

PLANT OPERATIONS MANUAL

Volume 01  
Section 10

01-S-10-6

Revision: 031

Date: 04/25/2016

REFERENCE USE

ADMINISTRATIVE PROCEDURE

EMERGENCY RESPONSE ORGANIZATION

SAFETY RELATED

Prepared:

Reviewed:

Technical

Concurred:

Manager, Emergency Planning

Approved:

General Manager, Plant Operations

List of Effective Pages:

Pages 1-8

Attachments I-IV


List of TCNs Incorporated:

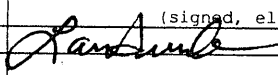
<u>Revision</u>	<u>TCN</u>
0	None
1	None
2	1, 2
3	None
4	None
5	None
6	None
7	None
8	3
9	None
10-031	None

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**RPTS FORM**

REQUIRED REVIEW PERFORMED (Check all that apply)	<input checked="" type="checkbox"/> PAD (EN-LI-100)	<input type="checkbox"/> 50.59 Evaluation (EN-LI-101)
	<input type="checkbox"/> 72.48 Evaluation (EN-LI-112)	<input type="checkbox"/> 50.54 Evaluation (EN-NS-210)
	<input type="checkbox"/> PAD Not Required (EN-LI-100 or 01-S-02-3) <input type="checkbox"/> Process Applicability Excluded <input type="checkbox"/> Editorial Change <input type="checkbox"/> ISI/IST Implementation <input type="checkbox"/> TCN Incorporation or Auto Rev. <input type="checkbox"/> Other Process-Number: _____	
	PAD Reviewer: _____ / (for PAD Not Required) Signature/Date	
Transmit applicable Review Form as a separate record along with procedure to Document Control.		

Cross-Discipline review required?	(X) Yes	(Note affected Departments Below)
	( ) No	
Preparer Initials>>>		

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)
Security	

Does this directive contain Tech Spec Triggers? ( ) YES (X) NO

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**REQUIREMENTS CROSS-REFERENCE LIST**

Requirement Implemented by Directive		Directive Paragraph Number
Name	Paragraph Number	That Implements Requirement
EPLAN	Figure 5.3 & 5.4	ATT I
EPLAN	5.4 S5	2.1
EPLAN	5.4.1	6.1.1
EPLAN	5.4.2 through 5.4.39	Att III
EPLAN	Table 5-1	Att II
EPLAN	9.3	*
AECM-89/0202	Att 1, Item IV, S3	6.3.1
AECM-89/0202	Att 1, Item IV, S4	6.3.5
AECM-89/0202	Att 1, Item IV, S7	6.3.6.S2
AECM-89/0202	Att 1, Item IV, S8	6.2
AECM-89/0202	Att 1, Item IV, S9	6.3.2, 6.3.5, 6.3.6
GGCR 1997-1249	*	6.3.2
GNRI 2000/00093	TABLE 5-1	6.1.2, Att. II
GNRI 2009/00083	*	Att. II
GNRO-97/00057	97-06-03.IV	6.2.1, 5.11
GNRO-97-00080	97-09-01.1TEM 4	Att. III
GNRO 2008/00004	*	Att. II
GNRO 2009/00012	*	Att. II

\* Covered by directive as a whole or by various paragraphs of the directive.

**NOTE**

The Equipment Database (EDB) Request statement is applicable only to Volume 06 and 07 maintenance directives.

EDB Change Request generated and the backup documentation available for setpoint and/or calibration data only ☐ Yes ☒ N/A EDBCR # \_\_\_\_\_

**Current Revision Statement:**

Revision 031:

- Changed responsibility for notifying Emergency Planning upon loss of access for any Entergy employee or Security Personnel from 'Corporate Security' to 'Access Authorization' in sections 2.5 and 6.3.2.
- Changed section 6.4.2 to clarify wording.
- Correct the title of Manager, Emergency Preparedness to Manager, Emergency Planning (HCM Change)
- Correct the title of the Emergency Preparedness Department to Emergency Planning Department (HCM Change)
- Correct the title of Reference 3.5, EN-TQ-110, from Emergency Preparedness Training Program to Emergency Response Organization Training Program.

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## 1.0 PURPOSE AND DISCUSSION

### 1.1 Purpose

- 1.1.1 To describe the responsibilities of various site personnel with respect to the Emergency Response Organization. The procedure also describes minimum staffing requirements for the different emergency classifications, site specific positions used to meet staffing requirements, required augmentation times for response personnel, requirements for assignment to the Emergency Response Organization, and expectations for response personnel.

### 1.2 Discussion

- 1.2.1 The Emergency Response Organization must be capable of responding within a short period after the declaration of an emergency and be capable of performing the assigned emergency function to mitigate consequences of the emergency.

## 2.0 RESPONSIBILITIES

### 2.1 Site Vice President - through the Director, Regulatory and Performance Improvement - Is responsible for:

- 2.1.1 Establishing management direction and control for the Emergency Planning Program to assure that preparedness is maintained and that any required corrective actions are implemented.
- 2.1.2 Designating personnel to fill Emergency Response Organization positions.

### 2.2 Manager, Emergency Planning - Is responsible for:

- 2.2.1 Overall management of the Emergency Planning Program.
- 2.2.2 Maintenance of this procedure.
- 2.2.3 Ensuring that an up-to-date ERO Duty Roster is maintained.
- 2.2.4 Identifying personnel to fill Emergency Response Organization positions. These positions are listed in Attachment II.
- 2.2.5 Ensuring that personnel assigned:
  - a. Are qualified in accordance with Reference 3.5 and 3.11 and remain qualified while assigned.
  - b. Reside in a location that enables them to respond to their Emergency Response Facility in the time required in accordance with Attachment II.
- 2.2.6 Ensure the ERO duty roster is updated every month.

