A** – Evacuation Time Estimate Study and Map Reference	The Evacuation Time Estimate report for Plant Hatch was relocated to the Site Annex.
APPENDIX 6 – TYPICAL EMERGENCY IMPLEMENTING PROCEDURES	**Annex Appendix C**	A complete set of function-based EPIPs will be developed to support the integrated Plan. Appendix will be updated prior to implementation of the revised Plan.
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 TSC 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.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 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.

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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.	**EP B.1.1** The ED, at their discretion or when procedurally required, activates the ERO.	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.
Appendix 7 A.3: Minimum EOF staff for facility activation will include the EOF Manager, the Dose Assessment Supervisor, the Dose Analyst, the Field Team Coordinator, the ENN Communicator, and the Licensing Support Coordinator.	**EP Figure B.2.D**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: Access control for the EOF is established through the use of electronic card readers.	**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.

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Appendix 7 A.3: The emergency director is responsible for the management of the emergency response. Specific duties and responsibilities are provided in the site specific Emergency Plan and Emergency Plan Implementing Procedures.	**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.
Appendix 7 A.3: ... the EOF can be quickly accessed and made operational within about an hour of the initial notification and is safe-guarded against unauthorized personnel.	**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. **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. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.
Appendix 7 A.3: The building itself (EOF building) has posted security guards and video surveillance cameras.	**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: 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.

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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	No direct equivalent Plan/Annex statement	EP O.1 The ERO Training Program assures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency.
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.

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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.

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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 EOF 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 EOF 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.

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Appendix 7 B.4: The TSC will initially be responsible for dose projection and field team control activities.	**EP B.2.1.5**: The TSC 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.
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** Offsite Emergency Response Organization (ERO)	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 EOF 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 EOF 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.

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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 EOF 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.
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.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
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 by means of 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.
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.	**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.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
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: ERF Communicators	The commitment wording was standardized and relocated to the Site Annex.
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.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 D.1: Computer workstations are dedicated for performing dose assessment for multiple sites.	**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.	No equivalent Plan statement.
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 among the ERO, required offsite responders, and the public with 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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	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.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 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. 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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	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.1** 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 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 provides no purpose in the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	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 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.	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 Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	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: The EAL's will be processed IAW a separate part of this project.	**Annex Appendix B**	The SNC Standard Emergency Plan maintains the approved EAL scheme relocated to the Site Annex.

Site On-Shift Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 on-shift*	Hatch 1981	Hatch Rev 36	Hatch 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)	3	2	4
		Auxiliary Operators	2 (per unit)	3	2	7
		Shift Support Supervisor (SRO)				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 comm.		1****	1**	1	1**
Radiological Accident Assessment and Support of Operational Accident Assessment	In-Plant surveys	HP Technicians	1	1	1	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
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**		2	1
		I&C Maintenance			1	1
		System Operator			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**	4	2
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**	**11**	**25**	**25**

*For each unaffected unit, maintain at least 1 SF, 1 CRO, 1 AO fully manned

**May be provided by shift personnel assigned other functions

***Overall direction to be assumed by EOF Dire when ERFs are

****May be performed by engineering aid to shift supervisor

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	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**	**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 10
Vogtle (Units 1 and 2) Staffing - Detailed Description and Technical Evaluation
(Marked-Up Pages and Clean Copy)

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 Emergency Plan requires augmentation of the following Technical Support Center (TSC) and Emergency Operations Facility (EOF) positions, which support activation of the Technical Support Center (TSC) and Emergency Operations Facility (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 63.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides for two Communicators~~, but this is~~ modified by a note stating, "may be provided by shift

personnel assigned other functions." In the proposed SNC Fleet Emergency Plan, the VEGP Unit 1 and Unit 2 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 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 change to the VEGP Unit 1 and Unit 2 provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the Emergency Operations Facility (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 a Hostile Action Based (HAB) event in which the site is not accessible to the ERO, sufficient personnel will be available in the Emergency Operations Facility (EOF) within 75 minutes of an Alert or higher declaration 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 on-site 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 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 augmentation time 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: Emergency Operations Facility (EOF) Emergency Director; Off-Site Dose Assessment and Chemistry/Radiochemistry; and Off-site, On-Site (out of plant) and In-Plant Surveys, and Radiation Protection.

Emergency Operations Facility (EOF) Emergency Director (ED)

The Technical Support Center (TSC) ED is not assigned to the on-shift complement. In the current plan, the TSC ED arrives within about 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 Protective Action Recommendations (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 resource ~~provide~~ for the on-shift dose assessment task.~~capability.~~ The current version of the VEGP Unit 1 and Unit 2 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to an on-shift RP individual. In the proposed change, on-shift dose

assessment will be assigned to appropriately trained Chemistry personnel who will be dedicated to this task with no other collateral emergency response duties. This will in turn free the RP 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), VEGP 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 63.0 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. An additional individual is provided to coordinate communications between this out of plant team and the dose assessor. The in-plant survey task is not included in the Radiological Accident Assessment and Support of Operational Accident Assessment function in Version 63.0 of the VEGP Unit 1 and Unit 2 Emergency Plan. However, it is addressed under the Protective Actions function where two RP personnel are assigned.

As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 1 and Unit 2 on-shift staffing, the on-site out of plant survey task will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 3 and Unit 4. SNC currently uses predesignated, readily accessible survey points around the VEGP 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 VEGP 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 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. 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 63.0 of the VEGP 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 an additional off-site survey team within 75 minutes of an Alert or higher emergency for the VEGP site 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).~~

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, focus 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 VEGP Unit 1 and Unit 2 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. A 10 CFR 50 Appendix E shift staffing evaluation has 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.

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 VEGP 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, firefighting, personnel monitoring, and dosimetry.

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 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
- EOF Dose Analyst

This License Amendment Request (LAR) revises the current on-shift and augmented Emergency Response Organization (ERO) for Vogtle Electric Generating Plant (VEGP) 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

VEGP Unit 1 and Unit 2 Emergency Plan Revision 63.0 requires staffing of augmented ERO at the Alert or higher classification. Specifically, it states the Emergency Response Facilities (ERFs) "...will be activated and will be operational within about an hour of 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, 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" in order to clearly define the augmentation requirement.

Assignment of Responsibility/Organizational Control

The VEGP Unit 1 and Unit 2 Emergency Plan maintains an on-shift organization as documented in the site Emergency Plan Revision 63.0. 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 VNP.

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 plan Revision 63.0 meets the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the VEGP Unit 1 and Unit 2

Technical Specifications. In addition to these requirements, the VEGP Unit 1 and Unit 2 Emergency Plan also 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 also 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 VEGP 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 and proposed VEGP 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 that prescribed in Revision 5.0 of the VEGP Unit 1 and Unit 2 Emergency Plan. The on-shift control room staff for VEGP, as described, remains unchanged in the proposed SNC Fleet Emergency Plan and continues to ensure prompt response to emergency events and the capability of on-shift personnel to support 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 5.0 of the VEGP Unit 1 and Unit 2 Emergency Plan, the Emergency Director (ED) function is 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 Technical Support Center (TSC) within about one hour of notification of an emergency.

As provided in the current revision to the VEGP 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 about 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 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 Emergency Plan requires augmentation of the following Technical Support Center (TSC) and Emergency Operations Facility (EOF) positions, which support activation of the Technical Support Center (TSC) and Emergency Operations Facility (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 63.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides for two Communicators modified by a note stating, "may be provided by shift personnel assigned other functions." In the proposed SNC Fleet Emergency Plan, the VEGP Unit 1 and Unit 2 staffing for this function is addressed as provided in NUREG-0654/FEMA REP-01 Revision 1 guidance.

The number of control 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 change to the VEGP Unit 1 and Unit 2 provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the Emergency Operations Facility (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 a Hostile Action Based (HAB) event in which the site is not accessible to the ERO, sufficient personnel will be available in the Emergency Operations Facility (EOF) within 75 minutes of an Alert or higher declaration 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 on-site 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 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 augmentation time 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: Emergency Operations Facility (EOF) Emergency Director; Off-Site Dose Assessment and Chemistry/Radiochemistry; and Off-site, On-Site (out of plant) and In-Plant Surveys, and Radiation Protection.

Emergency Operations Facility (EOF) Emergency Director (ED)

The Technical Support Center (TSC) ED is not assigned to the on-shift complement. In the current plan, the TSC ED arrives within about 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 Protective Action Recommendations (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 resource for the on-shift dose assessment task. The current version of the VEGP Unit 1 and Unit 2 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to an on-shift RP individual. In the proposed change, on-shift dose assessment will be assigned to appropriately trained Chemistry personnel who will be dedicated to this task with no other collateral emergency response duties. This will in turn free the RP 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), VEGP 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 63.0 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. An additional individual is provided to coordinate communications between this out of plant team and the dose assessor. The in-plant survey task is not included in the Radiological Accident Assessment and Support of Operational Accident Assessment function in Version 63.0 of the VEGP Unit 1 and Unit 2 Emergency Plan. However, it is addressed under the Protective Actions function where two RP personnel are assigned.

As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 1 and Unit 2 on-shift staffing, the on-site out of plant survey task will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 3 and Unit 4. SNC currently uses predesignated, readily accessible survey points around the VEGP 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 VEGP 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 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. 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 63.0 of the VEGP 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 an additional off-site survey team within 75 minutes of an Alert or higher emergency for the VEGP site 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 63.0 of the VEGP Unit 1 and Unit 2 Emergency Plan provides for two RP technicians to perform in-plant surveys. However, these individuals are provided under the Protective Actions function. The proposed SNC Fleet Emergency Plan VEGP Unit 1 and Unit 2 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 VEGP Unit 1 and Unit 2 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 for the VEGP site. 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 5 of the VEGP Unit 1 and Unit 2 Emergency Plan provided an individual to fulfill the STA task. Subsequently, VEGP Unit 1 and Unit 2 implemented a Technical Specification Amendment to align the STA position with the guidance of "Commission Policy Statement on Engineering Expertise on Shift" published in Federal Register Notice 50 FR 43621, dated October 1985. As a result, Revision 10 of the VEGP Unit 1 and Unit 2 Emergency Plan implemented a change to assign the STA task as a collateral duty to an STA qualified SRO assigned to other functions.

The current VEGP Unit 1 and Unit 2 Emergency Plan continues to identify this task as fulfilled by an individual holding the STA qualification as a collateral duty of appropriately qualified on-shift personnel that may also be assigned to another function. This will typically be assigned to either the Shift Manager or another on-shift Senior Reactor Operator (SRO). The performance of this task as a collateral duty 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.

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, focus 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 VEGP Unit 1 and Unit 2 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. A 10 CFR 50 Appendix E shift staffing evaluation has 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.

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 VEGP 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, firefighting, personnel monitoring, and dosimetry.

Revision 5.0 of the VEGP Unit 1 and Unit 2 Emergency Plan provides two individuals for performing this function. This practice continues through the current version of the VEGP Unit 1 and Unit 2 Emergency Plan.

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 VEGP 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 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 VEGP Unit 1 and Unit 2 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 for the VEGP site. 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 the Fire Fighting function. 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." The VEGP Unit 1 and Unit 2 Emergency Plan uses appropriately trained on-shift personnel to fulfill this function as a collateral duty. The proposed SNC Fleet Emergency Plan provides that the existing personnel assigned this function will be maintained. However, these positions will be shared for the VEGP site. 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; therefore, there is no impact represented by the change in augmentation times.

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)

The current ERO 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 VEGP 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 in 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 12.

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 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 12.

Plant Computer System

At the time of the original approval of the Revision 5.0 of the 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 Technical Support Center (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 displays of concentrated parameters from which plant safety status can be rapidly assessed, provided by the 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 2010, the site installed the Integrated Plant Computer (IPC). 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 1986 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 VEGP dose assessment capability was upgraded in the mid-1990s when the MIDAS dose assessment program was installed on the ERF Computer to provide VEGP 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 RP 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 2008 (Reference NL-08-0450, Revision 48.0 of VEGP Unit 1 and Unit 2 Emergency Plan) VEGP 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 VEGP Unit 1 and Unit 2. Since NRC approval of the VEGP 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 Revision 5.0 of the VEGP Unit 1 and Unit 2 Emergency Plan, in order to ensure adequate performance of the major emergency plan functions and tasks. A total of 24 persons are identified for on-shift staffing in Revision 63.0 of the VEGP 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 5.0 of the VEGP Unit 1 and Unit 2 Emergency Plan, Revision 63.0 of the VEGP Unit 1 and Unit 2 Emergency Plan, and proposed revisions are included in Enclosure 12.

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 existing at the time Revision 5.0 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 VEGP 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 the 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 12
Vogtle Units 1 and 2 Justification Matrix
(Marked-Up Pages and Clean Copy)

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	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 commitment wording has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H and the Emergency Communications portion of Section G of the SNC Standard Emergency Plan.
Section G.2: The Company spokesperson position is filled by individuals who, under normal operations, hold supervisory positions on the SNC Corporate or plant staff and are technically and professionally qualified to perform this important function.	**EP B.3.**2.~~81.17~~: 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 PID posted on that status.	The SNC Standard Emergency Plan provides an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.2: The Company spokesperson has access to all information and telephone contact with the emergency director through the EOF Manager. He briefs the media on plant status and Company emergency activities.	**EP B.3.**2.~~81.17~~: 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 PID posted on that status.	The SNC Standard Emergency Plan provides an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G.2: In addition, technical briefers have been designated who can provide general and background information.	**EP B.3.**2.~~91.18~~: 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, the ERF Communicator, ENN Forms, and direct contact with the EOF Manager.	The SNC Standard Emergency Plan provides an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.3: GPC and SNC will provide timely and accurate information to local, State and federal agencies.		The SNC Standard Emergency Plan and Site Annex provide an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.4: In an emergency, a rumor control network will be activated.	**EP B.3.2.6**: 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.
Section G.4: News media will be monitored to detect and respond to misinformation.		The SNC Standard Emergency Plan and Site Annex provide an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.5: GPC will offer an annual program to acquaint the news media with the methodology for obtaining information about overall emergency preparedness at Vogtle. Training will include information about the plant, radiation, and the role of the emergency news center.	**EP G.2:** 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.

VEGP 1 & 2 Site 60 Minute Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	VEGP 1&2 Rev 5	VEGP 1&2 Rev 63 (60 min)	VEGP 1&2 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	4	3	~~5~~6
	On-Site Surveys	HP Technicians	1			
	In-Plant surveys	HP Technicians	1			
	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
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1	1	1	
		Electrical Maintenance	1	1	1	1
		I&C Technician				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**	**15**	**14**	**4~~3~~4**

*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.

(a) EOF Emergency Director counted in Emergency Direction and Control.

VOGTLE ELECTRIC GENERATING PLANT UNIT 1&2

JUSTIFICATION MATRIX

Purpose

The purpose of this attachment is to identify the commitments in the current Vogtle Electric Generating Plant Emergency Plan Revision 63, identify the equivalent or modified commitment in the integrated Fleet Emergency Plan and Vogtle Site Annex, and justified on a commitment-by-commitment basis the proposed License Amendment.

CHANGE MATRIX

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
PREFACE The Vogtle Electric Generating Plant (VEGP) is a two-unit pressurized water reactor operated by Southern Nuclear Operating Company (SNC). The plant is on a 3169-acre site located in the eastern portion of Burke County, Georgia, approximately 23 river mi upstream from the intersection of the Savannah River with U.S. Highway 301, as shown on figure i. Figure ii shows the site and the locations of the buildings on the site. The locations of the VEGP emergency facilities are shown on fig4.1.1ure ii.	**Annex 1.1 Facility Description** The Vogtle Electric Generating Plant (VEGP) Units 1 and 2 are a two-unit pressurized water reactor. The plant site, to include VEGP Units 1-4, is on a 3,169-acre site located in the eastern portion of Burke County, Georgia, approximately 23 river miles upstream from the intersection of the Savannah River with U.S. Highway 301.	The commitment wording was standardized and relocated to the Site Annex.
This Emergency Plan is applicable to VEGP, Units 1 and 2, and to its environs as specified by the emergency planning zones (EPZs): a plume exposure pathway EPZ, which nominally consists of the area within approximately 10 mi of the plant, and an ingestion exposure pathway EPZ, which extends to 50 mi. These distances are reckoned from a point midway between the centers of the Unit 1 and Unit 2 containment buildings for the 10 mile EPZ map. The two EPZs are shown in figures iii and iv.	**Annex 1.2 Emergency Planning Zones (SEP J.5)** **Annex 1.2.1 Plume Exposure Pathway (SEP J.7)** The 10-mile Emergency Planning Zone (EPZ) for VEGP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Georgia and South Carolina, as well as the counties (Burke County in Georgia and Aiken, Barnwell, and Allendale Counties in South Carolina) are located within the plume exposure pathway EPZ. The major portion of the plume exposure pathway EPZ in South Carolina is within the Department of Energy's Savannah River Site (SRS).	The commitment wording was standardized and relocated to the Site Annex.

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The EPZ for ingestion exposure includes an area within 50 mi of VEGP. Planning for the ingestion exposure pathway is a responsibility of the States of Georgia and South Carolina. More information about the ingestion exposure pathway EPZ can be obtained from the States' Radiological Emergency Plans.	**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 states of Georgia and South Carolina. More information about the IPZ can be obtained from the states' Radiological Emergency Plans.	The commitment wording was standardized and relocated to the Site Annex.
Section A.1: Vogtle Electric Generating Plant (VEGP) accepts the responsibility of maintaining an effective Emergency Plan and maintaining proper preparedness through the maintenance of formal procedures for implementing the Plan as identified in appendix 9, the training of personnel in accordance with section O, the maintenance of necessary equipment, and continuing relationships with various governmental agencies and private organizations as identified in this section.	**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 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section A.1: The following tasks are part of VEGP's responsibility: • Recognize and declare the existence of an emergency condition. • Classify the event in accordance with the methodology described in section D of this Plan. • Notify appropriate VEGP personnel and offsite authorities. • Take corrective actions to mitigate the severity of the accident. • Request additional support as deemed necessary. • Establish and maintain effective communications within VEGP and with offsite response groups as described in section F. • 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. • Take protective measures onsite and recommend protective measures to offsite authorities. • Monitor and control radiation exposures of all personnel responding to the emergency and under the direction of VEGP. • Provide emergency information to the public through periodic press briefings in conjunction with State and local officials.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section A.1: The VEGP emergency response is carried out under the control of the emergency director.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A.2.1 PRINCIPAL AGENCIES OF THE STATE OF GEORGIA The following State agencies are assigned lead responsibility for radiation emergencies and for overall State preparedness, respectively: 1. GEORGIA EMERGENCY MANAGEMENT AGENCY a. GEMA is responsible for general State emergency planning and exercises 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 emergency activities of DNR with overall State response efforts.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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1. GEORGIA EMERGENCY MANAGEMENT AGENCY (cont) c. During an emergency, the State of Georgia, acting through GEMA, and the State of South Carolina, acting through the South Carolina Emergency Preparedness Division, will coordinate their emergency response efforts including such matters as radiological dose assessment, protective action decisions, and activation of the prompt notification system for alerting the public. d. On behalf of the Governor, activate all or portions of the GEOP to provide the necessary overall coordinated response. e. Provide communications for the State Operations Center (SOC), as required, through 24-hour radio network, commercial telephone, National Warning System (NAWAS), or other communications systems. Communication links will be established in accordance with existing procedures with the SOC in Atlanta as well as with additional State and local emergency response personnel within the plume exposure pathway and ingestion EPZs. These functions will initially be handled from the SOC and will then be transferred to the Forward Emergency Operations Center (FEOC) once activated.	**Annex 1.3** 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 Vogtle, including 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 and relocated to the Site Annex.

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1. GEORGIA EMERGENCY MANAGEMENT AGENCY (cont) f. Establish the FEOC if necessary. The FEOC will be established at the Burke County Emergency Operations Center (EOC) Building, on the corner of Georgia Highway 24 and Perimeter Road in Waynesboro. Upon the decision of the GEMA director to activate the FEOC, the GEMA Mobile Communications Vehicle (MCV) may be dispatched to Burke County and arrive within driving time plus 30 min for mobilization. When dispatched, it may be used to transport certain State responders. The GEMA MCV will be located adjacent to the Burke County EOC and will provide support services to State agencies at the FEOC. The Burke County EOC has the necessary electrical hook-ups to provide long term electrical services to the vehicle. In addition to providing backup for the communications described in the preceding paragraph, the MCV provides backup communications for State agencies other than GEMA (Department of Transportation, the Georgia State Patrol, the Georgia Department of Natural Resources – Law Enforcement Section, and the Georgia Forestry Commission). In addition, the MCV has an onboard weather station that can provide wind speed and direction, barometric pressure and relative humidity. It also has micro down-link capabilities and a video camera system.		

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1. GEORGIA EMERGENCY MANAGEMENT AGENCY (cont) g. Maintain liaison with DNR radiation emergency coordinator (REC). h. Activate public emergency warning and/or evacuation procedures, as needed, pursuant to the GEOP. i. Assist radiological monitoring and provide instrumentation. j. Provide radiological monitoring training assistance. k. Assist in area security and control; request National Guard assistance if needed. l. Provide for the coordination of land and air transportation for emergency personnel as requested. m. Coordinate public information releases in cooperation with State and local agencies. n. Communication links will be established with the state of South Carolina Emergency Preparedness Division and DOE-SRS to ensure efficient coordination of emergency response activities.		

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2. DEPARTMENT OF NATURAL RESOURCES a. DNR is assigned primary responsibility by Executive Order for implementation and administration of the State radiological emergency response function. DNR will: (1) Dispatch radiation emergency teams as needed. (2) Perform radiation survey and monitoring. (3) Provide radiation safety training. (4) Direct recovery/reentry operation and provide health physics control of contaminated areas. b. A radiation emergency coordinator (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 h 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 GEOP as required. e. DNR will provide for health physics escort of media and other personnel within the plume exposure pathway emergency planning zone (EPZ) as conditions allow if access controls have been established.	**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. **Annex 1.3**: 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 Vogtle, including 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 SNC Standard Emergency Plan and Site Annex.

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A.2.2 State Support Agencies in Georgia The following State agencies are prepared to provide related support of this function as indicated pursuant to the GEOP: 1. DEPARTMENT OF HUMAN RESOURCES Coordinate emergency health and social assistance pursuant to the GEOP. 2. DEPARTMENT OF PUBLIC SAFETY a. As applicable, assume control over the onsite situation until the arrival of radiation safety personnel. b. Maintain liaison with 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.	**Annex 1.3**: 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 Vogtle, including 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 SNC Standard Emergency Plan and Site Annex. The specific agencies for the state of Georgia were not listed in the SNC Standard Emergency Plan/Annex due to frequent reorganization and name changes at the recommendation of state authorities. The overall responsibilities of the state are unchanged by the SNC Standard Emergency Plan.

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A.2.2 State Support Agencies in Georgia (cont) 3. 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 DNR REC for assessing degree of contamination. 4. 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:** 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 Vogtle, including 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 SNC Standard Emergency Plan and Site Annex. The specific agencies for the state of Georgia were not listed in the SNC Standard Emergency Plan/Annex due to frequent reorganization and name changes at the recommendation of state authorities. The overall responsibilities of the state are unchanged by the SNC Standard Emergency Plan.

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A.2.2 State Support Agencies in Georgia (cont) 5. 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. 6. DEPARTMENT OF ADMINISTRATIVE SERVICES a. Provide for expeditious 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.		

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A.3 BURKE COUNTY, GEORGIA All the area within the plume exposure pathway EPZ in the State of Georgia falls within Burke County. The responsibility for overall radiological emergency response planning rests with the chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within Burke County which have a primary role in radiological emergency planning and response include the Emergency Management Agency and the Sheriff's Department. A detailed discussion of the Burke County response is contained in Annex D to the Georgia Radiological Emergency Response Plan. The chairman, Burke County Board of Commissioners, or his predesignated alternate (the vice chairman, any of three other commissioners, the county administrator, or the EMA director), may declare an emergency and implement offsite protective actions. However, upon the declaration of an emergency situation or the decision to implement protective actions the emergency management agency director is authorized to represent the chairman, Burke County Board of Commissioners.	**EP 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. **Annex 1.5.1 Burke County Georgia (SEP A.2.4)** The area within the plume exposure pathway (EPZ) in the state of Georgia falls within Burke County. The responsibility for overall radiological emergency response planning rests with the Chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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A.3 BURKE COUNTY, GEORGIA (cont) A.3.1 Emergency Management Agency Principal activities include the following: 1. Receive notification from VEGP and GEMA. 2. Maintain communications with VEGP on emergency situation status. 3. Provide information to other Burke County response elements, to the media, and to the public. 4. Activate the public notification system, if required. 6. Coordinate Burke County emergency response activities. 7. Activate and direct operations at the designated reception and care facility. 8. Implement protective action recommendations as requested by GEMA or the chairman of the Burke County Board of Commissioners or his predesignated designee. A.3.2 Sheriff's Department Principal activities include the following: 1. Provide backup public notification. 2. Control access to the plume exposure pathway EPZ. 3. Provide traffic control and law enforcement measures in the event of an evacuation.	**Annex 1.7 Hostile Action Based Events** Agreements are in place with the state of Georgia, Burke County, Georgia, Aiken, Allendale, and Barnwell Counties in South Carolina to provide available resources and equipment to support mitigation and response to an emergency at Plant Vogtle 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 Burke County 911 Center 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.

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A.4 STATE OF SOUTH CAROLINA The State of South Carolina has developed the South Carolina Radiological Emergency Response Plan (SCORERP) which provides guidance to state and local governments on procedures, organization, and responsibilities for preventing and mitigating the effects of a nuclear power plant incident or disaster. The SCORERP provides for the radiological emergency response in the event of a radiological accident at a fixed nuclear facility located in the state or in states contiguous to South Carolina. The SCORERP describes the South Carolina Radiological Emergency Response Organization, which consists of the Office of the Adjutant General (Emergency Management Division (EMD), the Department of Health and Environmental Control (Bureau of Solid and Hazardous Waste, Nuclear Emergency Planning (NEP) Section), and those state resources available to local government(s) during a fixed nuclear facility radiological accident. State radiological emergency response forces will be operational upon notification of a radiological emergency. The response functions of involved agencies are described in the SCORERP and the South Carolina Technical Radiological Emergency Response Plan (SCTRERP). A VEGP Site Specific Radiological Emergency Response Plan (Part 5 to SCORERP) addresses those matters that pertain directly to VEGP.	**EP A.2.3 State of South Carolina** **EP 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. **EP 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. **EP 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).	The wording was standardized and relocated to the Site Annex.

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A.4 STATE OF SOUTH CAROLINA (cont) Upon being advised by EMD that a radiological emergency exists, the Governor or his designated representative declares an emergency condition. Under the Governor's direction, the total and combined efforts of the state and local governments will be utilized to nullify or reduce the effects of offsite radiological hazards resulting from a nuclear plant accident. As deemed necessary, the Governor may transfer the direction, personnel, or functions of state agencies. All radiological emergency response organizations are prepared to react on a 24-h basis, and they are capable of continuous operations for a protracted period. Directors of state agencies, departments, and commissions are responsible for ensuring that their agencies' radiological emergency response responsibilities are accomplished. Designated county officials are responsible for emergency response within their jurisdictions. The legal basis and authority for the emergency response of the State of South Carolina include: 1. South Carolina Constitution, Article IV, Annex 17, Appendix A 2. South Carolina Code of Laws ANN, 25-1-420 through 25-1-460.	**Annex 1.4 State of South Carolina (SEP A.2.3)** The state of South Carolina has developed the South Carolina Radiological Emergency Response Plan (SCORERP), which provides guidance to state and local governments on procedures, organization, and responsibilities for preventing and mitigating the effects of a nuclear power plant incident or disaster. The SCORERP describes the South Carolina Radiological Emergency Response Organization, which consists of the Office of the Adjutant General (Emergency Management Division) (EMD), the Department of Health and Environmental Control (Bureau of Solid and Hazardous Waste, Nuclear Emergency Planning (NEP) Section), and those state resources available to local government(s) during a fixed nuclear facility radiological accident. The response functions of involved agencies are described in the SCORERP and the South Carolina Technical Radiological Emergency Response Plan (SCTRERP). **Annex 1.4.1** Office of the Governor (A.2.3.1) In the event of the declaration of a radiological emergency, the EMD, Department of Health and Environmental Control (DHEC), and other state agencies are activated.	The wording was standardized and relocated to the Site Annex.

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A.4 STATE OF SOUTH CAROLINA (cont) 3. Regulation 58-1, Local Government Preparedness Standards; and Regulation 58-101, State Emergency Preparedness Standards, South Carolina Code of Regulations. 4. The South Carolina Emergency Operations Plan (SCEOP). 5. The South Carolina Operational Radiological Emergency Response Plan (SCORERP). 6. The South Carolina Technical Radiological Emergency Response Plan (SCTRERP). The duties and responsibilities of the principal and support agencies of the State of South Carolina are summarized below. A.4.1 Principal Agencies of the State of South Carolina The following state agencies are assigned primary responsibilities for overall state radiological emergency management and response operations. 1. Office of the Governor a. Upon being advised that a radiological emergency exists, the Governor declares an emergency condition which results in the activation of EMD, DHEC, and other state agencies to deal with the situation, in accordance with their emergency response plans.	**Annex 1.4.2 Office of the Adjutant General - Emergency Management Division (EMD) (SEP A.2.3.1)** The EMD is responsible for coordinating the emergency planning efforts of all state, county, and municipal agencies in developing a state emergency plan. Additional responsibilities include conducting a preparedness program to assure capability of the state 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. **Annex 1.4.3 Department of Health and Environmental Control (DHEC) (A.2.3.2)** 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 VEGP. **Annex 1.4.4 Other State Support Agencies (A.2.3.3)** Other state agencies described in the South Carolina Emergency Operating Plan (SCEOP) and South Carolina Operational Radiological Emergency Response Plan (SCORERP) will provide related support pursuant to each plan. Those agencies include: • Department of Public Safety (Highway Patrol Division). • State Law Enforcement division (SLED). • Forestry Commission. • Department of Natural Resources. • Department of Social Services. • Department of Agriculture. • Clemson University Cooperative Extension Service.	The wording was standardized and relocated to the Site Annex.

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A.4 STATE OF SOUTH CAROLINA (cont) b. The Governor's press secretary or authorized representative will direct and control public information service activities and serve as the Governor's official representative/spokesperson regarding the preparation and release of emergency information by state government. 2. Office of the Adjutant General Emergency Management Division a. The EMD is assigned the responsibility for coordinating the emergency planning efforts of all state, county, and municipal agencies in developing a State emergency plan; 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. b. The director of EMD is the principal advisor to the Governor for emergency response. He coordinates with DHEC the recommended protective measures based on DHEC evaluation and assessment of the radiological emergency at VEGP.		

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A.4 STATE OF SOUTH CAROLINA (cont) 3. Department of Health and Environmental Control a. 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-SRS and VEGP. DHEC will obtain and coordinate radiological assistance resources from the Federal Government, other states, and the nuclear industry as required. b. The Bureau of Solid and Hazardous Waste, Nuclear Emergency Planning (NEP) Section within DHEC has the direct responsibility to provide technical assistance and resources necessary to evaluate and assess the consequences of a radiological incident and to provide protective action guidance to State and local authorities. NEP is responsible for radiological surveying and monitoring of the environment, including the collection and analyses of samples of soil, air, water, milk, and crops. c. The Manager, Nuclear Emergency Planning Section is the individual responsible for implementing the SCTRERP; providing EMD with recommended protective actions as well as recovery and reentry guidelines. NEP has 24-h accident response capability with EMD.		

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A.4 STATE OF SOUTH CAROLINA (cont) A.4.2 State Support Agencies in South Carolina The following state agencies are prepared to provide related support pursuant to SCEOP and SCORERP. 1. Department of Public Safety (Highway Patrol Division) a. Regulate and control traffic on the highways of the state. b. Have its Highway Patrol warning point serve as the backup means of notification from the VEGP. c. Provide for a 24-h communication system with VEGP, EMD, and DHEC. d. Support the State Law Enforcement Division in security and other law enforcement activities. e. Assist in transportation accident assessment and recovery operations. f. As requested, provide transportation for radiation safety personnel, other emergency response personnel, or equipment. g. Provide heavy equipment and personnel as requested. 2. State Law Enforcement Division (SLED) a. Coordinate law enforcement activities, particularly during evacuation. b. Assume control of areas suspected of contamination until the arrival of radiation safety personnel. c. Assist in search and rescue. d. Coordinate and assist in securing the SEOC, waterways and evacuated areas. f. Augment communication system and warning points operation.		

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A.4 STATE OF SOUTH CAROLINA (cont) 3. Forestry Commission a. Provide land or air transportation as requested for emergency response personnel or equipment. b. Provide fire control service. c. Assist in decontamination, in coordination with DHEC. d. Provide radio operators for the SEOC to operate permanently installed Forestry Commission radio equipment. e. Maintain radio contact with all Forestry Commission elements in affected counties. 4. Department of Natural Resources a. Coordinate search and rescue operations. b. Provide air transportation in support of radiological monitoring operations. c. Augment public warning operations and public information services. d. Assist in law enforcement. 5. Department of Social Services a. Coordinate shelter operations which includes registration of evacuees. b. Coordinate all emergency welfare services to evacuees such as feeding, clothing, and information. c. Administer and maintain individual and family assistance program. d. Augment public information service to evacuees.		

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A.4 STATE OF SOUTH CAROLINA (cont) 6. Clemson University Cooperative Extension Service a. Maintain updated agricultural data required for radiological assessment in support of DHEC. b. Assist in locating contaminated livestock, feed, milk, and other farm products for disposal or decontamination by DHEC. 7. Department of Agriculture a. Restrict the sale, production, distribution, and warehousing of livestock, produce, dairy and processed food products contaminated beyond safe consumption. b. Assist DHEC in disposal of contaminated products. d. Coordinate these activities with the United States Department of Agriculture (USDA).		

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A.5 AIKEN, BARNWELL, AND ALLENDALE COUNTIES, SOUTH CAROLINA Most of the plume exposure pathway EPZ within South Carolina falls within the site boundary of the Savannah River Site (SRS). The United States Department of Energy is responsible for the direction and control of all emergency response actions on the SRS. There are limited portions of Aiken, Barnwell, and Allendale counties which are outside of the SRS but within the plume exposure pathway EPZ of VEGP. These counties are similarly organized, with the responsibility for overall radiological emergency response planning resting with the chairman of the county council in each case. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within these counties which have a primary role in radiological emergency planning and response include the Emergency (Disaster) Preparedness Agency (EPA) and the Sheriff's Department. A detailed discussion of the county response is contained in Annex Q2 to each county's emergency operations plan. The chairman of the county council, or his predesignated alternate (the vice chairman, county administrator, or EPA director) may declare an emergency within his respective county and implement offsite protective actions. The chairman or his designee is available 24 h per day. The locations of the county EOCs are indicated in Table C-2. Principal emergency response activities include the following:	**EP 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. **Annex 1.5.2 Aiken, Barnwell, and Allendale Counties South Carolina (SEP A.2.4)** Most of the plume exposure pathway EPZ within South Carolina falls within the site boundary of the Savannah River Site (SRS). The United States Department of Energy is responsible for the direction and control of all emergency response actions on the SRS. Limited portions of Aiken, Barnwell, and Allendale counties are outside of the SRS but within the plume exposure pathway EPZ of VEGP. These counties are similarly organized, with the responsibility for overall radiological emergency response planning resting with the Chairman of the County Council in each case.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
A.5 AIKEN, BARNWELL, AND ALLENDALE COUNTIES, SOUTH CAROLINA (cont) A.5.1 Aiken County Emergency Preparedness Division, Allendale County Emergency Preparedness Agency, Barnwell County Emergency Management Agency. a. Maintain communications with South Carolina EMD and VEGP on emergency situation status. b. Provide information to other county response elements. c. Activate the county EOC. d. Activate public notification system if required. e. Coordinate county emergency response activities. f. Activate and direct operations at the designated reception facility. g. Implement protective actions as requested by South Carolina EMD or the chairman, county council, or his predesignated designee. A.5.2 Sheriff's Department a. In Barnwell and Aiken Counties, receive notification from VEGP and South Carolina EMD, as primary warning points. This function is performed by the Allendale County Central Dispatch. b. Provide backup public notification. c. Provide traffic control and law enforcement in the event of an evacuation. d. Coordinate access to the plume exposure pathway EPZ. e. Provide security at EOC. Other county resources, including Fire Department, Public Works Department, Emergency Medical Services, and Department of Social Services, may be mobilized as described in the county emergency operations plan.		

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
A.5 AIKEN, BARNWELL, AND ALLENDALE COUNTIES, SOUTH CAROLINA (cont) Other county resources, including Fire Department, Public Works Department, Emergency Medical Services, and Department of Social Services, may be mobilized as described in the county emergency operations plan.		
A.6 DEPARTMENT OF ENERGY - SAVANNAH RIVER SITE A significant portion of the plume exposure pathway EPZ falls within the site boundary of the Savannah River Site (SRS). The United States Department of Energy - Savannah River Operations consists of lands owned or leased by the Federal government. As such, DOE-SR is responsible for the direction and control of all emergency response actions on the SRS. See memorandum of agreement between DOE - Savannah River Operations Office and Georgia Power Company, as assigned to SNC, (appendix 5).	**Annex 1.6 Department of Energy (DOE) – Savannah River Site (SRS) (SEP A.1.4)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non-SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	The wording was standardized and relocated to the Site Annex.

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Section A.7: VEGP has established agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment.	**EP B.6.2**: Agreements with 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. **Annex 2.3.3:** VEGP has established agreements with the Burke County Emergency Management Agency to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan, and details of services provided were moved to the Site Annex.
Section A.7: For radiological medical emergency training, agreements have been established with Tetra Tech.	**EP B.6.3**: 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 2.3.2**: Agreements are in place with the University of Alabama at Birmingham (UAB) Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency, to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and details of services provided were moved to the Site Annex

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Section A.8.1: GPC/SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.
Section A.8.2: 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 a capability to respond on a 24-hour-a-day basis.	**EP A.3.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section A.8.3: SNC 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**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section A.9: The emergency director is specifically authorized to request Federal assistance on behalf of VEGP under the provisions of the National Response Plan. Section C.2: Requests for Federal assistance are directed as needed by the emergency director.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Request federal assistance as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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A.10 CONCEPT OF OPERATIONS The emergency preparedness program for VEGP requires the coordinated response of several organizations. The emergency organization for VEGP is described in detail in section B of this plan. The emergency director is the key individual in the VEGP emergency organization; one of his nondelegable responsibilities is the decision to notify the NRC and authorities responsible for offsite emergency measures. The interfaces among the emergency organizations are shown on figure A-1.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section A.10.1: The emergency director will initiate the activation of the emergency response organization by contacting the states of Georgia and South Carolina, counties within the plume exposure pathway EPZ, the SRS, and the NRC. Section A.10.2.4: The State is notified of an emergency at VEGP by the VEGP emergency director. Section A.10.3.3: The state and counties are notified of an emergency at VEGP by the VEGP emergency director.	**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 off site emergency measures. The ED, at their discretion or when procedurally required, activates the ERO.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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A.10.1 Continuous Communication Capability The emergency director will initiate the activation of the emergency response organization by contacting the states of Georgia and South Carolina, counties within the plume exposure pathway EPZ, the SRS, and the NRC. All these organizations can be contacted 24 h a day. The state and local agencies have continuously manned communication links for the purpose of receiving notification of a radiological emergency. The SRS is a continuously operating facility and can be contacted at all times. The Federal agencies which may be requested by VEGP to provide assistance can be notified by contacting the NRC on a dedicated communication link, the Emergency Notification System (ENS) line.	**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. **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 counties surrounding VEGP 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>: • Burke - Burke County Emergency Management Agency <u>State of South Carolina</u>: • Emergency Management Division (EMD) <u>South Carolina County Authorities</u>: • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOR-SRS)</u> • DOE-SRS Operations Center	The wording was standardized and relocated to the SNC Standard Emergency Plan and Annex

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Section B: Initial staffing of the onsite emergency organization will be provided from personnel normally employed at the site.	**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.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 is shown in Tables 2, 3and 5. 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. **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. A copy of the analysis is maintained in the SNC document management system. **Annex Table 2.2.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The staffing table, documenting the results of the On-Shift Staffing Assessment required by Part 50 Appendix E.IV.9, is in Section 2, Table 2.2.A of the Site Annex.

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Figure B-1 Section B.1: The normal operating crew for two units includes a shift supervisor, licensed plant operators, and non-licensed plant operators. A shift manager is also on shift during operation (as defined in the Technical Specifications).	**EP B.1**: The normal onsite organization of a 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.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. **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. A copy of the analysis is maintained in the SNC document management system. **Annex Table 2.2.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The staffing table, documenting the results of the On-Shift Staffing Assessment required by Part 50 Appendix E.IV.9, is in Section 2, Table 2 of the Site Annex.
Section B.1: Personnel from the Chemistry and Health Physics, Maintenance, and Security Departments are also on site continuously.	**EP B.1**: The normal onsite organization of a 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.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. **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. A copy of the analysis is maintained in the SNC document management system. **Annex Table 2.2.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The staffing table, documenting the results of the On-Shift Staffing Assessment required by Part 50 Appendix E.IV.9, is in Section 2, Table 2.2.A of the Site Annex.
Section B.2: The emergency director has the responsibility to classify an event in accordance with the emergency classification system	**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 and relocated to the SNC Standard Emergency Plan.

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Section B.1: The organizational structure shown on figure B-1 represents the pool of personnel available on site during normal working hours.	**EP B.1**: The normal onsite organization of a 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.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. **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. A copy of the analysis is maintained in the SNC document management system. **Annex Table 2**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The staffing table, documenting the results of the On-Shift Staffing Assessment required by Part 50 Appendix E.IV.9, is in Section 2, Table 2 of the Site Annex.
Section B.2: For an NUE, the emergency director assigns responsibility for making the appropriate notifications and directing the proper response.	**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 and relocated to the SNC Standard Emergency Plan.

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Section B.2: If the event is classified as an Alert, the technical support center (TSC), operations support center (OSC), and Emergency Operations Facility (EOF) will be activated.	**EP H.1**: 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 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.
Section B.2: For a Site Area Emergency or General Emergency, the emergency organization and EOF will be fully activated. (Figure B-3)	**EP H.1**: 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 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 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.	**EP O.4**: SNC ERO personnel who are responsible for implementing this plan receive specialized training. **EP O.4.1**: ERO members will receive Emergency Plan training on an annual basis.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.1: Following an Alert or higher emergency declaration, the positions shown on figures B-2 and B-3 will be filled by VEGP or SNC personnel.	**EP Figures B.2.B, B.2.C, B.2.D and B.2.E** illustrate the standard Emergency Organization at the three sites. **EP H.1:** 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 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.

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Section B.2.1.1: The emergency director has the authority, management ability, and knowledge to assume the overall responsibility for directing VEGP staff in an emergency situation.	**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 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 and relocated to the SNC Standard Emergency Plan.
Section B.2.1.1: Initially this position (Emergency Director) will be filled by the shift manager or the shift supervisor if the shift manager can not be located expeditiously.	**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 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 and relocated to the SNC Standard Emergency Plan.
Section B.2.1.1: The responsibility for emergency direction will be transferred to the plant manager or an alternate after receiving an appropriate briefing and becoming familiar with the current status of events.	**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 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 and relocated to the SNC Standard Emergency Plan.

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Section B.2.1.1: Turnover with the accompanying briefing will include, but is not limited to, the following: Review of logs and status boards. Discussion with the incumbent including emergency classification, summary of events, offsite notifications, plant status, equipment status, outstanding orders, any noted deficiencies and completed checklist items. Discussion with staff, as needed.	**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 SNC Standard Emergency Plan maintains the commitment to staff the position and defines the responsibilities. Conduct of the turnover is completed in accordance with site-specific EPIPs.
Section B.2.2.2: Following relief (of ED) announcement will be made to staff of the transfer of responsibility	**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.	No equivalent Plan Statement. The SNC Standard Emergency Plan maintains the commitment to staff the ED initially by the Shift Manager and perform relief in accordance with Plan commitments. Conduct of the turnover is procedural level information.
Section B.2.1.1: They (Emergency Directors) will receive training as specified in table 0-2 of this plan prior to becoming qualified to fill this position.	**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 lesson plans, study guides, and written tests are contained in the ERO Training Program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section B.2.1.1: The emergency director manages the following activities for the duration of the emergency: Notification and communication: directs the notification of VEGP, SNC and GPC personnel and notifies and maintains open communications with offsite authorities regarding all aspects of emergency response. Emergency response facilities: 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: can modify emergency implementing procedures; may tailor the emergency organization to fit the specific staffing needs on a case by case basis.	**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 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section B.2.1.1: The emergency director 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. Request for Federal assistance. The decision to order site dismissal of non-involved personnel from the site at an Alert classification level. The decision to order non-involved personnel to proceed to a reception center and receive radiological monitoring.	**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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Section B.2.1.2.a: The TSC manager performs the following activities: Coordination of inputs and recommendations from technical and corrective action advisors. Direction of onsite emergency personnel involved in restoration of the plant to a safe condition. Technical assistance and operations guidance to control room personnel. Direction of TSC staff in analysis of problems, design and planning for temporary modifications, and development of temporary emergency operating procedures. Recommendation of protective actions to the emergency director based on plant conditions. Providing recommendations on emergency classifications to the emergency director.	**EP B.2.1.2**: 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.
Section B.2.1.2.b: The TSC support coordinator directs the clerical and logistic activities in the TSC.	**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.
Section B.2.1.2.c: 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.	**EP B.2.1.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section B.2.1.2.d: The maintenance supervisor manages the planning and coordination of repair, damage control, and plant modification activities.	**EP B.2.1.4**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.1.2.e: The operations supervisor analyzes problems associated with systems operations and provides recommendations for procedures for mitigating the emergency situation.	**EP B.2.1.3**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.1.2.h: The TSC security supervisor coordinates the security functions including accountability and site access control. When directed by the emergency director, will request assistance from civil law enforcement authorities, as required.	**EP B.2.1.14**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.1.3.a: The OSC manager directs composition of the teams to ensure that appropriately qualified personnel are assigned. He will also maintain communications with the teams that remain assigned to the OSC and monitor the status of their activities.	**EP B.2.2.1**: 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.

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Section B.2.1.2.f: The health physics supervisor is responsible for onsite and in-plant radiological controls.	**EP B.2.1.5**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.1.2.g: The chemistry supervisor 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.2.1.10**: 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.	The Chem Supervisor was replaced with Chemistry Support position reporting to the RP Supervisor in the TSC. This change was to facilitate the standardization of the ERO across the Fleet. The duties of the equivalent Chemistry Support position will remain the same.
Section B.2.1.3.b: The following emergency teams will be formed as necessary: Backup fire brigade. Search and rescue. First aid. Damage assessment. Damage control. Repair and modification. Field monitoring.	**EP B.2.2.7**: The following emergency teams may be formed by OSC personnel, as necessary: • Search and rescue. • Repair. • Post-accident sampling. • Internal survey. • Field monitoring.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The site provides a trained qualified fire brigade in accordance with the Fire Plan. The duties of the Fire Brigade are validated by staffing analyses performed in accordance with 10 CFR 50 Appendix E.IV.A.9. Back-up fire brigade support is provided by offsite fire companies as maintained by the Letters of Agreement.
Section B.3.b: Depending on the nature of the emergency, personnel from the Maintenance, Operations, Chemistry and Health Physics Departments will be directed to report to the OSC.	**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.

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Section B.2.1.3.b: Each team will be headed by a designated team leader, who will maintain communications with the OSC, TSC, or EOF.	**EP B.2.2.7**: OSC teams are headed by a designated team leader, who maintains communication with the OSC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.2: Table B-2 identifies by title the individuals who will fill the key emergency positions.	**EP Figures B.2.B through B.2.E** illustrate the ERO organization	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.2: A sufficient number of people are identified to ensure that all emergency positions on table B-2 will be filled.	**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, health physics, fire protection, and security.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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4. EOF STAFF • The EOF staff is described in Appendix 7	**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.1.D and B.1.E. **EP 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.	The commitment wording was standardized, the offsite ERO integrated into the Base Plan, and relocated to the SNC Standard Emergency Plan.

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Section B.2.3.1: Arrangements have been made to obtain support services from Bechtel Power Corporation and Westinghouse.	**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. **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. **EP C.4.2.3**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B.2.3.2: Agreements are in place with Tetra Tech, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance and training for injured personnel, including cases involving radioactive contamination.	**Annex 2.3.2**: Agreements are in place with the University of Alabama at Birmingham (UAB) Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.	The commitment wording was standardized and relocated to the Site Annex.

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Table B-1: All Section L.1: Personnel to perform first aid and decontamination will be available 24-h a day as identified in Section B, Table B-1.	**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. Annex Table 2.2.A	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table B-2: All	No Equivalent Plan Table	The table was not carried forward to the SNC Standard Emergency Plan. Specific responsibilities are maintained as discussed throughout this section of the Justification Matrix.
Section B: Figure B-1	**EP Figure P.1**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
C.1 STATE AND LOCAL GOVERNMENTAL SUPPORT The State of Georgia through the Georgia Emergency Management Agency (GEMA) has the lead agency responsibility for responding to emergency situations throughout Georgia. Under the procedure established by the Georgia Emergency Operations Plan (EOP), which was developed pursuant to the Governor's Executive Order, the Department of Natural Resources (DNR) radiological emergency response team in coordination with GEMA assesses the radiological conditions at the site of an incident and determines whether a state of emergency should be declared. The Governor of the State of Georgia or GEMA can declare an emergency based upon the assessment made by GEMA and/or DNR.	**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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. A more detailed description of state support is provided in the references to the left.

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The South Carolina agencies responsible for responding to a radiological emergency are the Office of the Adjutant General, Emergency Management Division (EMD) and the Department of Health and Environmental Control (DHEC). The Nuclear Emergency Planning Section within DHEC is given the primary role in responding to the technical aspects of a nuclear accident: assessment of the radiological consequences and provision of protective action guidelines to state and local authorities, through the EMD. The EMD is assigned primary responsibility for the planning effort and for coordinating the state response operations. Jointly with DHEC, EMD determines whether a state of emergency should be declared. Upon EMD's advising the Governor of South Carolina that a radiological emergency exists, the Governor declares an emergency.	**EP A.2.3 State of South Carolina** **EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. A more detailed description of state support is provided in the references to the left.

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Agreements are in place with the State of Georgia, Burke County, Georgia, and Aiken, Allendale, and Barnwell Counties in South Carolina, to provide available resources and equipment to support the mitigation and response to an emergency at Plant Vogtle 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 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.	**EP 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. **Annex 1.5.1 Burke County Georgia (SEP A.2.4)** The area within the plume exposure pathway (EPZ) in the state of Georgia falls within Burke County. The responsibility for overall radiological emergency response planning rests with the Chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. **Annex 1.5.2 Aiken, Barnwell, and Allendale Counties South Carolina (SEP A.2.4)** Most of the plume exposure pathway EPZ within South Carolina falls within the site boundary of the Savannah River Site (SRS). The United States Department of Energy is responsible for the direction and control of all emergency response actions on the SRS. Limited portions of Aiken, Barnwell, and Allendale counties are outside of the SRS but within the plume exposure pathway EPZ of VEGP. These counties are similarly organized, with the responsibility for overall radiological emergency response planning resting with the Chairman of the County Council in each case.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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C.2 FEDERAL GOVERNMENTAL SUPPORT In addition to coordination with State/county governmental entities in an emergency situation, VEGP may require assistance from certain Federal agencies in the areas of communications, radiological monitoring and laboratory analysis, transportation, and disaster relief. Requests for Federal assistance are directed as needed by the emergency director, and usually these requests are channeled through GEMA. The exceptions to this procedure are direct contacts between the VEGP Emergency Organization, the Nuclear Regulatory Commission (NRC), and Department of Energy, Savannah River (DOE-SR).	SECTION A: ASSIGNMENT OF RESPONSIBILITY **EP A.1 Primary Federal Organizations** **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. **EP 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. **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 commitment was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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C.2 FEDERAL GOVERNMENTAL SUPPORT (cont)	**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. **EP 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. **EP 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. **EP A.1.7 Environmental Protection Agency (EPA)** The EPA can assist with field radiological monitoring, sampling, and non-plant related recovery and reentry guidance.	

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C.2 FEDERAL GOVERNMENTAL SUPPORT (cont)	**Annex 1.6 Department of Energy (DOE) – Savannah River Site (SRS) (SEP A.1.4)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non-SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	
C.3 VEGP SUPPORT VEGP provides space, telephone communications, and administrative services for NRC and FEMA personnel at the TSC and EOF. Up to five NRC representatives can be accommodated at the TSC. In the EOF, space is provided for nine NRC personnel and one FEMA representative. NRC representatives may also be present in the control room.	**EP H.1.2**: The TSC is sized to accommodate ERO responders and NRC Representatives. **EP H.2.1**: The EOF is capable of accommodating designated SNC personnel and offsite local, state, and federal responders including NRC and FEMA. EP Figure H.2.A: EOF Layout **Annex 5.1.2**: The TSC provides plant management and technical support personnel with a facility from which they can assist plant operating personnel located in the control room during an emergency. The emergency director and NRC director will be co-located to ensure proper communications. **Annex Figure 5.1.A: TSC Layout** **EP Figure H.2.A: EOF Layout** **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 and Site Annex.

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Section C.3 Emergency notification system (ENS) telephones and commercial telephones are available in the control room, TSC, and EOF.	**EP F.1.4.1:** 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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The current design of the FTS system allows any phone with long distance capability be used as the specific phone as previously indicated. The specific locations of the phones are no longer needed.
Section C.3: Health physics network (HPN) telephones are available in the TSC and the EOF.	**EP F.1.4.2:** This communications line provides a communications link with the NRC to provide radiological information. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The current design of the FTS system allows any phone with long distance capability be used as the specific phone as previously indicated. The specific locations of the phones are no longer needed.
Section C.4: The onsite laboratory is equipped to analyze all normal in-plant samples. Section C.4: The equipment includes an ion chromatograph, gas chromatograph, gamma spectrometer, and other analytical support equipment.	**EP C.3:** The onsite laboratory/counting room at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis effort. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section C.4: Field samples will be taken by VEGP field monitoring teams. Section C.4: These teams will take direct radiation readings and will collect air samples, soil samples, vegetation samples, and water samples as directed by the dose assessment manager.	**EP I.7:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section C.4: The samples will be scanned with field instrumentation and will then be taken to VEGP for laboratory analyses.	**EP H.10:** SNC-operated nuclear power plants have designated a point as the location for receipt and analysis of field monitoring team environmental samples.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section C.4: Environmental samples will be collected by corporate personnel. These samples will be obtained from the current fixed environmental program.	**EP H.6.2**: SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment. **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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specification that the sampling was conducted by corporate personnel was eliminated. However, the commitment to maintain the program was maintained.
Section C.4: In-plant samples such as effluent and air samples will be analyzed using a gamma spectrometer located in the counting room.	**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. The specific wording to perform the analysis by gamma spectroscopy was eliminated to permit flexibility as new equipment is developed and processes revised. The commitment to maintain the ability to perform the analysis is maintained in the Plan.
Section D.1: The described emergency classes and the emergency action levels which determine them are agreed on by VEGP and State and local authorities. The emergency action levels will be reviewed by these parties 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. **Annex 3.1.1**: The described emergency classes and the emergency action levels that determine them are agreed on by SNC and state and local authorities. The emergency action levels will be reviewed by these (state and local) officials annually.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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Section D.2.1.2: VEGP ACTIONS (NUE) a. 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 h following classification of the emergency. b. Augment on-shift resources, as needed. c. Assess and respond to the event. d. 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 h.	**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 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.2.1**: 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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan was standardized to address overall response requirements rather than repeat listings by Classification Level. No change was made in the expectations/commitments for response.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section D.2.2.2: VEGP ACTIONS (Alert) a. 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 h following classification of the emergency. b. 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. c. Assess and respond to the emergency. d. Mobilize, and dispatch if necessary, onsite survey teams. e. Provide periodic plant status updates to offsite authorities. f. Provide periodic meteorological assessments to offsite authorities and, if any emergency releases are occurring, field monitoring team readings or dose estimates for actual releases. g. Activate the Emergency Response Data System for the affected unit within 1 h following declaration of the Alert. h. Escalate to a more severe class, if appropriate, or close out emergency class by verbal summary to offsite authorities followed by written summary within 8 h of closeout.	**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 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.2.1**: 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). **EP E.2.3**: The Emergency Response Data System ERDS will be initiated within one hour of the declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan was standardized to address overall response requirements rather than repeat listings by Classification Level. No change was made in the expectations/commitments for response.

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Section D.2.2.3: VEGP ACTIONS (SAE) a. 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 h following classification of the emergency. b. If necessary, provide protective action recommendations to State and local authorities. c. 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. d. Assess and respond to the emergency. e. Dispatch as necessary onsite and offsite survey teams. f. Dedicate individuals for plant status updates to offsite authorities and periodic press briefings. g. On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials.	**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 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.2.1**: 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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan was standardized to address overall response requirements rather than repeat listings by Classification Level. No change was made in the expectations/commitments for response.

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Section D.2.2.3: VEGP ACTIONS (SAE) (Continued) h. Provide meteorological data and field monitoring team readings or dose estimates to offsite authorities. i. Provide release and dose projections based on available plant condition information and foreseeable contingencies. j. Activate the Emergency Response Data System for the affected unit within 1 h following declaration of the Site Area Emergency. k. Escalate to General Emergency, if appropriate, or close out emergency class by briefing of offsite authorities followed by written summary within 8 h of closeout or class reduction.	**EP E.2.2.1**: 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). **EP E.2.3**: The Emergency Response Data System ERDS will be initiated within one hour of the declaration of an Alert or higher classification.	

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section D.2.2.4: VEGP ACTIONS (GE) a. 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 h following classification of the emergency. b. Provide protective action recommendations to State and local authorities based upon plant conditions and/or actual or projected releases of radioactive material. c. 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. d. Assess and respond to the emergency. e. Dispatch onsite and offsite survey teams. f. Dedicate an individual for plant status updates to offsite authorities and periodic press briefings. g. On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials.	**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 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.2.1:** 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). **EP E.2.3**: The Emergency Response Data System ERDS will be initiated within one hour of the declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan was standardized to address overall response requirements rather than repeat listings by Classification Level. No change was made in the expectations/commitments for response.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section D.2.2.4: VEGP ACTIONS (GE) (Continued) h. Provide meteorological data and field monitoring team readings or dose estimates to offsite authorities for actual releases. i. Provide release and dose projections based on plant condition and foreseeable contingencies. j. Activate the Emergency Response Data System for the affected unit within1 h following declaration of the General Emergency. k. Close out emergency class by briefing of offsite authorities followed by written summary within 8 h of closeout or class reduction.	**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 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.2.1**: 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). **EP E.2.3**: The Emergency Response Data System ERDS will be initiated within one hour of the declaration of an Alert or higher classification.	
Section D.3: The procedure by which the plant operational staff classifies emergencies is EPIP 91001-C, "Emergency Classification And Implementing Instructions."	**Annex Appendix C**	Fleet functional EPIPs to be developed to support the SNC Standard Emergency Plan as part of the approval process. Procedural direction for Classification will be provided. The transition to the revised EPIPs will be conducted in accordance with the approval of the Plan by the Commission and the provisions of 10 CFR 50.54(q).

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Section D.3: The SNC policy is that once an emergency classification is made, it cannot be downgraded to a lower classification.	**EP D.2.5**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section D.3: Termination criteria contained in the Emergency Plan Implementing Procedures shall be completed for an event to be terminated.	**EP D.2.5**: 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 commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES This section describes the plan for notification of onsite and offsite Vogtle Electric Generating Plant (VEGP) response personnel and State, local, and Nuclear Regulatory Commission (NRC) emergency response centers.	**EP E.1 Notification Methodology** **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 off-site authorities. The primary notification method will be by a dedicated communications system.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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E. NOTIFICATION METHODS AND PROCEDURES (cont)	**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). The methods and forms used for notifying state and county authorities are site-specific, and detailed in plant specific Emergency Plan Implementing Procedures (EPIPs).	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP E.1.1:** NRC will be notified by the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP E.1.1:** 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP E.1.1:** 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP E.2 Notification of Personnel** **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 signal, 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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E. NOTIFICATION METHODS AND PROCEDURES (cont)	**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 commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP E.2.2.1:** 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).	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES (cont)	**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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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E. NOTIFICATION METHODS AND PROCEDURES (cont)	**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 commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E. NOTIFICATION METHODS AND PROCEDURES (cont)	**EP E.2.4 Notification of Other Federal Agencies** Notification of other federal agencies will be made in accordance with site-specific procedures.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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E. NOTIFICATION METHODS AND PROCEDURES (cont)	**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. 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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Actual methods and sequencing of notifications are covered in appropriate implementation procedures (Procedure 91002-C, Emergency Notifications, and Procedure 91204-C, Emergency Response Communications).	**Annex Appendix C**	Fleet functional EPIPs to be developed to support the SNC Standard Emergency Plan as part of the approval process. Procedural direction for Notification will be provided. The transition to the revised EPIPs will be conducted in accordance with the approval of the Plan by the Commission and the provisions of 10 CFR 50.54(q).
Section E: Tables E-1 and E-2 and figure E-1	**EP F Table 5**	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: The emergency director is responsible for classifying an event (section D) into the appropriate emergency class and then notifying onsite and offsite personnel accordingly.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications. **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 site-specific procedures.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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Section E.1: The primary means for notification of personnel within the protected area is the public address (PA) system. Section E.1: Upon declaration of a Notification of Unusual Event (NUE), an Alert, a Site Area Emergency, or a General Emergency, the emergency director will order an announcement of the emergency.	**EP E.2.1**: 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 commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: This notification will involve sounding the appropriate plant emergency alarm signal, making appropriate announcements over the plant public address system, activation of the recall system and using appropriate plant telephone system. Section F.7: As described in section E, notification of onsite personnel at VEGP will be completed through a combination of public address system announcements, tone signals, and proceduralized telephone calls.	**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 site-specific 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 commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: The supervisor nuclear security is responsible for notifying Plant Wilson, the training center, the visitors center, and recreation park staff.	**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 (EPIPs).	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

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Section E.1: Security will activate the site siren to notify personnel on site, outside the protected area of an evacuation order.	**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 site-specific 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 E.2.1**: Notificaticn 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).	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: The Security Department will also be responsible for evacuating all visitors and nonessential personnel from the Plant Vogtle Recreational Park and for the verification of the evacuation of all nonessential personnel from Plant Wilson, the training center, and the remaining areas inside the owner controlled area.	**EP E.2.1**: Notificaticn 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).	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: Visitors within the protected area are escorted by a permanently badged individual.	**EP E.2.1**: Visitors within the protected area are escorted by a permanently badged individual.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section E.1: Plant and contractor personnel will be trained on actions to be taken in an emergency prior to their work assignment. Otherwise, they must be escorted by an individual who has been trained in emergency procedures.	**EP O.4.8:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The general training requirements include visitor control. SNC provides emergency preparedness training appropriate to the individual's responsibilities as required by Appendix E. General employee training and specialized training are provided as required. The visitor program is maintained as part of the approved Security Plan ensuring all non-badged individuals receive the appropriate training.
Section E.1: The training includes instructions on the methods of personnel notification and the required personnel actions in the event of an emergency.	**EP O.4.8:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: Notification of the corporate staff is performed in accordance with NMP-EP-002 / NMP-GM-036.	**Annex Appendix C**	Fleet functional EPIPs are to be developed to support the SNC Standard Emergency Plan as part of the approval process. Procedural direction for Notification will be provided. The transition to the revised EPIPs will be conducted in accordance with the approval of the Plan by the Commission and the provisions of 10 CFR 50.54(q).
Section E.1: The notification procedure includes notification of Emergency Response Organization Personnel (ERO) not on site.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E.1: ERO members will be notified by means of an autodialer system activated by on-shift personnel.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section E.1: In addition to those personnel recalled; Operations, Maintenance, and Security personnel required to report shall be contacted by on-shift personnel from their own respective department.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E.2: The emergency director is responsible for the completion of the Initial Message Form (see figure E-1 for a sample form) and for the notification of the following within 15 min of the declaration of an emergency: • Georgia Emergency Management Agency Emergency Operations Center (EOC) communicator. • Burke County Emergency Operations Center (EOC) communicator. • South Carolina warning point. • Aiken County sheriff dispatcher. • Barnwell County sheriff dispatcher. • Allendale County central dispatch. • Department of Energy-Savannah River (DOE SR) Operations Cente communicator.	**EP E.2.2.1**: 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). **Annex 4.1.1 Notification Process** <u>State of Georgia</u>: • Georgia Emergency Management Agency (GEMA) <u>Georgia County Authorities</u>: • Burke - Burke County EMA <u>State of South Carolina</u>: • Emergency Management Division (EMD) <u>South Carolina County Authorities</u>: • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOR-SRS)</u> • DOE-SRS Operations Center	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section E.2: A dedicated telephone system, known as the Emergency Notification Network (ENN), will normally be used to accomplish these notifications.	**EP E.2.2**: A dedicated ENN will normally be used to accomplish state and local notifications.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section E.4: It is the responsibility of VEGP to provide adequate means for notifying the public, or to be assured that such means are provided.	**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 means exist to carry out this purpose rests with Southern Nuclear Operating Company. **Annex 4.2**: Within the 10 mile Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section E.4. Administrative and physical means have been established for providing early initial warning and subsequent clear instructions to the populace within the plume exposure pathway emergency planning zone (EPZ).	**Annex 4.2**: Two approved, independent, complementary alerting systems are installed in the EPZ to alert the public, consisting of a network of fixed sirens or tone-alert radios. Provisions for transient population notification are also included in state and county plans. In the event of an emergency declaration at the VEGP, DOE-Savannah River Site has agreed to provide prompt notification of all persons on the SRS within VEGP's plume exposure pathway EPZ.	The commitment wording was standardized and relocated to the Site Annex.
Section E.4: The alert notification system, except for the Savannah River Site (SRS), is described in appendix 3; this system has the capability to complete the initial alert notification of residents within the plume EPZ in about 15 min.	**EP E.2.5.2**: 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. **Annex 4.2**: Within the 10 mile Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section E.5: The emergency director is responsible for the completion of a follow up emergency message.	**EP E.2.2.3**: The Emergency Director is responsible for the completion of a follow-up emergency message.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section E.6: All notification messages must be verified.	**EP E.2.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.1.1: Commercial telephones and a Southern Company Communications in Atlanta provide backup for the dedicated telephone circuits.	**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 onsite and one offsite communications system is maintained, each with a backup power source to ensure continuous communications. **Annex 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 and Site Annex.
Section E.2: Figure E-1 presents the sample initial message form for making notifications to these response centers. This form has been developed in conjunction with appropriate offsite agencies.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E.6: All notification messages must be verified. When the ENN is used, verification is accomplished by roll call.	**EP E.1.1**: These notifications include a means of verification or authentication. **EP E.2.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section E.3: The emergency director is responsible for ordering notification calls to the DOE-SR Operations Center by ENN and to the NRC Operations Center by the Emergency Notification System (ENS).	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications. **EP E.2.3**: The NRC is notified via the Emergency Notification System (ENS). **Annex 5.3.1:** The primary means of communication between VEGP, the states of Georgia and South Carolina, as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site, is the Emergency Notification Network (ENN).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section E.2: The emergency director is responsible for the completion of the Initial Message Form (see figure E-1 for a sample form) and for the (initial notification) within 15 min of the declaration of an emergency.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E.4: VEGP 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.2.6**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E: Table E-1.	**EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section E: Table E-2: All	**EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.1.1: The primary means of communication between the VEGP and the State of Georgia is the Emergency Notification Network (ENN).	**Annex 5.3.1**: The primary means of communication between VEGP, the states of Georgia and South Carolina, as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site, is the Emergency Notification Network (ENN).	The commitment wording was standardized and relocated to the Site Annex.

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Section F.1.1: Extensions for this system are located in the control room, technical support center (TSC), emergency operations facility (EOF).	**EP F.1.2**: 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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.1.1: The plant telephone backup power is supplied by a battery system.	**EP F.1.1**: Reliable primary and backup means of communication have been established.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.1.1: An Administrative Decision Line (ADL) connects the EOF, SRS Operations Center, the GEMA FEOC, the SEOCs of both states and the three South Carolina counties.		
Section F.1.1: The ENN system is available and manned 24 h per day. Section F.1.2: The ENN is available and manned 24 h per day. Section F.3: The ENN system is available and manned 24 h per day.	**EP F.1.2**: SNC-operated plants maintain the capability to make initial notifications to the designated offsite agencies 24 hours per day. State and county warning points are continuously staffed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section F.2.1: The primary means of communication between the VEGP and South Carolina is the ENN, a dedicated telephone system from the plant to South Carolina emergency response agencies. Section F.2.2: The primary means of communication between VEGP and the South Carolina counties is the ENN, a dedicated telephone system which includes the plant and Aiken, Barnwell, and Allendale County emergency response agencies.	**Annex 4.1.1 Notification Process** State of Georgia: • Georgia Emergency Management Agency (GEMA) Georgia County Authorities: • Burke County Emergency Management Agency State of South Carolina: • Emergency Management Division (EMD) South Carolina County Authorities: • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch Department of Energy – Savannah River Site (DOE-SRS) • DOE-SRS Operations Center **Annex 5.3.1:** The primary means of communication between VEGP, the states of Georgia and South Carolina, as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site, is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia, the South Carolina Warning Point in the SEOC, and the Burke County EOC; and the Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The commitment wording was standardized and relocated to the Site Annex.

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Section F.1.1: Commercial telephones and a Southern Company Communications in Atlanta provide backup for the dedicated telephone circuits. Section F.1.2: Commercial telephones and the Burke County Emergency Management Agency (EMA) radio network provide backups for the ENN. Section F.2.1: Commercial telephones provide the backup for the ENN. Section F.2.2: Commercial telephone is the backup means of communication. Section F.3: Commercial telephones provide a backup for the ENN.	**EP F.1.3**: At least one on-site and one offsite communications system is maintained, each with a backup power source to ensure continuous communications. **Annex 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 and Site Annex.
Section F.1.2: The primary means of communication between VEGP and Burke County is the ENN.	**Annex 5.3.1**: The primary means of communication between VEGP, the states of Georgia and South Carolina, as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site, is the Emergency Notification Network (ENN).	The commitment wording was standardized and relocated to the Site Annex.
Section F.3: The primary means of communication between VEGP and the Savannah River Site (SRS) is the ENN.	**Annex 5.3.1:** The primary means of communication between VEGP, the states of Georgia and South Carolina, as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site, is the Emergency Notification Network (ENN).	The commitment wording was standardized and relocated to the Site Annex.
Section F.1.2: Commercial telephones and Southern Company Communications provide backups for the ENN..	**Annex 5.3.2:** Commercial telephones or land lines provide backup for the ENN	The commitment wording was standardized and relocated to the Site Annex.

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Section F.1.1: The ENN system is available and manned 24 h per day.	**EP F.1.2**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.1.2: At the plant, the emergency director is in charge of communications to the Burke County EOC.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications. **Annex 4.1.1**: State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP to be notified within 15 minutes of the declaration of an emergency condition are: Georgia County Authorities: • Burke - Burke County Emergency Management Agency	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section F.2.1: An ADL connects the EOF, the SRS Operations Center, the GEMA FEOC, the SEOCs of both states, and the three South Carolina counties.	No corresponding statement in the Plan or Annex.	Communication line is utilized by offsite agencies and is listed in the Offsite Emergency Plan. As the line is not utilized by SNC for official notification purposes, it is not included in the SNC Standard Emergency Plan or Annexes
Section F.3: At VEGP, the emergency director is in charge of communications to the SRS Operations Centers.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Notifications of offsite agencies and approval of state, local, and NRC notifications. **Annex 5.3.1:** The primary means of communication between VEGP, the states of Georgia and South Carolina, as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site, is the Emergency Notification Network (ENN).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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Section F.4: The primary means of communication between VEGP and the Nuclear Regulatory Commission (NRC) is the emergency notification system (ENS).	**EP F.1.4.1**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.4: Emergency notification system phones are located in the control room, TSC, and EOF. Section F.4: Health physics network phones are located in the TSC and EOF.	**EP F.1.4.2**: This communications line provides a communications link with the NRC to provide radiological information. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The design of the current FTS system allows any phone with long distance capability to be linked to any FTS bridge. Specific phone locations are no longer needed.
Section F.4: In the TSC, the HPN telephone is located in the communications room and will be attended by VEGP personnel until an NRC representative arrives.	**EP B.2.1.12**: The HPN Communicator reports to the RP Supervisor and is responsible for providing radiological and environmental information to the NRC on the HPN Line. **EP F.1.4.2**: This communications line provides a communications link with the NRC to provide radiological information.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The design of the current FTS system allows any phone with long distance capability to be linked to any FTS bridge. Specific phone locations are no longer needed.
Section F.4: The Emergency Response Data System (ERDS) is the primary means by which the transmission of plant parameters occurs. Section H.4.4: In accordance with the requirements of 10 CFR 50, Appendix E, Section VI and NUREG 1394, Revision 1, means are provided to transmit critical plant variables from the onsite computer system to the Nuclear Regulatory Commission Operations Center via a dedicated communications link.	**EP E.2.3:** The Emergency Response Data System ERDS will be initiated within one hour of the declaration of an Alert or higher classification. **EP F.1.4.8**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.4: Commercial telephone lines and the Southern Company Communications serve as backups to the ENS and HPN.	**EP F.1.4**: Commercial telephone lines serve as the backup to the ENS and other FTS lines.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section F.5: Communications among the control room, TSC, OSC, and EOF can be completed using dedicated telephone circuits, normal plant telephones, and radio, using the plant network.	**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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.5: The radio system is also used for communications with the radiological monitoring teams.	**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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section F.5: Communications available at each emergency response facility are as follows: CONTROL ROOM Dedicated telephone circuits to the TSC, EOF, and OSC (one for each location). The ENN. The NRC ENS. Normal plant phones. In-plant radio console Sound-powered phones. Plant page system. Commercial dial. Southern Company Communications. Facsimile. Section F.5: TECHNICAL SUPPORT CENTER Dedicated telephone circuits to the control room, EOF, and OSC (one to each location). The ENN. The ENS. Two FTS ERDS lines. The HPN. Facsimile. Normal plant phones. In-plant radio. Sound-powered phones. Plant page system. Field team radio remote. Additional FTS lines. Commercial dial. Burke County radio remote. South Carolina radio remote. Southern Company Communications.	**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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section F.5: OPERATIONS SUPPORT CENTER Dedicated voice telephone circuits to the EOF and TSC (one for each location). Normal plant phones. In-plant radio transceiver. Plant page system. Commercial dial.	**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. **EP F Table 5**	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
Section F.5: EMERGENCY OPERATIONS FACILITY Dedicated telephone circuits to the control room, OSC, and TSC (one each to the control room, OSC, TSC). The ENN. The ENS. The HPN. Facsimile. Normal plant phones. Commercial dial. Additional FTS lines. Southern Company Communications. ENC hotline. Field team radio remote. ADL prearranged conference.	**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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section F.5: Joint Information Center Southern Company Communications. GPC general office dial. Commercial dial. VEGP dial. Facsimile.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.6: Communications with Columbia Doctors Hospital or the Burke County Hospital will be by commercial telephone. Radio contact through the Burke County EOC serves as a backup.	**EP F.2** Medical Emergency Communications Communications have been established between the primary and backup medical hospitals and transportation services with SNC-operated plants.	

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section F.8: Communication channels with the State of Georgia, Burke County, the State of South Carolina, Aiken County, Barnwell County, Allendale County, SRS, and the NRC will be tested monthly, using the extensions in the control room, TSC, and EOF.	**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. • 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.8: Emergency Response Data System computers are tested once per quarter, or as dictated by NUREG 1394.	**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.
Section F.8: Communications procedures and systems are also tested biennially during a communications drill.	No specific Plan Statement is provided.	The Plan specifies tests for existing systems consistent with NUREG-0654 Revision 1. The Plan commits to a drill program that will include communications capabilities.
Section F.8: The communication system for communicating between the TSC, EOF, and VEGP field monitoring teams is tested quarterly.	No specific Plan Statement is provided.	The Drill programmed maintained will ensure specific testing of the Field Monitoring systems without a specific communications test requirement.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section F.8: Communications systems that link the control room, TSC, EOF, State EOC's and GEMA FEOC, County EOC's and SRS EOC are tested quarterly.	**EP F.3**: Communications with state and local governments within the plume exposure pathway will be tested monthly.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section F.9: In-plant monitoring teams will communicate with the Health Physics or OSC communicator at least every half hour per Procedure 91302-C, In-Plant Sampling and Surveys.		Specific communications frequencies between the OSC and dispatched response teams are event specific and determined on a case by case basis for the event. A Plan commitment is not appropriate and could actually hinder effective response.
Section F.9: Field monitoring teams will communicate with the EOF or TSC communicator at least every half hour per Procedure 91303-C, Field Sampling and Surveys.		Specific communications frequencies between the OSC and dispatched response teams are event specific and determined on a case by case basis for the event. A Plan commitment is not appropriate and could actually hinder effective response.
Section F.9: The field monitoring team radio covers the entire plume exposure pathway EPZ.		The capability to dispatch teams and for those teams to function is maintained in the SNC Standard Emergency Plan. This statement of radio coverage is not required. The required drills and equipment tests ensure the capability to effectively communicate is maintained.
Section F.9: Remote stations for communicating with the field monitoring teams are located in the TSC and the EOF.	**EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table F-1: All	**EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G: Georgia Power Company (GPC) and Southern Nuclear Operating Company (SNC) in coordination with State and local officials will provide information to the public at least annually regarding how they will be notified and what their actions should be in an emergency.	**EP G.8**: 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 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.
Section G: The means for disseminating this information include information on siren poles, signs, notices in public areas, and publications distributed at least annually.	**EP G.8**: 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.
Section G: All materials will be updated as necessary and printed material distributed annually. Section G: Information is distributed annually to residents in the plume exposure pathway emergency planning zone (EPZ) through an emergency information calendar entitled, "The Plant Vogtle Emergency Information Calendar".	**EP G.8**: 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 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. Based on experience, the most effective means of communicating with the EPZ citizens may no longer be the calendar. The SNC Standard Emergency Plan maintains the commitment to provide the required information and allows the flexibility to provide other means of distributing the information.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G: The text of the calendar addresses the following subjects: Summary - What to do if you are warned of an emergency at Plant Vogtle. Emergency response plans. When an emergency will affect you. How you will be told about an emergency. What actions you might need to take. What if you are told to shelter. What if you are told to evacuate. Steps to be prepared for an emergency. Steps for using map and chart of evacuation area. Steps to take to get ready for the trip. Classes of accidents. Where to get more information or other help. What radiation is. Special needs card. A joint message from Southern Nuclear Operating Company, the states of Georgia and South Carolina, and Burke, Aiken, Allendale, and Barnwell counties explaining the contents of the calendar, asking that they read the emergency information, requesting that they keep it in a handy place, and giving contacts for further information.	**Annex 2.3.6**: 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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G.1: Signs and notices providing information to transients are placed in public recreation areas as well as other public places in the plume EPZ such as siren poles, the Plant Vogtle Visitors Center, and in commercial establishments; for example, motels, restaurants, and gas stations. Section G.1: Finally, a Vogtle emergency information brochure will be made available within the EPZ to transients at commercial establishments, churches, motels, hunting clubs, Creek and Cawden Plantations, the Plant Vogtle Visitors Center, and through residents whose land is used by nonresidents Section G.1: Outside the EPZ, the brochure will be made available to timber company offices. Section G.1: (Outside the EPZ, the brochure will be made available) to the Waynesboro Office of the Agriculture Stabilization & Conservation Service for distribution to farmers who farm, but do not reside, in the EPZ.	**Annex 2.3.6:** 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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G.1: This material will include the following information: How people will be warned of an emergency. What to do if warned of an emergency. A list of radio and television stations to tune to for further information.	**Annex 2.3.6**: 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.
Section G: In addition, public information personnel provide public education programs to the community.	**EP G.8**: 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 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.
Section G: All materials used to provide emergency planning information to the public (information brochures, advertisements, signs and notices, etc.) will be reviewed by GPC and SNC on an annual basis.		The SNC Standard Emergency Plan and Site Annex retain the commitment to provide the information. The mechanics of performing the commitment are best controlled by administrative procedures.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G.2: The JIC will accommodate public information representatives from SNC, GPC, State, local and Federal response agencies.	**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 has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H and the Emergency Communications portion of Section G of the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	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 commitment wording has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H and the Emergency Communications portion of Section G of the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G.2: GPC will utilize the Corporate Headquarters Building at 241 Ralph McGill Boulevard, NE, Atlanta, Georgia, to serve as a temporary information center until the JIC in Waynesboro is activated.	**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. Joint Information Center (JIC) The VEGP JIC is located in Waynesboro, 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 public and media inquiries. Details of the JIC for VEGP 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. Annex 5.1.6: 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 VEGP are in section H of the Emergency Plan. If the decision is made to move the JIC function forward to a near site location from the Atlanta location, the Atlanta facility will maintain media	The commitment wording 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 Vogtle Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	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 commitment wording has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H and the Emergency Communications portion of Section G of the SNC Standard Emergency Plan.
Section G.2: The Company spokesperson position is filled by individuals who, under normal operations, hold supervisory positions on the SNC Corporate or plant staff and are technically and professionally qualified to perform this important function.	**EP B.3.2.8**: 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 PID posted on that status.	The SNC Standard Emergency Plan provides an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.2: The Company spokesperson has access to all information and telephone contact with the emergency director through the EOF Manager. He briefs the media on plant status and Company emergency activities.	**EP B.3.2.8**: 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 PID posted on that status.	The SNC Standard Emergency Plan provides an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.2: In addition, technical briefers have been designated who can provide general and background information.	**EP B.3.2.9**: 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, the ERF Communicator, ENN Forms, and direct contact with the EOF Manager.	The SNC Standard Emergency Plan provides an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section G.3: GPC and SNC will provide timely and accurate information to local, State and federal agencies.		The SNC Standard Emergency Plan and Site Annex provide an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.4: In an emergency, a rumor control network will be activated.	**EP B.3.2.6**: 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.
Section G.4: News media will be monitored to detect and respond to misinformation.		The SNC Standard Emergency Plan and Site Annex provide an updated structure and functional capability for Information Management to the public in the event of a classified emergency. The new system is described and supported separately in the technical analysis of this submittal.
Section G.5: GPC will offer an annual program to acquaint the news media with the methodology for obtaining information about overall emergency preparedness at Vogtle. Training will include information about the plant, radiation, and the role of the emergency news center.	**EP G.2:** 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.1 EMERGENCY FACILITIES 1. TECHNICAL SUPPORT CENTER (TSC) The TSC has been established consistent with NUREG 0696, as described below. The TSC is shared by both units and is located adjacent to the Unit 1 control room at el 220 ft. The layout of the TSC and location of key personnel are shown in figure H-1.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
The TSC covers about 5900 ft^2 and can accommodate 25 people.	**EP H.1.2**: The TSC is sized to accommodate ERO responders and NRC Representatives. **Annex Figure 5.1.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
The TSC has been established consistent with NUREG 0696.	**EP 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 Emergency Notification System (ENS). • Notification and update of the NRC via Health Physics Network (HPN).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The wording was updated to provide more specific capabilities for the facility.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
The TSC has been established consistent with NUREG 0696. (cont)	**EP H.1.2:** The TSC is the onsite 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 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 and airborne radioactivity inside the TSC 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Walking time from the TSC to the control room is less than 2 min.		Based on drill/exercise evidence and the ongoing improvement in inter-facility communication capabilities since the requirement for walking time was developed the effectiveness of the facility is not impacted by walking proximity. While the statement is removed based on demonstration the walking time is no longer a needed commitment the physical location of the TSC has not been changed as a result of this submittal.
The TSC provides plant management and technical support personnel (including five Nuclear Regulatory Commission (NRC) personnel) with a facility from which they can assist plant operating personnel.	**EP H.1.2:** The TSC is sized to accommodate ERO responders and NRC Representatives. **Annex 5.1.2:** The TSC provides plant management and technical support personnel with a facility from which they can assist plant operating personnel located in the control room during an emergency. The emergency director and NRC director will be co-located to ensure proper communications.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
The emergency director and NRC director will be located in close proximity to ensure proper communications.	**Annex 5.1.2:** The Emergency Director and NRC director will be co-located to ensure proper communications.	The commitment wording was standardized and relocated to the Site Annex.
The TSC is equipped with a computer system, which provides source term and meteorological data and technical data displays to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any significant release of radioactivity to the environment. Section H.1.1: In addition, the TSC has ready access to plant records.	**Annex 5.1.2:** The TSC is equipped with a computer system, which provides source term and meteorological data and technical data displays to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any significant release of radioactivity to the environment. In addition, the TSC has ready access to plant records, some of which are stored in the TSC and some in the control room.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
The TSC structure and ventilation system are designed to ensure that the TSC personnel are protected from radiological hazards.	**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**: TSC structure and ventilation system are designed to ensure that the TSC personnel are protected from radiological hazards. The TSC ventilation is a separate system and not a part of the control room ventilation system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
The air supply is filtered by high efficiency particulate air (HEPA) and charcoal filters.	**Annex 5.1.2**: The air supply is filtered by high efficiency particulate air (HEPA) and charcoal filters.	The commitment wording was standardized and relocated to the Site Annex.
During accident conditions the filtration system provides filtered cooling air meeting the following exposure design criteria: 5 rem - whole body; 30 rem - thyroid; and 75 rem - skin dose for a 30 day occupancy.	**Annex 5.1.2**: During accident conditions the filtration system provides filtered cooling air meeting the following exposure design criteria: 5 rem - whole body; 30 rem -thyroid; and 75 rem - skin dose for a 30 day occupancy.	The commitment wording was standardized and relocated to the Site Annex.
The air filtration system will be placed in service when required by Procedure 91110-C, Duties of the Health Physics Supervisor (TSC).	**Annex 5.1.2**: The air filtration system will be placed in service when required by site procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. The procedure reference is deleted. The SNC Standard Emergency Plan retains the commitment to provide the appropriate radiological protection of TSC responders.
The ventilation system can be manually controlled from the TSC.	**Annex 5.1.2**: The ventilation system can be manually controlled from the TSC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. The procedure reference is deleted. The SNC Standard Emergency Plan retains the commitment to provide the appropriate radiological protection of TSC responders.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
The air filtration system will also be placed in the filtration mode automatically whenever the control room HVAC is isolated.	**Annex 5.1.2:** The air filtration system will also be placed in the filtration mode automatically whenever the control room HVAC is isolated.	The commitment wording was standardized and relocated to the Site Annex. The specific mechanical functioning of the ventilation system is not required in the Emergency Plan.
The air filtration system, when activated, automatically processes all of the outdoor air together with approximately 25 percent of the recirculated air through the filtration unit.	**Annex 5.1.2:** The ventilation system will be designed to maintain exposures to occupants at or below 5 rem total effective dose equivalent (TEDE) for the duration of the accident.	The commitment wording was standardized and relocated to the Site Annex. The specific mechanical functioning of the ventilation system is not required in the Emergency Plan.
In the initial actuation of the air filtration system, a parallel signal is initiated to deenergize the onsite technical support center battery room and toilet exhaust fans and dampers.	**Annex 5.1.2:** The continuous influx of outdoor air with no positive exhaust is designed to pressurize the area to 0.125 in. WG.	The commitment wording was standardized and relocated to the Site Annex. The specific mechanical functioning of the ventilation system is not required in the Emergency Plan.
The continuous influx of outdoor air with no positive exhaust is designed to pressurize the area to 0.125 in. WG.	**Annex 5.1.2:** The continuous influx of outdoor air with no positive exhaust is designed to pressurize the area to 0.125 in. WG.	The commitment wording was standardized and relocated to the Site Annex. The specific mechanical functioning of the ventilation system is not required in the Emergency Plan.
When the TSC is activated, there will be a portable radiation monitor placed in the TSC to alert personnel of the presence of high radiation levels.	**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 and airborne radioactivity inside the TSC while in use. In addition, potassium iodide (KI) is available for use.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition, portable radiation monitors are available for personnel in transit from the TSC to other areas.	**Annex 5.1.2:** In addition, portable radiation monitors will be available for personnel in transit from the TSC to other areas.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
The TSC normal lighting is supplied from normal offsite power through a motor control center backed up by the security diesel generator.	**Annex 5.1.2**: The TSC normal lighting is supplied from normal offsite power through a motor control center backed up by the security diesel generator.	The commitment wording was standardized and relocated to the Site Annex.
Self-contained, battery-operated emergency lighting is provided as a backup to the normal lighting for ingress and egress only.	**Annex 5.1.2**: Self-contained, battery-operated emergency lighting is provided as a backup to the normal lighting for ingress and egress only and is located in the TSC hallway.	The commitment wording was standardized and relocated to the Site Annex.
Power for TSC vital equipment is provided from either the motor control center backed up by the security diesel generator or from a battery-backed uninterruptible power supply system.	**Annex 5.1.2**: Power for TSC vital equipment is provided from either the motor control center backed up by the security diesel generator, 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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Separate copies of the following documents will be stored in the control room complex and in the TSC: Technical Specifications. Plant Operating Procedures. Final Safety Analysis Report. Emergency Plan. Emergency Plan Implementing Procedures. The following documents are available in Vogtle Electric Generating Plant (VEGP) Document Control: Plant operating records. • Plant Review Board records and reports. • 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. • Technical Specifications. • Final Safety Analysis Report. • Emergency Plan. • Records needed to perform the functions of the emergency operating facility (EOF) when it is not operational.	**Annex 5.1.2:** The records storage is shared by the control room and the TSC. 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 but are not limited to: • 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 above records are updated as necessary to ensure currency and completeness.	The commitment wording was standardized and relocated to the Site Annex.

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2. OPERATIONS SUPPORT CENTER (OSC) The OSC has been established to be consistent with NUREG 0696 as described below. The OSC is located on the second floor of the maintenance building in the lunch room. The lunch room is located in the southeast corner of the second floor and is accessed via the south stairwell or the east stairwell. Figure H-2 defines the OSC layout and shows access stairwells. The OSC is where operational support personnel (such as instrument technicians, engineers, mechanics, electricians, chemical/radiation technicians, equipment operators, incoming shift personnel, etc.) assemble to aid in the response to an emergency.	**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. **Annex 5.1.3**: Operations Support Center The OSC is located in the Maintenance Building. The OSC is where operational support personnel (such as instrument technicians, engineers, mechanics, electricians, chemical/radiation technicians, equipment operators and incoming shift personnel) assemble to aid in the response to an emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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The OSC has been established to be consistent with NUREG 0696.	**EP H.1.3:** 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, System Operators, 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The wording was updated to provide more specific capabilities for the facility.
Members of the team will be selected by the OSC manager based on the type of work to be conducted.	**EP B.2.2.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Preparations for dispatching maintenance teams to the plant will include the following steps as described in Procedure 91104, Duties of the OSC Manager, and Procedure 91202, Activation and Operation of the OSC. A. Members of the team will be selected by the OSC manager based on the type of work to be conducted. B. The work will be preplanned by the maintenance personnel. C. Drawings, manuals, and other procedures will be obtained from the document control room or maintenance building. If the equipment manuals are not available in either facility, a complete set of manuals is available in the service building. D. Dosimetry will be obtained from the OSC emergency kit or at the HP control point. E. Protective clothing and equipment, radios, and other supplies will be obtained from the emergency kit stored in the OSC or the health physics control point. All equipment will be checked before leaving the OSC or health physics control point. F. A radiation work permit (RWP) will be completed in accordance with standard practices at the health physics control point, TSC, or OSC. Standard procedures include emergency RWPs. Procedure 91301-C, Emergency Exposure Guidelines, provides instruction for emergency exposures. G. The tools and equipment needed to conduct repairs and take corrective actions will be determined. This...	**EP B.2.2.1:** 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. **EP H.1.3:** The OSC has been established to provide an area for coordinating and planning activities and staging of personnel and equipment. The OSC responders include groups such as Instrument and Control Technicians, Mechanics, Electricians, Nuclear Chemistry and RP Technicians, System Operators, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment to perform OSC operations is maintained unchanged by the SNC Standard Emergency Plan. The responsibility of conducting OSC operations is included in Section B job descriptions of the various OSC leaders. The OSC Manager's job description contains the overall unchanged intent of job operations. Specifics in each area (RP, Maint, Ops, etc.) are included in the remainder of the job descriptions in B.2.

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G. (Continued) ... equipment may be available in the auxiliary building tool crib or in the maintenance building. Arrangements for tools and equipment not located onsite will be made in coordination with the support coordinator. H. ALARA and job briefings will be held with each team in the OSC, the TSC, or at the health physics control point, as appropriate. Work to be performed, special precautions, plant conditions, and radiological information will be included in the briefings. I. Upon completion of the job, the team members will be debriefed and their exposures recorded.	Continued from above	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment to perform OSC operations is maintained unchanged by the SNC Standard Emergency Plan. The responsibility of conducting OSC operations is included in Section B job descriptions of the various OSC leaders. The OSC Manager's job description contains the overall unchanged intent of job operations. Specifics in each area (RP, Maint, Ops, etc.) are included in the remainder of the job descriptions in B.2.
Status boards containing plant conditions and emergency classification will be available in the OSC.		Specific reference to status boards was eliminated from the SNC Standard Emergency Plan due to the ongoing enhancements in communications display capabilities.
Emergency kits containing radiation monitoring equipment, first aid supplies, decontamination supplies, breathing apparatus, portable lighting, and hand-held radios are stored in the OSC.	**Annex 5.1.3**: Emergency kits containing radiation monitoring equipment, first aid supplies, decontamination supplies, breathing apparatus, portable lighting, and portable radios are stored in the OSC.	The commitment wording was standardized and relocated to the Annex
In the event that this facility becomes uninhabitable, the functions of the OSC will be conducted from the Clearance and Tagging (C&T) located in the control building.	**Annex 5.1.3**: In the event this facility becomes uninhabitable, the functions of the OSC will be conducted from the Outage Execution Center (OEC) located in the control building. Evacuation of the OSC will be conducted according to emergency plan implementing procedures.	The commitment wording was standardized and relocated to the Site Annex.

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Evacuation of the OSC will be conducted according to Procedure 91202-C, Activation and Operation of the OSC.	**Annex 5.1.3**: Evacuation of the OSC will be conducted according to emergency plan implementing procedures.	New EPIPs will be developed to support the SNC Standard Emergency Plan and Site Annex. These procedures will be developed consistent with the approval of the new Plan by the NRC and in accordance with the requirements of 10 CFR 50.43(q).
3. EMERGENCY OPERATIONS FACILITY The Emergency Operations Facility is described 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 wording was standardized and relocated to the SNC Standard Emergency Plan. See Justification Matrix for Appendix 7 below for specific documentation.

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4. 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 Vogtle JIC building. The alternative facility is located in the rear conference room of the JIC and is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF.	**EP H.1.4**: 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**: 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 rear of the near site media center in Waynesboro, Georgia. 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 wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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H.2 NEWS CENTER FACILITIES The Joint Information Center is described in appendix 8.	**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 has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H and the Emergency Communications portion of Section G of the SNC Standard Emergency Plan.
	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 has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H and the Emergency Communications portion of Section G of the SNC Standard Emergency Plan.

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H.3 ACTIVATION AND STAFFING OF EMERGENCY FACILITIES During the initial stages of an emergency situation, emergency activities at VEGP are directed from the control room. For a Notification of Unusual Event, no other facilities need be activated. For security related events, the activation of emergency facilities may be delayed as described in section B.	**EP H.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan requests ERO augmentation be revised to 75 minutes as part of this submittal. That justification is provided in the Technical Analysis Section of this submittal rather than repeated in the table each place it is referenced.
Section H.4.1.a: (Meteorological) Parameters measured and transmitted to the control room include: Windspeed (10 m and 60 m). Wind direction (10 m and 60 m). Standard deviation of horizontal wind direction (10 m). Vertical temperature difference (10 m and 60 m). Ambient temperature (10 m). Dewpoint temperature (10 m). Precipitation (base). Section I.4: In the event the primary instruments are unavailable, the backup meteorological tower is equipped with instruments at the 10-m level to provide parameters relevant to atmospheric dispersion calculations (i.e., windspeed, wind direction, and sigma theta).	**Annex 5.6.1**: A meteorological monitoring program is in place at VEGP. Instruments are mounted on a 60-meter tower located to the south-southwest of the power block. Parameters measured and transmitted to the control room include: • Windspeed (10 m and 60 m). • Wind direction (10 m and 60 m). • Standard deviation of horizontal wind direction (10 m). • Vertical temperature difference (10 m and 60 m). • Ambient temperature (10 m). • Dewpoint temperature (10 m). • Precipitation (base). 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. Met Tower modified under DCP SNC143331 which was evaluated per 10 CFR 50.54 (q) VEGP-15-003-02. This DCP provided to channels of instrumentation on the primary tower and deleted the back-up tower.

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Section H.4.1.a: (Meteorological) Parameters measured and transmitted to the control room include: Windspeed (10 m and 60 m). Wind direction (10 m and 60 m). Standard deviation of horizontal wind direction (10 m). Vertical temperature difference (10 m and 60 m). Ambient temperature (10 m). Dewpoint temperature (10 m). Precipitation (base).	**Annex 5.6.1:** A meteorological monitoring program is in place at VEGP. Instruments are mounted on a 60-meter tower located to the south-southwest of the power block. Parameters measured and transmitted to the control room include: • Windspeed (10 m and 60 m). • Wind direction (10 m and 60 m). • Standard deviation of horizontal wind direction (10 m). • Vertical temperature difference (10 m and 60 m). • Ambient temperature (10 m). • Dewpoint temperature (10 m). • Precipitation (base).	The commitment wording was standardized and relocated to the Site Annex.
Section H.4.1.a: The system is powered by an uninterruptible power supply consisting of wet cell batteries, charger, and inverter for high availability. Section H.4.3: The meteorological system power is provided with a wet cell battery backup.	**Annex 5.6.1:** The system is powered by an uninterruptible power supply consisting of wet cell batteries, charger, and inverter for high availability.	The commitment wording was standardized and relocated to the Site Annex.

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Section H: Table H-1: All	**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. **Annex Section 5.6**: The plant instrumentation and monitors perform indicating, recording, and protective functions. The Reactor Protection System and associated plant instrumentation provide the ability to maintain plant safety from shutdown to full power operations, and to monitor and maintain key variables such as reactor power, flow, temperature, and radioactivity levels within predetermined safe limits at both steady state conditions and during plant transients. Plant instrumentation and control systems also provide means to cope with abnormal operating conditions. The control and display of information of these various systems are centralized in the unit Control Room. This instrumentation provides the basis for initiation of protective actions.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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Section I.4: In the event both the primary and backup meteorological systems are unavailable, meteorological data will be obtained by commercial telephone directly from the National Weather Service located in Columbia, South Carolina. Section H.5.1: The National Weather Service (NWS) maintains an automated observation station at the airport (Augusta); and windspeed, wind direction, cloud cover, and ceiling height can be obtained. Information from this automated observation station as well as forecast information can be obtained from the NWS in Columbia, S. C.	**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.
Section H.4.3: In the event the data transmission system fails, data will be obtained by sending a person to the meteorological shack to collect the information and phone it back to the plant.		Procedural level steps to obtain tertiary sources are not needed in the SNC Standard Emergency Plan.
Section H. 4.1.c: Seismic monitoring instrumentation for VEGP consists of time-history accelerographs, central control unit, and free-field ETNA. A strong-motion accelerometer (SMA) is installed in the containment tendon gallery on the basemat.	**Annex 5.6.1**: Seismic monitoring instrumentation for VEGP consists of time-history accelerographs, central control unit, and free-field ETNA. A strong-motion accelerometer (SMA) is installed in the containment tendon gallery on the basemat. The second SMA is located on the containment operating floor at elevation 220 feet. Activation of the time history accelerographs causes visual and audible annunciation in the control room to alert the plant operator that an earthquake has occurred.	The commitment wording was standardized and relocated to the Site Annex.

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Section H.4.1.c: Activation of the time history accelerographs causes visual and audible annunciation in the control room to alert the plant operator that an earthquake has occurred	**Annex 5.6.1**: Activation of the time history accelerographs causes visual and audible annunciation in the control room to alert the plant operator that an earthquake has occurred.	The commitment wording was standardized and relocated to the Site Annex.
Section H.4.1.d: The fire-detection system at VEGP includes smoke, flame, and temperature detectors and manual fire alarms.	**EP H.5.4**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.1.d: Fire-detection systems are provided in all areas with safe shutdown equipment.	**EP H.5.4**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.1.d: 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 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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Section H.4.2: 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.
Section H.4.2: The monitors are comprised of area, airborne, and air particulate monitors.	**EP H.5.2.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.2: Area monitors respond to gamma radiation photons within any energy range from 60 keV to 3 MeV.	**EP H.5.2.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.2: 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**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section H.4.2: Power to post-accident monitors is diesel generator backed.		The SNC Standard Emergency Plan and Site Annex retain the commitment to provide sampling capability.
Section H.4.3: The IPC serves as the primary data acquisition system for emergency response, acquiring, processing, and feeding data to the TSC and SPDS. Section H.4.3: In addition, data links are provided to other locations including the EOF. Section H.4.5: The SPDS provides a display of plant parameters from which the status of operation can be assessed, in the control room and TSC. The EOF accesses SPDS via the IPC gateway. Section H.4.5: Duplicate SPDS displays are located in the TSC and EOF.	**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:** 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 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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Section H.4.3: The IPC has the required data storage capability to meet the guidelines of NUREG-0696, which specifies 2 hours of pre-events data, 12 hours of post event data, and 2 weeks of additional post-event data within reduced-time resolution.	**EP H.5.3.1:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.3: The IPC hardware and software are protected against unauthorized manipulation of, or interference with, input signals, data processing, data storage, and data output	**EP H.2 Offsite Emergency Facilities** **EP H.2.1 Emergency Operations Facility** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.3: The required IPC equipment (processor, workstations, printer, video copiers, and network devices) are powered by a battery system (uninterruptible power).	**EP H.2 Offsite Emergency Facilities** **EP H.2.1 Emergency Operations Facility** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section H.4.3: The EOF is located in Birmingham, Alabama. It contains workstations and computer network equipment required for communicating with the main IPC processors via the IPC gateway.	**EP H.2.1:** 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 Emergency Notification System (ENS). • Notification and update of the NRC via Health Physics Network (HPN). • Coordination of emergency response activities with federal, state, and local agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.4.5 The SPDS is in operation during normal and abnormal operating conditions.	**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.
Section H.4.6: Liquid samples from the reactor coolant system and the containment sumps, and air samples from the containment atmosphere may be taken during accident conditions.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section H.5.3:VEGP has laboratory facilities for analysis of radioactive samples. The major pieces of equipment include a solid-state gamma spectrometer and a beta/gamma gas proportional counter.	**EP C.3.1**: The onsite laboratory/counting room at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis effort. 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 H.5.2.3**: SNC sites have a laboratory facility for analysis of radioactive samples.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.5.3: The GPC environmental laboratory located in Smyrna, GA has the capability to perform isotopic analyses of drinking water, river water, milk, vegetation, sediment, and biological samples, as well as tritium and gross-beta analysis. Section H.5.3: In addition, processing of environmental TLDs will be handled by this laboratory.	**EP A.3.5**: 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 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.

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Section H.5.3: Backup laboratory facilities are available at Plant Hatch.	**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.
Section H.5.2: VEGP will have sufficient portable equipment and trained personnel to field three field monitoring teams.	**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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The modification of the commitment to provide two vs. three field teams aligns with industry standards. The bases for the original commitment to deploy three field teams cannot be determined at this point.
Section H.6: Emergency kits are located in the TSC (for control room also), the OSC, the health physics control point, the EOF and other plant locations. Section H.6: An ambulance kit will be carried by the VEGP health physics technician who accompanies the ambulance.	**EP H.9**: 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. **Annex 5.5**: Emergency supplies and equipment are located in the TSC (also for the control room), the OSC, the radiation protection control point, and other 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 procedures. 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 Site Annex.

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Section H.6: Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Section H.6: Equipment in these kits is calibrated in accordance with the suppliers' recommendations.	**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.
Section H.6: A set of spares of certain 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.
Section I: Initial assessment actions are the responsibility of the shift superintendent and/or the shift supervisor, using available shift personnel.	**EP B.1**: The normal onsite organization of a SNC-operated nuclear power plant provides a staff capable of providing the initial response to an emergency event. The normal on-shift complement provides the initial response to an emergency. The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E.IV.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. **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 and relocated to the SNC Standard Emergency Plan. The responsibility was relocated to Section B description of on-shift staff and ED responsibilities.

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Section I: Subsequent assessment actions are directed by the emergency director with assistance from the control room, technical support center (TSC), emergency operations facility (EOF), and emergency teams, as necessary.	**EP B.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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.2: The containment high-range radiation monitor and containment 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 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 are capable of detecting and measuring radioactive gaseous effluent concentrations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.2: Emergency procedures (Procedure 91502-C) include a correlation between the monitor reading and the extent of core damage. Section I.2: A more detailed assessment of core damage is then performed using Procedures 91502-C and 91503-C, which are also based on the WOG methodology.	**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.
Section I.2: Samples can be obtained for reactor coolant, containment sump, and containment atmosphere and are used for all radiochemical analyses.	**EP H.5.2.2**: 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 be taken to mitigate and control the course of an accident.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.2: Grab samples can be transported in a shielded cask.	**EP H.5.2.2**: 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 be taken to mitigate and control the course of an accident.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.4: Computer dose calculation systems will be located in both the TSC and EOF for offsite dose assessment purposes.	**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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Section I.4: Initial dose projections can be made within 15 min of a radiological release utilizing the computer system.	**EP I.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.4: Subsequent dose projections will be made approximately every 15-30 min depending on the variability of meteorological conditions and/or radioactive releases.	**EP I.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment is to maintain the comparison with EPA PAGs. The time reference is not required to support the PAR process.
Section I.4: Default release rates are available for possible accidents in the event that measured source term data are not available or the case where bounding calculations are desired.	**EP I.3:** 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 and quick estimates based on hand-calculation methods. 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.4: When precipitation is predicted or occurring in the area of the plume, the potential for significantly increased rates of radioactivity deposition will be considered by increasing the scope of environmental sampling as required.	**EP I.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Precipitation is part of the standard modeling techniques and a specific discussion in the Plan is not required.
Section I.4: The VEGP staff will calculate the 50-mile ingestion pathway doses from the deposition of specific radionuclides.	**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.	The deposition doses will be calculated in the intermediate phase under the direction of the Offsite Response Organization. The utility retains the commitments to make Ad Hoc Protective Action Recommendations beyond the 10 mile EPZ in Section J of the SNC Standard Emergency Plan.
Section I.4: The VEGP field monitoring team will collect sufficient environmental data to characterize the initial deposition of activity, the peak activity in pasture grass and milk, and total intake of I-131, Cs-137, Sr-90, and Sr-89.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.4: The dose assessment computer program will be used to calculate the projected deposition of radionuclides and associated doses in the ingestion pathway based on release data and meteorological conditions.	**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.	The deposition doses will be calculated in the intermediate phase under the direction of the Offsite Response Organization. The utility retains the commitments to make Ad Hoc Protective Action Recommendations beyond the 10 mile EPZ in Section J of the SNC Standard Emergency Plan.
Section I.4: The results of all analyses will be provided to the States of Georgia and South Carolina by the dose assessment supervisor.	**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.
Section I.4: Data from the primary meteorological monitoring system can be accessed directly from the control room, TSC, and EOF, and are also available to NRC personnel and State representatives at the site.	**EP I.3**: The dose calculation model is provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses. **EP I.5**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section H.5.2: VEGP will have sufficient portable equipment and trained personnel to field three field monitoring teams. Section I.5: The emergency director or his designee can deploy up to three teams for field monitoring.	**EP I.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The modification of the commitment to provide two vs. three field teams aligns with industry standards. The bases for the original commitment to deploy three field teams cannot be determined at this point.
Section I.5: Initially, the emergency director can activate at least one team from on-shift personnel.	**EP I.7**: 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). **Table 2.2.A - Vogtle Electric Generating Plant On-Shift Staffing**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Table 2 designating the required minimum on-shift staffing retains the commitment to support one environmental team from on-shift personnel.
Section H.5.2: Results of the offsite monitoring activities will be provided to the TSC until the dose assessment activities are transferred from the TSC to the EOF. Section I.5: They will be controlled by the TSC until the responsibility is transferred to the EOF.	**EP B.2.1.5**: The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Radiation Protection 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.2: In addition to the onsite capabilities for radiological assessment, Framatome Technologies has agreed to provide backup analysis of high radioactivity level samples per the agreement in appendix 2. 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. Appendix 7 F.8 Contract Laboratories Teledyne Isotopes, Inc. for emergency analytical services. Framatome ANP for emergency analytical services	**EP C.3.1**: 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 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.
Section I.2: The TSC manager will approve and direct the transport of the grab sample to Framatome.		The statement of process was eliminated. Procedural control for the release of material offsite is maintained by existing site non-emergency procedures.
Section H.5.2: Each team will include two people who will obtain an emergency monitoring kit. Section I.5: Monitoring teams of at least two people are formed and dispatched at the OSC or TSC as appropriate.	**EP Table 3** **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)	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.5: Field monitoring kits are available to the teams in predetermined locations as described in 91702-C. Section I.5: The kits will include anti-contamination suits, respirators, a two-way radio, meters for measuring gamma and beta/gamma dose rates, and air samplers.	**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). The environmental monitoring equipment include portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.5: Designated vehicles may be used which are equipped with two-way radios on plant-dedicated frequencies. Section I.5: Handheld radios will also be available as a backup. Section I.5: Vehicles will be available 24 h per day.	**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). The environmental monitoring equipment include portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H.5.2: VEGP monitoring teams will remain on the Georgia side of the Savannah River.		The conduct of sampling operations is event specific and Plan direction not considering the environmental and release considerations are potentially inconsistent with appropriate deployment.
Section I.5: It is estimated that teams will be in the field and performing monitoring tasks within about 1 h of the determination of the need for field monitoring.	**Table 2.2.A - Vogtle Electric Generating Plant On-Shift Staffing**	Table 2.2.A of the Site Annex directs the capability to be maintained for a single team with on-shift personnel. The submittal supports the response of a second team at 75 minutes.
Section I.5: Monitoring teams are instructed to contact the monitoring team communicator approximately every half hour.		Procedural guidance for the conduct of sampling will be relocated to EPIPs developed to support implementation of the Plan.
Section I.5: The teams will inspect their field monitoring kits, perform survey equipment operation checks, obtain dosimeters, and establish radio communications with the monitoring team communicator.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Procedural guidance for the conduct of sampling will be relocated to EPIPs developed to support implementation of the Plan.
Section I.6: Copies of the map showing the locations will be in the field monitoring kits, the TSC and EOF.	**EP I.7**: Samples are taken at predetermined locations as well as those locations specified during and after a release.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section H.5.2: The kits will include dosimeters, a two-way radio, meters for measuring gamma and beta/gamma dose rates, and air samplers for collecting particulates and iodines. Section I.5: The emergency monitoring kits contain a portable air sampler, silver zeolite cartridges, and counters to provide the capability to detect and measure radioiodine concentrations in the air as low as 10-7 µCi/cc.	**EP I.9**: Field monitoring equipment has the capability to detect and measure airborne radioiodine in the presence of noble gases.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.5: Prior to leaving for the field, the dose assessment supervisor, or designee, will normally direct and brief the teams on the initial survey and sample locations, suggested travel routes, meteorological conditions, and team identification name or number for communication purposes.		The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams.
Section I.5: The teams will obtain their briefing from the health physics supervisor in the TSC or in the OSC by the OSC manager.		The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams.
Section I.5: In-transit dose rate measurements will be made.		The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams.

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Section I.5: If the dose rate exceeds 100 mrem/h, off-centerline measurements will be made.		The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams.
Section I.5: The total sample volume and the limiting background count rate allow for a LLD of at least 10-7 µCi/cc.		The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams.
Section I.5: The Dose Assessment Team at the EOF will collate field monitoring data for VEGP dose projection purposes.	**EP I.7**: The environmental monitoring equipment include 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.6: In addition to direct monitoring and air sampling, the assessment program includes an emergency environmental sampling program.	**EP I.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.6: Direct radiation is measured by thermoluminescent dosimeters (TLDs) which are exchanged and analyzed (read) for gamma dose quarterly.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I.6: The (airborne radioiodine and particulates for environmental sample) cartridge and filter are changed weekly.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Filters are composited quarterly by location for gamma isotopic analysis.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Quarterly composites, which are obtained from the monthly composites, are analyzed for tritium.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.

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Section I.6: Composite samples (of drinking water) from each location are collected monthly.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Grab samples of finished drinking water are taken monthly.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Monthly samples are analyzed for gross beta and gamma isotopics.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.

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Section I.6: Quarterly composites, which are prepared from the monthly samples, are analyzed for tritium.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Sediment from the Savannah River is collected semiannually from control and indicator locations using manual grab sampling techniques. Sediment samples are analyzed for gamma isotopics	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Milk samples are collected semimonthly by taking grab samples from milk supplies at control and indicator stations. These samples are analyzed for gamma isotopics.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.

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Section I.6: Vegetation is sampled monthly during the growing season.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: Vegetation samples are analyzed for gamma isotopics.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
Section I.6: During and/or subsequent to emergency conditions, the routine environmental monitoring program will be modified to collect and analyze additional samples from existing stations.	**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. SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Section I.6: The GPC environmental laboratory, located in Smyrna, Georgia, has the capability to perform isotopic analyses of drinking water, river water, milk, vegetation, sediment, and biological samples as well as tritium and gross beta analysis.	**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.
Section J.1.2: Emergency response personnel in the protected area badge into their emergency response facility (TSC, OSC, or control room) using their ACAD badge and also sign in on a personnel roster (TSC and OSC only). Section J.1.2: Thereafter, the emergency response facility managers of the control room, TSC, and operations support center shall be responsible for periodically assuring that accountabilities in their facilities are being maintained.	**EP J.4.2:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.2: The security computer system performs an initial of all persons in the protected area. Section J.1.2: The Security Department accounts for each person inside the protected area at the start of an emergency by using the security computer system.	**EP J.4.2:** 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. **Annex 4.3.2:** Personnel assembly is mandatory at the Site Area Emergency or higher level classification. Upon activation of the plant emergency alarm, plant personnel assigned specific emergency responsibilities will proceed to their designated emergency response locations. Assembly of site personnel outside of the Protected Areas is accomplished by non-essential personnel reporting to designated assembly areas. Assembly may be initiated at any time site management deems it appropriate for personnel safety reasons. Nonessential plant personnel located within the Protected Area will exit the Protected Area upon hearing the Site Area or the General Emergency alarm and report to designated assembly areas. Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.2: Accountability reports are made periodically to the emergency director by the Security Department.	**EP J.4.2:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. The SNC Standard Emergency Plan retains the commitment to perform and maintain accountability. The procedural aspects of e of the process are not needed in the Plan.
Section J.1.2: Assignment logs and required periodic communications between emergency response teams maintain accountability.	**EP J.4.2**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to perform and maintain accountability. The procedural aspects of e of the process are not needed in the Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.2: This method provides for accountability of all individuals inside the protected area within about 30 min. of the emergency declaration page announcement.	**EP J.4.2:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section J.1.3: If protected area accountability reveals a missing person, the emergency director assembles a search and rescue team per emergency response procedures (Procedure 91401-C, Assembly and Accountability).	**EP J.4.2:** 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 he 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.3: A search of likely areas is conducted until the missing individual is located.	**EP J.4.2**: 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 commitment wording was standardized and relocated to the Site Annex.
Section J.1.4: Site dismissal, with or without monitoring, of non-involved personnel on-site (if feasible) is ordered by the emergency director whenever a Site Area or General Emergency is declared.	**EP J.4.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.4: Personnel on site will be notified by public address, site siren, or other communication that dismissal of non-involved personnel to the applicable reception center will take place and specify the route.	**EP J.4.3**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section J.1.4: Security will dispatch security officers to work areas outside the protected area to ensure all non- involved personnel have left the owner-controlled area.	**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 (EPIPs).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.5: 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.	**EP J.4**: 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. **Annex 4.3.3**: Onsite protection of employees during security events involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.5: These actions will be communicated to onsite personnel via the plant PA system and other communications means as applicable.	**EP J.4:** 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. **Annex 4.3.3**: Onsite protection of employees during security events involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.6: When an Alert is declared and site dismissal with no monitoring is anticipated, personnel who have left the protected area are monitored by portal monitors.	**EP J.4.3**: 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. **Annex 4.3.4**: When an Alert is declared but no site evacuation is anticipated, personnel who have left the protected area are monitored by portal monitors. If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations. When site evacuation with monitoring is expected and release of radioactivity has occurred, monitoring is performed by Burke County emergency workers at an established reception center.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.1.6: A supply of potassium iodide is stored in the TSC for TSC and control room use, OSC, main control point, or health physics room. Section J.1.6: The health physics supervisor will direct the issuance of potassium iodide when the projected thyroid exposure is greater than 25 rem. Section J.1.6: The health physics supervisor will direct radiological survey personnel to distribute potassium iodide and record the name and social security number of those individuals who are issued potassium iodide.	**EP J.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section J.1.6: Potassium iodide will be issued in 130-mg doses daily for at least 3 days, but not more than 10 days.	**EP J.4:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section J.1.6: Issuance will be performed immediately prior to exposure or not longer than 4 hours after exposure.	**EP J.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section J.1.6: At the time potassium iodide is distributed, an iodine sensitivity check will be made by querying each individual concerning known reactions to iodine.	**EP J.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Table J-1: Emergency equipment locations.	**EP H.9**: 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. **Annex 5.5:** Emergency supplies and equipment are located in the TSC (also for the control room), the OSC, the health physics control point, and other plant locations. An ambulance kit will be carried by the VEGP Radiation Protection technician who accompanies the ambulance. 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 Site Annex.
Section J.2.2: The emergency director is responsible for providing protective action recommendations to State and local officials as part of initial notifications and follow-up communications.	**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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.2.2: Using available information on plant conditions, projected dose estimates, and any available monitoring data, the emergency director recommends whether the public should be advised to seek shelter or evacuate.	**EP J.5**: 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 the use of KI (potassium iodide)) in accordance with state Plans and Policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section J.2.2: Site dismissal of non-involved station personnel and evacuation and/or sheltering the general public is recommended for a General Emergency even though there has not been a release of radioactivity from the plant.	**EP J.4.3:** 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. **EP J.5**: 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 the use of KI (potassium iodide)) in accordance with state Plans and Policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section J.3: Determination of the benefit of evacuation must take into account the time needed to complete the evacuation.	**EP J.5**: 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. **EP J.6**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.1: Decisions as to appropriate exposures, considering the action required and relative risks, will be made by the emergency director in consultation with health physics personnel.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. **EP K.1:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.1: When necessary, the emergency director can authorize emergency exposures in excess of 10 CFR 20 limits but within the limits in table K-1.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Authorization of emergency exposures in excess of federal limits.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: Where possible, the normal radiation work permit (RWP) procedure will be used to control exposures.	**EP K.3.3**: Where possible, the normal radiation work permit procedure will be used to control exposures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: If time and urgency do not allow this procedure to be followed, the health physics supervisor may approve emergency RWP controls.	**EP K.3.3**. Based on conditions and urgency Radiation Protection supervision may approve emergency radiological work permit controls.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: In all cases, a briefing is given to the emergency team by health physics staff, and each team is accompanied by a qualified health physics technician who meets the qualifications of ANSI 18.1 criteria set out in the VEGP Technical Specifications.	**EP K.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: This briefing includes a discussion of the hazards involved in the planned action, as well as protective actions to be taken.	**EP K.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: A record of individual and collective exposure received during the emergency will be maintained by the dosimetry team.	**EP K.3.1**: Exposure records will be maintained for emergency response personnel who are issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.2: An individual's dose margin will be assessed by determining the difference between the updated exposure and current administrative limit; these margins are used to determine emergency assignments.	**EP K.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: In situations where exposures in excess of 10 CFR 20 limits are authorized, the following considerations will be made prior to emergency team selection: 1. Declared pregnant female employees shall not be allowed to participate. 2. For doses greater than 25 rem, personnel shall be volunteers and be fully aware of the risks involved.	**EP K.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.: All emergency exposures will be included in personnel radiation exposure records.	**EP K.3.1:** In an emergency situation, onsite personnel, offsite support personnel and local governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel who are issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: Emergency dosimetry is provided to each member of the emergency response organization for both onsite and offsite organizations as required by the radiological conditions existing at the time.	**EP K.3.1:** In an emergency situation, onsite personnel, offsite support personnel and local governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel who are issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.2: Emergency response personnel will be made aware that self reading dosimeters should be checked every 15 to 30 min. during the emergency.		No direct statement is made for reading direct reading dosimetry. The original Plan statement was intended for pocket dosimeters requiring specific action of the ERO individual. Modern dosimetry provides alarm functions to support awareness.
Section K.2: Appendix 4 presents information on the types of dosimetry available in each emergency response facility and other locations.	**EP K.3.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: There is the capability to read TLDs within 24 h.	**EP K.3.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.2: A record of individual and collective exposure received during the emergency will be maintained by the dosimetry team.	**EP K.3.1**: Exposure records will be maintained for all emergency response personnel who are issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: The action levels for determining the need for decontamination of personnel, equipment, and areas are delineated in plant admin. and health physics procedures.	**EP K.5**: During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.3: The facility (decontamination area) has vertical showering and normal wash sinks. Section K.3: Instrumentation to survey personnel during and after decontamination is located at the health physics station.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: Waste generated through the use of the decontamination facilities is collected and processed by the plant liquid radwaste system.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: If decontamination activities are required, a controlled access area will be established by roping off the area.	**EP K.5**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.3: Supplies of clean clothing will be made available.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: Decontamination of personnel will be conducted in accordance with standard health physics practices. Section K.3: Personnel decontamination will be accomplished using water washes or other methods for extreme cases as described in plant health physics procedures.	**EP K.5:** Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: Decontamination of serious wounds will be accomplished at Doctors Hospital or the Burke Medical Center as described in section L of this Plan.	**Annex 2.3.2**: Agreements are in place with the University of Alabama at Birmingham (UAB) Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency, to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.	The commitment wording was standardized and relocated to the Site Annex.
Section K.3: It (equipment and area decon) is accomplished as described in plant health physics procedures and ranges from vacuum cleaning to wash downs with water and acid or caustic solutions.	**EP K.5**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: Personnel exiting the radiation-controlled area will be monitored for contamination by stand-up monitoring booths or by a whole-body scan with a hand-held probe.	**EP K.5**: Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.4: Access control is provided by the Security Department during emergency conditions.	**B.2.1.14** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.3: Plant areas that require access to facilitate recovery operations will be surveyed with portable instruments equipped with Beta/Gamma detectors. Section K.4: Emergency monitoring teams are responsible for determining the need for onsite access control and establishing the proper method through discussions with technical support center (TSC) personnel. Section K.4: Plant procedures used for determining contaminated areas will be used for determining the need for access control.	**EP K.5:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section K.3: The standard health physics contamination limits will be used for release of personnel.	**EP K.5:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section K.4: The emergency health physics supervisor is responsible for permitting return of onsite areas and equipment to normal use once monitoring and decontamination are completed.	**EP K.5:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L.1: There are personnel on shift and in the Emergency Organization trained in first aid and decontamination procedures.	**EP K.1.2.1:** Selected plant workers at SNC-operated plants have received first aid and decontamination training. **EP O.3:** Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Table 2 of the Site Annex retains the commitment for on-shift capability to perform the function.
Section L.1: The onsite personnel responsible for responding to a medical emergency have had training per the OSHA standard 29 CFR 1910.151 and directive OSHA 3317-06N, Fundamentals of a Workplace First-Aid Program	**EP K.1.2.1:** Selected plant workers at SNC-operated plants have received first aid and decontamination training. **EP O.3:** Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Table 2 of the Site Annex retains the commitment for on-shift capability to perform the function.
Section L.1: Health physics technicians will be assigned to first aid teams in accordance with Procedure 70302-C, Reporting and Documenting Occupational Injuries Or Illnesses.	**EP K.1.2.1:** Selected plant workers at SNC-operated plants have received first aid and decontamination training. **EP O.3:** Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Table 2 of the Site Annex retains the commitment for on-shift capability to perform the function.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section L.1: Personnel found to be externally contaminated but not requiring immediate medical attention will undergo decontamination in accordance with plant procedures.	**EP K.5**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L.2: Injured and contaminated personnel requiring hospital medical attention will be transported to Doctors Hospital, Augusta, or Burke County Hospital, Waynesboro, by the Burke County Ambulance Service. Letters of agreement pertaining to these services are located in Appendix 2.	**EP L.1**: 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. **Annex 5.8.1:** Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. **Annex 5.8.2:** Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section L.1: In addition, an onsite first aid and decontamination area equipped with decontamination supplies and other specialized equipment is located near the health physics station on the 220 ft elevation in the control building.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations. **EP L.2:** SNC-operated nuclear power plants maintain onsite first aid supplies and equipment necessary for the treatment of contaminated and/or injured persons.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section L.2: All contaminated materials will be properly packaged and returned to the site for disposal.	**EP L.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L.2: A health physics technician (HPT) will accompany the patient to the hospital.	**EP L.4**: Radiation monitoring services are provided by SNC plant personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section A.7: VEGP has established agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment.	**Annex 5.8.2**: Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section L.2: Injured and contaminated personnel requiring hospital medical attention will be transported to Doctors Hospital, Augusta, or Burke County Hospital, Waynesboro, by the Burke County Ambulance Service. Section L.3: Arrangements for treating externally contaminated patients have been made with the Doctors Hospital in Augusta, Georgia, and Burke County Hospital in Waynesboro, Georgia, (appendix 2).	**Annex 5.8.1**: Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L.3: The medical staff of the hospital is trained to treat externally contaminated patients or individuals who have received high exposures.	**EP L.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L.2: The HPT will perform radiation surveys of the patient, ambulance, and attending hospital staff and assist in maintaining contamination control in the hospital. Section L.3: Trained plant radiation protection personnel will assist hospital staff when plant personnel are being evaluated.	**Annex 5.8.2**: Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section L.2: The ambulance will also be decontaminated at VEGP if required.	**Annex 5.8.2**: Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.
Section L.3: Following decontamination, personnel suspected to have ingested radionuclides will undergo whole body counting at VEGP.	**Annex 5.8.1**: Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures.	The SNC Standard Emergency Plan commits to maintaining agreements supporting the treatment of contaminated and/or injured personnel. Medical experts will determine the course of treatment and subsequent monitoring. A specific commitment for internal monitoring at the site may or may not be included in this post event treatment.
Section L.3: Arrangements have also been made with local doctors to render medical assistance, both onsite and offsite, and to assume responsibility for the medical supervision of the patient (appendix 2, Letters of Agreement).	**EP L.3:** 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. **Annex 2.3.2**: Agreements are in place with the University of Alabama at Birmingham (UAB) Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section L.4: The VEGP training department conducts training sessions at least once per calendar year (for onsite and offsite personnel who have medical support responsibilities).	**EP O.1.1**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L.4: In addition, drills and exercises are an integral part of the training program and are conducted as specified in section N, Exercises and Drills.	**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. Local support service organizations that support more than one plant shall only be required to participate once each calendar year.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section M.1: The emergency director will determine when the recovery phase begins.	**EP M.1:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.1: The following guidelines, as applicable to the specific situation, will be observed prior to terminating the emergency: 1. The affected reactor is in a stable condition and can be maintained in that condition indefinitely. 2. Plant radiation levels are stable or are decreasing with time. 3. Releases of radioactive material to the environment have ceased or are being controlled within permissible limits. 4. Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel. 5. For a site area emergency or general emergency, discussions with plant management, applicable members of the VEGP emergency organization, offsite authorities including the Nuclear Regulatory Commission (NRC); Georgia Emergency Management Agency, Burke County Emergency Management Agency director; South Carolina Emergency Management Division director; and Savannah River Site (SRS) emergency staff do not result in identification of any valid reason for not terminating the emergency.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.1: He (ED) will direct that all elements of the emergency response organization be advised of the change in status via the Emergency Notification Network (ENN), Emergency Notification System (ENS), and other pertinent communications systems.	**EP M.3:** 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. **EP M.5:** Following the completion of the Recovery Phase, the site will transition to an Outage Organization to complete necessary repairs.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section M.1: At this time, the emergency director will designate a recovery manager to constitute the recovery organization.	**EP M.1**: The Emergency Director will designate a recovery manager to constitute the recovery organization.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Individuals will be assigned to specific positions by the recovery manager, depending on the nature and extent of damage to the plant.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2 : He (Recovery Manager) will structure the recovery organization to accomplish the following general objectives: 1. Maintain comprehensive radiation surveillance of the site until levels return to normal. 2. Control access to the affected area of the plant and exposures to workers. 3. Decontaminate affected areas and equipment. 4. Conduct activities in radiation areas in accordance with the plant's standard radiation work practices. 5. Isolate and repair damaged systems. 6. 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. 7. Provide offsite authorities with plant status reports and information concerning the plant recovery organization. 8. Provide assistance with recovery activities undertaken by State and county authorities, if requested. 9. Provide public information on the status of recovery operations via releases to the media.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Recovery manager: has overall responsibility for restoring the station to a normal operating configuration.	**EP M.1**: 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. **EP M.5:** Following the completion of the Recovery Phase, the site will transition to an Outage Organization to complete necessary repairs.	The Statement on return to normal operations is not appropriate for the Plan. Normal operations, extended shutdown, or decommissioning are all potential outcomes of events involving activation of the Emergency Plan. The outcome will be determined on a site-specific basis through transition from the Emergency Phase.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Plant operations manager: manages day-to-day in-plant operations and during recovery, is responsible for ensuring that repairs and modifications will optimize post recovery plant operational effectiveness and safety.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Design and construction support manager: focuses necessary engineering, design, and construction resources on those aspects of plant recovery requiring redesign, modifications, or new construction.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Chemistry manager: develops plans and procedures to process and control liquid, gaseous, and solid wastes to minimize adverse effects on the health and safety of the public and plant recovery personnel.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Health physics manager: responsible for As Low As Reasonably Achievable (ALARA) planning, execution, and monitoring; plans and manages decontamination of affected areas and equipment; supervises and directs all special radiological controls required to support the recovery operation.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Technical support manager: provides analyses, plans, schedules, and procedures in direct support of plant operations.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Quality assurance manager: ensures that the overall conduct of recovery operations is performed in accordance with corporate policy and rules and regulations governing activities which may affect public health and safety.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Scheduling/planning manager: prepares plans and schedules and tracks/expedites recovery operations.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Administration/logistics manager: supplies administrative, logistic, communications, and personnel support for the recovery operation.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.2: Public information director: coordinates the flow of media information concerning recovery operations.	**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 provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.
Section M.3: If the accident situation involved a release of radioactivity, appropriate areas of the plant and site will be monitored to determine contamination and radiation levels.	**EP M.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.3: Identifying and controlling access to these areas will be in accordance with normal plant procedures.	**EP M.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section M.3: When reentry to a radiation area is required for inspection or work, the activity will be preplanned and plant radiation work practices and As Low As Reasonably Achievable (ALARA) program principles will be followed.	**EP M.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section M.4: All personnel who require access to the plant or to radiation areas on site during the recovery phase will be issued dosimetry, as appropriate.	**EP M.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section M.4: The criteria for reading TLDs and assessing radiation dose will be in accordance with standard health physics practices.	**EP M.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section M.4: The results of the dosimeter readings, including integrated exposures (i.e., man-rems) will be reported to the recovery manager, the radcon/radwaste manager, and others in the plant organization who normally receive such reports	**EP M.1:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section M.4: VEGP will provide radiological information including estimated quantity of radioactivity released, isotopic composition of released material, and meteorological data to assist the governmental authorities in their determinations.	**EP M.4**: 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.	Section B of the Standard Emergency Plan retains the commitment to provide environmental field teams. The progression of the overall planning process has shifted the long term responsibilities for offsite radiological assessment to the FRMAC.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section N.1: Exercises are conducted every two calendar years, and are designed to include the demonstration of response to a major portion of the basic elements of the emergency preparedness plans of the participating organizations.	**EP N.1:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section N.1: The exercise program for VEGP consists of an 8 year cycle and incorporates the following features: 1. A full participation exercise which tests as much of the Plant Vogtle, State, and local emergency plans as is reasonable achievable without mandatory public participation will be conducted on a biennial basis and evaluated by NRC and FEMA. 2. Biennial exercise scenarios will be submitted to the NRC under § 50.4 at least 60 days before use in the biennial exercise. 3. 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.	**EP N.1.2:** 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. **EP N.2.1:** During these drills, activation 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. **EP N.1.4:** The Exercise planning cycle will consist of eight (8) successive calendar years. **EP N.3:** SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The wording has been updated to reflect the Enhanced Emergency Preparedness Rulemaking (November 23, 2011)

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section N.1 (Continued) 4. 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 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. **EP N.2.2**: 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 8 years. **EP N.2.7**: Accountability drills are conducted annually. **EP N.2.9**: 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. **EP N.2.10**: 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.	

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section N.1 (Continued) 5. An ingestion pathway exercise will be conducted on a frequency to ensure the applicable States have the opportunity to participate in an ingestion pathway exercise at least once every exercise cycle.	**EP N.1.3**: States within an ingestion exposure pathway EPZ, are expected to exercise its 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section N.2.1: At least one of these drills will be conducted during the calendar year when there is no biennial exercise and shall involve a combination of some of the principal functional areas of the onsite emergency response capabilities.	**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. During these drills, activation 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Section N.2.1: 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.	**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. **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 **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: • A drill initiated between the hours of 6 p.m. and 4 a.m.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Section EP N.2.1 is directed to types of drills/exercises. The existing requirement to respond to essentially 100% of initiating conditions is moved to Section N.3 of SNC Standard Emergency Plan.

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Section N.2.1 (Continued) • Response to actual industry event sequences appropriate for the nuclear plant technology (e.g., BWR). • 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 9(hh)(2) to mitigate reactor accidents and maintain containment).	**EP 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 8 years. **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: • Implementation of strategies, procedures, and guidance developed in 50.54(hh), (i.e., potential aircraft threat, explosion or large fire). **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.	

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Section N.2.2.b: Communication drills among the control room, technical support center (TSC), operations support center (OSC), emergency operations facility (EOF), emergency news center, general office operations center, the States of Georgia and South Carolina, Burke, Aiken, Barnwell, and Allendale Counties, SRS, and VEGP field monitoring teams are conducted every two years.	**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. • 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.2: To ensure that emergency communication channels between VEGP and offsite authorities are operable, periodic drills are conducted.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.2: For drills, the communication is initiated at VEGP using the actual message format in accordance with the applicable plan and procedure.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Section N.2.3: As discussed in the FSAR, the program involves quarterly (fire) drills, at least one of which is unannounced.	**EP N.2.3**: Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.3: The quarterly drills are scheduled so that each member of the fire brigade participates in at least two drills per year.	**EP N.2.3**: Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.3: In addition, an annual practice is conducted which requires extinguishing a fire.	**EP N.2.3**: Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.4: A medical emergency drill involving a simulated contaminated person is conducted each calendar year.	**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. Local support service organizations that support more than one plant shall only be required to participate once each calendar year.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.5: Plant environs and radiological monitoring drills are conducted each calendar year per Procedure NMPEP-303, Drill and Exercise Standards.	**EP N.2.5**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.2.6: Semiannual health physics drills will be conducted per Procedure NMP-EP-303, Drill and Exercise Standards.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section N.2.6: Post accident sampling under simulated accident conditions will be demonstrated each calendar year.		Vogtle executed the PASS elimination as approved by NRC SER in a letter dated November 12, 2001 The annual sampling requirement in the description of Radiation Protection drills in EP N.2.6 ensures accident sampling capabilities are maintained.
Section N.3: Each drill and exercise is conducted in accordance with a scenario.	**EP N.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section N.3: The preparation of exercise scenarios is directed by the emergency preparedness supervisor who enlists the assistance of personnel from other departments, as required, to assist in this task.	**EP N.3:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Section N.3: Scenarios include the following information: Objectives. Date, time period, place, and participating organizations. Controller/evaluator assignments. Time schedules of real and simulated initiating events. Messages describing equipment malfunctions, personnel injuries, and other non plant events, as appropriate. Narrative summary describing the conduct of the drill or exercise. Radiological data for onsite facilities and offsite field monitoring teams.	**EP N.3**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Section N.4: All drills and exercises are evaluated. Section N: For periodic drills, the process consists of the following steps: 1. Drills will be evaluated by controllers/evaluators selected on the basis of expertise and availability. 2. Improper or incorrect performance during the drill may be corrected by the controller/evaluator and the proper method pointed out or demonstrated. 3. The exercise or drill controllers assemble the players at the conclusion of activities for a critique. Players are encouraged to identify areas where improvements are required. The drill controllers also presents their observations to the players. 4. The site emergency preparedness supervisor submits a list of corrective actions, responsibilities, and schedule information to the site support manager for approval. 5. The emergency preparedness supervisor assigns action items and monitors the status of completion of corrective actions. Significant problems will be brought to the attention of appropriate plant management. Exercise evaluation and corrective action are carried out in similar fashion.	**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. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section O: All VEGP badged personnel will receive General Employee Training at inception of onsite duties. Section O.3: All badged VEGP workers will receive general training in emergency preparedness.	**EP O.4.8:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section O: GET will include emergency classification, individual response, signals, accountability, and site dismissal procedures.	**EP O.4.8**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section O: All VEGP emergency response organization personnel will receive specialized training per Table O-2. Section O.3: Selected individuals on site and off site will annually receive specialized training.	**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

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section O: All VEGP emergency response organization personnel will receive specialized training per Table O-2. Section O.1: As a minimum, training will be provided in the subject areas shown in table O-1 to various personnel according to their emergency response position as shown on table O-2. Section O.1: Those designated to receive training in each subject area are indicated in table O-2.	**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. **EP O.4.1**: Emergency Response Organization (ERO) **EP O.4.2**: Active Senior Licensed Control Room Personnel **EP O.4.3**: Radiological Field Monitoring Teams **EP O.4.4**: Fire Brigade Training **EP O.4.5**: Operations, Maintenance, Chemistry and Radiation Protection Training **EP O.4.6:** Medical Support **EP O.4.7**: News Media Training **EP O.4.8**: General Employee Training (GET)	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section O.1: The training will be conducted in accordance with lesson plans.	**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 lesson plans, study guides, and written tests are contained in the ERO Training Program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section O.1: Records of the attendance and examination scores will be retained in the training files.	**EP O.1**: Responsibilities for implementing the training program are contained in plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section O.1: Upon completion of each training session or drill, the participants will be asked to critique the training in order to ensure continued improvement.	**EP O.1**: Responsibilities for implementing the training program are contained in plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section O.1: Radiological emergency response training is offered throughout the year, with each training course being covered at least once per calendar year.	**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 and relocated to the SNC Standard Emergency Plan
Section O.1: Annual retraining consists of initial training material reinforcement and appropriate lessons learned from the previous year's operating experience.	**EP O.4**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section O: All VEGP emergency response organization personnel will receive specialized training per Table O-2.	**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 Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section O: Offsite response groups who may support onsite situations, such as fire or personnel injury, will be offered annual training in notification, expected roles, site orientation, security procedures, and basic radiation protection. Section O: Selected state and local emergency response management personnel with offsite emergency response roles will be offered a seminar/training course in specific areas; (1) the VEGP emergency classification system; (2) the VEGP protective action recommendation criteria and their relationship to plant conditions; and (3) the VEGP emergency response organization. Section O: These offsite management personnel will be offered initial training and annual retraining.	**EP O.1**: 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. **EP O.1.1**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Section O.2: Mandatory training for emergency positions held: All ERO personnel shall be trained per table O-2 within the last 15 months, except for post accident sampling and first aid training, which is to be within 36 months.	**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. Specific emergency response task training, prepared for response positions, is described in lesson plans and study guides.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The Executive Vice President/Chief Nuclear Officer (CNO) Southern Nuclear Operating Company (SNC) has overall responsibility and authority for all nuclear activities, including emergency planning (EP) programs.	**EP P**: The President/Chief Executive Officer (CEO) Southern Nuclear Operating Company (SNC) has direct responsibility for the operation and maintenance of the SNC Plants.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The vice president-regulatory affairs is responsible for administration of the corrective action program in the corporate headquarters, the overall coordination of the corporate emergency preparedness programs (including the common Emergency Operations Facility), Emergency Plans, and site emergency response communication.	**EP P.1:** The Vice President - Regulatory Affairs is responsible for the overall coordination of the corporate emergency preparedness programs and Emergency Plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: 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 Director is responsible for the oversight of Emergency Preparedness activities and coordinating those activities with Licensee, federal, state, and local response organizations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Section P: Vice President – (Plant) 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 at each site.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and procedure development and maintenance.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The Fleet Emergency Preparedness Manager performs a review of the site specific emergency plan annually and all onsite EPIPs biennially. The review includes the letters of agreement, which are updated as necessary.	**EP P.3.** The Emergency Plan, agreements, and the EPIPs are reviewed once per calendar year and updated, as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The Emergency plans and EPIPs are revised in accordance with applicable site procedures.	**EP P.3.** The Emergency Plan, agreements, and the EPIPs are reviewed once per calendar year and updated, as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: As required by 10 CFR 50.54(t), an annual independent audit of the emergency preparedness program is conducted by the SNC Fleet Oversight Department.	**EP P.3:** An independent review of the EP program is conducted, as required by 10 CFR 50.54(t).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The interval from the previous audit may be shortened but may not be extended beyond 15 months.	**EP P.3:** An independent review of the EP program is conducted, as required by 10 CFR 50.54(t).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Section P: Audits are performed in accordance with SNC Fleet Oversight department procedures.	**EP P.3:** An independent review of the EP program is conducted, as required by 10 CFR 50.54(t).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Section P: The Fleet Emergency Preparedness Manager performs a review of the emergency plans for Southern Nuclear once each calendar year.	**EP P.3.** The Emergency Plan, agreements, and the EPIPs are reviewed once per calendar year and updated, as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 2: All		Criteria added to body of SNC Standard Emergency Plan. Individual Annex no longer required.
Appendix 3: In the event of an emergency the Emergency Director at VEGP is responsible for notifying appropriate State and local response organizations, plant emergency personnel, and DOE's Savannah River Site.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Appendix 3: Initial alerting will be made primarily by both tone-alert radios and a system of fixed sirens. Appendix 3: In the event of a serious emergency at VEGP, the primary means for alerting and providing initial instructions to the public will be by a combination of tone-alert radios and a system of fixed sirens. Appendix 3: The siren system consists of a network of 47 rotating electronic sirens mounted on poles strategically located throughout the populated area of the plume exposure EPZ.	**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. An overview of these means excluding the Savannah River Site is listed in the site-specific Annex of this Plan. **Annex 4.2**: Two approved independent, complementary alerting systems are installed in the EPZ to alert the public, consisting of a network of fixed sirens or tone-alert radios. Provisions for transient population notification are also included in state and county plans. The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex
Appendix 3: Based upon Appendix 3 of NUREG-0654 and FEMA REP-10, the system is designed to provide a minimum of 60 dBC coverage to all residences within the plume exposure EPZ, plus adequate coverage for people outdoors in all other areas of the plume exposure EPZ open to the public.	**Annex 4.2**: Two approved independent, complementary alerting systems are installed in the EPZ to alert the public, consisting of a network of fixed sirens or tone-alert radios. Provisions for transient population notification are also included in state and county plans. The ANS system includes administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method has the capability to alert and notify the public within the plume exposure pathway EPZ, but may not meet the 15-minute design objective for the primary prompt public alert and notification system.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
Appendix 3: Assurance of continued notification capability will be verified on a statistical basis similar to engineering calculation DOEJ-HX2008100234-M001.	**EP E.2.5.2**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: Southern Nuclear Operating Company, and/or the State and local governments will survey a sample of the residents in the plume exposure pathway EPZ. Appendix 3: The survey results shall be used to assess the public's ability to hear the alerting signal and their awareness of the meaning of the prompt notification message, as well as the availability of information on what to do in an emergency.	**EP E.2.5.2:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: In response to the findings of these surveys, appropriate corrective measures will be taken to provide reasonable assurance that the required coverage is maintained.	**EP E.2.5.2**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 3: The communications system between the plant and the responsible authorities (Federal, State and local) features the following capabilities: Twenty-four hour coverage at VEGP and at the primary points to receive and act upon notification. VEGP assumes primary responsibility for net control since effectively all of the emergency information originates at VEGP.	**Annex 1.6:** Primary offsite authorities provide a 24-hour per day staffing of communications links as follows: State of Georgia: • Georgia Emergency Management Agency (GEMA) Georgia County Authorities: • Burke - Burke County EMA State of South Carolina: • Emergency Management Division (EMD) South Carolina County Authorities: • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch Department of Energy – Savannah River Site (DOR-SRS) • DOE-SRS Operations Center	The commitment wording was standardized and relocated to the Site Annex

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Appendix 3: Within the plume exposure pathway EPZ, the prompt alerting and notification system will provide an alerting signal and notification by NOAA radio and an alerting signal by fixed sirens. Appendix 3: Southern Nuclear Operating Company in conjunction with Georgia Power Company provides NOAA radio receivers for all known establishments (residence, businesses, schools, etc.) within the plume exposure pathway EPZ who choose to accept them.	**Annex 4.2**: Two approved independent, complementary alerting systems are installed in the EPZ to alert the public, consisting of a network of fixed sirens or tone-alert radios. Provisions for transient population notification are also included in state and county plans. The ANS system includes administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method has the capability to alert and notify the public within the plume exposure pathway EPZ, but may not meet the 15-minute design objective for the primary prompt public alert and notification system. The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex
Appendix 3: During the distribution to those accepting the radios, a brochure is handed out.	**EP G.8**: 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 and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.

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Appendix 3: That brochure will be redistributed on an annual basis to NOAA recipients.	**EP G.8:** 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 and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: This brochure includes the following information: What is NOAA. Why NOAA radios are provided. Information they will receive on the NOAA radio. When the alert system will be activated. Who makes NOAA broadcasts. Where to place the radio. Backup battery power for power failures. What to do if the NOAA radio doesn't work. How to replace radio batteries.	**EP G.8:** 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 and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: A public information calendar entitled "The Plant Vogtle Emergency Information Calendar" will be distributed on an annual basis to the NOAA radio recipients.	**Annex 2.3.6:** 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

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Appendix 3: SNC will replace any defective radios upon request or discovery that the radios are defective.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: SNC will also annually distribute replacement batteries to all recipients of tone alert radios.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: SNC will maintain a register of all radio recipients.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: The Emergency Communications staff distributes tone alert radios to any new residents and updates the register of radio recipients periodically.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: The Emergency Communications staff also determines whether there are any permanent Burke County plume EPZ residents without electricity. A list of these residents is maintained.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.

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Appendix 3: A survey of the Burke County portion of the plume EPZ will be made annually by the Emergency Communications staff to assure that the list of any such residents is current.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: Rather, annual surveys of the entire South Carolina portion of the plume EPZ will be made directly by the Emergency Communications Staff.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: The effectiveness of the tone alert radios will be tested and evaluated at least once a year per procedure 91706-C, Alert Notification System.	**Annex 4.2** The Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: The testing and maintenance of the public alerting sirens in the VEGP EPZ are the responsibility of VEGP.	**EP E.2.5.2**: The testing and maintenance of the public alerting sirens are the responsibility of SNC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 3: The maintenance program will consist of both periodic routine checks and, as required, corrective maintenance.	**EP E.2.5.2**: The maintenance program will consist of both periodic routine checks and, as required, corrective maintenance.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 3: This program will be under the direction of the VEGP emergency preparedness coordinator.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan

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Appendix 3: SNC will replace any defective radios upon request or discovery that the radios are defective.	**EP E.2.5.2**: Unsatisfactory conditions detected by any means will be promptly repaired.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The combination of Sirens and Tone Alert Radios is conducted in accordance with the FEMA approved Design Report.
Appendix 3: The periodic routine maintenance program will be based on the manufacturers' recommendations and experience gained with the installation.	**EP E.2.5.2:** The periodic routine maintenance and test program will be based on the manufacturers' recommendations and experience gained with the installation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 3: It will consist of quarterly inspections to verify the proper physical condition of each siren location and checks to verify the proper operation of each location utilizing the built-in test and monitoring features of this system.	**EP E.2.5.2**: The periodic routine maintenance and test program will be based on the manufacturers' recommendations and experience gained with the installation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 3: The periodic test program will consist of a weekly silent test, from the county activation points, and an annual full scale activation of the system.	**EP E.2.5.2:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 3: The weekly silent test will consist of activation of the siren from the County EOC.	**EP E.2.5.2:** The periodic routine maintenance and test program will be based on the manufacturers' recommendations and experience gained with the installation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex The testing will be conducted in accordance with the FEMA approved Design Report.

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Appendix 3: Proper activation of each siren is confirmed utilizing a monitoring system.	**EP E.2.5.2:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The testing will be conducted in accordance with the FEMA approved Design Report.
Appendix 3: Once each year the system will be activated from the associated county EOC in the normal mode.	**EP E.2.5.2:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The testing will be conducted in accordance with the FEMA approved Design Report.
Appendix 3: Advance notice of the test will be provided to the public.	**EP E.2.5.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan The testing will be conducted in accordance with the FEMA approved Design Report.
Appendix 3: Activation of each siren will be verified by the WSMRFC.	**EP E.2.5.2:** 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan The testing will be conducted in accordance with the FEMA approved Design Report.
Appendix 3: Reports of siren failures or inadequate coverage will be investigated by VEGP.	**EP E.2.5.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan The testing will be conducted in accordance with the FEMA approved Design Report.

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Appendix 3: Unsatisfactory conditions detected by any means will be promptly repaired by Southern Company Services maintenance or contract personnel under the direction of the VEGP emergency preparedness coordinator.	**EP E.2.5.2:** Unsatisfactory conditions detected by any means will be promptly repaired.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan The testing will be conducted in accordance with the FEMA approved Design Report.
Appendix 4: All	**EP H.9**: 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. **Annex 5.5:** Emergency supplies and equipment are located in the TSC (also for the control room), the OSC, the radiation protection control point, and other 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 procedures. 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
Appendix 9: All	**Annex Appendix C.**	New Emergency Plan Implementing Procedures are to be developed following submittal of SNC Standard Emergency Plan and Annexes. The EPIPs will be developed consistent with the NRC approval of the Plan and the criteria of 10 CFR 50.54(q)
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

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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.2.1.16**: The Support Coordinator reports to the TSC Manager and directs the clerical and logistic activities in the TSC and ensures that support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers and that 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.		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 event 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.		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.

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Appendix 7 A.3: Minimum EOF staff for facility activation will include the EOF Manager, the Dose Assessment Supervisor, the Dose Analyst, the Field Team Coordinator, the ENN Communicator, and the Licensing Support Coordinator.	**EP Figure B.2.D**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: Access control for the EOF is established through the use of electronic card readers.	**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: The emergency director is responsible for the management of the emergency response. Specific duties and responsibilities are provided in the site specific Emergency Plan and Emergency Plan Implementing Procedures.	**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.
Appendix 7 A.3: … the EOF can be quickly accessed and made operational within about an hour of the initial notification and is safe-guarded against unauthorized personnel.	**EP B.2**: Augmentation of on-shift staffing will occur within 75 minutes of event classification by the Emergency Response Organization (ERO). ERO positions for the TSC, OSC, EOF, and JIC are detailed below. **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. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.
Appendix 7 A.3: The building itself (EOF building) has posted security guards and video surveillance cameras.	**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.

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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 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 and relocated to the SNC Standard Emergency Plan.
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.2:** Augmentation of on-shift staffing will occur within 75 minutes of event 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.	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 event 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.

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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 upon 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.
Appendix 7 B.2: The EOF Technical Supervisor will typically have plant specific long-term engineering/design experience.		The commitment was modified to required qualified personnel.

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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 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.
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.
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 Offsite Emergency Response Organization (ERO)**	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.

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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.
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.

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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, 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 by means of the plant computer system. **EP H.5.3.2**: The SPDS parameters are available 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 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.

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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 via 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 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: 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: ERF Communicators**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
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 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 and Site Annex
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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
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, required offsite responders, and the public through the execution of 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.
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.		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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
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.
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.		Egress of personnel from the EPZ fall 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.		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 that 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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
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.
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.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
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.		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 provides no purpose in the SNC Standard Emergency Plan.
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.		The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. The Drill criteria of the Plan and Annex. 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).		The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. The Drill criteria of the Plan and Annex. Separate drill criteria for the EOF are no longer required.

Current Vogtle Emergency Plan Revision 63	Revised SNC Emergency Plan	Justification
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 At least once 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 requirement into the base Plan response.
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.

VEGP 1 & 2 Site On-Shift Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	0654 Table B-1 on-shift*	VEGP 1&2 Rev 5	VEGP 1&2 Rev 63	VEGP 1&2 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	7	7
		Shift Support Supervisor			1	1
Emergency Direction and Control (Emergency Coordinator) ***		Shift Technical Advisor, Shift Supervisor or designated 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	In-Plant surveys	HP Technicians	1	1	1	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
	Offsite Surveys onsite (out of plant)	Chemistry Technicians, System Operator or other trained personnel		5	2	1
		FMT Communicator			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 Technician		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**
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**	**22**	**25**	**24**

VEGP 1 & 2 Site 60 Minute Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	VEGP 1&2 Rev 5	VEGP 1&2 Rev 63 (60 min)	VEGP 1&2 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	4	3	6
	On-Site Surveys	HP Technicians	1			
	In-Plant surveys	HP Technicians	1			
	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
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1	1	1	
		Electrical Maintenance	1	1	1	1
		I&C Technician				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**	**15**	**14**	**44**

*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.

(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 13
Vogtle Units 3 and 4 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	

Technical Support Center (TSC) and Emergency Operations Facility (EOF) positions, which support activation of the Technical Support Center (TSC) and Emergency Operations Facility (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 ~~requires one~~the Communicator function ~~to be assigned~~ on-shift. Revision 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides for two Communicators. In the proposed SNC Fleet Emergency Plan, the VEGP Unit 3 and Unit 4 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. The number of control room personnel available to perform this task will remain unchanged. ~~However, t~~This ~~is a dedicated position, which~~ will ensure there will be sufficient, appropriately trained personnel on-shift so that the Communications function may be~~is~~ assigned to an individual with no conflicting~~collateral~~ tasks. A detailed on-shift staffing analysis has been performed in accordance with 10 CFR 50 Appendix E that demonstrates the ability of the proposed staffing to perform the Communicator function with no undue burden on the control room staff or impact on the notification function.

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 a 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 on-site surveys provide additional information, such as direct radiation measurements, that could 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 allows 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 VEGP Unit 3 and Unit 4 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to an on-shift RP individual. In the proposed change, on-shift dose assessment will be assigned to an appropriately trained Chemistry individual~~personnel~~ from Vogtle Unit 1 and Unit 2 who will be assigned~~dedicated~~ to this task for the entire VEGP site, with no other conflicting~~llateral~~ emergency response duties. This will in turn free the RP individual assigned to VEGP 3&4 to perform other radiation protection related tasks. The Sharing the Chemistry position ~~will be shared~~ for the VEGP site, as the dose ~~assessment~~ analyst~~program~~ supports performing dose assessment for all units on the VEGP site in multi-unit and multi accident scenarios.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can perform dose assessments easily and rapidly 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 located on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A ~~second~~ separate Chemistry individual is provided as part of the minimum on-shift staffing for VEGP Unit 3 and Unit 4 to complete~~so that~~ ~~any~~ required chemistry sample~~s may be~~ collection~~ed~~ without impacting the VEGP Unit 1 and Unit 2 Chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), VEGP Unit 3 and Unit 4 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 Radiation Protection (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 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.

As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 3 and Unit 4 on-shift staffing, the on-site out of plant survey task will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 1 and Unit 2. SNC currently uses predesignated, readily accessible survey points around the VEGP 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 VEGP 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 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. 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.

The proposed staffing for the SNC Fleet Emergency Plan augments ~~an additional~~ off-site survey teams within 75 minutes of an Alert or higher emergency for the VEGP site as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided. Upon augmentation, the on-site out of plant monitoring activity becomes 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 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides for two RP technicians to perform in-plant surveys. However, these individuals are

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 VEGP Unit 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. A 10 CFR 50 Appendix E shift staffing evaluation has 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.

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 VEGP Unit 3 and Unit 4 licensing basis (FSAR), the design philosophy with respect to Engineered 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 passive, redundant, and have diversity of subsystems. Therefore, the inoperability of different system components 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. Furthermore, the passive design of VEGP Unit 3 and Unit 4 does not anticipate significant operator action or maintenance support for 72 hours following a design basis accident.

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 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides two individuals for performing 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

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 VEGP Unit1 and Unit 2 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
Total		**5**
Note: * JIC Staff does 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:

This License Amendment Request (LAR) revises the current on-shift and augmented Emergency Response Organization (ERO) for Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 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

VEGP Unit 3 and Unit 4 Emergency Plan Revision 3.0 requires staffing of augmented ERO at the Alert or higher classification. Specifically, it states the Emergency Response Facilities (ERFs) "...will be activated and will be operational within about an hour of 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" in order to clearly define the augmentation requirement.

Assignment of Responsibility/Organizational Control

VEGP Unit 3 and Unit 4 Emergency Plan Revision 3 identifies the on-shift organization 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 VEGP.

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 plan Revision 3.0 meets the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the VEGP Unit 3 and Unit 4 Technical Specifications. In addition to these requirements, the proposed SNC Fleet

Emergency Plan Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 staffing provides for a dedicated Shift Manager position in the VEGP Unit 3 control room and the VEGP Unit 4 control room. The NUREG-0654/FEMA REP-01 Revision 1 function of Emergency Direction and Control will be assigned to the Shift Manager on which the emergency event has been declared. Per NUREG-0654/FEMA REP-01 Revision 1, this function may be performed as a collateral duty of one of the individuals also 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 VEGP Unit 3 and Unit 4 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 and proposed Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Emergency Plan, the on-shift staffing exceeds the requirements of NUREG-0654/FEMA REP-01 Revision 1 Table B-1. The on-shift staff as described serves to ensure prompt response to emergency events and the capability of on-shift personnel to support plant operations or the assessment of operational aspects 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 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan, the Emergency Director (ED) function is 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 Technical Support Center (TSC) within about one hour of notification of an emergency. The proposed SNC Fleet Emergency Plan Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 staffing provides for a dedicated Shift Manager position in the VEGP Unit 3 control room and the VEGP Unit 4 control room. The Emergency Direction and Control function will be assigned to the Shift Manager on which the emergency event has been declared.

As provided in the current revision to the VEGP Unit 3 and Unit 4 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 about 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 the 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	

Technical Support Center (TSC) and Emergency Operations Facility (EOF) positions, which support activation of the Technical Support Center (TSC) and Emergency Operations Facility (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 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides for two Communicators. In the proposed SNC Fleet Emergency Plan, the VEGP Unit 3 and Unit 4 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 an individual with no conflicting tasks. A detailed on-shift staffing analysis has been performed in accordance with 10 CFR 50 Appendix E that demonstrates the ability of the proposed staffing to perform the Communicator function with no undue burden on the control room staff or impact on the notification function.

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 a 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 on-site surveys provide additional information, such as direct radiation measurements, that could 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 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 augmentation time 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: Emergency Operations Facility (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 Technical Support Center (TSC) ED is not assigned to the on-shift complement. In the current plan, the TSC ED arrives within about 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 Protective Action Recommendations (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 resource for the on-shift dose assessment task. The current version of the VEGP Unit 3 and Unit 4 Emergency Plan does provide for an on-shift capability for performance of dose assessment and is currently assigned to an on-shift RP individual. In the proposed change, on-shift dose assessment

will be assigned to an appropriately trained Chemistry individual from Vogtle Unit 1 and Unit 2 who will be assigned to this task for the entire VEGP site, with no other conflicting emergency response duties. This will in turn free the RP individual assigned to VEGP 3&4 to perform other radiation protection related tasks. The Sharing the Chemistry position for the VEGP site, as the dose analyst supports performing dose assessment for all units on the VEGP site in multi-unit and multi accident scenarios.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can perform dose assessments easily and rapidly 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 located on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A separate Chemistry individual is provided as part of the minimum on-shift staffing for VEGP Unit 3 and Unit 4 to complete required chemistry sample collection without impacting the VEGP Unit 1 and Unit 2 Chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), VEGP Unit 3 and Unit 4 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 Radiation Protection (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 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.

As part of the proposed SNC Fleet Emergency Plan for VEGP Unit 3 and Unit 4 on-shift staffing, the on-site out of plant survey task will be performed by a single RP technician or other appropriately trained individual shared with VEGP Unit 1 and Unit 2. SNC currently uses predesignated, readily accessible survey points around the VEGP 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 VEGP 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 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. 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.

The proposed staffing for the SNC Fleet Emergency Plan augments off-site survey teams within 75 minutes of an Alert or higher emergency for the VEGP site as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided. Upon augmentation, the on-site out of plant monitoring activity becomes 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 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides for two RP technicians to perform in-plant surveys. However, these individuals are provided under the Protective Actions function. The proposed SNC Fleet Emergency Plan VEGP Unit 3 and Unit 4 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 VEGP Unit 3 and Unit 4 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 for the VEGP site. 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. Subsequently, the NRC modified this position with the guidance of "Commission Policy Statement on Engineering Expertise on Shift" published in Federal Register Notice 50 FR 43621, dated October 1985. Based on this Commission Policy Statement, the Current VEGP Unit 3 and Unit 4 Emergency Plan assigns the STA task as a collateral duty to an STA qualified SRO assigned to other functions.

The proposed SNC Fleet Emergency Plan staffing for VEGP Unit 3 and Unit 4 continues to identify this task as fulfilled by an individual holding the STA qualification as a collateral duty of appropriately qualified on-shift personnel that may also be assigned to another function. This will typically be assigned to either the Shift Manager or another on-shift Senior Reactor Operator (SRO). The performance of this task as a collateral duty includes the 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 various critical safety parameters,. This enhances critical parameter monitoring and the rapid identification and assessment of in plant conditions.

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 VEGP Unit 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. A 10 CFR 50 Appendix E shift staffing evaluation has 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.

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 VEGP Unit 3 and Unit 4 licensing basis (FSAR), the design philosophy with respect to Engineered 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 passive, redundant, and have diversity of subsystems. Therefore, the inoperability of different system components 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. Furthermore, the passive design of VEGP Unit 3 and Unit 4 does not anticipate significant operator action or maintenance support for 72 hours following a design basis accident.

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 3.0 of the VEGP Unit 3 and Unit 4 Emergency Plan provides two individuals for performing 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 VEGP Unit 3 and Unit 4 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 their allowed dose or dose rate. In-plant teams are briefed regarding 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 VEGP Unit 3 and Unit 4 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 for the VEGP site. 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 the Fire Fighting function. 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." The VEGP Unit 3 and Unit 4 Emergency Plan uses appropriately trained on-shift personnel to fulfill this function as a collateral duty. The proposed SNC Fleet Emergency Plan provides that the existing personnel assigned this function will be maintained. However, these positions will be shared for the VEGP site. 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; therefore, there is no impact represented by the change in augmentation times.

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 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 VEGP 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 15.

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 VEGP Unit1 and Unit 2 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
Total		**5**
Note: * JIC Staff does 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 aspects of plant systems, dose assessment, procedures, and training which 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 included in Enclosure 15.

Plant Computer System

The VEGP Unit 3 and Unit 4 Safety Parameter Display System (SPDS) is a state of the art system integrated into the overall man-machine interface for VEGP Unit 3 and Unit 4. It provides a display of plant parameters from which the status of operation can be assessed, in the control room and in the onsite and off-site Emergency Response Facilities (ERFs).

This state of the art SPDS:

- 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.

The SPDS in the control room consists of displays of sets of concentrated parameters from which plant safety status can be rapidly assessed. Duplicate SPDS displays are located in the TSC and EOF to maximize the exchange of information between these facilities and the control room. The SPDS in each facility is a peripheral of the Integrated Plant Computer (IPC) system.

The Integrated Plant Computer gathers, stores, and displays data used by TSC and EOF personnel to analyze plant conditions. The IPC performs this function independently of actions in the control room and without degrading or interfering with control room and plant functions. The IPC consists of workstations, printers, video copiers, and associated computer hardware and software. The IPC serves as the primary data acquisition system for emergency response, acquiring, processing, and feeding data to the TSC and the Safety Parameter Display System (SPDS). In addition, data links are provided to other locations including the EOF.

Dose Assessment

Radiological dose assessment has benefited from technological advances that make performance of dose assessment simpler and less time-consuming. Dose assessment is currently performed by on-shift RP 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 streamlined 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)

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 uses a classification methodology based on NEI 07-01 guidance. This EAL guidance has improved 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 Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4. The application of the Systematic Approach to Training (SAT) 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 will be used during Operations Training. Simulator evaluations include emergency response scenarios that will periodically exceed 75 minutes in length and will be part of the requalification cycle. Simulator scenarios will be designed to be realistic and reflect a wide range of plant conditions, including emergency conditions. During evaluated simulator sessions, the control room staff will be presented with a variety of plant conditions from normal operation to accident conditions resulting in declaration of at least one event. These events can range from Unusual Event to General Emergency. The crews will perform 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 will be assessed in every training cycle.

The Licensed Operator Requalification (LOR) Training Program will include 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

The regulatory guidance provided by NUREG-0654/FEMA REP-01 Revision 1 requires a total of 10 persons. The staffing proposed for VEGP Unit 2 and Unit 3 significantly exceeds this guidance. A comparative chart depicting on-shift and augmented staffing based on NUREG-0654/FEMA REP-01 Revision 1, Revision 3.0 of the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Emergency Plan, and the staffing proposed in the SNC Fleet Emergency Plan is included in Enclosure15.

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 existing at the time NUREG-0654/FEMA REP-01 Revision 1 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 rea- 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 in reactor technology, staffing, equipment, procedures, communication of plant information, and training since initial approval of NUREG-0654/FEMA REP-01 Revision 1 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 the 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 14
Vogtle Units 3 and 4 Standard Emergency Plan Annex
(Marked-Up Pages and Clean Copy)

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Section 2: Organizational Control of Emergencies (SEP B.1)

2.1 Normal Plant Organization (SEP B.1)

The normal plant operating crew is staffed and qualified to perform actions that may be necessary to initiate immediate protective actions and to implement the emergency plan and is designated as the responsible group for such actions.

The normal plant organization is described in Section B.1 of the Emergency Plan.

2.2 Emergency Organization (SEP B.2, B.3)

2.2.1 The VEGP On-Shift Emergency Response Organization is described in Table 2.2.A. (SEP B.1)

2.2.2 The VEGP 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)

~~2.2.2.1 Additional Augmented ERO positions for Site Vogtle include:~~

~~TSC – Engineering Supervisor, Operations Supervisor, Mechanical Engineer, Electrical Engineer~~

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.

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~~		1 Note 3
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Chemistry Technician			1
	In-plant surveys	RP Technician	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		
	Chemistry/Radio- chemistry	Chemistry Technician	1		
Plant System Engineering, Repair and Corrective Actions	Repair and Corrective Actions	Maintenance Supervisor			1
		Mechanic			1
		Electrician			1
		I & C Technician			1

		Total:	**21**	~~78~~
Firefighting		Fire Brigade Note 2	5	
Rescue Operations and First Aid		Rescue Operations/First Aid Note 1		2
Site Access and Personnel Accountability		Security	Security 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

Southern Nuclear Operating Company

STANDARD EMERGENCY PLAN ANNEX
for
Vogtle Electric Generating Plant
Units 3 and 4
Revision 0

Table of Contents

Section 1: Introduction (SEP)

This document serves as the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Annex and contains information and guidance that is unique to VEGP Units 3 and 4. This includes Emergency Action Levels (EALs) and facility geography.

In an emergency situation at VEGP, the initial response would be made by the site staff and, if needed, by local support agencies. This Annex addresses the actions and responsibilities of the VEGP plant staff and the offsite support agencies.

1.1 Facility Description

The Vogtle Electric Generating Plant (VEGP) Units 3 and 4 are a two-unit pressurized water reactor, based upon the Westinghouse AP1000 passive reactor design. The plant site, to include VEGP Units 1-4, is on a 3,169-acre site located in the eastern portion of Burke County, Georgia, approximately 23 river miles upstream from the intersection of the Savannah River with U.S. Highway 301.

1.2 Emergency Planning Zones (SEP J.5)

1.2.1 Plume Exposure Pathway (SEP J.7)

The 10-mile Emergency Planning Zone (EPZ) for VEGP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Georgia and South Carolina, as well as the counties (Burke County in Georgia and Aiken, Barnwell, and Allendale Counties in South Carolina) are located within the plume exposure pathway EPZ. The major portion of the plume exposure pathway EPZ in South Carolina is within the Department of Energy's Savannah River Site (SRS).

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 states of Georgia and South Carolina. More information about the IPZ can be obtained from the states' Radiological Emergency Plans.

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 Vogtle 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.

1.4 State of South Carolina (SEP A.2.3)

The state of South Carolina has developed the South Carolina Radiological Emergency Response Plan (SCORERP), which provides guidance to state and local governments on procedures, organization, and responsibilities for preventing and mitigating the effects of a nuclear power plant incident or disaster.

The SCORERP describes the South Carolina Radiological Emergency Response Organization, which consists of the Office of the Adjutant General (Emergency Management Division) (EMD), the Department of Health and Environmental Control (Bureau of Solid and Hazardous Waste, Nuclear Emergency Planning (NEP) Section), and those state resources available to local government(s) during a fixed nuclear facility radiological accident.

The response functions of involved agencies are described in the SCORERP and the South Carolina Technical Radiological Emergency Response Plan (SCTRERP).

1.4.1 Office of the Governor (SEP A.2.3.1)

In the event of the declaration of a radiological emergency, the EMD, Department of Health and Environmental Control (DHEC) and other state agencies are activated.

1.4.2 Office of the Adjutant General - Emergency Management Division (EMD) (SEP A.2.3.1)

The EMD is responsible for coordinating the emergency planning efforts of all state, county, and municipal agencies in developing a state emergency plan. Additional responsibilities include conducting a preparedness program to assure capability of the state government to execute the plan; establishing and maintaining a state EOC and provide support of the state emergency staff and work force; and establishing an effective system for reporting, analyzing, and disseminating emergency information.

1.4.3 Department of Health and Environmental Control (DHEC) (A.2.3.2)

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 VEGP.

1.4.4 Other State Support Agencies (A.2.3.3)

Other state agencies described in the South Carolina Emergency Operating Plan (SCEOP) and South Carolina Operational Radiological Emergency Response Plan (SCORERP) will provide related support pursuant to each plan.

Those agencies include:

- Department of Public Safety (Highway Patrol Division)
- State Law Enforcement division (SLED)
- Forestry Commission
- Department of Natural Resources

- Department of Social Services
- Department of Agriculture
- Clemson University Cooperative Extension Service

1.5 Local Organizations (SEP A.2.4, B.6.1)

Principal activities of Local Emergency Management Agencies (LEMA) and Local Law Enforcement Agencies (LLEA) in Georgia and South Carolina are described in the respective county Emergency Operations Plans.

1.5.1 Burke County Georgia (SEP A.2.4)

The area within the plume exposure pathway (EPZ) in the state of Georgia falls within Burke County. The responsibility for overall radiological emergency response planning rests with the Chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident.

1.5.2 Aiken, Barnwell, and Allendale Counties South Carolina (SEP A.2.4)

Most of the plume exposure pathway EPZ within South Carolina falls within the site boundary of the Savannah River Site (SRS). The United States Department of Energy is responsible for the direction and control of all emergency response actions on the SRS.

Limited portions of Aiken, Barnwell, and Allendale counties are outside of the SRS but within the plume exposure pathway EPZ of VEGP. These counties are similarly organized, with the responsibility for overall radiological emergency response planning resting with the Chairman of the County Council in each case.

1.6 Department of Energy (DOE) – Savannah River Site (SRS) (SEP A.1.4)

The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.

1.7 Hostile Action Based Events (SEP H.1.4)

Agreements are in place with the state of Georgia, Burke County, Georgia, Aiken, Allendale, and Barnwell Counties in South Carolina to provide available resources and equipment to support the mitigation and response to an emergency at Plant Vogtle 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 Burke County 911 Center 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.

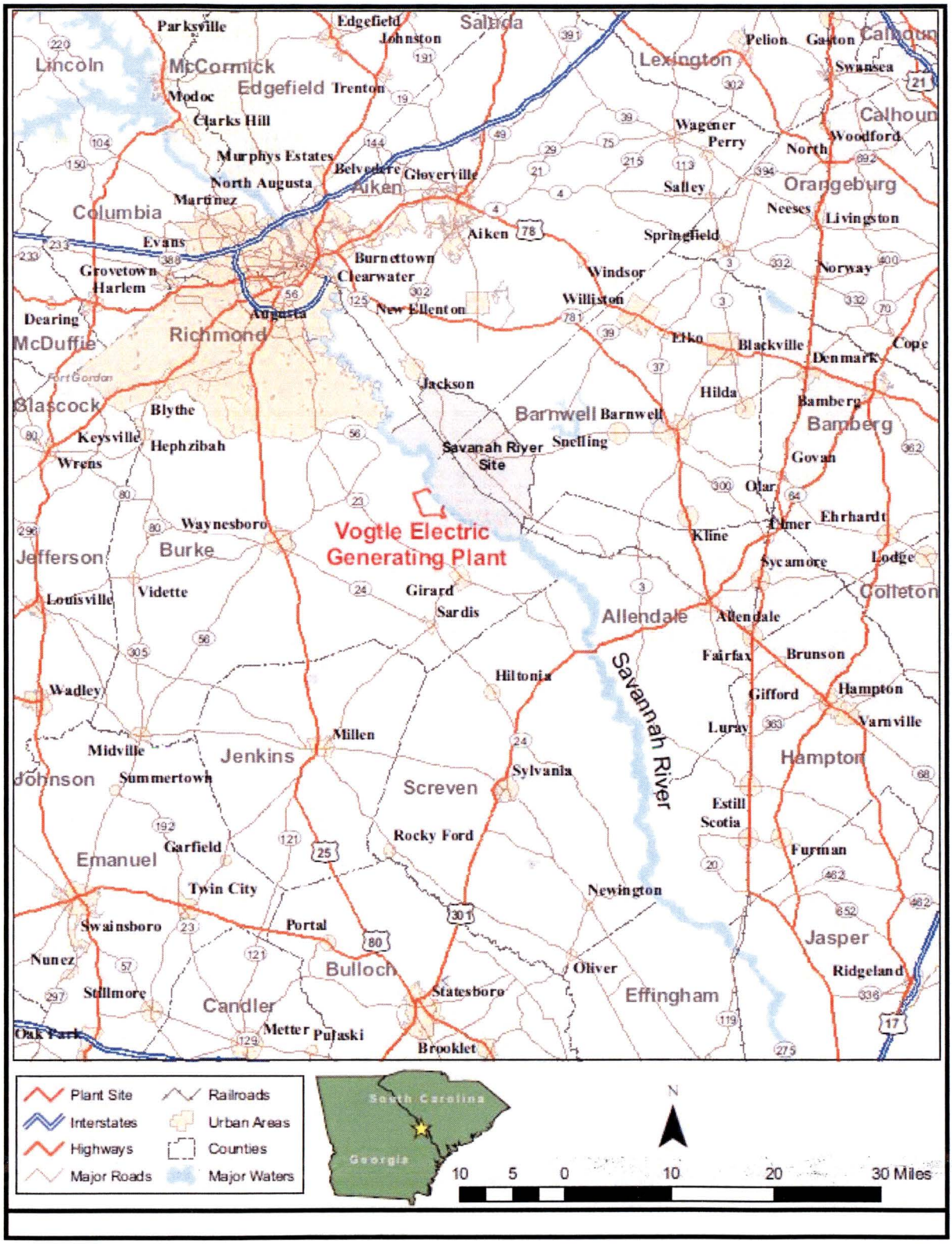

Figure 1.1.A - Location and Vicinity Map

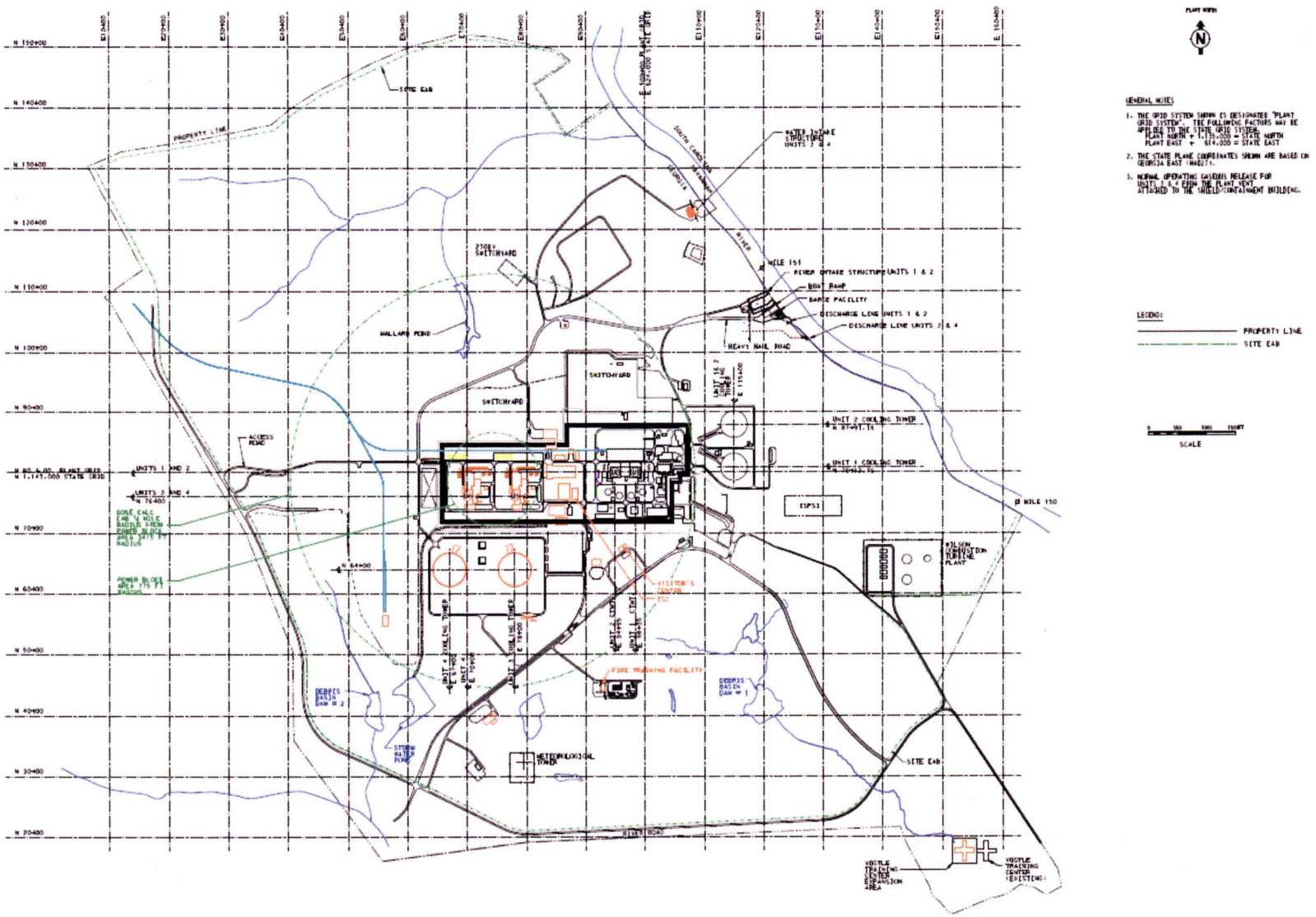

Figure 1.1.B – VEGP Site Layout

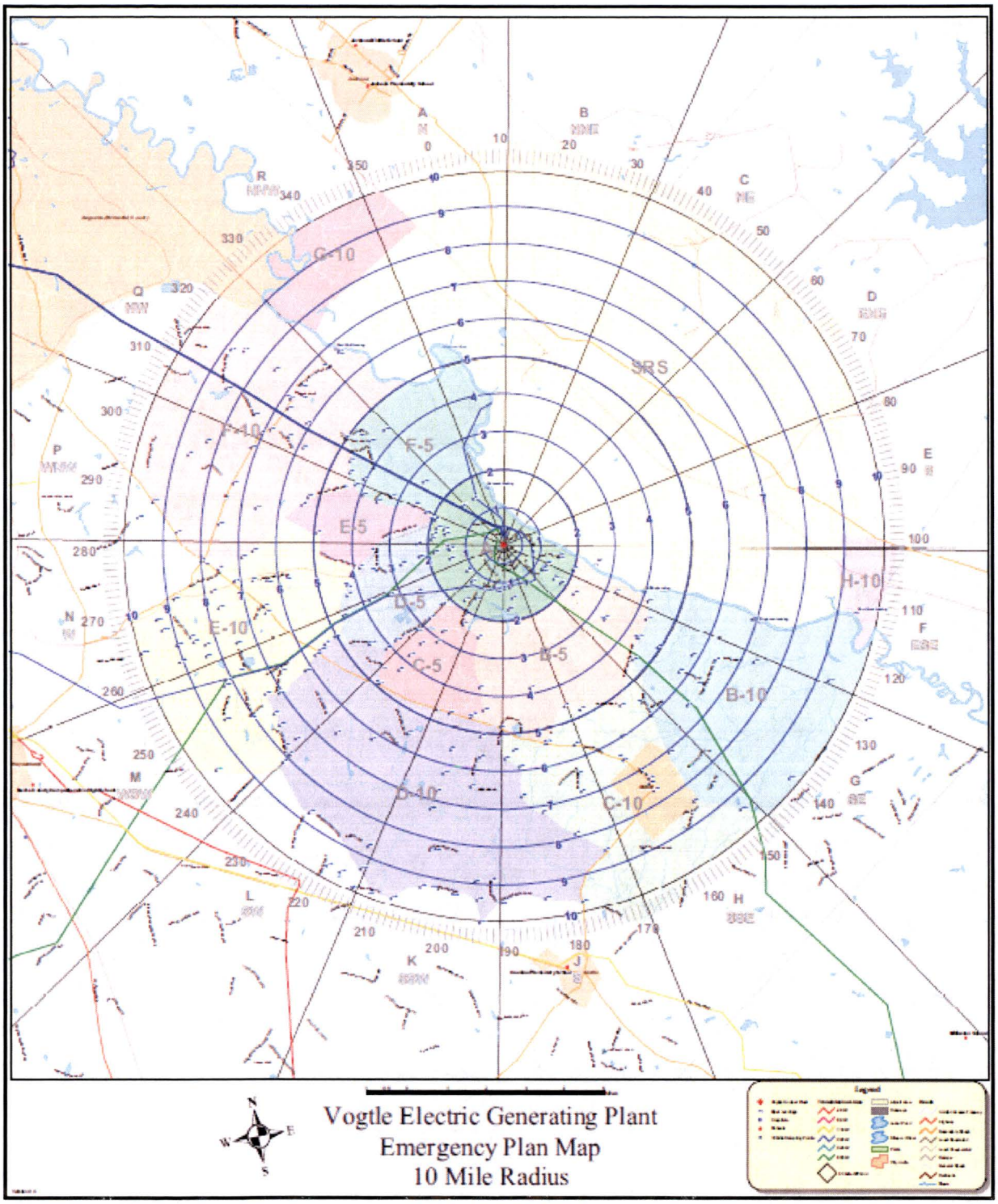

Figure 1.2.A – 10 Mile Emergency Planning Zone (EPZ)

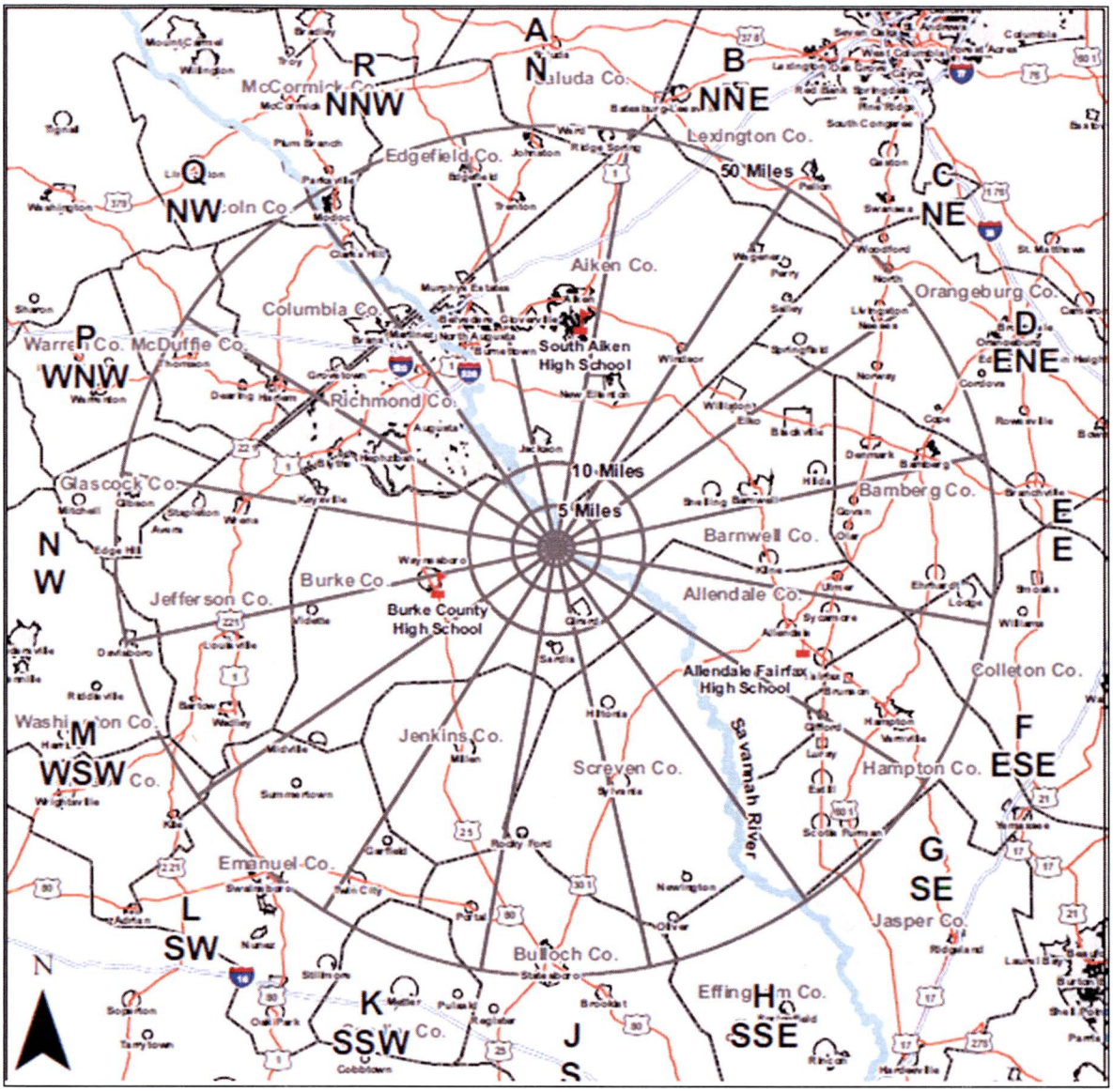

Figure 1.2.B – 50 Mile Ingestion Pathway IPZ

Section 2: Organizational Control of Emergencies (SEP B.1)

2.1 Normal Plant Organization (SEP B.1)

The normal plant operating crew is staffed and qualified to perform actions that may be necessary to initiate immediate protective actions and to implement the emergency plan and is designated as the responsible group for such actions.

The normal plant organization is described in Section B.1 of the Emergency Plan.

2.2 Emergency Organization (SEP B.2, B.3)

2.2.1 The VEGP On-Shift Emergency Response Organization is described in Table 2.2.A. (SEP B.1)

2.2.2 The VEGP 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)

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.

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		
	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		
	Chemistry/Radio- chemistry	Chemistry Technician	1		
Plant System Engineering, Repair and Corrective Actions	Repair and Corrective Actions	Maintenance Supervisor			1
		Mechanic			1
		Electrician			1
		I & C Technician			1

		Total:	**21**	**8**
Firefighting		Fire Brigade Note 2	5	
Rescue Operations and First Aid		Rescue Operations/First Aid Note 1		2
Site Access and Personnel Accountability		Security	Security 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

2.3 Non-SNC Support Groups (SEP B.4, B.5, B.6)

2.3.1 Fire Fighting (SEP B.6.4)

VEGP has established an agreement with the Burke County Emergency Management Agency to provide, upon request, offsite fire support to the VEGP Units 3 and 4 Fire Brigade. Fire 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 Burke County Emergency Management Agency, Burke 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.

2.3.2 Hospital and Medical Support (SEP B.6.3, K.1.3, L.1)

Agreements are in place with the University of Alabama at Birmingham (UAB) Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.

2.3.3 Ambulance Service (SEP B.6.2, L.4)

VEGP has established agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment.

Support provided includes, but is not limited to, Emergency medical services, ambulances, and emergency medical technicians Request for fire support will be made by the control room or site security to the Burke County Emergency Management Agency, Burke 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 accordance with Emergency Plan procedures.

2.3.4 Emergency Broadcasts (SEP E.2.5.1)

VEGP has established agreements with media agencies to broadcast emergency messages and information to the public during an emergency event. The messages will be coordinated with local or state Emergency Management Agencies and are available on a 24 hour basis as members of the Emergency Alert System (EAS).

2.3.5 Voluntary Assistance Group (SEP B.4.2)

VEGP 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.

2.3.6 Information for Transients (SEP G.8)

Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated upon 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 as to what local media will be providing additional information in the event of an emergency.

Section 3: Classification of Emergencies (SEP D.1)

3.1 Emergency Classifications: (SEP D.1)

Emergencies are classified into four levels according to severity, taking into consideration potential, as well as actual, events in progress. They are, from the least to the most serious, Unusual Event, Alert, Site Area Emergency, and General Emergency. Initiating Conditions (ICs), which determine which level will be declared, are predetermined subsets of plant conditions where the potential exists for a radiological emergency, or such an emergency has occurred. Emergency Action Levels (EALs) are plant-specific indications, conditions, or instrument readings that are utilized to classify emergency conditions.

3.1.1 The described emergency classes and the emergency action levels that determine them are agreed on by SNC and state and local authorities. The emergency action levels will be reviewed by these (state and local) officials annually.

3.2 Determination of Levels: (SEP D.1.2)

Appendix B to this Annex contains the matrix for Initiating Conditions used to determine an Emergency Action Level (EAL). They are part of the scheme established by NEI 07-01, Methodology for Development of Emergency Action Levels for Advanced Passive Light Water Reactors.

3.3 Operating Mode Applicability (SEP D.2.7)

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.

PWR Operating Modes at VEGP 3&4

Power Operations (1):	Reactor Power > 5%, $K_{eff} \geq 0.99$
Startup (2):	Reactor Power ≤ 5%, $K_{eff} \geq 0.99$
Hot Standby (3):	RCS > 420 °F, $K_{eff} < 0.99$
Safe Shutdown (4):	420 °F ≥ T_{avg} > 200 °F, $K_{eff} < 0.99$
Cold Shutdown (5):	RCS ≤ 200 °F, $K_{eff} < 0.99$
Refueling (6):	One or more vessel head closure bolts less than fully tensioned
Defueled (None):	All reactor fuel removed from reactor pressure vessel. (Full core off load during refueling or extended outage)

Section 4: Emergency Measures (SEP E)

4.1 Notification of Off-Site Agencies (SEP E.2.2)

4.1.1 Notification Process (SEP E.2.2.2)

State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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:

- Burke - Burke County Emergency Management Agency

State of South Carolina:

- Emergency Management Division (EMD)

South Carolina County Authorities:

- Barnwell and Aiken County - Sheriff's Department
- Allendale County – County Central Dispatch

Department of Energy – Savannah River Site (DOE-SRS)

- DOE-SRS Operations Center

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 Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Provisions for transient population notification are also included in state and county plans.

In the event of an emergency declaration at the VEGP, DOE-Savannah River Site has agreed to provide for the prompt notification of all persons on the SRS within VEGP's plume exposure pathway EPZ.

A full Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report (ANS-VEGP-001) located in the SNC document management system.

The ANS system includes administrative and physical means for a backup method of public alerting and notification capable of being used in the event the primary method of alerting and notification is unavailable during an emergency to alert or notify all or portions of the plume exposure pathway EPZ population. The backup method has the capability to alert and notify the public within the plume exposure pathway EPZ, but may not meet the 15-minute design objective for the primary prompt public alert and notification system.

4.3 Protective Actions for Onsite Personnel (SEP J.4)

Protective response for onsite personnel (including visitors and contractor personnel) includes alerting, assembly and accountability, site evacuation, monitoring, and decontamination. Protective actions may also be taken for onsite personnel for emergencies such as fires, security related events or natural disasters where personnel safety is threatened.

4.3.1 Alerting (SEP E.2.1, J.1)

Section E of the Emergency Plan (EP), Notification Methods and Procedures, describes the methods to be used to alert onsite personnel of emergency conditions.

4.3.2 Assembly (SEP J.4.1)

Personnel assembly is mandatory at the Site Area Emergency or higher level classification. Upon activation of the plant emergency alarm, plant personnel assigned specific emergency responsibilities proceed to their designated emergency response locations reporting to designated assembly areas. Assembly may be initiated at any time site management deems it appropriate for personnel safety reasons.

Nonessential plant personnel located within the Protected Area will exit the protected area upon hearing the Site Area or the General Emergency alarm and report to designated areas. Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.

4.3.3 Security Events (SEP J.4)

Onsite protection of employees during security events involves a combination of restricted movement, movement to safe locations and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.

4.3.4 Monitoring and Decontamination (SEP K)

When an Alert is declared but no site evacuation is anticipated, personnel who have left the protected area are monitored by portal monitors. If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations.

When site evacuation with monitoring is expected and release of radioactivity has occurred, monitoring is performed by Burke County emergency workers at an established reception center.

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.

4.4.1 Protective Action Recommendations (SEP J.5)

A range of Protective Actions have been developed and agreed upon with state and local authorities. They may include the following:

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

Section 5: Emergency Facilities and Equipment (SEP H)

5.1 Emergency Response Facilities (SEP H.1, H.2)

5.1.1 Control Room (SEP H.1.1)

A main control room is provided that is able to control the plant during normal and anticipated transients and design basis accidents. The main control room includes indications and controls capable of monitoring and controlling the plant safety systems as well as the non-safety related control systems. The safety related power sources and passive cooling system are designed to provide a habitable environment for the operating staff assuming that no ac power is available. Installed equipment provides for at least 3 days of operation. After 3 days, it is possible to continue operation with the control room cooled and ventilated with circulation of outside air.

5.1.2 Technical Support Center (SEP H.1.2)

The TSC will be located in the lower level of the Communication Support Center (CSC) sited between the Unit 2 and 3 power blocks within the VEGP Site protected area as shown on Figure 1.1.B. The TSC will be designed to withstand plant design basis earthquakes and high winds. The layout of the proposed TSC is shown in Figure 5.1.A.

The TSC will accommodate the required personnel to support events on multiple Units. Technical and operational data and information will be available for Units within the TSC. Support facilities will be located within the TSC to support long term operation of the TSC.

The TSC will provide plant management and technical support personnel (including Nuclear Regulatory Commission (NRC) personnel) with a facility from which they can assist plant operating personnel located in the control rooms during an emergency. The Emergency Director and NRC will be co-located to ensure proper communications. The TSC will be equipped with a computer system, which provides source term and meteorological data and technical data displays to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any significant release of radioactivity to the environment. In addition, the TSC will have ready access to plant records. The TSC structure and ventilation system will be designed to ensure that the TSC personnel are protected from radiological hazards.

The ventilation system will include high efficiency particulate air (HEPA) and charcoal filters. The ventilation system will be designed to maintain exposures to occupants at or below 5 rem total effective dose equivalent (TEDE) for the duration of the accident.

The ventilation system will be operated in accordance with emergency plan implementing procedures (EPIPs) and will be manually controlled from the TSC. The ventilation system will operate in the pressurization and filtering mode upon detection of high radiation in the TSC ventilation intake. In addition, portable radiation monitors will be available for personnel in transit from the TSC to other areas. Portable air breathing apparatus and anti-contamination clothing will also be available for the TSC.

The TSC will be powered by reliable and redundant power supplies. Lighting will be powered by the normal and redundant electrical supply system. An

emergency battery operated lighting system will be installed. Power for vital information systems will be provided by redundant power supplies including a battery backed uninterruptible power supply system.

The records storage is shared by the control room and the TSC. These records can be accessed via a digital records system. This system is supplied backup power via an uninterruptible power supply to allow retrieval of records in the event of a loss of power. These records include but are not limited to:

- Technical Specifications.
- Plant Operating Procedures.
- Final Safety Analysis Report.
- Emergency Plan.
- Emergency Plan Implementing Procedures.
- Plant operating records.
- System piping and instrumentation diagrams and heating, ventilation, and air-conditioning (HVAC) flow diagrams.
- Electrical one-line, elementary, and wiring diagrams.
- Control logic and loop diagrams.

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

5.1.3 Operations Support Center (SEP H.1.3)

The OSC is located in the Maintenance Support Building located between Unit 2 and Unit 3. The OSC is where operational support personnel (such as instrument technicians, engineers, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel) assemble to aid in the response to an emergency. The layout of the proposed OSC is in Figure 5.1.A.

Emergency kits containing radiation monitoring equipment, first aid supplies, decontamination supplies, breathing apparatus, portable lighting, and hand-held radios are stored in the OSC. In the event that this facility becomes uninhabitable, the functions of the OSC will be conducted from Outage Control Center (OCC) located in the Annex Building if Unit 3 or Unit 4 is affected unit and from Clearance and Tagging (C&T) located in the control building if Unit 1 or Unit 2 is the affected unit. These designated back-up OSC spaces will have the same capability as the OSC. Evacuation of the OSC will be conducted according to emergency implementing procedures. These procedures will describe the method by which the OSC is evacuated and the movement of personnel to other facilities

The OSC will accommodate the staff support and technical staff to support an event on multiple Units. The OSC has the communications capability to communicate with control rooms, the Technical Support Center (TSC) and the Emergency Operations Facility (EOF).

Operations at this facility will be directed by the OSC Manager.

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 near site media center in Waynesboro, GA. 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 the SNC document management resources, 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 contained in site procedures.

5.1.5 Emergency Operations Facility (SEP H.2.1)

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). Additional details of the EOF are contained in section H.2.1 of the Emergency Plan.

The near site location is maintained at the Vogtle Training Center space for members of an NRC Site Team.

5.1.6 Joint Information Center (JIC) (SEP H.2.2)

The VEGP JIC is located in Waynesboro, 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 public and media inquiries. Details of the JIC for VEGP 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.

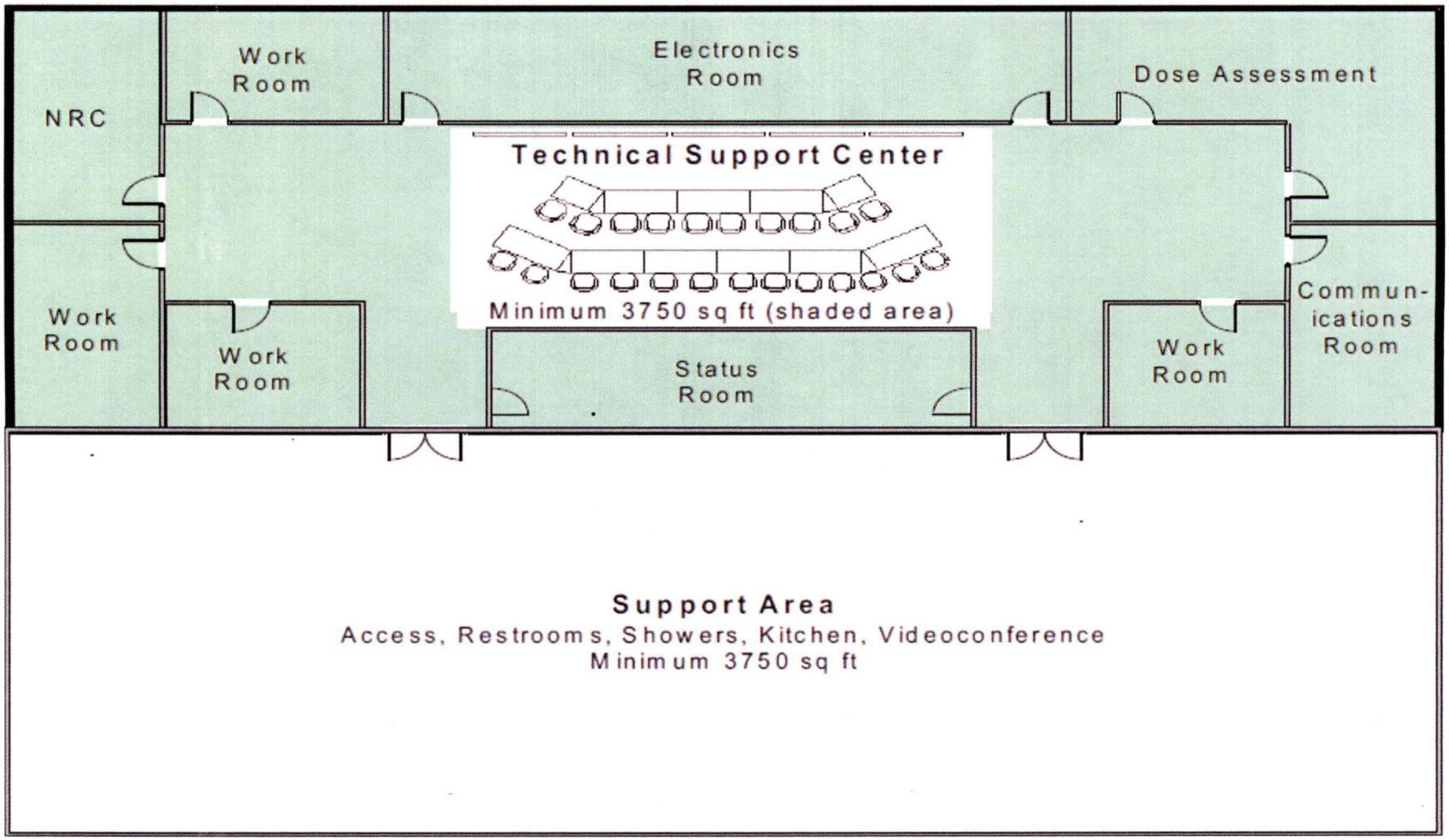

Figure 5.1.A – Sample Technical Support Center

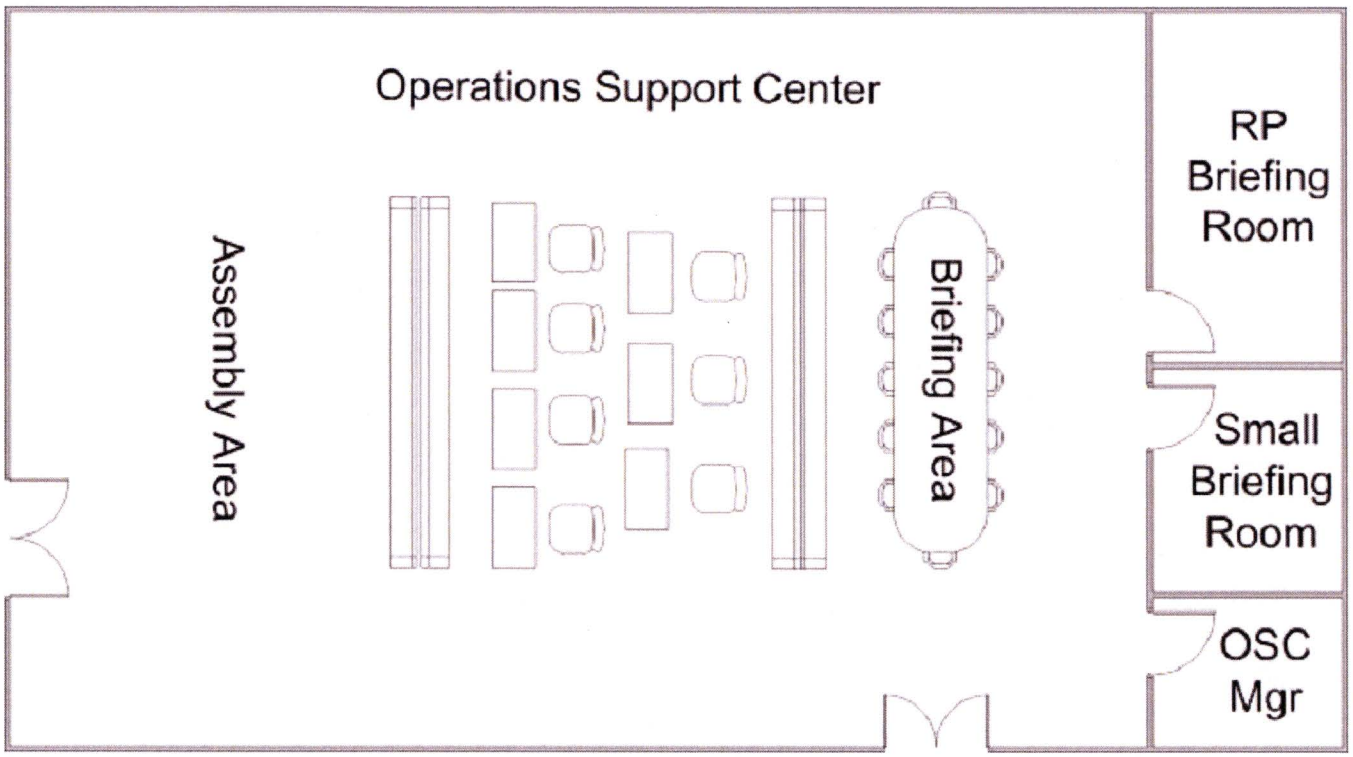

Figure 5.1.B – Sample Operations Support Center

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 may also 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 Building. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities.

5.3 Offsite Communications (SEP F.1)

5.3.1 Communications with States, Counties, and Savannah River (SEP F.1.2)

The primary means of communication between VEPG, the states of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, the Burke County EOC, and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.

5.3.2 Alternate Offsite Communications (SEP F.1.1)

Commercial telephones, or land lines provide backup for the ENN.

5.4 Communications System Testing (SEP F.3)

Communication channels with the state of Georgia, the state of South Carolina, the Savannah River Site, 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.

5.5 Emergency Kits (SEP H.9)

Emergency supplies and equipment are located in the Control Room, the TSC, the OSC, the radiation protection control points, and other 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 procedures. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.

5.6 Facilities and Equipment for On-site Monitoring (SEP H.5)

The plant instrumentation and monitors perform indicating, recording, and protective functions. The Reactor Protection System and associated plant instrumentation provide the ability to maintain plant safety from shutdown to full power operations and to monitor and maintain key variables such as reactor power, flow, temperature, and radioactivity levels within predetermined safe limits at both steady state conditions and during plant transients. Plant instrumentation and control systems also provide means to cope with abnormal operating conditions. The control and display of information of these various systems are centralized in the unit Control Room. This instrumentation would provide the basis for initiation of protective actions.

5.6.1 Geophysical Phenomena Monitors (SEP H.5.1)

Meteorological (SEP H.5.1)

A meteorological monitoring program is in place at VEGP. Instruments are mounted on a 60-meter tower located to the south-southwest of the power block. Parameters measured and transmitted to the control room include:

- Windspeed (10 m and 60 m).
- Wind direction (10 m and 60 m).
- Standard deviation of horizontal wind direction (10 m).
- Vertical temperature difference (10 m and 60 m).
- Ambient temperature (10 m).
- Dewpoint temperature (10 m).
- Precipitation (base).

An equipment building that houses the recording, calibration, and amplification equipment is located near the base of the tower. The system is powered by an uninterruptible power supply consisting of wet cell batteries, charger, and inverter for high availability. 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 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.

Hydrologic (SEP H.5.1)

The normal source of plant makeup water to the secondary plant for Units 3 and 4 is the Savannah River, which provides makeup to the circulating water system cooling towers. The probable maximum flood level has been determined to be about 140 ft mean sea level (MSL). However, since the access elevations to safety- related structures are at 220 ft MSL, high river level is not relevant to plant safety. The ultimate heat sink for VEGP Units 3 and 4 is the atmosphere. Because of these design features, hydrologic monitors will not be required for initiation of emergency actions; therefore, there will be no emergency levels based on hydrologic monitors.

Seismic (SEP H.5.1)

Seismic monitoring instrumentation for VEGP Units 3 and 4 will include triaxial acceleration sensors and a time-history analyzer. One of the four triaxial acceleration sensors will be located in the free field, a second sensor will be located on the nuclear island basemat, a third sensor will be located on the shield building structure, and a fourth sensor will be located on the containment internal structure.

The triaxial acceleration sensors will provide a signal to the time-history analyzer located in a room near the control room. The time-history analyzer includes a dedicated computer for data storage, playback, and analysis. Activation of the time-history analyzer causes visual and audible annunciation in the control room to alert the plant operator that an earthquake has occurred.

5.7 Protective Facilities and Equipment (SEP J)

Assembly Points (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 utilized. 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. Georgia Power Company facilities may be utilized as the off-site assembly area at the discretion of the Emergency Director. Its 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.

5.8 Medical Support (SEP B, SEP L)

5.8.1 Hospital and Medical Support (SEP B.6.3, L.1)

Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures.

5.8.2 Ambulance Service (SEP B.6.2, L.4)

Injured/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, and an RP technician may accompany, as requested, any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.

Appendix A – Evacuation Time Estimate Study and Map Reference (SEP J.6)

In order to ensure the safety of the public living in the vicinity of nuclear power plants in the nation, the U.S. Nuclear Regulatory Commission (NRC) requires licensees to develop and update evacuation time estimates (ETEs) for areas within the emergency planning zone (EPZ). Population reviews will be conducted annually using the most recent US Census and local information. Updates are required following the availability of data from the decennial census (10 years) or when the sensitivity factor for changes in population within the EPZ has been exceeded. This appendix implements the requirements of 10 CFR 50, Appendix E, Sections IV.3 and IV.4 and in accordance with NUREG/CR-7002, *Criteria for Development of Evacuation Time Estimate Studies.*

Southern Nuclear Operating Company (SNC) contracted IEM to estimate evacuation times for the 2012 populations within the 10-mile plume exposure pathway emergency planning zone (EPZ) surrounding VEGP. The report provided a breakdown of population by geographic areas and protective actions zones (PAZ). Four categories of population are identified in the report:

- Permanent residents
- Transient population
- Transit dependent permanent residents
- Schools

The permanent resident population is made up of individuals residing in the 10-mile EPZ. The total year 2012 permanent resident populations within the 10-mile EPZ for VEGP Units 3 and 4 are estimated to be 3.080. The transient population consists of workers employed within the area, recreational sportsmen, and visitors. The total peak transient population within the 10—mile EPZ is estimated to be 2,915. Only one school, Lord's House of Praise Christian School, was identified in the VEGP Units 3 and 4 EPZ. The total peak population for the school in the EPZ is estimated to be 70. Transient dependent permanent residents in the EPZ are estimated to be 29. This study also considered shadow evacuees that reside within 10-15 miles from VEGP.

IEM utilized a computer traffic simulation model, PTV Vision VISUM, to perform the ETE analyses. For the analyses, the 10-mile plume exposure pathway EPZ was divided into 19 unique geographic areas based on two-mile, five-mile, and ten-mile radius rings, the 16 22.5-degree PAZs, as well as keyhole and staged evacuation logic. In order to represent the most realistic emergency scenarios, evacuations for the 19 geographic evacuation areas were modeled individually for the midweek daytime, midweek – weekend evening, and weekend daytime scenarios. Each of these scenarios was then considered under both normal and adverse weather conditions using the 2012 population estimations. A total of 114 evacuation scenarios were considered as part of this study to represent different wind, temporal, seasonal and weather conditions.

Both 100% and 90% ETEs for each scenario were collected. The 100% ETEs for the evacuation areas ranged from 2 hours 10 minutes to 3 hours 25 minutes for the normal scenarios, and from 2 hours 15 minutes to 3 hours 25 minutes for those occurring in adverse weather. The 90% ETEs for the evacuation areas ranged from 1 hour 20 minutes to 2 hours 20 minutes for the normal scenarios, and from 1 hour 20 minutes to 2 hours 25 minutes for those occurring in adverse weather.

The factors that contributed to the variations in ETEs between scenarios include differences in the number of evacuating vehicles, the capacity of the evacuation routes used, or the distance from the origin zones to the EPZ boundary.

Based on the data gathered and the results of the evacuation simulations, the existing evacuation strategy was determined to be functional for the 2012 conditions, given the lack of severe congestion or very high ETEs. Recommendations were provided for enhancements to improve the evacuation time estimate.

Assumptions utilized in the ETE will be reviewed when evaluating changes to roadways or evacuation networks to ensure the results of the ETE remain valid. Changes in population will be evaluated utilizing the sensitivity factor developed during the ETE analysis.

The full Evacuation Time Estimate was submitted for NRC review in accordance with NRC regulations 10 CFR 50, Appendix E, Section IV.3. Following the NRC review, the results of the study and recommendations were reviewed with applicable offsite agencies. The review focused on the utilization of the results of the evacuation simulations provided in the ETE for comparison to existing protective action strategies. Modifications were incorporated as part of the ongoing emergency planning process. (Reference: Annual ETE Review document ETE-VEGP-002, ETE document ETE-VEGP-001).

Appendix B - Emergency Action Level (EAL) Scheme (SEP D.1)

HOLD FOR EAL Scheme

Appendix C - Supporting Plans & Implementing Procedures (SEP P.3)

Supporting Plans

- State of South Carolina Radiological Emergency Response Plan
- State of Georgia Radiological Emergency Response Plan.
- Burke County Georgia Emergency Response Plan
- Aiken, Allendale, Barnwell County Emergency Response Plan
- VEGP Security Plan,
- VEGP Fire Protection Plan

Administrative and Emergency Plan Implementing Procedures (EPIP)

Placeholder for future EPIPs to be developed

Procedure #	Title	Applicable Plan Section

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 15
Vogtle Units 3 and 4 Justification Matrix
(Marked-Up Pages and Clean Copy)

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: It is estimated that teams will be in the field and performing monitoring tasks within about 1 h of the determination of the need for field monitoring.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.As previously stated the dispatch of teams at 75 minutes vice the previous 1 hour commitment is justified separately in the Technical Analysis Section of this submittal.
I.5: Monitoring teams are instructed to contact the monitoring team communicator approximately every half hour.	**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.~~21~~.84 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Site Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	VEGP 3&4 Rev 2	VEGP 3&4 Rev 3 (60 min)	VEGP 3&4 Proposed (75 min)
Emergency Direction and Control				1	1	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	TSC, OSC and EOF Leadership	1	1	1	(a)
	Dose Assessment	HP Expertise				3
	Offsite Surveys	HP Technicians~~/Support~~/Support	2	3	4	~~6~~6
	On-Site Surveys	HP Technicians	1	1		
	In-Plant surveys	HP Technicians	1			
	Chemistry / Radiochemistry	Chem/RP Technicians	1	2	2	2
Plant System Engineering	Technical Support	Electrical	1	1	1	1
		Mechanical	1	1	1	1
		Engineering Supervision				2
		Core Thermal / Hydraulics	1			1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1	1	1	
		Electrical Maintenance	1	2	2	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	4	3
Total Augmented ERO			**15**	**21**	**21**	~~44~~44

(a) EOF Emergency Director counted in Emergency Direction and Control.

VOGTLE ELECTRIC GENERATING PLANT UNITS 3 & 4

JUSTIFICATION MATRIX

Purpose

The purpose of this attachment is to identify the commitments in the current Vogtle Electric Generating Plant, Emergency Plan, Revision 3, and compare/identify the equivalent or modified commitment in the integrated Fleet Emergency Plan and Vogtle Unit 3 and 4 Site Annex. Justification for change will be addressed on a commitment by commitment basis for the proposed License Amendment.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Preface		
The Vogtle Electric Generating Plant (VEGP) is a two-unit pressurized water reactor operated by Southern Nuclear Operating Company (SNC). In addition, SNC plans to submit an application for a Combined Operating License (COL) for two additional pressurized water reactor plants, based on the Westinghouse Electric Company, LLC (Westinghouse) AP1000 standard design, on the VEGP site. The plant is on a 3169-acre site located in the eastern portion of Burke County, Georgia, approximately 23 river miles upstream from the intersection of the Savannah River with U.S. Highway 301, as shown on Figure i. Figure ii shows the site and the locations of existing and proposed buildings on the site. The locations of the VEGP emergency facilities are also shown on Figure ii.	**Annex 1.1:** The Vogtle Electric Generating Plant (VEGP) Units 3 and 4 are a two unit pressurized water reactor, based upon the Westinghouse AP1000 passive reactor design. The plant site, to include VEGP Units 1-4, is on a 3169-acre site located in the eastern portion of Burke County, Georgia, approximately 23 river miles upstream from the intersection of the Savannah River with U.S. Highway 301. Annex Figure 1.1.A, 1.1.B	The information for Vogtle Units 3&4 was relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
This Emergency Plan (EP) is applicable to existing VEGP Units 1 and 2, as well as the proposed Westinghouse AP1000 (AP1000) units (i.e., new VEGP Units 3 and 4), and to its environs as specified by the emergency planning zones (EPZs) as described below. The plume exposure pathway EPZ nominally consists of the area within approximately 10 miles of the plant, and the ingestion exposure pathway EPZ extends to 50 miles from the plant. These distances are centered on a point midway between the centers of the VEGP Unit 1 and Unit 2 containment buildings for the 10 mile EPZ map. The two EPZs are shown in Figures iii and iv, respectively.	**Annex 1.1 Facility Description** The Vogtle Electric Generating Plant (VEGP) Units 3 and 4 are a two unit pressurized water reactor, based upon the Westinghouse AP1000 passive reactor design. The plant site, to include VEGP Units 1-4, is on a 3169-acre site located in the eastern portion of Burke County, Georgia, approximately 23 river miles upstream from the intersection of the Savannah River with U.S. Highway 301. **Annex 1.2 Emergency Planning Zones (SEP J.5)** **Annex 1.2.1 Plume Exposure Pathway (SEP J.7)** The 10-mile Emergency Planning Zone (EPZ) for VEGP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Georgia and South Carolina, as well as the counties (Burke County in Georgia and Aiken, Barnwell, and Allendale Counties in South Carolina) are located within the plume exposure pathway EPZ. The major portion of the plume exposure pathway EPZ in South Carolina is within the Department of Energy's Savannah River Site (SRS). **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 States of Georgia and South Carolina. More information about the IPZ can be obtained from the States' Radiological Emergency Plans.	The commitment wording was standardized and moved to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Because of the location of VEGP site, the emergency planning and/or protective action responsibilities at the state level involves two states, Georgia and South Carolina. Georgia, South Carolina, and the respective counties (Burke County in Georgia and Aiken, Barnwell, and Allendale Counties in South Carolina) have prepared plans for a response to an emergency at VEGP. These plans describe their respective responsibilities, authorities, capabilities, and emergency functions. The major portion of the plume exposure pathway EPZ in South Carolina is within the U. S. Department of Energy (DOE) Savannah River Site (SRS). The Department of Energy, Savannah River Operations Office (DOE-SR), pursuant to a memorandum of agreement between Georgia Power Company (GPC), as assigned to SNC, and DOE-SR, will be responsible for all emergency response actions on the SRS whenever an emergency occurs at the VEGP. The memorandum of Agreement is shown in Appendix 4.	**EP Introduction:** There are also various supporting and complementing emergency plans, including those of federal agencies and those for the states of Alabama, Georgia, South Carolina, and associated counties. **Annex 1.2 Emergency Planning Zones (SEP J.5)** **Annex 1.2.1 Plume Exposure Pathway (SEP J.7)** The 10-mile Emergency Planning Zone (EPZ) for VEGP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Georgia and South Carolina, as well as the counties (Burke County in Georgia and Aiken, Barnwell, and Allendale Counties in South Carolina) are located within the plume exposure pathway EPZ. The major portion of the plume exposure pathway EPZ in South Carolina is within the Department of Energy's Savannah River Site (SRS). **Annex 1.6 Department of Energy (DOE) – Savannah River Site (SRS) (SEP A.1.4)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	The commitment wording was standardized and moved to the SNC Standard Emergency Plan and the Site Annex. Agencies for which Memorandum of Agreements are maintained are now included in the SNC Standard Emergency Plan and Site Annex with descriptions of services/support expected in accordance with the requirements of 10 CFR 50 Appendix E.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Within the plume exposure pathway EPZ, Burke County in the State of Georgia has the largest resident population. However, the population is small and dispersed. The areas in South Carolina that are not federally owned or controlled are along the Savannah River lowlands in Aiken, Allendale, and Barnwell Counties. The segment in Aiken County, approximately 8 to 10 miles north-northwest (NNW) from the VEGP, is part of the Cowden Plantation and has no resident population. The segments to the east-southeast (ESE), Barnwell and Allendale Counties (approximately 9 to 10 miles from the VEGP), are largely comprised of portions of the Creek Plantation, a horse farm. Within the South Carolina portion of the plume exposure pathway EPZ, the only housing occurs within the Creek Plantation in Barnwell County, where there are only a limited number of permanent residences. Figure v presents the permanent population within the plume exposure pathway EPZ.	**Annex 1.2.1 Plume Exposure Pathway (SEP J.7)** The 10-mile Emergency Planning Zone (EPZ) for VEGP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Georgia and South Carolina, as well as the counties (Burke County in Georgia and Aiken, Barnwell, and Allendale Counties in South Carolina) are located within the plume exposure pathway EPZ. The major portion of the plume exposure pathway EPZ in South Carolina is within the Department of Energy's Savannah River Site (SRS). **Annex 1.5.1**: The area within the plume exposure pathway (EPZ) in the State of Georgia falls within Burke County. The responsibility for overall radiological emergency response planning rests with the Chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. **Annex 1.5.2:** Most of the plume exposure pathway EPZ within South Carolina falls within the site boundary of the Savannah River Site (SRS). The United States Department of Energy is responsible for the direction and control of all emergency response actions on the SRS.Limited portions of Aiken, Barnwell, and Allendale counties are outside of the SRS but within the plume exposure pathway EPZ of VEGP. These counties are similarly organized, with the responsibility for overall radiological emergency response planning resting with the Chairman of the County Council in each case.	The commitment wording was standardized and moved to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
The transient population within the plume exposure pathway EPZ includes persons in the work force at the VEGP and at recreational areas, mainly hunters and fishermen. This transient population is generally along the Savannah River; around the Cowden Plantation and Gray's Landing in Aiken County; around Creek Plantation in Barnwell and Allendale Counties; and at St. Mary's Baptist Church in Barnwell County. Figure vi presents the transient and special populations within the VEGP plume EPZ.	**EP G.8**: 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 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. **Annex 2.3.6:** Signs and notices providing information to transients are placed in public recreation areas in the plume EPZ such as siren poles, churches, campgrounds, and the Plant Vogtle Visitors Center. This material will include the following information: • How people will be warned of an emergency. • What to do if warned of an emergency. • A list of radio and television stations to tune to for further information. A VEGP emergency information brochure will be made available within the EPZ to transients at commercial establishments, churches, motels, hunting clubs, Creek and Cawden Plantations, the Plant Vogtle Visitors Center, and through residents whose land is used by nonresidents (e.g., the occasional nonresident hunter). Outside the EPZ, the brochure will be made available to timber company offices for distribution to their employees who enter the EPZ on Company business, and to the Waynesboro Office of the Agriculture Stabilization & Conservation Service for distribution to farmers who farm, but do not reside, in the EPZ.	The commitment wording was standardized and moved to the SNC Standard Emergency Plan and the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
The EPZ for ingestion exposure for the VEGP is shared with the Department of Energy's Savannah River Site. The ingestion pathway EPZ includes an area within about 50 miles of the Savannah River Site and the VEGP site. The ingestion pathway EPZ for the VEGP is contained within the States of Georgia and South Carolina. It includes the Counties of Bullock, Burke, Candler, Columbia, Effingham, Emanuel, Glasscock, Jefferson, Jenkins, Johnson, Lincoln, McDuffie, Richmond, Screven, Warren, and Washington in Georgia, and the Counties of Aiken, Allendale, Bamberg, Barnwell, Colleton, Edgefield, Hampton, Jasper, Lexington, McCormick, Orangeburg, and Saluda, in South Carolina.	**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 States of Georgia and South Carolina. More information about the IPZ can be obtained from the States' Radiological Emergency Plans.	The commitment wording was standardized and moved to the Site Annex.
Planning for the ingestion exposure pathway is a responsibility of the States of Georgia and South Carolina. Details of ingestion pathway emergency planning are contained in the respective State emergency plans.	**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 States of Georgia and South Carolina. More information about the IPZ can be obtained from the States' Radiological Emergency Plans.	The commitment wording was standardized and moved to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
The VEGP Emergency Plan is designed to be compliant with 10 CFR 50.47, Emergency plans, and 10 CFR 50 Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities. It is based on meeting the intent of the guidance contained in NUREG 0654, Revision 1 with the exception of emergency action levels which are based on Nuclear Energy Institute (NEI) 99-01, Revision 4, Methodology for Development of Emergency Action Levels (EAL), for Units 1 and 2. EALs for Units 3 and 4 will be based on the NRC endorsed version of NEI 07-01, Revision 0, Methodology for Development of Emergency Action Levels Advanced Passive Light Water Reactors.	**EP Intro**: 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. **EP D.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. **Annex 3.2:** Appendix B to this Annex contains the matrix for Initiating Conditions used to determine an Emergency Action Level (EAL). They are part of the scheme established by NEI 07-01, Methodology for Development of Emergency Action Levels for Advanced Passive Light Water Reactors. **Annex Appendix B**	The commitment wording was standardized and disseminated between the SNC Standard Emergency Plan and the Site Annex. EALs to be submitted separately from SNC Standard Emergency Plan and Annexes for SNC. Currently, Appendix B to this annex is a placeholder for the approved EAL's.
In addition, for proposed Units 3 and 4, the VEGP Emergency Plan is designed to be compliant with 10 CFR 52.17(b)(1), 10 CFR 52.17(b)(2)(ii), and 10 CFR 52.17(b)(3). NUREG 0654, Supplement 2 is also used as guidance for the development of the VEGP Emergency Plan pertaining to proposed Units 3 and 4 for the Early Site Permitting process.	**EP Intro:** 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 commitment wording was standardized and moved to the SNC Standard Emergency Plan. The wording was updated to reflect operational conditions under 10 CFR Part 50.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
The VEGP Emergency Plan is designed to accommodate the unique features of the two unit designs used at the Site. A common VEGP Emergency Plan is supported by Annex V1 which contains the parts of the Emergency Plan that are unique to Units 1 and 2, and Annex V2 which contains the parts of the Emergency Plan that are unique to proposed Units 3 and 4. Each segment of the Emergency Plan is supported by Appendices that contain supporting information for each segment of the plan. The Appendices for Annex V2 contain a set of inspections, tests, analyses, and acceptance criteria (ITAAC) that contain those elements of the Emergency Plan pertaining to proposed Units 3 and 4 that cannot be completed or verified prior to approval of the Emergency Plan as part of the Early Site Permitting Process. Thus, these ITAACs will be incorporated into the Combined License (COL). After proposed Units 3 and 4 are operating, all references to ITAACs will be removed.	**Annex 1:** Introduction (SEP)This document serves as the Vogtle Electric Generating Plant (VEGP) Units 3 and 4 Annex and contains information and guidance that is unique to VEGP Units 3 and 4. This includes Emergency Action Levels (EALs) and facility geography.	The commitment wording was standardized and moved to the SNC Standard Emergency Plan. The wording was updated to reflect operational conditions under 10 CFR Part 50.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.1: The VEGP Site will be responsible for maintaining an effective Emergency Plan and maintaining proper preparedness through the maintenance of formal procedures for implementing the Plan, the training of personnel in accordance with Section O, the maintenance of necessary equipment, and continuing relationships with various governmental agencies and private organizations as identified in this Section and in Appendix 2. The following tasks will be part of the VEGP Site's responsibility: • Recognize and declare the existence of an emergency condition. • Classify the event in accordance with the methodology described in Section D of this Plan. • Notify appropriate Site personnel and offsite authorities. • Take corrective actions to mitigate the severity of the accident.Request additional support as deemed necessary. • Establish and maintain effective communications within the Site and with offsite response groups as described in Section F. • 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.	**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, maintenance of facilities and equipment, both onsite and off-site, which will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public. **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 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Responsibilities of SNC Sites and Personnel are listed in Section B of the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.1 (cont) • Take protective measures onsite and recommend protective actions to offsite authorities. • Monitor and control radiation exposures of all personnel responding to the emergency and under the direction of the site. • Provide emergency information to the public through periodic press briefings in conjunction with Federal, State and local officials. The Site emergency response will be carried out under the control of the Emergency Director. The onsite organization to support these activities is described in Section B.	**Continued from Above.** 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.	See above

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.2 State of GeorgiaThe Georgia Emergency Management Agency (GEMA) is assigned responsibility for overalldirection and coordination of emergency and disaster planning and operations in the State ofGeorgia. GEMA has developed the Georgia Emergency Operations Plan (GEOP), which is an emergency operations plan for all natural disasters, accidents, and incidents, including radiological emergencies at fixed nuclear facilities. Integral to the GEOP is the Georgia Radiological Emergency Response Base Plan (GA REP) which is used for planning for, responding to, and dealing with radiological emergencies. Details concerning assignment of responsibilities are contained in the GEOP and GA REP.	**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 the Hatch Nuclear Plant and the Vogtle Electric Generating Plant. **Annex 1.3 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. 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 Vogtle 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 and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.3 Burke County, Georgia All of the area within the VEGP plume exposure pathway EPZ in the State of Georgia falls withinBurke County. The responsibility for overall radiological emergency response planning for BurkeCounty rests with the chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within Burke County which have a primary role in radiological emergency planning and response include the Emergency Management Agency (EMA) and the Sheriff's Department. Details concerning assignment of responsibilities for the Burke Countyresponse are contained in Annex D to the GA REP.	**EP 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. 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. **Annex 1.5.1:** The area within the plume exposure pathway (EPZ) in the State of Georgia falls within Burke County. The responsibility for overall radiological emergency response planning rests with the Chairman, Burke County Board of Commissioners. It is the chairman's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.4 State of South Carolina The South Carolina Emergency Management Division (SCEMD) in the Office of the Adjutant General State of South Carolina is assigned responsibility for South Carolina's emergency preparedness, response, recovery, and mitigation activities. SCEMD has developed the South Carolina Emergency Operational Plan (SCEOP) which establishes the policies and procedures by which South Carolina will coordinate state and federal response to disasters impacting South Carolina. SCEOP Attachment A, Annex 25, Radiological Hazards, assigns responsibilities for radiological hazards in South Carolina. Integral to the SCEOP is the South Carolina Operational Radiological Emergency Response Plan (SCORERP) which prescribes planning objectives, tasks, and responsibilities to departments and agencies of state and local governments for radiological events at nuclear facilities. Details concerning assignment of responsibilities are contained in the SCEOP and SCORERP.	**EP 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. **Annex 1.4:** The State of South Carolina has developed the South Carolina Radiological Emergency Response Plan (SCORERP), which provides guidance to state and local governments on procedures, organization, and responsibilities for preventing and mitigating the effects of a nuclear power plant incident or disaster. The SCORERP describes the South Carolina Radiological Emergency Response Organization, which consists of the Office of the Adjutant General (Emergency Management Division) (EMD), the Department of Health and Environmental Control (Bureau of Solid and Hazardous Waste, Nuclear Emergency Planning (NEP) Section), and those state resources available to local government(s) during a fixed nuclear facility radiological accident. The response functions of involved agencies are described in the SCORERP and the South Carolina Technical Radiological Emergency Response Plan (SCTRERP).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.5 Aiken, Barnwell, and Allendale Counties, South Carolina Most of the plume exposure pathway EPZ within South Carolina falls within the site boundary of the SRS. The DOE is responsible for the direction and control of all emergency response actions on the SRS.There are limited portions of Aiken, Barnwell, and Allendale counties which are outside of the SRS but within the plume exposure pathway EPZ of the VEGP Site. These counties are similarly organized, with the responsibility for overall radiological emergency response planning resting with the chairperson of the county council. It is the chairperson's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within these counties which have a primary role in radiological emergency planning and response include the Emergency Management Division (EMD) and the Sheriff's Department. Details concerning assignment of responsibilities can be found in the respective county's Emergency Operations Plan (EOP) and the respective Annex Q2, Fixed Nuclear Facility Radiological Emergency Response Plan (RERP).	**EP 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 which affects their respective jurisdiction. 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. **Annex 1.6: DOE-Savannah River Site (SRS)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
A.6 Department of Energy- Savannah River Site A significant portion of the plume exposure pathway EPZ falls within the site boundary of the SRS. The DOE-SR consists of lands owned or leased by the Federal government. As such, DOE-SR is responsible for the direction and control of all emergency response actions on the SRS. See memorandum of agreement between DOE - Savannah River Operations Office and Georgia Power Company, as assigned to SNC, (Appendix 4).	**Annex 1.6: DOE-Savannah River Site (SRS)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	The commitment wording was standardized and relocated to the Site Annex.

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A.7 Medical Support The VEGP Site has establish agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Agreements with Radiation Management Consultants, Burke County Hospital, which is located on Liberty Street between Fourth and Dogwood Streets in Waynesboro, Georgia, and Doctors Hospital in Augusta, Georgia, near the junction of Interstate Highways 20 and 520, will also be established for treatment of injured and contaminated individuals. Copies of these agreements are included in Appendix 2.	**EP B.6.2 Ambulance Services** Agreements with 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 may be found in the SNC plant's site-specific Annex. **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 may be found in the SNC plant's site-specific Annex. **Annex 2.3.2:** Agreements are in place with the University of Alabama Birmingham Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital. **Annex 2.3.3:** VEGP has established agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment.Support provided includes, but is not limited to, Emergency medical services, ambulances, and emergency medical technicians Request for fire support will be made by the control room or site security to the Burke County Emergency Management Agency, Burke 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 accordance with Emergency Plan procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan with details contained in the Site Annex.

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A.7: VEGP has established agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment.	**Annex 5.8.2:** Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.
A.8 Private Sector Organizations A.8.1 Bechtel Power Corporation GPC/SNC 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 as described in Appendix 2.	**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. **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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A.8.2 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 as described in Appendix 2. Westinghouse will provide a capability to respond on a twenty-four seven basis.	**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 a capability to respond on a 24-hour-a-day basis. **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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.8.3 Voluntary Assistance Group SNC 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 C.4.1:** 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 upon 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: 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. **Annex 2.3.5 Voluntary Assistance Group (SEP B.4.2)** VEGP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.9 Federal Government The resources of the Federal agencies appropriate to the emergency condition would be made available in accordance with the National Response Plan (NRP). The Emergency Director will be specifically authorized to request Federal assistance on behalf of the Site under the provisions of the NRP. In addition to the NRC, other agencies which may become involved are the Department of Homeland Security (DHS), the Department of Energy (DOE), the Federal Emergency Management Agency (FEMA), the Environmental Protection Agency (EPA, the Department of Health and Human Services (HHS), the Department of Transportation (DOT), and the Department of Agriculture (USDA).	**EP A.1.4 Department of Energy (DOE)** The DOE provides radiological assistance upon 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. **EP 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. **EP 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. **EP A.1.7 Environmental Protection Agency (EPA)** The EPA can assist with field radiological monitoring, sampling, and non-plant related recovery and reentry guidance.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.9 Federal Government The resources of the Federal agencies appropriate to the emergency condition would be made available in accordance with the National Response Plan (NRP). The Emergency Director will be specifically authorized to request Federal assistance on behalf of the Site under the provisions of the NRP. In addition to the NRC, other agencies which may become involved are the Department of Homeland Security (DHS), the Department of Energy (DOE), the FederalEmergency Management Agency (FEMA), the Environmental Protection Agency (EPA, theDepartment of Health and Human Services (HHS), the Department of Transportation (DOT), and the Department of Agriculture (USDA).	**EP A.1 Primary Federal Organizations** **EP A.1.1 Nuclear Regulatory Commission (NRC)** The NRC acts as the lead federal agency regarding technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response aspects. 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. **EP 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. **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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.10 Concept of Operations Consistent with the Emergency Classification System described in Section D, the emergency preparedness program for the VEGP Site will require the coordinated response of several organizations. The emergency response organization for the VEGP Site is described in detail in Section B. The Emergency Director will be the key individual in the VEGP Site emergency response organization; one of his non-delegable responsibilities will be the decision to notify the NRC and authorities responsible for offsite emergency measures. The interfaces among the emergency response organizations are shown on Figure A-1.	**EP B.1.1** The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
A.10.1 Continuous Communication CapabilityConsistent with the Emergency Classification System described in Section D, the Emergency Director will initiate the activation of the emergency response organization by contacting the states of Georgia and South Carolina, the counties within the plume exposure pathway EPZ, the SRS, and the NRC. These organizations can be contacted on a twenty-four seven basis. The state and local agencies have continuously manned communication links for the purpose of receiving notification of a radiological emergency. The SRS is a continuously operating facility and can be contacted at all times. The Federal agencies which may be requested by the VEGPSite to provide assistance can be notified by contacting the NRC on a dedicated communication link, the Emergency Notification System (ENS) line.	**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 off-site 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 per 10CFR50 Appendix E, section 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.3** 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. **EP F.1.2** State and county warning points are continuously staffed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A.10.2 State of Georgia and Burke County Operations The State of Georgia and Burke County responses are conducted in accordance with the Georgia Radiological Emergency Response Plan and its associated Annex D.	**EP H.3 State and local Emergency Operations Centers (EOC)** EOCs operated by the state and 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 found in the state and county emergency plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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A.10.3 State of South Carolina and County Operations The state of South Carolina and county response is conducted in accordance with the South Carolina Operational Radiological Emergency Response Plan, the respective county Emergency Operations Plan and its associated Annex Q2.	**EP H.3 State and local Emergency Operations Centers (EOC)** EOCs operated by the state and 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 found in the state and county emergency plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A.10.4 Savannah River Site The DOE-SR will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting on-plant response operations to protect the health and safety of SRS personnel.DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate life saving medical treatment of non SRS personnel on plant. DOE will also provide access control for SRS areas.DOE will provide initial radiological monitoring and assessment support to the State of South Carolina under the DOE Radiological Assistance Program (RAP). This includes projected release dispersion information and offsite radiological monitoring and assessment assistance. SRS will also coordinate public affairs activities with the State of South Carolina, SNC and GPC.By memorandum of agreement between DOE-SR and GPC, as assigned to SNC (see Appendix 4), DOE will provide radiological monitoring within about 10 miles of the VEGP Site in the State ofSouth Carolina.	**EP A.1.4 Department of Energy (DOE)**The DOE provides radiological assistance upon 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. **Annex 1.6 DOE-Savannah River Site (SRS)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Section B VEGP Emergency Response Organization		
B Initial staffing of the VEGP onsite emergency response organization (ERO) will be provided from personnel normally employed at the Site. An organizational chart for VEGP is shown in Figure B- 1. If the need arises, this staff will be augmented substantially by the addition of SNC personnel and by personnel from other organizations. This 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 on whom the Site can rely; and a description of the relationships between onsite and offsite response activities.	**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. **EP B.2:** Augmentation of on-shift staffing will occur within 75 minutes of event 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/day basis for an extended event. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization. On-shift as well as Offsite state/ local government interfaces are detailed in the site-specific Annexes.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Further justification for ERO Augmentation is provided in the Technical Evaluation section of the License Amendment Request.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.1 Normal Plant Organization The organizational structure shown on Figure B-1 represents the pool of management personnel available on site during normal working hours. Approximately 700 people are stationed at Units 1 and 2 during the standard workday, and approximately 650 people will be stationed at Units 3 and 4 during the standard workday. The normal operating crew for each unit includes a shift supervisor, licensed plant operators, and non-licensed plant operators. A Shift Manager is also on shift during operation (as defined in the Technical Specifications). Personnel from the Chemistry and Health Physics, Maintenance, and Security Departments are also on site continuously.	**EP B.1 Normal Plant Organization** The normal onsite organization of a 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.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 emergency is shown in Tables 1, 2 and 3. 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, material control, fire protection, and security **Annex Table 2.2.A Minimum Shift Staffing**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. A Staffing Analysis supporting the on-shift staffing design and compliant with 10 CFR 50 Appendix E.IV.A.9 was conducted to support the submittal.

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B.1: Refer to Table B-1 for minimum staffing requirements. The table is segmented into columns to identify the staffing requirements for the two reactor designs used at the site. The table also includes a column that lists site staffing requirements. The fourth column lists the minimum staffing requirements for Units 1 and 2 operations; the fifth column lists the minimum staffing requirements for Unit 3 operations (prior to Unit 4 and independent of Units 1 and 2 staffing levels); the sixth column lists the minimum staffing requirements for Unit 3 and 4 operations; the seventh column lists the minimum staffing requirements for the VEGP site; and the eighth column lists staff augmentation that will occur within 60 minutes of notification. Augmentation of the site will occur at the indicated levels irrespective of the number of units located at the site. After Unit 4 is in operation, the fifth column (Unit 3 staffing) will not be used.	**Annex Table 2.2.A: Minimum Shift Staffing**	The commitment wording was standardized and relocated to the Site Annex.A Staffing Analysis supporting the on-shift staffing design was conducted to support the submittal.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2 Emergency Response Organization The Emergency Director has the responsibility to classify an 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) activates the Site emergency response organization. The extent to which the emergency response organization is activated depends on the severity of the situation. Table B-1 provides a summary of personnel available on shift and those who would be available within 60 minutes of notification.	**EP B.2** Augmentation of on-shift staffing will occur within 75 minutes of event 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/day basis for an extended event. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization. On-shift as well as Offsite state/ local government interfaces are detailed in the site-specific Annexes. **EP B.1.1** The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2: For an NUE, the Emergency Director will assign responsibility for making the appropriate notifications and directing the proper response; but no further activation of the emergency response organization will be required.	**EP B.1.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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B.2: If the event is classified as an Alert, the Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF) will be activated. For these classifications, the emergency response organization will be structured as shown on Figure B-2. The corporate resources and operation is presented in Appendix 7, Emergency Operations Facility. Corporate personnel who report to the plant site will be integrated into the Site emergency response organization.	**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. **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.
B.2: For a Site Area Emergency or General Emergency, the emergency response organization will be fully activated. The organization will be as shown in Figure B-3.	**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. **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. It is SNC policy to fully activate the ERO at Alert or Higher.

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B.2: 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. However, these events will warrant timely ERO augmentation. An alternative facility has been identified to ensure rapid access to the site by augmented staff due to its close proximity. The alternative facility is located in a designated area in the Joint Information Center (JIC) in Waynesboro, Georgia. This facility has been established to minimize delays in overall site response by permitting ERO assembly without exposing responders to the danger of hostile action. This facility functions as a staging area for augmented ERO staff until the site is secured.	**EP H.1.4** 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** 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 near site media center in Waynesboro, GA. 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 the SNC document management resources, 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 contained in site procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. The SNC Standard Emergency Plan and Annex provide commitments to maintain the communications capabilities within the ERO, required offsite responders and the public through the execution of a Joint Information System. The detailed physical description of equipment maintaining those commitments is subject to change and not necessary to ensure effective implementation of the Emergency Plan. Additional details on the JIC/JIS are provided in a separate enclosure as a part of this LAR.
B.2.1 Emergency response organization ResponsibilitiesFollowing an Alert or higher emergency declaration, the positions shown on Figures B-2 and B-3 will be filled by Site or SNC personnel as discussed below.	**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. **EP H.2.1**: Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification. **EP Figure B.2.B, B.2.C, B.2.D, and B.2.E**: illustrates the standard Emergency Organization.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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B.2.1.1 Emergency Director Plant personnel that may be designated as Emergency Directors are listed in Table B-2. They will receive training as specified in Table O-2 prior to becoming qualified to fill this position. Their non-emergency positions will provide them plant knowledge and supervisory skills necessary to fill the Emergency Director position.	**EP O.1:** The ERO Training Program assures 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment for qualified responders was maintained in a generic statement applicable to any position.
B.2.1.1 The Emergency Director has the authority, management ability, and knowledge to assume the overall responsibility for directing Site staff in an emergency situation. Initially this position will be filled by the Shift Manager or the Shift Supervisor if the Shift Manager cannot be located expeditiously. The responsibility for emergency direction will be transferred to the Nuclear Plant General Manager or an alternate after receiving an appropriate briefing and becoming familiar with the current status of events.	**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 has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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B.2.1.1 The Emergency Director will manage the following activities for the duration of the emergency: • Directs the notification of Site, SNC and GPC personnel and notifies and maintains open communications with offsite authorities regarding all aspects of emergency response. • Oversees the activation and staffing of emergency response facilities and requests additional assistance, as needed. • Authorizes emergency operation 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. • Provides overall direction for management of emergency services related to the procurement of materials, equipment, and supplies; documentation; accountability; and security functions. • Provides overall direction for the management of emergency operations planning for procedure, equipment, and system development to support emergency operations. • Use discretionary authority to modify emergency implementing procedures or tailor the emergency response organization to fit the specific staffing needs.	**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 has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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B.2.1.1 The Emergency Director may not delegate the following responsibilities: • Decision to notify offsite emergency response agencies. • Decision to recommend protective actions to offsite authorities. • Declaration of emergency classifications. • Authorization for plant personnel to exceed 10 CFR 20 radiation exposure limits. • Decision to terminate the emergency. • Requests for Federal assistance. • Decision to order site dismissal of non-involved personnel from the site at an Alert classification level. • Decision to order non-involved personnel to proceed to a reception center and receive radiological monitoring.	**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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B.2.1.1 The Emergency Director may operate from the control room or TSC at his discretion. He may act as the TSC manager during the early phases of emergency response until the TSC is activated. It is the intent of SNC that the ED function will be transferred from the Control Room as soon as practicable.	**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 has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.1 The primary and alternates for the position of Emergency Director are shown on Table B-2.	**EP O.1:** The ERO Training Program assures 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The normal site staffing positions and individuals assigned are subject to change based on normal plant reassignment. The Integrated Plan maintains a commitment to staff any ERO position with qualified personnel.

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B.2.1.1: Initially this position (Emergency Director) will be filled by the shift manager or the shift supervisor if the shift manager cannot be located expeditiously.	**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 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.1: The responsibility for emergency direction will be transferred to the plant manager or an alternate after receiving an appropriate briefing and becoming familiar with the current status of events.	**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 has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.2 TSC Staff	**EP B.2.1 Technical Support Center (TSC)**	

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2.1.2.1 TSC Manager • Coordination of inputs and recommendations from technical and corrective action advisors. • Direction of onsite emergency personnel involved in restoration of the plant to a safe condition. • Technical assistance and operations guidance to control room personnel. • Direction of TSC staff in analysis of problems, design and planning for temporary modifications, and development of temporary emergency operating procedures. • Recommendation of protective actions to the emergency director based on plant conditions. • Providing recommendations on emergency classifications to the Emergency Director.	**EP B.2.1.2 TSC Manager** The TSC Manager reports to the TSC ED and is responsible for coordination of activities between the TSC and other emergency response facilities, directs the activities of the TSC staff and ensures communications are established with applicable offsite agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.2.2: The TSC Support Coordinator will direct the clerical and logistic activities in the TSC. The TSC Support Coordinator ensures that support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers and that office supplies, drawings, and other documents are available to TSC and OSC personnel. The TSC Support Coordinator is responsible for timely completion of offsite notification. The TSC Support Coordinator ensures that transportation and communication needs are satisfied. The TSC Support Coordinator arranges for additional offsite support personnel and equipment working in conjunction with the EOF Support Coordinator.	**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 and ensures that support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers and that 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 Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2.1.2.3: The Engineering Supervisor will direct a staff of engineers with expertise in reactor engineering, thermal and hydraulic analysis, instrumentation and control, and mechanical and electrical systems. The Engineering Supervisor will direct the analysis of plant problems, core damage assessment, and provide 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, core damage, and provides recommendations for plant modifications to mitigate the effects of the accident.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.2.4: The Maintenance Supervisor will manage the planning and coordination of repair, damage control, and plant modification activities. The Maintenance Supervisor will work 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.2.5: The Operations Supervisor will analyze 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, assist the OSC Manager in determining the priority assigned to OSC activities and timely completion of offsite notifications.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2.1.2.6: The Health Physics Supervisor will be responsible for onsite and in-plant radiological controls. The Health Physics Supervisor will provide guidance to the Maintenance Supervisor related to radiological considerations associated with plant modification and repair, and will provide direction to the OSC Manager related to the health physics controls for emergency teams. The Health Physics Supervisor will perform offsite dose assessment prior to EOF activation and will keep the Dose Assessment Supervisor in the EOF informed of the radiological status of the plant.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.2.7: The Chemistry Supervisor will be responsible for directing and evaluating in-plant chemistry and analyses, directing and evaluating post accident sampling, and assisting in core damage assessment.	**EP B.2.1.10 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.2.8: The TSC Security Supervisor will coordinate the security functions including accountability and site access control. The TSC Security Supervisor coordinates the processing of offsite personnel who require authorization to enter the site. When directed by the Emergency Director, the TSC Security Supervisor will request assistance from civil law enforcement authorities, as required.	**EP B.2.1.14 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, assisting in evacuation of onsite areas.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2.1.3.1: The OSC Manager will receive direction from TSC personnel to dispatch emergency teams (e.g., firefighting, search and rescue, first aid, repair, etc.) to prescribed areas of the plant or site. The OSC Manager will direct the composition of the teams to ensure that appropriately qualified personnel are assigned. In particular, the OSC Manager will ensure that proper health physics coverage is provided. The OSC Manager will provide specific instructions to the team leaders. The OSC Manager will also maintain communications with the teams that remain assigned to the OSC and 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.3.2: Depending on the nature of the emergency, personnel from the Maintenance, Operations, Chemistry and Health Physics Departments will be directed to report to the OSC.	**EP B.2.2.7:** Selected personnel report to the OSC, as directed. Emergency personnel from the Maintenance, the Operations, and the 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. **EP Figure B.2.C: OSC Organization**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.1.3.2: The following emergency teams will be formed as necessary: • Backup fire brigade. • Search and rescue. • First aid. • Damage assessment. • Damage control. • Repair and modification. • Field monitoring.	**EP 2.2.7 OSC Personnel** The following emergency teams may be formed by OSC personnel, as necessary. • Search and rescue • Repair • Post accident sampling • Internal survey • Field monitoring	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan and Site Annex provide for on-shift fire response supported by offsite response.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2.2 Emergency response organization Assignments Table B-2 identifies by title the individuals who will fill the key emergency positions. A sufficient number of people will be identified to ensure that all emergency positions on Table B-2 will be filled.	**EP Figures B.2.B, B.2.C, B.2.D, and B.2.E**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.2: A sufficient number of people are identified to ensure that all emergency positions on table B-2 will be filled.	**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/day basis for an extended event.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.2: Table B-2 identifies by title the individuals who will fill the key emergency positions.	**Annex Table 2.2.A – Minimum On-Shift Staffing** **EP Figures B.2.B through B.2.E – ERO Organizations**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
B.2.3 Other Support Services B.2.3.1 Contractor Support Arrangements have been made to obtain support services from Bechtel Power Corporation and Westinghouse, if required. These organizations will initially be contacted by the EOF Support Coordinator to arrange for the required assistance.	**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. **EP A.3.3:** 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 a capability to respond on a 24-hour-a-day basis.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
B.2.3.1: Arrangements have been made to obtain support services from Bechtel Power Corporation and Westinghouse, if required.	**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. **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 a capability to respond on a 24-hour-a-day basis.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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B.2.3.2 Medical Assistance Agreements are in place with Radiation Management Consultants, Burke County Hospital, Doctors Hospital, and Burke County Emergency Management Agency (see Appendix 2) to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested, whenever necessary, in accordance with plant procedures.	**EP B.6.2:** Agreements with ambulance services are in place to transport injured personnel from the plants to the designated medical facility. **EP B.6.3:** Prior arrangements have been made for medical treatment at a variety of facilities. **Annex 2.3.2 Hospital and Medical Support (SEP B.6.3, K.1.3, L.1)** Agreements are in place with the University of Alabama Birmingham Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital. **Annex 2.3.3 Ambulance Service (SEP B.6.2, L.4)** VEGP has established agreements with the Burke County EMA to provide ambulance service for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Support provided includes, but is not limited to, Emergency medical services, ambulances, and emergency medical technicians Request for fire support will be made by the control room or site security to the Burke County Emergency Management Agency, Burke 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 accordance with Emergency Plan procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
B.2.3.2: Agreements are in place with Radiation Management Consultants, Burke County Hospital, Doctors Hospital, and Burke County Emergency Management Agency (see Appendix 2) to provide assistance for injured personnel, including cases involving radioactive contamination.	**EP B.6.2:** Agreements with ambulance services are in place to transport injured personnel from the plants to the designated medical facility. **Annex 2.3.2 Hospital and Medical Support (SEP B.6.3, K.1.3, L.1)** Agreements are in place with the University of Alabama Birmingham Hospital, Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures. Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
B.2.3.3 Government Agency Support Assistance may be requested from Burke County, the State of Georgia, or Federal agencies. Section A describes the assistance that may be requested. Requests for aid will be made by the Emergency Director.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Request Federal assistance as needed. **Annex 1.3 State of Georgia (SEP A.2.2)** **Annex 1.5.1 Burke County Georgia (SEP A.2.4)**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
B.2.4 Interfaces among Response Groups Figure A-1 illustrates the integrated organization for response to an emergency at the Site.		The figure was deleted. Interactions are described in the respective facility descriptions and Communications table.
B.2: Table B-1 provides a summary of personnel available on shift and those who would be available within 60 minutes of notification.	**EP Tables 2, 3, 4 & 5** **Annex Table 2.2.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. A Staffing Analysis supporting the on-shift staffing design and compliant with 10 CFR 50 Appendix E.IV.A.9 was conducted to support the submittal.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Table B-1: All	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table B-2: All	**EP Figure B.2.B**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. ERO Augmentation response is justified separately in the Technical Evaluation section of the License Amendment Request.
B: Figure B-1	**EP Figure P.1**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section C Emergency Response Support and Rescue		
C.1: The State of Georgia through the Office of Homeland Security - Georgia Emergency Management Agency (OHS-GEMA) has the lead agency responsibility for responding to emergency situations throughout Georgia.	**EP A.2.2.1:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
C.1: The South Carolina agencies responsible for responding to a radiological emergency are theOffice of the Adjutant General, Emergency Management Division (EMD) and the Department ofHealth and Environmental Control (DHEC).	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
C.1: Representatives from the states of Georgia and South Carolina will be dispatched to the emergency operations facility (EOF) and the emergency news center (ENC).	**EP H.2.1:** 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). **EP H.2.2Corporate 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. The SNC Standard Emergency Plan and Annex provide commitments to maintain the communications capabilities within the ERO, required offsite responders and the public through the execution of a Joint Information System. The detailed physical description of equipment maintaining those commitments is subject to change and not necessary to ensure effective implementation of the Emergency Plan.
	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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C.2: Requests for Federal assistance will be directed, as needed, by the emergency director, and usually these requests will be channeled through the GEMA. The exceptions to this procedure are direct contacts between the Site Emergency Response Organization, the Nuclear Regulatory Commission (NRC), and Department of Energy, Savannah River (DOE-SR). In the event of an incident in which Federal assistance is needed to supplement county and State emergency response capabilities, principal points of contact for State government are as follows: • The Federal Emergency Management Agency (FEMA), Regional Headquarters in Atlanta, Georgia. • The Department of Energy (DOE), Region Operations Office in Aiken, South Carolina. • The Environmental Protection Agency (EPA), Regional Headquarters in Atlanta, Georgia. The Department of Homeland Security (DHS) and its subordinate agency FEMA are assigned lead responsibility for Federal offsite nuclear emergency planning and response (per Title 44 CFR 351 and the Homeland Security Act of 2002). DHS is also delegated responsibility for development and promulgation of the Federal Radiological Emergency Response Plan (FRERP). The FRERP assumes that 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. Federal emergency response consists of technical and non-technical components. The NRC and FEMA jointly coordinate federal emergency response actions. The NRC coordinates technical aspects, and FEMA coordinates non-technical aspects of Federal response. The NRC and FEMA are expected to have representatives at the Site within about three hours after receiving notification. DOE can give assistance within about two hours.	**EP B.1.1:** The Emergency Director's non-delegable duties include: • Request Federal assistance as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Removed excess content.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
C.3: Emergency notification system (ENS) telephones and commercial telephones will be available in the control room, TSC, and EOF.	**EP 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 used as needed. Communication with the Nuclear Regulatory Commission (NRC) is via 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. **EP F.1.4.1 NRC Emergency Notification System (ENS)** This communications line provides a communications link to the NRC Operations Center in Rockville, MD and is used for continuous communications in a classified emergency.	The commitment 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.
C.3: Health physics network (HPN) telephones are available in the TSC and 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 commitment 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.
C.3: In the EOF, space is provided for nine NRC personnel and one FEMA representative.	**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.

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C.3: The Site will provide space, telephone communications, and administrative services for NRC and FEMA personnel at the TSC and EOF. Up to five NRC representatives can be accommodated at the TSC.	**EP H.1.2** The TSC is sized to accommodate ERO responders and NRC Representatives. **Annex 5.1.2** The TSC will provide plant management and technical support personnel (including Nuclear Regulatory Commission (NRC) personnel) with a facility from which they can assist plant operating personnel located in the control rooms during an emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
C.4: Environmental samples will be collected by GPC corporate personnel. These samples will be obtained from the current fixed environmental program which is described in Section I.	**EP I.7** 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.	There is no equivalent SNC Standard Emergency Plan statement. The SNC Standard Emergency Plan maintains the commitment to perform the sampling.
C.4: Field samples will be taken by Site field monitoring teams. These teams will take direct radiation readings and will collect air samples, soil samples, vegetation samples, and water samples as directed by the dose assessment manager.	**EP I.7:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
C.4: In-plant samples such as effluent and air samples will be analyzed using a gamma spectrometer located in the counting room.	**EP I.2:** 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 as to how post-accident sampling will be performed are in the plant-specific procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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C.4: The onsite laboratory will be equipped to analyze all normal in-plant samples. The equipment will include an ion chromatograph, gas chromatograph, gamma spectrometer, and other analytical support equipment.	**EP H.5.2.3:** SNC sites have a laboratory facility for analysis of radioactive samples. **EP C.3**: The onsite laboratory/counting room at SNC operated nuclear power plants are the primary facility for radiation monitoring and analysis effort. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
C.4: The samples will be scanned with field instrumentation and will then be taken to the Site for laboratory analyses.	**EP H.10**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table C-1	**NA**	Location of EOCs is a function of the offsite Emergency Plans and not included in the Fleet Plan
Section D Emergency Classification System		
D.1: All the actions associated with the emergency classification level must be completed and then a termination of the event can be affected.	**EP D.2.5:** 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.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
D.1: Once an emergency classification is made, it cannot be downgraded to a lower classification.	**EP D.2.5:** The SNC policy is that once an emergency classification is made, it cannot be downgraded to a lower classification.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
D.1: 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.	**Annex 3.1.1**: 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 (state and local) officials annually.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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D.1.1.2: VEGP ACTIONS (NUE) • Inform State and local offsite authorities of the nature of the unusual event within 15 minutes 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. • Augment on-shift resources, as needed. • Assess and respond to the event. • 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 per 10CFR50 Appendix E, section IV(D)(3). NRC will be notified, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.The SNC Standard Emergency Plan incorporates the actions needed for each individual Classification Level into general responsibilities section.The wording has been standardized and relocated into the position descriptions for the ERO members and various sections of the SNC Standard Emergency Plan and Site Annex (on-shift or augmented that maintain those functions.

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D.1.2.2: VEGP ACTIONS (Alert) • Within 15 minutes 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. • 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. • Assess and respond to the emergency. • Mobilize, and dispatch if necessary, onsite survey teams. • Provide periodic plant status updates to offsite authorities. • Provide periodic meteorological assessments to offsite authorities and, if any emergency releases are occurring, field monitoring team readings or dose estimates for actual releases. • Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the Alert. • 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.	**EP B.1.1** The ED, at their discretion or when procedurally required, activates the ERO. **EP B.2** Augmentation of on-shift staffing will occur within 75 minutes of event 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. **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 per 10CFR50 Appendix E, section IV(D)(3). NRC will be notified, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.The SNC Standard Emergency Plan incorporates the actions needed for each individual Classification Level into general responsibilities section.The wording has been standardized and relocated into the position descriptions for the ERO members and various sections of the SNC Standard Emergency Plan and Site Annex (on-shift or augmented that maintain those functions.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
D.1.3.2: VEGP ACTIONS (SAE) • Within 15 minutes of classification, inform State and local offsite authorities of Site AreaEmergency and reasons for emergency. Notify the NRC ASAP, but no later than 1 hour following classification of the emergency. • If necessary, provide protective action recommendations to State and local authorities. • 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. • Assess and respond to the emergency. • Dispatch, as necessary, onsite and offsite survey teams. • Dedicate individuals for plant status updates to offsite authorities and periodic press briefings. • On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. • Provide meteorological information and dose estimates to offsite authorities for actual releases via a dedicated individual. • Provide release and dose projections based on available plant condition information and foreseeable contingencies. • Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the Site Area Emergency • .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.	**EP B.1.1** The ED, at their discretion or when procedurally required, activates the ERO. **EP B.2** Augmentation of on-shift staffing will occur within 75 minutes of event 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. **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 per 10CFR50 Appendix E, section IV(D)(3). NRC will be notified, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.The SNC Standard Emergency Plan incorporates the actions needed for each individual Classification Level into general responsibilities section.The wording has been standardized and relocated into the position descriptions for the ERO members and various sections of the SNC Standard Emergency Plan and Site Annex (on-shift or augmented that maintain those functions.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
D.1.4.2: VEGP ACTIONS (GE) • Within 15 minutes of classification, inform State and local offsite authorities of the General Emergency and reason for emergency. Notify the NRC ASAP, but no later than 1 hour following classification of the emergency. • Provide protective action recommendations to State and local authorities based upon plant conditions and/or actual or projected releases of radioactive material. • 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. • Assess and respond to the emergency. • Dispatch onsite and offsite survey teams. • Dedicate an individual for plant status updates to offsite authorities and periodic press briefings. • On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. • Provide meteorological data and field monitoring team readings or dose estimates to offsite authorities for actual releases. • Provide release and dose projections based on plant condition and foreseeable contingencies. • Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the General Emergency. Close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.	**EP B.1.1** The ED, at their discretion or when procedurally required, activates the ERO. **EP B.2** Augmentation of on-shift staffing will occur within 75 minutes of event 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. **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 per 10CFR50 Appendix E, section IV(D)(3). NRC will be notified, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.The SNC Standard Emergency Plan incorporates the actions needed for each individual Classification Level into general responsibilities section.The wording has been standardized and relocated into the position descriptions for the ERO members and various sections of the SNC Standard Emergency Plan and Site Annex (on-shift or augmented that maintain those functions.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
D.2: The Classification Emergency Implementing Procedure is used to classify the emergency condition upon recognition of an off-normal condition relative to an Initiating Condition.	**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. The need to list the specific procedure to be used is not necessary for the Plan.
Section E Notification Methods and Procedures		
E.1: The Emergency Director is responsible for classifying an event (Section D) into the appropriate emergency class and then notifying onsite and off-site personnel accordingly using the means described below.	**EP B.1.1** 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; • Notifications of offsite agencies and approval of state, local, and NRC notifications. **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 site specific procedures.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E.1: The primary means for notification of personnel within the protected area is the Public Address (PA) system. Section E.1: Upon declaration of a Notification of Unusual Event (NUE), an Alert, a Site Area Emergency, or a General Emergency, the emergency director will order an announcement of the emergency.	**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 site specific 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 commitment wording has been standardized and relocated to the SNC Standard Emergency Plan. .

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.1: The tone signals for each of these classes of emergency conditions, as well as for a fire, will beas follows: • NUE: announcement only, no tone signal • Alert: warble tone • Site Area Emergency: warble tone • General Emergency: warble tone • Fire: siren tone Section F.7: As described in Section E, notification of onsite personnel at the Site will be completed through a combination of public address system announcements, tone signals, and proceduralized telephone calls.	**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 site specific 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.1: The Supervisor Nuclear Security will be responsible for notifying the unaffected Site units, Plant Wilson, the training center, the visitor's center, and recreation park staff.	**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 would be accomplished in accordance with the Emergency Plan Implementing Procedures (EPIPs).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.1: Security will activate the site siren to notify personnel on site, but outside the protected area, of an evacuation order.	**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 site specific 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 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 would be accomplished in accordance with the Emergency Plan Implementing Procedures (EPIPs).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.1: The Security Department will also be responsible for evacuating all visitors and nonessential personnel from the Plant Vogtle Recreational Park and for the verification of the evacuation of all nonessential personnel from the unaffected Site Units, Plant Vogtle, Plant Wilson, the training center, and the remaining areas inside the owner controlled area.	**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 would be accomplished in accordance with the Emergency Plan Implementing Procedures (EPIPs).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.1: Visitors within the protected area are escorted by a permanently badged individual.	**EP E.2.1** Visitors within the protected area are escorted by a permanently badged individual.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
E.1: Plant and contractor personnel will be trained on actions to be taken in an emergency prior to their work assignment.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan The general training requirements include visitor control. SNC provides Emergency Preparedness Training appropriate to the individual's responsibilities as required by Appendix E in general employee training and specialized training as required. The visitor program is maintained as part of the approved Security Plan assuring all non-badged individuals receive the appropriate training.
E.1: The training will include instructions on the methods of personnel notification and the required personnel actions in the event of an emergency.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.1: Notification of the corporate staff is performed in accordance with EIPs.	**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
E.1: The notification procedure includes notification of Emergency Response Organization Personnel (ERO) not on site.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.1: ERO members will be notified by means of an autodialer system activated by on-shift personnel.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.1: In addition to those personnel recalled; Operations, Maintenance, and Security personnel required to report shall be contacted by on-shift personnel from their own respective department.	**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 needed 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.
E.2: A dedicated telephone system, known as the Emergency Notification Network (ENN), will normally be used to accomplish these notifications..	**EP E.2.2:** A dedicated ENN will normally be used to accomplish State and local notifications.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.2: Figure E-1 presents the sample initial message form for making notifications to these response centers. This form has been developed in conjunction with appropriate offsite agencies.	**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 site specific EPIPs.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.2: The Emergency Director is responsible for the completion of the Initial Message Form (Figure E-1) and for the notification of the following agencies within 15 minutes of the declaration of anemergency:Georgia Emergency Management Agency Emergency Operations Center (EOC) communicatorBurke County Emergency Operations Center (EOC) communicatorSouth Carolina warning pointAiken County sheriff dispatcherBarnwell County sheriff dispatcherAllendale County central dispatchDepartment of Energy-Savannah River (DOE-SR) Operations Center communicator	**EP E.2.2.1:** State and local agencies listed in the site specific Annexes shall be notified within fifteen (15) minutes 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 site specific EPIPs. **Annex 4.1.1: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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> • Burke County Emergency Management Agency <u>State of South Carolina:</u> • Emergency Management Division (EMD) <u>South Carolina County Authorities:</u> • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOE-SRS)</u> • DOE-SRS Operations Center	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.3: The Emergency Director is responsible for ordering notification calls to the DOE-SR Operations Center by ENN and to the NRC Operations Center by the Emergency Notification System (ENS), or commercial telephone as backup, within prescribed time constraints from the declaration of an emergency	**EP E.1.1:** NRC will be notified, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.2:** 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. **EP E.2.2.1:** 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). **EP E.2.3:** The NRC is notified via the ENS.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.3: The emergency director is responsible for ordering notification calls to the DOE-SR Operations Center by ENN and to the NRC Operations Center by the Emergency Notification System (ENS).	**EP E.1.1:** NRC will be notified, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.3:** The NRC is notified via the ENS. **Annex Section 4.1.1: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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: • Burke County Emergency Management Agency State of South Carolina: • Emergency Management Division (EMD) South Carolina County Authorities: • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch Department of Energy – Savannah River Site (DOE-SRS) DOE-SRS Operations Center **Annex 5.3.3 Communications with the Savannah River Site (SEP F.1.2)** The primary means of communication between VEGP and the Savannah River Site (SRS) is the ENN. SRS has two ENN drops, both located in their Operations Center. The ENN system is available and staffed 24 hours per day. Commercial telephones provide a backup for the ENN.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
E.4. Administrative and physical means have been established for providing early initial warning and subsequent clear instructions to the populace within the plume exposure pathway emergency planning zone (EPZ).	**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 that means exist for this purpose rests with Southern Nuclear Operating Company.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.4: It is the responsibility of SNC to provide adequate means for notifying the public, or to be assured that such means are provided.	**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 that means exist for 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. The state and/or local authorities are responsible for activation of this system. The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
E.4: The alert notification system, except for the Savannah River Site (SRS), is described in Appendix 3. This system has the capability to complete the initial alert notification of residents within the plume EPZ in about 15 minutes.	**EP E.2.5.2:** 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. **Annex 4.2:** within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
E.4: The Site 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:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.5: The Emergency Director is responsible for the completion of a follow-up emergency message	**EP E.2.2.3 Follow-up Emergency Message** The Emergency Director is responsible for the completion of a follow-up emergency message.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E.6: All notification messages must be verified. This is a suitable mechanism, since the ENN is a multiparty, dedicated telephone line. When commercial telephone or radio is used for notification, the called party will contact the Site to verify the validity of the message or use the authentication system provided by the State of South Carolina EMD.	**EP E.2.7:** 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 within the states of Alabama and Georgia. Communications with agencies within the state of South Carolina will be authenticated using the authentication system provided by the South Carolina Emergency Management Division. In the unlikely event 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
E.6: All notification messages must be verified. When the ENN is used, verification is accomplished by roll call.	**EP E.2.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E: Actual methods and sequencing of notifications will be covered in appropriate implementation procedures.	**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 per 10CFR50 Appendix E, section 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, via the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **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 site specific procedures.	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan.
E: Tables E-1 and E-2 and Figure E-1 present the initial notification concept.	**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: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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> • Burke County Emergency Management Agency <u>State of South Carolina:</u> • Emergency Management Division (EMD) <u>South Carolina County Authorities:</u> • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOE-SRS)</u> • DOE-SRS Operations Center	The commitment wording has been standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E: Table E-1.	**EP E.2.1:** Notification of Onsite PersonnelThe 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 site specific 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 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 would be accomplished in accordance with the Emergency Plan Implementing Procedures (EPIPs). **EP E.2.3:** The NRC is notified via the ENS. **Annex 4.1.1: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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> • Burke County Emergency Management Agency <u>State of South Carolina:</u> • Emergency Management Division (EMD) <u>South Carolina County Authorities:</u> • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOE-SRS)</u> DOE-SRS Operations Center **Annex 5.3.3** The primary means of communication between VEGP and the Savannah River Site (SRS) is the ENN.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
E: Table E-2: All	**EP E.2.1:** Notification of Onsite PersonnelThe 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 site specific 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 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 would be accomplished in accordance with the Emergency Plan Implementing Procedures (EPIPs). **EP E.2.3:** The NRC is notified via the ENS. **Annex 4.1.1: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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> • Burke County Emergency Management Agency <u>State of South Carolina:</u> • Emergency Management Division (EMD) <u>South Carolina County Authorities:</u> • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOE-SRS)</u> DOE-SRS Operations Center	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Section F Emergency Communications		

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
F.1.1: The primary means of communication between the VEGP and the State of Georgia is the Emergency Notification Network (ENN).	**Annex 5.3.1:** Communications with the States, Local Counties and Savannah River (SEP F.1.2) The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The commitment wording was standardized and relocated to the Site Annex.
F.1.1: Commercial telephones and a Southern Company Communications in Atlanta provide backup for the dedicated telephone circuits.	**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 and Site Annex.
F.1.1: Commercial telephones and a Southern Company Communications in Atlanta provide backup for the dedicated telephone circuits. F.1.2: Commercial telephones and the Burke County Emergency Management Agency (EMA) radio network provide backups for the ENN. F.2.1: Commercial telephones provide the backup for the ENN. F.2.2: Commercial telephone is the backup means of communication.F.3: Commercial telephones provide a backup for the ENN.	**EP F.1.3** At least one onsite and one offsite communications system is maintained, each with a backup power source to ensure continuous communications. **Annex 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 and Site Annex.
F.1.1: Extensions for this system are located in the control room, technical support center (TSC), emergency operations facility (EOF).	**EP F.1.2:** 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 via the ENN.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
F.1.1: The ENN system is available on a twenty-four seven basis. F.1.2: The ENN is available and manned on a twenty-four seven basis F.3: The ENN system is available and manned on a twenty-four seven basis.	**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 via the ENN. **Annex 5.3.1:** Communications with the States, Local Counties and Savannah River (SEP F.1.2) The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
F.1.1: The plant telephone backup power is supplied by a battery system.	**EP F.1.3** At least one onsite and one offsite communications system is maintained, each with a backup power source to ensure continuous communications.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
F.1.2: At the plant, the emergency director is in charge of communications to the Burke County EOC.	**Annex 4.1.1: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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: • Burke County Emergency Management Agency State of South Carolina: • Emergency Management Division (EMD) South Carolina County Authorities: • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch Department of Energy – Savannah River Site (DOE-SRS) • DOE-SRS Operations Center	The commitment wording was standardized and relocated to the Site Annex.
F.1.2: Commercial telephones and the Burke County Emergency Management Agency (EMA) radio network provide backups for the ENN.	**Annex 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.
F.1.2: The primary means of communication between VEGP and Burke County is the ENN.	**Annex 5.3.1:** Communications with the States, Local Counties and Savannah River (SEP F.1.2) The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
F.2.1: An Administrative Decision Line (ADL) connects the EOF, SRS Operations Center, the GEMA FEOC, the SEOCs of both states and the three South Carolina counties. This prearranged conference call over commercial lines may be used for discussions other than emergency notifications.	**No equivalent Plan/Annex statement**	The Administrative Decision line is used by offsite agencies and listed in the Offsite Emergency Plan. This line is not used by SNC and so is not included in the Plan or Annexes.
F.2.1: The primary means of communication between the Site and South Carolina is the ENN, a dedicated telephone system from the Site to South Carolina emergency response agencies. F.2.2: The primary means of communication between the Site and the South Carolina counties will be the ENN, a dedicated telephone system which includes the Site and Aiken, Barnwell, and Allendale Counties' emergency response agencies.	**Annex 5.3.1 Communications with the States, Local Counties and Savannah River (SEP F.1.2)** The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The commitment wording was standardized and relocated to the Site Annex.
F.3: Actual communications may be completed by others as designated by the Emergency Director.	**Annex 4.1.1: Notification Process (SEP E.2.2)** State and local warning points are staffed 24 hours per day. State and local counties surrounding VEGP are 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> • Burke County Emergency Management Agency <u>State of South Carolina:</u> • Emergency Management Division (EMD) <u>South Carolina County Authorities:</u> • Barnwell and Aiken County - Sheriff's Department • Allendale County – County Central Dispatch <u>Department of Energy – Savannah River Site (DOE-SRS)</u> • DOE-SRS Operations Center	The commitment wording was standardized and relocated to the Site Annex.

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F.3: The primary means of communication between VEGP and the Savannah River Site (SRS) is the ENN.	**Annex 5.3.1: Communications with the States, Local Counties and Savannah River (SEP F.1.2)** The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The commitment wording was standardized and relocated to the Site Annex.
F.4: Commercial telephone lines and the Southern Company Communications serve as backups to the ENS and HPN.	**EP F.1.4:** SNC has established communications systems to provide reliable communications with Federal emergency response organizations. Commercial telephone lines serve as the backup to the ENS and other FTS lines.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
F.4: Emergency notification system phones are located in the control room, TSC, and EOF. F.4: Health physics network phones are located in the TSC and EOF.	**EP F.1.4.1** This communications line provides a communications link to the NRC Operations Center in Rockville, MD and is used for continuous communications in a classified emergency. **EP F.1.4.2** This communications line provides a communications link with the NRC to provide radiological information. .	The commitment 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.

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F.4: In the TSC, the HPN telephone is located in the communications room and will be attended by VEGP personnel until an NRC representative arrives.	**EP F.1.4.2** This communications line provides a communications link with the NRC to provide radiological information.	The commitment 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.
F.4: The Emergency Response Data System (ERDS) is the primary means by which the transmission of plant parameters occurs.Annex V2 H.4.4: In accordance with the requirements of 10 CFR 50, Appendix E, Section VI and NUREG 1394, Revision 1, Emergency Response Data System (ERDS) Implementation, means will be providedto transmit critical plant variables from the onsite computer system to the Nuclear RegulatoryCommission Operations Center via a dedicated communications link.	**F.1.4.8** Emergency Response Data System (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 that provides for the automated transmission of a limited data set of selected parameters.	The commitment 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.
F.4: The primary means of communication between VEGP and the Nuclear Regulatory Commission (NRC) is the emergency notification system (ENS).	**EP E.2.3:** The NRC is notified via the Emergency Notification System (ENS).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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F.5: Communications among the Control Room, TSC, OSC, and EOF will be completed usingdedicated telephone circuits, normal plant telephones, and radio, using the plant network.	**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. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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F.5: Communications available at each emergency response facility are as follows: Section F.5.1: CONTROL ROOM • Dedicated telephone circuits to the TSC, EOF, and OSC (one for each location). • ENN. • NRC ENS. • Normal plant phones. • In-plant radio console • Sound-powered phones. • Plant page system. • Commercial dial. • Southern Company Communications. • Facsimile. Section F.5.2: TECHNICAL SUPPORT CENTER • Dedicated telephone circuits to the control room, EOF, and OSC (one to each location). • ENN. • ENS. • Two FTS ERDS lines. • HPN. • Facsimile. • Normal plant phones. • In-plant radio. • Sound-powered phones. • Plant page system. • Field team radio remote. • Additional FTS lines. • Commercial dial. • Burke County radio remote. • South Carolina radio remote. • Southern Company Communications.	**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. **Annex 5.3.1**: Communications with the States, Local Counties and Savannah River (SEP F.1.2) The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
F.5.3: OPERATIONS SUPPORT CENTER • Dedicated voice telephone circuits to the EOF and TSC (one for each location). • Normal plant phones. • In-plant radio transceiver. • Commercial dial.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
F.5.4: EMERGENCY OPERATIONS FACILITY • Dedicated telephone circuits to the control room, OSC, and TSC (one each to the control room, OSC, TSC). • ENN • ENS • HPN. • Facsimile. • Normal plant phones. • Commercial dial. • Additional FTS lines. • Southern Company Communications. • ENC hotline. • Field team radio remote. • ADL prearranged conference.	**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. **Annex 5.3.1:** Communications with the States, Local Counties and Savannah River (SEP F.1.2) The primary means of communication between VEPG, the States of Georgia and South Carolina as well as Burke, Aiken, Allendale and Barnwell Counties and the Savannah River Site is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia the South Carolina Warning Point in the SEOC, and the Burke County EOC and Savannah River Operations Center. Extensions for this system are located in the Control Room, the TSC, and the EOF. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
F.5.5: EMERGENCY NEWS CENTER • Southern Company Communications. • GPC general office dial. • Commercial dial. • VEGP dial. • Facsimile.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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F.5: The radio system is also used for communications with the radiological monitoring teams.	**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. **EP F Table 5** •	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
F.6: Communications with Columbia Doctors Hospital or the Burke County Hospital is by commercial telephone. Radio contact through the Burke County EOC serves as a backup.	**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 commitment wording was standardized and relocated to the Site Annex.
F.7: As described in Section E, notification of onsite personnel at the Site will be completed through a combination of public address system announcements, tone signals, and proceduralized telephone calls. After normal working hours, Site personnel not on site at the time of the emergency will be notified by beeper (for plant management) or by telephone call using an autodialer system.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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F.8: Communication channels with the State of Georgia, Burke County, the State of South Carolina, Aiken County, Barnwell County, Allendale County, SRS, and the NRC are tested monthly, usingthe extensions in the Control Room, TSC, and EOF	**EP F.3.:** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that participants in the test are able to understand the content of the messages used 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.
F.8: Communications systems that link the Control Room, TSC, EOF, State EOC's and GEMA FEOC, County EOC's, and SRS EOC are tested quarterly.	**EP F.3** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that participants in the test are able to understand the content of the messages used in the test. • Communications between SNC operated nuclear power plants, state Emergency Operating Centers and local Emergency Operations Centers, and radiation monitoring teams will be tested annually;	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
F.8: The communication system for communicating between the TSC, EOF, and the Site field monitoring teams is tested quarterly.		Separate testing for the Field monitoring communication system is performed as part of the routine drill and training programs. Any non-conforming conditions are addressed via the site corrective action program.

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F.8: Communications procedures and systems are also tested biennially during a communications drill.	**EP F.3 Communications Tests** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that participants in the test are able to understand the content of the messages used 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
F.8: Emergency Response Data System computers are tested once per quarter, or as dictated by NUREG 1394.	**EP F.3** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that participants in the test are able to understand the content of the messages used in the test. • 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.

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F.9: In-plant monitoring teams will communicate with the Health Physics or OSC communicator at least every half hour.		Specific communications frequencies between the OSC and dispatched response teams are event specific and determined on a case by case basis for the event. A Plan commitment is not appropriate and could actually hinder effective response.
F.9: The field monitoring team radio covers the entire plume exposure pathway EPZ.	**EP F Table 5**	The capability to dispatch teams and for those teams to function is maintained in the SNC Standard Emergency Plan. This statement of radio coverage is not required.
F.9: Remote stations for communicating with the field monitoring teams are located in the TSC and 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 at other locations onsite and offsite. **EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Table F-1: All	**EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section G Public Education and Information		
G: Georgia Power Company (GPC) and Southern Nuclear Operating Company (SNC) in coordination with State and local officials will provide information to the public at least annually regarding how they will be notified and what their actions should be in an emergency.	**EP G.8**: 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 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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G: All materials used to provide emergency planning information to the public (information brochures, advertisements, signs and notices, etc.) will be reviewed by GPC and SNC on an annual basis.	**EP G.8:** 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 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 SNC Standard Emergency Plan and Annex retains the commitment to provide the information. The mechanics of performing the commitment are best controlled by administrative procedures.
G: The means for disseminating this information include information on siren poles, signs, notices in public areas, and publications distributed at least annually.	**EP G.8:** 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 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
G: Information is distributed annually to residents in the plume exposure pathway emergency planning zone (EPZ) through use of emergency information communication publications. The text of the communication addresses the following subjects: Summary – • What to do if you are warned of an emergency at the VEGPEmergency response plans • When an emergency will affect you • How you will be told about an emergency • What actions you might need to take • What if you are told to shelter • What if you are told to evacuate • Steps to be prepared for an emergency • Steps for using map and chart of evacuation area • Steps to take to get ready for the trip • Classes of accidents • Where to get more information or other help • What radiation is • Special needs card	**EP G.8:** 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 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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G: In addition, public information personnel provide public education programs to the community.	**EP G.8:** 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 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.
G.1: Signs and notices providing information to transients are placed in public recreation areas as well as other public places in the plume EPZ such as siren poles, the Plant Vogtle Visitors Center, and in commercial establishments. • How people will be warned of an emergency. • What to do if warned of an emergency. • A list of radio and television stations to tune to for further information G.1: Finally, a Vogtle emergency information brochure will be made available within the EPZ to transients at commercial establishments, churches, motels, hunting clubs, Creek and Cawden Plantations, the Plant Vogtle Visitors Center, and through residents whose land is used by nonresidents. G.1: Outside the EPZ, the brochure will be made available to timber company offices. G.1: (Outside the EPZ, the brochure will be made available) to the Waynesboro Office of the Agriculture Stabilization & Conservation Service for distribution to farmers who farm, but do not reside, in the EPZ.	**Annex 2.3.6** Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated upon 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 as to what local media will be providing additional information in the event of an emergency.	The commitment wording was standardized and relocated to the Site Annex.

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G.1: This material will include the following information: • How people will be warned of an emergency. • What to do if warned of an emergency. • A list of radio and television stations to tune to for further information.	**Annex 2.3.6** Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated upon 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 as to what local media will be providing additional information in the event of an emergency.	The commitment wording was standardized and relocated to the Site Annex.

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G.2: The emergency news center (ENC) will be the principal point of contact with the news media during an emergency. The ENC will accommodate public information representatives from SNC, GPC, State, local and Federal response agencies.	**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 VEGP JIC is located in Waynesboro, 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 public and media inquiries. Details of the JIC for VEGP 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 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 Vogtle 3-4 Annex.

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	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 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 Vogtle 3-4 Annex.
G.2: GPC will utilize the Corporate Headquarters Building at 241 Ralph McGill Boulevard, NE, Atlanta, Georgia, to serve as a temporary information center until the ENC in Waynesboro (Burke County Office Park) is activated.	**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 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 Vogtle 3-4 Annex.

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	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 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 Vogtle 3-4 Annex.
G.2: In addition, technical briefers have been designated who can provide general and background information.	**EP 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 via displays, ENN Forms, and direct contact with the EOF Manager.	The commitment wording was 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 Vogtle 3-4 Annex.
G.2: The Company spokesperson has access to all information and telephone contact with the emergency director through the EOF Manager. He briefs the media on plant status and Company emergency activities.	**EP 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 PID posted on that status.	The commitment wording was 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 Vogtle 3-4 Annex.

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G.2: The Company spokesperson position is filled by individuals who, under normal operations, hold supervisory positions on the SNC Corporate or plant staff and are technically and professionally qualified to perform this important function.	**EP 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 PID posted on that status.	The commitment wording was 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 Vogtle 3-4 Annex.
G.3: GPC and SNC will provide timely and accurate information to local, State and federal agencies, and will seek reciprocal information from these agencies.	**EP 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 off-site agencies. The PID may delegate emergency communications approval authority to other staff members.	The commitment wording was 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 Vogtle 3-4 Annex.
G.4: Rumors will be controlled by providing timely, accurate, and consistent information to the public and by having a single source of information.	**EP G.5: Public Response** All appropriate information will be released as clearly, concisely and quickly as possible. Public announcements will be made on a frequent and regular basis.	The commitment wording was 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 Vogtle 3-4 Annex.

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G.4: To dispel rumors in an emergency, a rumor control network will be activated. News media will be monitored to detect and respond to misinformation.	**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 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 Vogtle 3-4 Annex.
G.5: GPC will offer an annual program to acquaint the news media with the methodology for obtaining information about overall emergency preparedness at the VEGP. Training will include information about the plant, radiation, and the role of the emergency news center.	**EP G.2:** 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.
Section H Emergency Facilities and Equipment		
H.1.1: In addition, portable radiation monitors will be available for personnel in transit from the TSC to other areas.	**Annex 5.1.2** The ventilation system will be operated in accordance with emergency plan implementing procedures (EPIPs) and will be manually controlled from the TSC. The ventilation system will operate in the pressurization and filtering mode upon detection of high radiation in the TSC ventilation intake. In addition, portable radiation monitors will be available for personnel in transit from the TSC to other areas. Portable air breathing apparatus and anti-contamination clothing will also be available for the TSC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.The procedure reference is deleted. The SNC Standard Emergency Plan retains the commitment to provide the appropriate radiological protection of TSC responders. Procedures will be developed consistent with the License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.1: Lighting will be powered by the normal and redundant electrical supply system. An emergency battery operated lighting system will be installed.	**Annex 5.1.2:** Lighting will be powered by the normal and redundant electrical supply system. An emergency battery operated lighting system will be installed.	The commitment wording was standardized and relocated to the Site Annex.
H.1.1: Motorized vehicles are provided to facilitate the movement of personnel between the TSC and the Site's Control Rooms		The history of drills and exercises supplemented by limited actual events has determined that personnel transit between the Control Room and the TSC is not effective in the overall command and control process. The enhancements in data transmission and phone/radio voice communication have effectively eliminated the need for transit between facilities.
H.1.1: Portable air breathing apparatus and anti-contamination clothing will also be provided in the TSC.	**Annex 5.1.2:** Portable air breathing apparatus and anti-contamination clothing will also be available for the TSC	The commitment wording was standardized and relocated to the Site Annex.
H.1.1: Power for vital information systems will be provided by redundant power supplies including a battery backed uninterruptible power supply system	**Annex 5.1.2:** Power for vital information systems will be provided by redundant power supplies including a battery backed uninterruptible power supply system.	The commitment wording was standardized and relocated to the Site Annex.
H.1.1: The air supply is filtered by high efficiency particulate air (HEPA) and charcoal filters.	**Annex 5.1.2:** The ventilation system will include high efficiency particulate air (HEPA) and charcoal filters.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.1: The documents that will be maintained in the TSC include:Technical Specifications.Plant Operating Procedures.Final Safety Analysis Reports.Emergency Plan.Emergency Implementing Procedures.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.Records needed to perform the functions of the emergency operating facility (EOF) when it is not operational.In addition, copies of the above-listed documents and the following documents are available inVEGP Document Control:Plant operating records.Plant Review Board records and reports.	**Annex 5.1.2:** The records storage is shared by the control room and the TSC. These records can be accessed via a digital records system. This system is supplied backup power via an uninterruptible power supply to allow retrieval of records in the event of a loss of power. These records include but are not limited to. • Technical Specifications. • Plant Operating Procedures. • Final Safety Analysis Report. • Emergency Plan.Emergency Plan Implementing Procedures. • Plant operating records. • System piping and instrumentation diagrams and 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.
H.1.1: The emergency director and NRC director will be located in close proximity to ensure proper communications.	**Annex 5.1.2** The Emergency Director and NRC director will be co-located to ensure proper communications	The commitment wording was standardized and relocated to the Site Annex. Note that the SNC Standard Emergency Plan provides space in both the TSC and EOF. The responding NRC team will have the option of positioning personnel in either location.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.1: The TSC is equipped with a computer system, which provides source term and meteorological data and technical data displays to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any significant release of radioactivity to the environment. Section H.1.1: In addition, the TSC has ready access to plant records.	**Annex 5.1.2** The TSC will be equipped with a computer system, which provides source term and meteorological data and technical data displays to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any significant release of radioactivity to the environment. In addition, the TSC will have ready access to plant records.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H.1.1: The TSC structure and ventilation system are designed to ensure that the TSC personnel are protected from radiological hazards.	**Annex 5.1.2**: The TSC structure and ventilation system will be designed to ensure that the TSC personnel are protected from radiological hazards.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.1: The TSC will be established consistent with NUREG 0696.	**Annex 5.1.2:** The TSC structure and ventilation system will be designed to ensure that the TSC personnel are protected from radiological hazards. **EP 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 Emergency Notification System (ENS) • Notification and update of the NRC via Health Physics Network (HPN).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. The wording was updated to provide more specific capabilities for the facility.
H.1.1: The TSC will provide plant management and technical support personnel (including five Nuclear Regulatory Commission (NRC) personnel) with a facility from which they can assist plant operating personnel located in the control rooms during an emergency.	**Annex 5.1.2** The TSC will provide plant management and technical support personnel (including Nuclear Regulatory Commission (NRC) personnel) with a facility from which they can assist plant operating personnel located in the control rooms during an emergency.	The commitment wording was standardized and relocated to the Site Annex.
H.1.1: The ventilation system will be designed to maintain exposures to occupants at or below 5 rem total effective dose equivalent (TEDE) for the duration of the accident.	**Annex 5.1.2:** The ventilation system will be designed to maintain exposures to occupants at or below 5 rem total effective dose equivalent (TEDE) for the duration of the accident.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.1: The ventilation system will be operated in accordance with emergency implementing procedures (EIPs) and will be manually controlled from the TSC.	**Annex 5.1.2** The ventilation system will be operated in accordance with emergency plan implementing procedures (EPIPs) and will be manually controlled from the TSC.	The commitment wording was standardized and relocated to the Site Annex. The procedure reference is deleted. The SNC Standard Emergency Plan retains the commitment to provide the appropriate radiological protection of TSC responders. Procedures will be developed consistent with the License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q). Procedures will be submitted to the NRC no later than 180 days prior to fuel load ion each unit.
H.1.1: The ventilation system will operate in the pressurization and filtering mode upon detection of high radiation in the TSC ventilation intake.	**Annex 5.1.2** The ventilation system will operate in the pressurization and filtering mode upon detection of high radiation in the TSC ventilation intake.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.The procedure reference is deleted. The SNC Standard Emergency Plan retains the commitment to provide the appropriate radiological protection of TSC responders.Procedures will be developed consistent with the License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.1: The TSC will be powered by reliable and redundant power supplies. Lighting will be powered by the normal and redundant electrical supply system. An emergency battery operated lighting system will be installed. Power for vital information systems will be provided by redundant power supplies including a battery backed uninterruptible power supply system	**Annex 5.1.2:** The TSC will be powered by reliable and redundant power supplies. Lighting will be powered by the normal and redundant electrical supply system. An emergency battery operated lighting system will be installed. Power for vital information systems will be provided by redundant power supplies including a battery backed uninterruptible power supply system.	The commitment wording was standardized and relocated to the Site Annex.
H.1.2: Emergency kits containing radiation monitoring equipment, first aid supplies, decontamination supplies, breathing apparatus, portable lighting, and hand-held radios are stored in the OSC.	**Annex 5.1.3** Emergency kits containing radiation monitoring equipment, first aid supplies, decontamination supplies, breathing apparatus, portable lighting, and hand-held radios are stored in the OSC.	The commitment wording was standardized and relocated to the Site Annex. The commitment to perform OSC operations is maintained unchanged by the SNC Standard Emergency Plan. The responsibility of conducting OSC operations is included in Section B job descriptions of the various OSC leaders. The OSC Manager's job description contains the overall unchanged intent of job operations. Specifics in each area (RP, Maint, Ops, etc.) are included in the remainder of the job descriptions in B.2.
H.1.2: Evacuation of the OSC will be conducted according to emergency implementing procedures	**Annex 5.1.3** Evacuation of the OSC will be conducted according to emergency implementing procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.2: In the event that this facility becomes uninhabitable, the functions of the OSC will be conducted from the designated back-up OSC space in the Outage Control Center (OCC) located in theAnnex Building if Unit 3 or Unit 4 is the affected unit and from Clearance and Tagging (C&T) located in the control building if Unit 1 or Unit 2 is the affected unit.	**Annex 5.1.3:** In the event that this facility becomes uninhabitable, the functions of the OSC will be conducted from Outage Control Center (OCC) located in the Annex Building if Unit 3 or Unit 4 is affected unit and from Clearance and Tagging (C&T) located in the control building if Unit 1 or Unit 2 is the affected unit. These designated back-up OSC spaces will have the same capability as the OSC. Evacuation of the OSC will be conducted according to emergency implementing procedures. These procedures will describe the method by which the OSC is evacuated and the movement of personnel to other facilities	The commitment wording was standardized and relocated to the Site Annex.
H.1.2: Status boards containing plant conditions and emergency classification will be available in the OSC.		Due to the ongoing evolution of electronic capabilities for display and dissemination of information the specific reference to status boards was eliminated from the SNC Standard Emergency Plan. Facility Operating Procedures will direct information dissemination.
H.1.2: The OSC has been established to be consistent with NUREG 0696 guidelines as described below.	**EP H.1.3:** The OSC has been established to provide an area for coordinating and planning of activities and the staging of personnel and equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H.1.2: The OSC is where operational support personnel (such as instrument technicians, engineers, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel) assemble to aid in the response to an emergency.	**Annex 5.1.3** The OSC is where operational support personnel (such as instrument technicians, engineers, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel) assemble to aid in the response to an emergency.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.1.3 & Appendix 7: 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 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H.3: Activation of the OSC will be 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 wording was standardized and relocated to the SNC Standard Emergency Plan.The SNC Standard Emergency Plan requests ERO augmentation be revised to 75 minutes as part of this submittal. That justification is provided in the Technical Analysis Section of this submittal rather than repeated in the table each place it's referenced.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.3: The OSC will be operational within about an hour of 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 wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan requests ERO augmentation be revised to 75 minutes as part of this submittal. That justification is provided in the Technical Analysis Section of this submittal rather than repeated in the table each place it's referenced.
H.3: Upon declaration of an Alert or higher level classification, the TSC will be activated and will be operational within about an hour of the initial notification. Overall	**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 and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan requests ERO augmentation be revised to 75 minutes as part of this submittal. That justification is provided in the Technical Analysis Section of this submittal rather than repeated in the table each place it's referenced.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.4.5: As described in UFSAR Subsection 18.8.2, Safety Parameter Display System (SPDS), the SPDS is integrated into the design of the AP1000 human system interface resources.	**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 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.
H.4.6: Liquid samples from the reactor coolant system and the containment sumps, and air samples from the containment atmosphere may be taken during accident conditions.	**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. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken to mitigate and control the course of an accident.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.5.2: Each team will include two people who will obtain an emergency monitoring kit. Section I.5: Monitoring teams of at least two people are formed and dispatched at the OSC or TSC as appropriate.	**EP B.2.2.7** The following emergency teams may be formed by OSC personnel, as necessary. • Search and rescue • Repair • Post accident sampling • Internal survey • Field monitoring **EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H.5.2: Results of the offsite monitoring activities will be provided to the TSC until the dose assessment activities are transferred from the TSC to the EOF.Section I.5: They will be controlled by the TSC until the responsibility is transferred to the EOF.	**EP I.7:** Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H.5.2: The kits will include dosimeters, a two-way radio, meters for measuring gamma and beta/gamma dose rates, and air samplers for collecting particulates and iodines. Section I.5: The emergency monitoring kits contain a portable air sampler, silver zeolite cartridges, and counters to provide the capability to detect and measure radioiodine concentrations in the air as low as 10-7 µCi/cc.	**EP I.9:** Field monitoring equipment has the capability to detect and measure airborne radioiodine in the presence of noble gases.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to perform the function rather than the specifics on equipment.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.5.2: VEGP monitoring teams will remain on the Georgia side of the Savannah River.	**EP I.7**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The most effective positioning of the monitoring teams is event specific. The existing Plan statement limiting the locations of the SNC teams is not needed.
H.5.2: VEGP will have sufficient portable equipment and trained personnel to field three field monitoring teams.	**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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The modification of the commitment to provide two vs. three field teams aligns with industry standards. The bases for the original commitment to deploy three field teams cannot be determined at this point.
H.5.2: VEGP will have sufficient portable equipment and trained personnel to field three field monitoring teams. Section I.5: The emergency director or his designee can deploy up to three teams for field monitoring.	**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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The modification of the commitment to provide two vs. three field teams aligns with industry standards. The bases for the original commitment to deploy three field teams cannot be determined at this point.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.5.3: Backup laboratory facilities are available at Plant Hatch.	**EP H.6.3 Laboratory Facilities** External facilities for counting and analyzing samples, dosimetry processing, can be provided by the 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.
H.5.3: The GPC environmental laboratory located in Smyrna, GA has the capability to perform isotopic analyses of drinking water, river water, milk, vegetation, sediment, and biological samples, as well as tritium and gross-beta analysis. In addition, processing of environmental thermos luminescent dosimeters (TLDs) will be handled by this laboratory.	**EP H.6.3 Laboratory Facilities** External facilities for counting and analyzing samples, dosimetry processing, can be provided by the 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.
H.5.3: VEGP has laboratory facilities 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. **EP H.6.3 Laboratory Facilities** External facilities for counting and analyzing samples, dosimetry processing, can be provided by the 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.
H.6: A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	**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. 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
H.6: Emergency kits are located in the TSC (for control room also), the OSC, the health physics control point, the EOF and other plant locations.Section H.6: An ambulance kit will be carried by the VEGP health physics technician who accompanies the ambulance.	**EP H.9**: Emergency kits are available at SNC operated nuclear power plants. Designated site or department procedures identify the equipment in the various emergency kits. **Annex 5.5:** Emergency supplies and equipment are located in the Control Room, the TSC, the OSC, the health physics control points, and other 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 procedures. 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 Site Annex.
H.6: Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Section H.6: Equipment in these kits is calibrated in accordance with the suppliers' recommendations.	**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. 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.
Section I Accident Assessment		
I: Initial assessment actions are the responsibility of the shift superintendent and/or the shift supervisor, using available shift 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The responsibility was relocated to Section B description of on-shift staff and ED responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I: Subsequent assessment actions are directed by the emergency director with assistance from the control room, technical support center (TSC), emergency operations facility (EOF), and emergency teams, as necessary.	**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 has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations to State and Local government organizations responsible for implementing off site emergency measures. 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.2: In-plant radiological measurements provide information to help assess emergency conditions. The containment high-range radiation monitor and containment hydrogen monitor are used to provide an early indication of the quantity of radioactivity available for release from the containment. Emergency procedures include a correlation between the monitor reading and the extent of core damage. These correlations are based on the Westinghouse Owners Group (WOG) Core Damage Assessment Guidance, WCAP-14696-A, Revision 1, November 1999. A more detailed assessment of core damage is then performed using emergency implementing procedures which are also based on the WOG methodology.	**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 are capable of detecting and measuring 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.
I.2 Samples can be obtained from the reactor coolant system (RCS), the containment sump, and the containment atmosphere, and are used for all radiochemical analyses.	**EP H.5.2.2:** Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.2 Grab samples can be transported in a shielded cask.	**EP H.5.2.2**: Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken 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.
I.2: Reactor coolant grab samples can be either diluted or undiluted. Grab samples can be transported in a shielded cask. Analysis capability meets all Final Safety Analysis Report (FSAR) commitments to Regulatory Guide 0737, II.B.3. In addition to the onsite capabilities for radiological assessment, AREVA ANP has agreed to provide backup analysis of high radioactivity level samples per the purchase order listed in Appendix 2.	**EP B.4.3.1** Contract laboratories can provide assistance in environmental monitoring and sampling. **EP C.3.2:** Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services. **EP H.6.3:** External facilities for counting and analyzing samples, dosimetry processing, can be provided by the 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.
I.2 In addition to the onsite capabilities for radiological assessment, AREVA ANP has agreed to provide backup analysis of high radioactivity level samples per the purchase order listed in Appendix 2.	**EP B.4.3.1** Contract laboratories can provide assistance in environmental monitoring and sampling. **EP C.3.2**: Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services. **EP H.6.3**: External facilities for counting and analyzing samples, dosimetry processing, can be provided by the 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.2 The TSC Manager will approve and direct the transport of the grab sample to AREVA ANP.		The statement of process was eliminated. Procedural control for the release of material offsite is maintained by existing site non-emergency procedures.
I.3: The source term or release rate is determined using the process and effluent radiation monitoring systems, and measured or estimated flow rates for releases via monitored effluent release paths. In the event that instrumentation is off-scale or inoperable, direct measurements with portable survey instruments will be used for determination and verified by field monitoring team samples.	**EP H.5.2.2**: Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.4: Computer dose calculation systems will be located in both the TSC and EOF for offsite dose assessment purposes. These systems will support the MIDAS code, a VEGP-specific version of a dose assessment computer code developed by Pickard, Lowe, and Garrick, Inc., (PLG). The code is based on a PLG application entitled Calculation of Reactor Accident Consequences Including Trajectory (CRACIT), which is similar in concept to that in the CRAC program written for the Reactor Safety Study. The MIDAS version is referred to as MIDRAC. The basic functions of MIDRAC are the calculation of dispersion of the released material as it travels downwind and the estimation of the resulting concentrations of this material. Dispersion is modeled using the straight-line Gaussian dispersion model and variable trajectory transport. Initial dose projections can be made within 15 minutes of a radiological release utilizing the computer system. Subsequent dose projections will be made approximately every 15-30 minutes depending on the variability of meteorological conditions and/or radioactive releases.	**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 are capable of detecting and measuring 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. **EP I.3**: The dose calculation model is provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses. **EP I.3:** SNC operated nuclear power plants use an offsite dose assessment program which estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment is to maintain the comparison with EPA PAGs. The time reference is not required to support the PAR process.
I.4: MIDAS is a personal computer based program for rapidly assessing the radiological impact of accidents at nuclear power plants. It calculates total effective dose equivalent (TEDE), thyroid doses, and skin doses at various fixed downwind distances. Source term information is derived from plant effluent monitors, RCS or containment samples, field monitoring teams, or default accident scenario.	**EP I.3**: The dose calculation model is provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses.	The statement of process was eliminated. Procedural control for the release of material offsite is maintained by existing site non-emergency procedures.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.4: Actual meteorological data and release rate data are obtained from the plant computer and information systems, and entered into the dose projection computer. Minimum meteorological data to be obtained include wind speed, wind direction, and a stability indicator (either vertical temperature difference or standard deviation of the horizontal wind direction). Plant-specific default values are part of the program for use when meteorological or release rate data are not available. The computer will calculate dispersion, dose, and plume arrival times. Dose calculations are based on dose conversion factors (DCF) from EPA 400.	**EP I.1:** Plant system and effluent parameter values are used in the determination of 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.4: Default release rates are available for possible accidents in the event that measured source term data are not available or the case where bounding calculations are desired.	**EP I.3**: 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 and quick estimates based on hand-calculation methods. 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.4: In the event both the primary and backup meteorological systems are unavailable, meteorological data will be obtained by commercial telephone directly from the National Weather Service located in Columbia, South Carolina.	**EP H.5.1:** The National Weather Service (NWS) maintains an automated observation station at the airport; and wind speed, wind direction, cloud cover, and ceiling height can be obtained. **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 SNC Standard Emergency Plan and Site Annex.
I.4: The VEGP field monitoring team will collect sufficient environmental data to characterize the initial deposition of activity, the peak activity in pasture grass and milk, and total intake of I-131, Cs-137, Sr-90, and Sr-89.	**EP I.7** Environs Surveys and MonitoringIn 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 the determination and assessment of protective actions for the general public and recovery actions for the plant.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.The modification of the commitment to provide two vs. three field teams aligns with industry standards. The bases for the original commitment to deploy three field teams cannot be determined at this point.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.4: When precipitation is predicted or occurring in the area of the plume, the potential for significantly increased rates of radioactivity deposition will be considered by increasing the scope of environmental sampling as required.	**EP I.3:** 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 and quick estimates based on hand-calculation methods. 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Precipitation is part of the standard modeling techniques and a specific discussion in the Plan is not required.
I.4: The VEGP staff will calculate the 50-mile ingestion pathway doses from the deposition of specific radionuclides.		The deposition doses will be calculated in the intermediate phase under the direction of the Offsite Response Organization. The utility retains the commitments to make Ad Hoc Protective Action Recommendations beyond the 10 mile EPZ in Section J of the Standard Plan.
I.4: The dose assessment computer program will be used to calculate the projected deposition of radionuclides and associated doses in the ingestion pathway based on release data and meteorological conditions.		The deposition doses will be calculated in the intermediate phase under the direction of the Offsite Response Organization. The utility retains the commitments to make Ad Hoc Protective Action Recommendations beyond the 10 mile EPZ in Section J of the Standard Plan.
I.4: The results of all analyses will be provided to the States of Georgia and South Carolina by the dose assessment supervisor.	**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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: Initially, the emergency director can activate at least one team from on-shift personnel.	**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).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.5 Monitoring teams of at least two people are formed at the OSC, TSC, or the EOF, as appropriate.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.5: Field monitoring kits are available to the teams in the EOF or plant entry security building. I.5: The emergency monitoring kits contain a portable air sampler, silver zeolite cartridges, andcounters to provide the capability to detect and measure radioiodine concentrations in the air aslow as 10-7 µCi/cc.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.5: Designated vehicles may be used which are equipped with two-way radios on plant-dedicated frequencies. I.5: Handheld radios will also be available as a backup.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: If the dose rate exceeds 100 mrem/h, off-centerline measurements will be made.		No equivalent Plan Statement. The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams. Environmental Team Procedures (Part of the EPIP series) will be developed consistent with the approval of this License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).
I.5: In-transit dose rate measurements will be made.		No equivalent Plan Statement. The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams. Environmental Team Procedures (Part of the EPIP series) will be developed consistent with the approval of this License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: It is estimated that teams will be in the field and performing monitoring tasks within about 1 h of the determination of the need for field monitoring.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.As previously stated the dispatch of teams at 75 minutes vice the previous 1 hour commitment is justified separately in the Technical Analysis Section of this submittal.
I.5: Monitoring teams are instructed to contact the monitoring team communicator approximately every half hour.	**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.3.2.8 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: Prior to leaving for the field, the dose assessment supervisor, or designee, will normally direct and brief the teams on the initial survey and sample locations, suggested travel routes, meteorological conditions, and team identification name or number for communication purposes.		No equivalent Plan Statement. The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams. Environmental Team Procedures (Part of the EPIP series) will be developed consistent with the approval of this License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: The Dose Assessment Team at the EOF will collate field monitoring data for VEGP dose projection purposes.	**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 the determination and assessment of 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.5: The teams will inspect their field monitoring kits, perform survey equipment operation checks, obtain dosimeters, and establish radio communications with the monitoring team communicator.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.5: The teams will obtain their briefing from the health physics supervisor in the TSC or in the OSC by the OSC manager.		No equivalent Plan Statement. The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams.Environmental Team Procedures (Part of the EPIP series) will be developed consistent with the approval of this License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).
I.5: The total sample volume and the limiting background count rate allow for a LLD of at least 10-7 µCi/cc.		No equivalent Plan Statement. The SNC Standard Emergency Plan retains the commitment to dispatch Field Teams and use the environmental information for radiological assessment as previously described. The information here is appropriate to procedural control of the teams. Environmental Team Procedures (Part of the EPIP series) will be developed consistent with the approval of this License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.6: Composite samples (of drinking water) from each location are collected monthly.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: Copies of the map showing the locations will be in the field monitoring kits, the TSC and EOF.	**EP I.7:** Samples are taken at predetermined locations as well as those locations specified during and after a release.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.6: Direct radiation is measured by thermoluminescent dosimeters (TLDs) which are exchanged and analyzed (read) for gamma dose quarterly.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
I.6: During and/or subsequent to emergency conditions, the routine environmental monitoring program will be modified to collect and analyze additional samples from existing stations.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Section H of the SNC Standard Emergency Plan maintains the commitment to have the program as part of the Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.6: Filters are composited quarterly by location for gamma isotopic analysis.		The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: Grab samples of finished drinking water are taken monthly.		The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: In addition to direct monitoring and air sampling, the assessment program includes an emergency environmental sampling program.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.6: Milk samples are collected semimonthly by taking grab samples from milk supplies at control and indicator stations. These samples are analyzed for gamma isotopics.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: Monthly samples are analyzed for gross beta and gamma isotopics.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: Quarterly composites, which are obtained from the monthly composites, are analyzed for tritium.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: Sediment from the Savannah River is collected semiannually from control and indicator locations using manual grab sampling techniques. Sediment samples are analyzed for gamma isotopics		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: The (airborne radioiodine and particulates for environmental sample) cartridge and filter are changed weekly.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.6: The GPC environmental laboratory, located in Smyrna, Georgia, has the capability to perform isotopic analyses of drinking water, river water, milk, vegetation, sediment, and biological samples as well as tritium and gross beta analysis.	**EP H.6.3 Laboratory Facilities** External facilities for counting and analyzing samples, dosimetry processing, can be provided by the 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.
I.6: Vegetation is sampled monthly during the growing season.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.
I.6: Vegetation samples are analyzed for gamma isotopics.		The SNC Standard Emergency Plan retains the commitment to maintain the capability for the fixed environmental program. The procedural aspects of maintenance of the program are not needed in the Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
I.7 Field monitoring measurements are important in determining the actual radiation levels in the environment. The dose assessment computer code provides only a rough approximation of radiation levels and location of the plume. The uncertainties in the source term and meteorological conditions in the affected areas are the chief contributors to the inaccuracies of projected dose and dose rate. Once field monitoring information becomes available, the dose assessment computer code becomes less important in providing data on which to base protective action recommendations. There is no widely accepted formula to use field monitoring data to reduce the uncertainties and inaccuracies in the dose assessment computer code. The Dose Assessment Manager or HP Supervisor must exercise professional judgment in determining the proper correction factors. Field monitoring teams should not unnecessarily be exposed to high levels of radiation from a radioactive plume. ALARA (as-low-as-reasonably-achievable) principles should be applied to all field monitoring activities. Once the decision to evacuate the general public has been made, field monitoring activities should be restricted to such activities as determining the source term for an unmonitored release or confirming the presence of a radioactive plume. Plume centerline tracking is of relatively minor importance in protecting the health and safety of the public, and should not be attempted for highly radioactive plumes unless the information derived has some value in assisting in the evacuation of the public. Field monitoring team activities that contribute to the expeditious evacuation and consequent reduction in radiation dose of the public should continue within the EPA emergency exposure guidelines, if necessary		Wording duplicates Standard Plan content in other sections.
Section J Protective Response		

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.2: Accountability reports are made periodically to the emergency director by the Security Department.	**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 them, 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 SNC Standard Emergency Plan retains the commitment to perform and maintain accountability. The procedural aspects of the process are not needed in the Plan. Environmental Team Procedures (Part of the EPIP series) will be developed consistent with the approval of this License Amendment Request and in accordance with the requirements of 10 CFR 50.54(q).
J.1.2: Assignment logs and required periodic communications between emergency response teams maintain accountability.		The SNC Standard Emergency Plan retains the commitment to perform and maintain accountability. The procedural aspects of e of the process are not needed in the Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.2: Emergency response personnel in the protected area badge into their emergency response facility (TSC, OSC, or control room). The security computer system performs an initial of all persons in the protected area. J.1.2: Thereafter, the emergency response facility managers of the control room, TSC, and operations support center shall be responsible for periodically assuring that accountabilities in their facilities are being maintained.	**EP 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 thirty minutes of the emergency declaration. **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 them, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.2: The Security Department accounts for each person inside the protected area at the start of an emergency by using the security computer system.	**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 them, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.1.2: This method provides for accountability of all individuals inside the protected area within about 30 min. of the emergency declaration page announcement.	**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 them, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.3: If protected area accountability reveals a missing person, the emergency director assembles a search and rescue team per emergency response procedures	**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 them, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan
J.1.3: A search of likely areas is conducted until the missing individual is located.	**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 them, 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.4: Site dismissal, with or without monitoring, of non-involved personnel on-site (if feasible) is ordered by the emergency director whenever a Site Area or General Emergency is declared.	**J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or to immediately leave the site. Personnel will be directed to either proceed to their homes or to 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.1.4: Personnel on site will be notified by public address, site siren, or other communication that dismissal of non-involved personnel to the applicable reception center will take place and specify the route.	**J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or to immediately leave the site. Personnel will be directed to either proceed to their homes or to 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.1.4: Security will dispatch security officers to work areas outside the protected area to ensure all non- involved personnel have left the owner-controlled area.	**J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or to immediately leave the site. Personnel will be directed to either proceed to their homes or to 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.5: When an Alert is declared and site dismissal with no monitoring is anticipated, personnel who have left the protected area are monitored by portal monitors.	**J.4.3 Site Evacuation** If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or to immediately leave the site. Personnel will be directed to either proceed to their homes or to 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.1.6: A supply of potassium iodide is stored in the TSC for TSC and control room use, OSC, main control point, or health physics room. J.1.6: The health physics supervisor will direct the issuance of potassium iodide when the projected thyroid exposure is greater than 25 rem. J.1.6: The health physics supervisor will direct radiological survey personnel to distribute potassium iodide and record the name and social security number of those individuals who are issued potassium iodide.	**EP J.4:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.1.6: Potassium iodide will be issued in 130-mg doses daily for at least 3 days, but not more than 10 days.	**EP J.4:** 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 onsite	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.1.6: Issuance will be performed immediately prior to exposure or not longer than 4 hours after exposure.	**EP J.4:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.1.6: At the time potassium iodide is distributed, an iodine sensitivity check will be made by querying each individual concerning known reactions to iodine.	**EP J.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.2.2: The emergency director is responsible for providing protective action recommendations to State and local officials as part of initial notifications and follow-up communications.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination;	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J.2.2: Using available information on plant conditions, projected dose estimates, and any available monitoring data, the emergency director recommends whether the public should be advised to seek shelter or evacuate.	**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.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 the use of KI (Potassium Iodide) in accordance with State Plans and Policy	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J.2.3: Determination of the benefit of evacuation must take into account the time needed to complete the evacuation.	**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.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 the use of KI (Potassium Iodide) in accordance with State Plans and Policy	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table J-1: Emergency equipment locations.	**EP H.9:** Emergency kits are available at SNC operated nuclear power plants. Designated site or department procedures identify the equipment in the various emergency kits. **Annex 5.5:** Emergency supplies and equipment are located in the Control Room, the TSC, the OSC, the health physics control points, and other 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 procedures. 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 Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
J Figures J-1 and J-2	**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.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 the use of KI (Potassium Iodide) in accordance with State Plans and Policy	Figures were removed from the SNC Standard Emergency Plan. The PAR flowcharts are contained in EPIPs.
Table J-5, Reception Centers/Shelters		The location of Reception Centers and Shelter information is a function of offsite agencies and included in offsite Plan and does not need to be addressed as part of the Standard Plan for SNC.
Section K Radiological Exposure Control		
K.1: Decisions as to appropriate exposures, considering the action required and relative risks, will be made by the emergency director in consultation with health physics personnel.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent;	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.2: A record of individual and collective exposure received during the emergency will be maintained by the dosimetry team.	**EP K.3.1** Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: A record of individual and collective exposure received during the emergency will be maintained by the dosimetry team.	**EP 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 governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.2: All emergency exposures will be included in personnel radiation exposure records.	**EP 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 governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: An individual's dose margin will be assessed by determining the difference between the updated exposure and current administrative limit; these margins are used to determine emergency assignments.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.2: Appendix 4 presents information on the types of dosimetry available in each emergency response facility and other locations.	**EP 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 governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: Emergency dosimetry is provided to each member of the emergency response organization for both onsite and offsite organizations as required by the radiological conditions existing at the time.	**EP 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 governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.2: Emergency response personnel will be made aware that self reading dosimeters should be checked every 15 to 30 min. during the emergency.		No direct statement is made for reading direct reading dosimetry. The original Plan statement was intended for pocket dosimeters requiring specific action of the ERO individual. Modern dosimetry provides alarm functions to support awareness.
K.2: If time and urgency do not allow this procedure to be followed, the health physics supervisor may approve emergency RWP controls.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: In all cases, a briefing is given to the emergency team by health physics staff, and each team is accompanied by a qualified health physics technician who meets the qualifications of ANSI 18.1 criteria set out in the VEGP Technical Specifications.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: In situations where exposures in excess of 10 CFR 20 limits are authorized, the followingconsiderations will be made prior to emergency team selection: • Declared pregnant female employees shall not be allowed to participate • For doses greater than 25 rem, personnel shall be volunteers and be fully aware of the risks involved	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.2: There is the capability to read TLDs within 24 hours.	**EP 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 governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: This briefing includes a discussion of the hazards involved in the planned action, as well as protective actions to be taken.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.2: When necessary, the emergency director can authorize emergency exposures in excess of 10 CFR 20 limits but within the limits in table K-1.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Authorization of emergency exposures in excess of federal limits. • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent;	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.2: Where possible, the normal radiation work permit (RWP) procedure will be used to control exposures.	**EP K.1:** Under normal operating conditions, SNC operated plants maintain personnel exposure control programs in accordance with 10 CFR 20. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: Decontamination of personnel will be conducted in accordance with standard health physics practices. K.3: Personnel decontamination will be accomplished using water washes or other methods for extreme cases as described in plant health physics procedures.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: Decontamination of serious wounds will be accomplished at Doctors Hospital or the Burke Medical Center as described in Section L of this Plan.	**Annex 5.8.1** Hospital and Medical Support (SEP B.6.3, L.1) Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures.	The commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.3: If decontamination activities are required, a controlled access area will be established by roping off the area.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: It (equipment and area decon) is accomplished as described in plant health physics procedures and ranges from vacuum cleaning to wash downs with water and acid or caustic solutions.	**EP K.5:** Designated personnel, under the direction of the Radiation Protection Group, will perform material decontamination. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: Personnel exiting the radiation-controlled area will be monitored for contamination by stand-up monitoring booths or by a whole-body scan with a hand-held probe.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.3: Plant areas that require access to facilitate recovery operations will be surveyed with portable instruments equipped with Beta/Gamma detectors.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: Supplies of clean clothing will be made available.	**EP K.7:** 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 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: The action levels for determining the need for decontamination of personnel, equipment, and areas are delineated in plant admin. and health physics procedures.	**EP K.5:** During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: The facility (decontamination area) has vertical showering and normal wash sinks.Section K.3: Instrumentation to survey personnel during and after decontamination is located at the health physics station.	**EP K.5:** Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.3: The standard health physics contamination limits will be used for release of personnel.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
K.3: Waste generated through the use of the decontamination facilities is collected and processed by the plant liquid radwaste system.	**EP K.5:** Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.4: Access control is provided by the Security Department during emergency conditions.	**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, assisting in evacuation of onsite areas.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.4: Emergency monitoring teams are responsible for determining the need for onsite access control and establishing the proper method through discussions with technical support center (TSC) personnel.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.4: Plant procedures used for determining contaminated areas will be used for determining the need for access control.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
K.4: The emergency health physics supervisor is responsible for permitting return of onsite areas and equipment to normal use once monitoring and decontamination are completed.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Table K-1, Emergency Worker Limits for Workers Performing Emergency Services	Table K.1.A Emergency Worker Dose Limits	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section L Medical and Public Health Support		
L.1: There are personnel on shift and in the Emergency Organization trained in first aid and decontamination procedures.	**EP 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. **EP O.3 First Aid Training** Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training. **Site Annex Table 2.2.A - Vogtle Electric Generating Plant On-Shift Staffing**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. Table 2.2.A of the site annex retains First Aid as a required on-shift capability. SNC operated nuclear power plants maintain qualified first responders capable of providing initial first aid response in accordance with the Staffing requirements of Section B.
L.1: The onsite personnel responsible for responding to a medical emergency have had training per the OSHA standard 29 CFR 1910.151 and directive CPL 02-02-053, Guidelines for First Aid Training Programs.	**EP 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. **EP O.3 First Aid Training** Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training. **Site Annex Table 2.2.A - Vogtle Electric Generating Plant On-Shift Staffing**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. Table 2.2.A of the site annex retains First Aid as a required on-shift capability. SNC operated nuclear power plants maintain qualified first responders capable of providing initial first aid response in accordance with the Staffing requirements of Section B.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
L.1: Health physics technicians will be assigned to first aid teams in accordance with Procedure 70302-C, Reporting and Documenting Occupational Injuries Or Illnesses.	**EP 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. **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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan. Table 2.2.A of the site annex retains First Aid as a required on-shift capability. SNC operated nuclear power plants maintain qualified first responders capable of providing initial first aid response in accordance with the Staffing requirements of Section B.
L.1: In addition, an on-site first aid and decontamination area equipped with decontamination supplies and other specialized equipment is located near the health physics stations.	**EP L.1** Plant personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
L.1: Personnel found to be externally contaminated but not requiring immediate medical attention will undergo decontamination in accordance with plant procedures.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
L.2: Injured and contaminated personnel requiring hospital medical attention will be transported to Doctors Hospital, Augusta, or Burke County Hospital, Waynesboro, by the Burke County Ambulance Service. Letters of agreement pertaining to these services are located in Appendix 2.	**EP L.1:** In addition to the onsite first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses. **Annex 5.8.1:** Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
L.2: A health physics technician (HPT) will accompany the patient to the hospital.	**Annex 5.8.2:** Ambulance Service (SEP B.6.2, L.4) Injured/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, and an RP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.
L.2: The HPT will perform radiation surveys of the patient, ambulance, and attending hospital staff and assist in maintaining contamination control in the hospital.	**Annex 5.8.2:** Injured/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, and an HP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.
L.2: All contaminated materials will be properly packaged and returned to the site for disposal.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
L.2: The ambulance will also be decontaminated at VEGP if required.	**Annex 5.8.2:** Injured/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, and an HP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.
L.3: Arrangements for treating externally contaminated patients have been made with the Doctors Hospital in Augusta, Georgia, and Burke County Hospital in Waynesboro, Georgia, (appendix 2).	**EP L.1:** In addition to the onsite first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses. **Annex 5.8.1**: Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
L.3: Trained plant radiation protection personnel will assist hospital staff when plant personnel are being evaluated.	**Annex 5.8.2:** Injured/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, and an HP technician accompanies any contaminated patients to the hospital. Ambulance service is provided by the Burke County Emergency Management Agency.	The commitment wording was standardized and relocated to the Site Annex.
L.3: Arrangements have also been made with local doctors to render medical assistance, both onsite and offsite, and to assume responsibility for the medical supervision of the patient (appendix 2, Letters of Agreement).	**EP 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. **Annex 5.8.1** Medical Specialists, Inc., a group of medical professionals, has agreed to provide treatment services through Burke Medical Center and Doctors Hospital.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
L.3: Following decontamination, personnel suspected to have ingested radionuclides will undergo whole body counting at VEGP.	**Annex 5.8.1:** Agreements are in place with Burke Medical Center, Doctors Hospital, and Burke County Emergency Management Agency to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance will be requested whenever necessary in accordance with plant procedures	The SNC Standard Emergency Plan commits to maintaining agreements supporting the treatment of contaminated and/or injured personnel. Medical experts will determine the course of treatment and subsequent monitoring. A specific commitment for internal monitoring at the site may or may not be included in this post event treatment.
L.3: The medical staff of the hospital is trained to treat externally contaminated patients or individuals who have received high exposures.	**EP O.1.1:** Annually, training will be offered for hospital personnel, ambulance/rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
L.4: In addition, drills and exercises are an integral part of the training program and are conducted as specified in section N, Exercises and Drills.	**EP N.2.4** Medical Emergency DrillsA 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, which support more than one plant, shall only be required to participate once each calendar year.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
L.4: The VEGP training department conducts training sessions at least once per calendar year (for onsite and offsite personnel who have medical support responsibilities).	**EP O.1.1:** Annually, training will be offered for hospital personnel, ambulance/rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section M Recovery and Reentry Planning and Post-Accident Operations		

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.1: The emergency director will determine when the recovery phase begins.	**EP M.1:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M.1: The following guidelines, as applicable to the specific situation, will be observed 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 VEGP emergency organization, offsite authorities including the Nuclear Regulatory Commission (NRC); Georgia Emergency Management Agency, Burke County Emergency Management Agency director; South Carolina Emergency Management Division director; and Savannah River Site (SRS) emergency staff do not result in identification of any valid reason for not terminating the emergency.	**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, offsite authorities do not result in identification of any valid reason for not terminating the emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.1: He (the ED) will direct that all elements of the emergency response organization be advised of the change in status via the Emergency Notification Network (ENN), Emergency Notification System (ENS), and other pertinent communications systems.	**EP M.1** 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. **EP M.3 Recovery Notification** Members of the ERO will be informed when Recovery is initiated. The recovery organizational structure may be much the same as the emergency response organization with additional modifications depending upon the nature of the accident, post-accident conditions, and other factors to be determined. 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 has ordered an evacuation, it is legally required for the governor to officially rescind the order prior to return to evacuated areas. The states are responsible for coordinating reentry procedures for the offsite population.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M.1: At this time, the emergency director will designate a recovery manager to constitute the recovery organization.	**EP M.1:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Individuals will be assigned to specific positions by the recovery manager, depending on the nature and extent of damage to the plant.	**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 via releases to the media. **EP Figure M.2**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2 : He (the Recovery Mgr.)will structure the recovery organization to accomplish the following generalobjectives: • 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 via releases to the media	**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 via releases to the media. **EP Figure M.2**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Recovery Manager: has overall responsibility for restoring the station to a normal operating configuration.	**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 upon the nature of the accident and the conditions following the accident. 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. **EP 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.	The Statement on return to normal operations is not appropriate for the Plan. Normal operations, extended shutdown, or decommissioning are all potential outcomes of events involving activation of the Emergency Plan. The outcome will be determined on a site specific basis through transition from the Emergency Phase.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Plant Operations Manager: manages day-to-day in-plant operations and during recovery, is responsible for ensuring that repairs and modifications will optimize post recovery plant operational effectiveness and safety.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Design and Construction Support Manager: focuses necessary engineering, design, and construction resources on those aspects of plant recovery requiring redesign, modifications, or new construction.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager.The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Health Physics Manager: responsible for As Low As Reasonably Achievable (ALARA) planning, execution, and monitoring; plans and manages decontamination of affected areas and equipment; supervises and directs all special radiological controls required to support the recovery operation.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Technical Support Manager: provides analyses, plans, schedules, and procedures in direct support of plant operations.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager.The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Quality Assurance Manager: ensures that the overall conduct of recovery operations is performed in accordance with corporate policy and rules and regulations governing activities which may affect public health and safety.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Scheduling/Planning Manager: prepares plans and schedules and tracks/expedites recovery operations.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Administration/Logistics Manager: supplies administrative, logistic, communications, and personnel support for the recovery operation.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager.The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Public Information Director: coordinates the flow of media information concerning recovery operations.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager.The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.2: Chemistry Manager: develops plans and procedures to process and control liquid, gaseous, and solid wastes to minimize adverse effects on the health and safety of the public and plant recovery personnel.	**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 via releases to the media. **EP Figure M.2**	The SNC Standard Emergency Plan provides a likely recovery organization and provides overall responsibility for the event under the Recovery Manager. The specific event will drive individual responsibilities.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.3: Identifying and controlling access to these areas will be in accordance with normal plant procedures.	**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 via releases to the media. **EP Figure M.2**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.3: If the accident situation involved a release of radioactivity, appropriate areas of the plant and site will be monitored to determine contamination and radiation levels.	**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 via releases to the media. **EP Figure M.2**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M.3: When reentry to a radiation area is required for inspection or work, the activity will be preplanned and plant radiation work practices and As Low As Reasonably Achievable (ALARA) program principles will be followed.	**EP M.1 Recovery** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
M.4: All personnel who require access to the plant or to radiation areas on site during the recovery phase will be issued dosimetry, as appropriate.	**EP M.1 Recovery** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M.4: The criteria for reading TLDs and assessing radiation dose will be in accordance with standard health physics practices.	**EP M.1 Recovery** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M.4: The results of the dosimeter readings, including integrated exposures (i.e., man-rems) will be reported to the recovery manager, the radcon/radwaste manager, and others in the plant organization who normally receive such reports.	**EP M.1 Recovery** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M.4: VEGP will provide radiological information including estimated quantity of radioactivity released, isotopic composition of released material, and meteorological data to assist the governmental authorities in their determinations.	**EP 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.	Section B of the Plan retains the commitment to provide environmental field teams. The progression of the overall planning process has shifted the long term responsibilities for offsite radiological assessment to the FRMAC.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Figure M-1	**EP Figure M.2**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section N Exercises and Drills		
N.1: Exercises are conducted every two calendar years, and are designed to include the demonstration of response to a major portion of the basic elements of the emergency preparedness plans of the participating organizations.	**EP N.1.2:** 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. **EP N.1.4:** The Exercise planning cycle will consist of eight (8) successive calendar years	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.1: The exercise program for VEGP incorporates the following features: • Scenarios are varied from year to year so that all major elements of the VEGP emergency preparedness program are tested within an eight year period, commencing in the calendar year in which the VEGP 3 and 4 first exercise is conducted. • VEGP starts an exercise between 6:00 p.m. and 4:00 a.m. once every 8 years. • Since exercises are normally scheduled several months in advance, a variety of weather conditions is likely to occur.	**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 utilizing essentially 100 % of Initiating Conditions in the 8 year cycle. Drills and exercise scenarios will be varied from year to year so as to test major components of the plans and preparedness organizations. A record of Exercises conducted during the eight (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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The wording has been updated to reflect the Enhanced Emergency Preparedness Rulemaking (November 23, 2011).

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.2.1: At least one of these drills will be conducted during the calendar year when there is no biennial exercise and shall involve a combination of some of the principal functional areas of the onsite emergency response capabilities.	**EP N.2.1:** SNC operated nuclear power plants shall take actions necessary to ensure that 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; and • Plant system repair and corrective actions.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.2: To ensure that emergency communication channels between VEGP and offsite authorities are operable, periodic drills are conducted.	**EP F.3:** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that all participants in the test are able to understand the content of the messages used in the test.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.2: For drills, the communication is initiated at VEGP using the actual message format in accordance with the applicable plan and procedure.	**EP F.3:** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that all participants in the test are able to understand the content of the messages used in the test.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.2.2: Communication drills among the control room, technical support center (TSC), operations support center (OSC), emergency operations facility (EOF), emergency news center, general office operations center, the States of Georgia and South Carolina, Burke, Aiken, Barnwell, and Allendale Counties, SRS, and VEGP field monitoring teams are conducted every two years.	**EP F.3:** Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure that all participants in the test are able to understand the content of the messages used 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.3: As discussed in the FSAR, the program involves quarterly (fire) drills, at least one of which is unannounced.	**EP N.2.3:** Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.3: The quarterly drills are scheduled so that each member of the fire brigade participates in at least two drills per year.	**EP N.2.3:** Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.3: In addition, an annual practice is conducted which requires extinguishing a fire.	**EP N.2.3:** Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.2.4: A medical emergency drill involving a simulated contaminated person is conducted each calendar year.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.5: Plant environs and radiological monitoring drills are conducted each calendar year per administrative procedures	**EP N.2.5:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.6: Semi-annual health physics drills will be conducted in accordance with emergency implementing procedures.	**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 wording was standardized and relocated to the SNC Standard Emergency Plan.
N.2.6: Post accident sampling under simulated accident conditions will be demonstrated each calendar year.		The annual sampling requirement in the description of Radiation Protection drills in EP N.2.6 ensures accident sampling capabilities are maintained.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.3: Each drill and exercise is conducted in accordance with a scenario.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
N.3: The preparation of exercise scenarios is directed by the Manager-Training and Emergency Preparedness or EPC who enlists the assistance of personnel from other departments, as required, to assist in this task.	**EP N.3 Scenarios** When a major drill or exercise is required, the Emergency Preparedness (EP) group will coordinate the preparation of a scenario.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.3: Scenarios include the following information: • Objectives. • Date, time period, place, and participating organizations. • Controller/evaluator assignments. • Time schedules of real and simulated initiating events. • Messages describing equipment malfunctions, personnel injuries, and other non plant events, as appropriate. • Narrative summary describing the conduct of the drill or exercise. • Radiological data for onsite facilities and offsite field monitoring teams.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
N.4: All drills and exercises are evaluated.Section N: For periodic drills, the process consists of the following steps: 1. Drills will be evaluated by controllers/evaluators selected on the basis of expertise and availability. 2. Improper or incorrect performance during the drill may be corrected by the controller/evaluator and the proper method pointed out or demonstrated. 3. The exercise or drill controllers assemble the players at the conclusion of activities for a critique. Players are encouraged to identify areas where improvements are required. The drill controllers also presents their observations to the players. 4. The site emergency preparedness supervisor submits a list of corrective actions, responsibilities, and schedule information to the site support manager for approval. 5. The emergency preparedness supervisor assigns action items and monitors the status of completion of corrective actions. Significant problems will be brought to the attention of appropriate plant management.Exercise evaluation and corrective action are carried out in similar fashion.	**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.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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section O Radiological Emergency Response Training		
O: All VEGP badged personnel will receive General Employee Training at inception of onsite duties. O.3: All badged VEGP workers will receive general training in emergency preparedness.	**EP O.4.8:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The prerequisites for badging workers includes GET training.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
O: GET will include emergency classification, individual response, signals, accountability, and site dismissal procedures.	**EP O.4.8:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
O: All VEGP emergency response organization personnel will receive specialized training per Table O-2.	**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 who may be called upon to provide assistance in the event of an emergency. The ERO Training Program assures 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 upon to provide assistance in the event of an emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
O: Offsite response groups who may support onsite situations, such as fire or personnel injury, will be offered annual training in notification, expected roles, site orientation, security procedures, and basic radiation protection. O: Selected state and local emergency response management personnel with offsite emergency response roles will be offered a seminar/training course in specific areas; • VEGP emergency classification system. • VEGP protective action recommendation criteria and their relationship to plant conditions • VEGP emergency response organization. O: These offsite management personnel will be offered initial training and annual retraining.	**EP O.1:** 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. **EP O.1.1**: 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/rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
O.1: As a minimum, training will be provided in the subject areas shown in table O-1 to various personnel according to their emergency response position as shown on table O-2.O.1: Those designated to receive training in each subject area are indicated in table O-2.	**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) **EP O.4.2** Active Senior Licensed Control Room Personnel **EP O.4.3** Radiological Field Monitoring Teams **EP O.4.4** Fire Brigade Training **EP O.4.5** Operations, Maintenance, Chemistry and Radiation Protection Training **EP O.4.6** Medical Support **EP O.4.7** News Media Training **EP O.4.8** General Employee Training (GET)	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
O.1: The training will be conducted in accordance with lesson plans.	**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 who may be called upon to provide assistance in the event of an emergency. The ERO Training Program assures 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
O.1: Records of the attendance and examination scores will be retained in the training files.	**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 who may be called upon to provide assistance in the event of an emergency. The ERO Training Program assures 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 upon to provide assistance in the event of an emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
O.1: Radiological emergency response training is offered throughout the year, with each training course being covered at least once per calendar year.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
O.1: Annual retraining consists of initial training material reinforcement and appropriate lessons learned from the previous year's operating experience.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
O.1: Upon completion of each training session or drill, the participants will be asked to critique the training in order to ensure continued improvement.	**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 who may be called upon to provide assistance in the event of an emergency. The ERO Training Program assures 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 upon to provide assistance in the event of an emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Table O-1 All ERO personnel shall be trained per table O-2 within the last 15 months, except for post accident sampling and first aid training, which is to be within 36 months.	**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 who may be called upon to provide assistance in the event of an emergency. The ERO Training Program assures 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 upon to provide assistance in the event of an emergency.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
O.3: Selected individuals on site and off site will annually receive specialized training.	**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 who may be called upon to provide assistance in the event of an emergency. The ERO Training Program assures 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 upon to provide assistance in the event of an emergency. **EP O.4.1 ERO Training** 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.
Section P Responsibility for the Planning Effort		
P: The Executive Vice President/Chief Nuclear Officer (CNO) Southern Nuclear Operating Company (SNC) has overall responsibility and authority for all nuclear activities, including emergency planning (EP) programs.	**EP P:** The President/Chief Executive Officer (CEO) Southern Nuclear Operating Company (SNC) has direct responsibility for the operation and maintenance of the SNC Plants.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
P: Vice President Fleet Operations Support has Fleet responsibility for emergency planning.	**EP P.1:** The Vice President - Regulatory Affairs is responsible for the overall coordination of the corporate emergency preparedness programs and Emergency Plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: The Nuclear Fleet Security and Emergency Preparedness Manager has overview management responsibility for the Fleet SNC Emergency Planning program effort.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: The Emergency Planning (EP) Supervisor, reporting to the Nuclear Fleet Security and 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.2:** The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: Vice President – (Plant) 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 at each site	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: The EP Supervisor, 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:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: The Emergency Planning Supervisor performs a review of the emergency plans for Southern Nuclear once each calendar year.	**EP P.3:** The Emergency Plan, agreements, and the Emergency Implementing Procedures are reviewed once per calendar year and updated, as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
P: The Emergency Preparedness Supervisor performs a review of the site specific emergency plan annually and all onsite EPIPs biennially. P: The review includes the letters of agreement, which are updated as necessary.	**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 being the principle 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: As required by 10 CFR 50.54(t), an annual independent audit of the emergency preparedness program is conducted by the SNC Quality Assurance (QA) Department.	**EP P.3:** An independent review of the EP program is conducted, as required by 10 CFR 50.54(t).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: Audits are performed in accordance QA department procedures.	**EP P.3:** An independent review of the EP program is conducted, as required by 10 CFR 50.54(t).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: The interval from the previous audit may be shortened but may not be extended beyond 15 months.	**EP P.3:** An independent review of the EP program is conducted, as required by 10 CFR 50.54(t).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
P: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
P: The Emergency plans and EPIPs are revised in accordance with applicable site procedures.	**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 being the principle 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendices and Annexes		
Annex V2		
Annex V2 H.4.1.1: (Meteorological) Parameters measured and transmitted to the control room include: • Windspeed (at 10 m and 60 m) • Wind direction (at 10 m and 60 m) • Standard deviation of horizontal wind direction (at 10 m) • Vertical temperature difference (between 10 m and 60 m) • Ambient temperature (at 10 m) • Dewpoint temperature (at 10 m) • Precipitation (at the tower base) I.4: In the event the primary instruments are unavailable, the backup meteorological tower is equipped with instruments at the 10-m level to provide parameters relevant to atmospheric dispersion calculations (i.e., windspeed, wind direction, and sigma theta).	**EP H.5.1:** Meteorological Instrumentation: Meteorological Instrumentation: A permanent meteorological monitoring station is located near the plant for the acquisition and recording of wind speed, wind direction, ambient and differential temperatures for use in making offsite dose projections. Meteorological information is displayed in the CR, TSC, and EOF. **Annex 5.6.1:** A meteorological monitoring program is in place at VEGP. Instruments are mounted on a 60-meter tower located to the south-southwest of the power block. Parameters measured and transmitted to the control room include: • Windspeed (10 m and 60 m). • Wind direction (10 m and 60 m). • Standard deviation of horizontal wind direction (10 m). • Vertical temperature difference (10 m and 60 m). • Ambient temperature (10 m). • Dewpoint temperature (10 m). • Precipitation (base).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Annex V2 H.4.1.1: The system is powered by an uninterruptible power supply consisting of wet cell batteries, charger, and inverter for high availability.	**Annex 5.6.1:** The system is powered by an uninterruptible power supply consisting of wet cell batteries, charger, and inverter for high availability.	The commitment wording was standardized and relocated to the Site Annex.
Annex V2 H.4.1.3: Seismic monitoring instrumentation for VEGP Units 3 and 4 will include triaxial acceleration sensors and a time-history analyzer.	**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 5.6.1**: Seismic monitoring instrumentation for VEGP Units 3 and 4 will include triaxial acceleration sensors and a time-history analyzer.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Annex V2 H.4.1.3: Activation of the time-history analyzer causes visual and audible annunciation in the control room to alert the plant operator that an earthquake has occurred.	**Annex 5.6.1:** Activation of the time-history analyzer causes visual and audible annunciation in the control room to alert the plant operator that an earthquake has occurred.	The commitment wording was standardized and relocated to the Site Annex.
Annex V2 H.4.1.4: The fire-detection system at VEGP Units 3 and 4 will include smoke, flame, heat, and products of combustion detectors and manually activated fire alarms.	**EP H.5.4:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Annex V2 H.4.1.4: Fire-detection systems are provided in all areas where required by the fire protection analysis.	**EP H.5.4:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Annex V2 H.4.1.4: The fire detection system will provide audible and visual alarms in the main control room.	**EP H.5.4:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Annex V2 H.4.2: The radiation monitoring system is designed in accordance with ANSI N13.1-1969, Sampling Airborne Radioactive Materials	**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 are capable of detecting and measuring 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.
Annex V2 H.4.2: The radiation monitoring system is divided functionally into two subsystems: • Process, airborne, and effluent radiological monitoring and sampling • Area radiation monitoring	**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 are capable of detecting and measuring 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Annex V2 H.4.2: Radiation monitoring data, including alarm status, are provided to operators via the plant control system (and the protection and safety monitoring system for Class 1E monitors). The information is available in either counts per minute (count rate), microCuries/cc (activity concentration), or R/hr (radiation dose rate).	**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 are capable of detecting and measuring 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.
Annex V2 H.4.2: Safety-related channels are environmentally qualified and are powered from the Class 1E DC and uninterruptible power supply system. Nonsafety-related channels are powered from the non-Class 1E DC and uninterruptible power supply (UPS) system.	**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 are capable of detecting and measuring 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Annex V2 H.4.3: The processing monitoring function is performed by equipment which is part of the Protection and Safety Monitoring System (PMS), Special Monitoring System (SMS), Plant Control System (PLS), Diverse Actuation System (DAS), Operation and Control Centers System (OCS), Data Display and Processing System (DDS), and the Incore Instrumentation System (IIS). A description of each of these systems is provided in UFSAR Section 7.1.	**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. It is capable of providing information relative to post-accident plant conditions to allow operator actions to be taken 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.
Annex V2 H.4.4 Emergency Response Data System (ERDS)	**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 that provides for the automated transmission of a limited data set of selected parameters. The ERDS supplements the existing voice transmission over the FTS-ENS.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Annex V2 H.4.5 Safety Parameter Display System	SECTION I: ACCIDENT ASSESSMENT **EP I.1 Systems and Parameters Monitored** The instrumentation and equipment capabilities available for emergency facilities are described in Section H. For Vogtle Unit 3 and Unit 3 the Safety Parameter Display System (SPDS) is integrated into the overall human interface design such that the SPDS parameters are available to operators via workstation visual display units.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Annex V2 H.4.6 Post Accident Sampling	SECTION I: ACCIDENT ASSESSMENT **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 as to how post-accident sampling will be performed are in the plant-specific procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Annex V2, Appendix 1, Table A2-1 FSAR Postulated Events: All	No equivalent listing of FSAR Postulated Events in Plan or Annexes.	The Table of FSAR postulated events is not required in the Emergency Plan. These events are a design basis concern and not applicable to implementation of the Emergency Plan on an ongoing basis.
Appendix 2: All		LOA descriptions were added to the Plan/Annex per the requirements of Appendix E, eliminating the need for a separate appendix with a list of LOA's.
Appendix 3		

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Appendix 3: Initial alerting will be made primarily by both tone-alert radios and a system of fixed sirens. Appendix 3: In the event of a serious emergency at VEGP, the primary means for alerting and providing initial instructions to the public will be by a combination of tone-alert radios and a system of fixed sirens. Appendix 3: The siren system consists of a network of 47 rotating electronic sirens mounted on poles strategically located throughout the populated area of the plume exposure EPZ.	**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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Appendix 3: Based upon Appendix 3 of NUREG-0654 and FEMA REP-10, the system is designed to provide a minimum of 60 dBC coverage to all residences within the plume exposure EPZ, plus adequate coverage for people outdoors in all other areas of the plume exposure EPZ open to the public.	**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 Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans. In the event of an emergency declaration at the VEGP, DOE-Savannah River Site has agreed to provide for the prompt notification of all persons on the SRS within VEGP's plume exposure pathway EPZ. A full Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report (ANS-VEGP-001) located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: Within the plume exposure pathway EPZ, the prompt alerting and notification system will provide an alerting signal and notification by NOAA radio and an alerting signal by fixed sirens.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.

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Appendix 3: Assurance of continued notification capability will be verified on a statistical basis.	**EP E.2.5.2** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: Southern Nuclear Operating Company, and/or the State and local governments will survey a sample of the residents in the plume exposure pathway EPZ. Appendix 3: The survey results shall be used to assess the public's ability to hear the alerting signal and their awareness of the meaning of the prompt notification message, as well as the availability of information on what to do in an emergency.	**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 that means exist for 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 which are 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% assurance, or that the system when tested under actual field conditions will meet the design objectives. **Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

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Appendix 3: In response to the findings of these surveys, appropriate corrective measures will be taken to provide reasonable assurance that the required coverage is maintained.	**EP E.2.5.2** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Appendix 3: The communications system between the plant and the responsible authorities (Federal, State and local) features the following capabilities: a. Twenty-four seven coverage at VEGP and at the primary points to receive and act upon notification. c. VEGP assumes primary responsibility for net control since effectively all of the emergency information originates at VEGP.	**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 via the Emergency Notification Network (ENN).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: Southern Nuclear Operating Company in conjunction with Georgia Power Company provides NOAA radio receivers for all known establishments (residence, businesses, schools, etc.) within the plume exposure pathway EPZ who choose to accept them.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.

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Appendix 3: During the distribution to those accepting the radios, a brochure is handed out.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Appendix 3: That brochure will be redistributed on an annual basis to NOAA recipients.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: This brochure includes the following information: • What is NOAA. • Why NOAA radios are provided. • Information they will receive on the NOAA radio • When the alert system will be activated. • Who makes NOAA broadcasts • Where to place the radio • Backup battery power for power failures. • What to do if the NOAA radio doesn't work. • How to replace radio batteries.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.

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Appendix 3: Public information will be distributed on an annual basis to the NOAA radio recipients.	**EP G.8** 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 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.
Appendix 3: SNC will replace any defective radios upon request or discovery that the radios are defective.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: SNC will also annually distribute replacement batteries to all recipients of tone alert radios.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: SNC will maintain a register of all radio recipients.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.

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Appendix 3: The Emergency Preparedness staff distributes tone alert radios to any new residents and updates the register of radio recipients periodically.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: The Emergency Preparedness staff also determines whether there are any permanent Burke County plume EPZ residents without electricity. A list of these residents is maintained.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.

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Appendix 3: A survey of the Burke County portion of the plume EPZ will be made annually by the Emergency Preparedness staff to assure that the list of any such residents is current.	**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 Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans. In the event of an emergency declaration at the VEGP, DOE-Savannah River Site has agreed to provide for the prompt notification of all persons on the SRS within VEGP's plume exposure pathway EPZ. A full Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report (ANS-VEGP-001) located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: Rather, annual surveys of the entire South Carolina portion of the plume EPZ will be made directly by the Emergency Preparedness Staff.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.

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Appendix 3: The effectiveness of the tone alert radios will be tested and evaluated at least once a year in accordance with implementing procedures.	**Annex 4.2** The Vogtle Electric Generating Plant (VEGP) has developed a Public Alert and Notification system designed for coverage of the population within the EPZ. This is accomplished utilizing a combination of fixed sirens and tone-alert radios. Sirens installed by VEGP have been sited according to FEMA-REP-10 criterion to ensure the required coverage. Siren Locations are shown in Figure 4.2.A, Fixed Siren Location Map. Provisions for transient population notification are also included in State and County plans.	The commitment wording was standardized and relocated to the Site Annex.
Appendix 3: The testing and maintenance of the public alerting sirens in the VEGP EPZ are the responsibility of VEGP.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: The maintenance program will consist of both periodic routine checks and, as required, corrective maintenance.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 3: This program will be under the direction of the VEGP emergency preparedness coordinator.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: The periodic routine maintenance program will be based on the manufacturers' recommendations and experience gained with the installation.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: It will consist of quarterly inspections to verify the proper physical condition of each siren location and checks to verify the proper operation of each location utilizing the built-in test and monitoring features of this system.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 3: The periodic test program will consist of a weekly silent test, from the county activation points, and an annual full scale activation of the system.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: The weekly silent test will consist of activation of the siren from the County EOC.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: Once each year the system will be activated from the associated county EOC in the normal mode.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 3: Advance notice of the test will be provided to the public.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: Activation of each siren will be verified by the WSMRFC.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 3: Reports of siren failures or inadequate coverage will be investigated by VEGP.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 3: Unsatisfactory conditions detected by any means will be promptly repaired by Southern Company Services maintenance or contract personnel under the direction of the VEGP emergency preparedness coordinator.	**EP E.2.5.2** 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 detail Prompt Notification System (PNS) activation. Activation of the alert and notification system (ANS) is discussed in the offsite agencies specific emergency response plans.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 4: All		The specific list of Emergency Equipment was deleted from the SNC Standard Emergency Plan and Annex. The Plan/Annex commit to the functions the equipment is needed to support. Specific equipment changes on a regular basis. The lack of needed equipment would affect the ability to perform the function. The specific equipment needed to adequately perform the function is not appropriate at Plan level.

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Appendix 5: Memorandum of Agreement with Department of Energy – Savannah River	**EP 1.7 Department of Energy (DOE) – Savannah River Site (SRS) (SEP A.2.5)** The DOE-Savannah River Site (SRS) will provide the necessary response within the SRS reservation in accordance with the SRS Emergency Plan. The DOE will exercise overall responsibility, jurisdiction, and authority for conducting response operations on the Savannah River Site to protect the health and safety of SRS personnel. DOE will provide for emergency notification and, as needed, evacuation, monitoring, decontamination, and immediate lifesaving medical treatment of non SRS personnel on the Savannah River Site. DOE will also provide access control for SRS areas.	The commitment wording was standardized and description of expected response included as required by 10 CFR 50 Appendix E and relocated to the Site Annex.
Appendix 6: All	**EP 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. **Annex Appendix A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7: All		
The Emergency Operations Facility has been established consistent with NUREG 0696 guidelines		Removed specific statement referencing NUREG-0696 as SER #SECY-04-0236 addresses the establishment and NRC approval of the EOF.
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 Emergency Operations Facility** 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.

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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.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 needed 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 A.3: The corporate emergency response organization will provide offsite emergency response support and resources to SNC sites on a twenty-four seven basis until the emergency has been terminated.		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 Emergency Operations Facility** 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 H.4:** 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 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.

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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.		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.
Appendix 7 A.3: Minimum EOF staff for facility activation will include the EOF Manager, the Dose Assessment Supervisor, the Dose Analyst, the Field Team Coordinator, the ENN Communicator, and the Licensing Support Coordinator.	**EP Figure B.2.D**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: Access control for the EOF is established through the use of electronic card readers.	**EP H.2.1:** Access control for the EOF is established through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 7 A.3: The emergency director is responsible for the management of the emergency response. Specific duties and responsibilities are provided in the site specific Emergency Plan and Emergency Plan Implementing Procedures.	**EP B.1.1** The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action (PAR) Recommendations 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: ... the EOF can be quickly accessed and made operational within about an hour of the initial notification and is safe-guarded against unauthorized personnel.	**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: Any outside doors that do not have security guards are accessible only by SNC ID badges.	**EP H.2.1:** Access control for the EOF is established through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: The building itself (EOF building) has posted security guards and video surveillance cameras.	**EP H.2.1:** Access control for the EOF is established 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 control for the EOF is established through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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Appendix 7 B: The EOF Organization is displayed in Figure A7-1 and typical duty assignments are shown on Table A7-1.	**EP Figure B.2.D EOF Organization Chart** **EP Table 4 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, procure 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.
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.2:** A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24 hour/day basis for an extended event. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
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:** A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24 hour/day basis for an extended event. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.1: The designated individual will be assigned according to a predetermined rotation schedule and will typically have either previous plant specific SRO background or long term supervisory/management experience.	**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, procure outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Appendix 7 B.1: The duties and responsibilities of the EOF Manager are as follows: (As listed in App. 7, 7 items listed)	**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.3.1.2 EOF Manager** The EOF Manager reports to the EOF ED and is responsible for managing and directing EOF activities, developing recovery plans, procure outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
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 wording was standardized and relocated to the SNC Standard Emergency Plan.
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 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 Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
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 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 needed 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 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.4: The TSC will initially be responsible for dose projection and field team control activities.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
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.	**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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
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.3.1.4:** 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 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 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 concerning 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.
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:** 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 site specific 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Appendix 7 C.1: The On-call EOF Manager will be notified of all emergencies classified at any SNC site.	**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 site specific 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.	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**: 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. **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 Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
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 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 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 via 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 is also available to all state agencies responding to the EOF.	**EP H.2 Offsite Emergency Facilities** **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: 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 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 commitment wording was standardized and relocated to the Site Annex.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	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:** 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 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 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 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.	**EP I.3** SNC operated nuclear power plants use an offsite dose assessment program which estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. 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.
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.		The SNC Standard Emergency Plan and Annex contain the commitments to perform the required functions. The detailed list of equipment performing the function has been deleted. Equipment changes can be more effectively implemented to address new developments.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	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.		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). •	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
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.		Egress of personnel from the EPZ fall 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.		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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
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:** 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 used as needed. Communication with the Nuclear Regulatory Commission (NRC) is via 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: 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, dosimetry processing, can be provided by the 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.4.1:** 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 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.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
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.1 Training** The ERO Training Program assures 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.	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 provides no purpose in the SNC Standard Emergency Plan.
Appendix 7 G.1.1: A training matrix for corporate personnel assigned to the ERO is shown in Table A7-2, and training course summaries are presented in Table A7-3.	**EP O.1 Training** The ERO Training Program assures 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. **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.1.2: 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.		The SNC Standard Emergency Plan incorporates the EOF into the Site Plans. Separate commitment statements for EOF activation are no longer required.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Appendix 7 G.1.2: EOF activation is required at least 3 times annually (1 scenario per site per year).		The SNC Standard Emergency Plan incorporates the EOF into the Site Plans. Separate commitment statements for EOF activation 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 requirement into the Common Plan.
Appendix 7 G.1.2: Each drill/exercise will test, as a minimum, the communication links and notification procedures.	**EP N.1:** Drills/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.1:** A formal critique shall be conducted following the drill/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.	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.1:** A formal critique shall be conducted following the drill/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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 Table 4: Table A7-4 provides additional information concerning EOF communications capabilities	**EP F Table 5**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Vogtle 3&4 Emergency Plan Revision 3	Revised SNC Emergency Plan	Justification
Appendix 8: All		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 Vogtle 3-4 Annex
Appendix 9: All		The SNC Standard Emergency Plan/Annex provides the agencies and descriptions as required by Appendix E in their respective sections eliminating the need for a standalone appendix.

VEGP 3 & 4 Site On-Shift Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	0654 Table B-1 on-shift*	VEGP 3&4 Rev 2	VEGP 3&4 Rev 3	VEGP 3&4 Proposed
Plant Operation and Assessment of Operation Aspects		Shift Supervisor (SRO)	1	1	1	2
		Shift Foreman (SRO)	1	3	3	2
		Control Room Operators	2 (per unit)	4	4	4
		Auxiliary Operators	2 (per unit)	4	4	8
		Shift Support Supervisor (SRO)				1
Emergency Direction and Control (Emergency Coordinator) ***		Shift Technical Advisor, Shift Supervisor or designated facility manager	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	In-Plant surveys	HP Technicians	1	1	1	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	1
Plant System Engineering	Technical support	Shift Technical Advisor	1			1**
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1**	1	1	
		Electrical Maintenance	1**	1	1	
		I & C Technician		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**
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**	**21**	**21**	**21**

*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

Site Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	VEGP 3&4 Rev 2	VEGP 3&4 Rev 3 (60 min)	VEGP 3&4 Proposed (75 min)
Emergency Direction and Control				1	1	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	TSC, OSC and EOF Leadership	1	1	1	(a)
	Dose Assessment	HP Expertise				3
	Offsite Surveys	HP Technicians/Support	2	3	4	6
	On-Site Surveys	HP Technicians	1	1		
	In-Plant surveys	HP Technicians	1			
	Chemistry / Radiochemistry	Chem/RP Technicians	1	2	2	2
Plant System Engineering	Technical Support	Electrical	1	1	1	1
		Mechanical	1	1	1	1
		Engineering Supervision				2
		Core Thermal / Hydraulics	1			1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1	1	1	
		Electrical Maintenance	1	2	2	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	4	3
Total Augmented ERO			**15**	**21**	**21**	**44**

(a) EOF Emergency Director counted in Emergency Direction and Control.