### 2.3 Manager, Training and Development - Is responsible for:

- 2.3.1 Providing emergency plan training for emergency response personnel commensurate with their emergency response position.

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2.4 Facility Process Owners - Are responsible for:

2.4.1 Making recommendations for their assigned facilities concerning:

- a. Staffing
- b. Operation
- c. Readiness

2.5 Access Authorization - Is responsible for:

2.5.1 Notifying the Manager, Emergency Planning (GGNS) upon loss of access for any Entergy employee or Security Personnel.

2.6 Radiation Protection - Is responsible for:

2.6.1 Notifying the Manager, Emergency Planning (GGNS) upon any Radworker Restriction for any Entergy employee or Security personnel.

2.7 Discipline Training Coordinators - Are responsible for:

2.7.1 Providing names of personnel who fill Emergency Plan On-Shift positions to the Emergency Planning Department.

2.7.2 Ensuring training and qualification of individuals assigned to Emergency Plan On-Shift position remain qualified.

2.8 GGNS Management (Managers and Supervisors) - Is responsible for supporting the Emergency Response Organization through the following means:

2.8.1 Ensuring that each ERO member under their supervision remains qualified to respond to an emergency.

2.8.2 Providing clear expectations for emergency response performance and hold their employees accountable. This applies to both ERO and non-ERO members.

2.8.3 Enforcing accountability for Emergency Preparedness Violations/Weaknesses at all levels of the organization as appropriate.

2.8.4 Discussing Emergency Preparedness issues at morning meetings or Plan of the Day meetings to ensure appropriate priorities are given to those issues.

2.9 Emergency Response Organization (ERO) Members - Are responsible for:

2.9.1 Contacting their medical provider, if they believe they may be allergic to KI, who can evaluate them and if warranted, notify the EP group of the non-specific reason why the individual should not be considered eligible for assignment to an onsite facility during an emergency.

2.9.2 If unable to perform their duty on any given assigned duty day, the individual needing replacement must find a like qualified replacement, update the on-line ERO duty roster found on the EP webpage, and inform their Emergency Director and EP Duty Planner of the duty swap.

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### 3.0 REFERENCES

- 3.1 NUREG 0654 Section II, Planning Standards and Evaluation Criteria.
- 3.2 Administrative Procedure 01-S-10-3, Emergency Planning Department Responsibilities
- 3.3 Nuclear Management Manual Procedure EN-EP-306, Drills and Exercises.
- 3.4 GGNS Emergency Plan
- 3.5 Nuclear Management Manual Procedure EN-TQ-110, Emergency Response Organization Training Program
- 3.6 Emergency Plan Procedure 10-S-01-6, Notification of Offsite Agencies and Plant On-Call Emergency Personnel
- 3.7 GNRI 2000/00093 Emergency Plan Table 5-1 changes.
- 3.8 GNRO 2008/00004, Proposed E-plan Change - Table 5-1 Staffing
- 3.9 GNRO 2009/00012, Response to Request for Additional Information Related to Proposed Emergency Plan Change and E Plan Revision.
- 3.10 GNRI 2009/00083 GGNS Emergency Plan Change, Table 5-1 Staffing, NRC Safety Evaluation.
- 3.11 Nuclear Management Manual Procedure EN-EP-801, Emergency Response Organization.
- 3.12 Nuclear Management Manual Policy EN-PL-147, Personnel Expectations Related to Emergency Response at Entergy Nuclear Sites
- 3.13 Entergy Fleet KI Basis, November 2011

### 4.0 ATTACHMENTS

- 4.1 Attachment I - ERO Organizational Chart
- 4.2 Attachment II - ERO Assignment Responsibility Matrix
- 4.3 Attachment III - ERO Position Descriptions
- 4.4 Attachment IV - ERO Personnel Assignment Memo

### 5.0 DEFINITIONS

- 5.1 EOF - Emergency Operations Facility
- 5.2 ERO - Emergency Response Organization
- 5.3 ERO Duty Roster - A list of Emergency Response Organization personnel showing position and dates assigned
- 5.4 OSC - Operational Support Center
- 5.5 Response time - The time from the declaration of an emergency classification until the emergency response person arrives at their assigned emergency response facility.

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- 5.6 Augmentation - Actions taken to support on-shift personnel prior to emergency facilities becoming fully operational.
- 5.7 TSC - Technical Support Center
- 5.8 ERO Call-In Notification System - A computer notification system used to notify the ERO.
- 5.9 On-Call Period - The period of time that an assigned ERO person is expected to be able to respond to an emergency condition when notified
- 5.10 JIC - Joint Information Center
- 5.11 Facility Process Owner - Person assigned by the Site Vice President who is responsible for making operational recommendation and concurring with staffing assignments of a designated Emergency Response Facility.
- 5.12 On-Call Week - The ERO assignment period. On-Call duty typically changes from one duty team to another at 7:00am Monday morning.

## 6.0 DETAILS

### 6.1 Augmentation Requirements

- 6.1.1 The normal shift organization shall be augmented by additional personnel within a short period of time after the declaration of an emergency as described by the GGNS Emergency Plan. Attachment II (ERO Assignment Responsibilities) provides detailed information on Emergency Response Organization responsibilities to implement the GGNS Emergency Plan.
- 6.1.2 The operational and augmentation times for the TSC, EOF, OSC and JIC have been established in the appropriate emergency plan procedures. Emergency Planning should determine the cause if the times established in the procedures are not met. If the cause is isolated and beyond the control of the GGNS, i.e., weather, traffic, etc., then the inability to meet the times in that instance is understood and GGNS should continue to strive to meet the times. However, if the inability to meet the times is systemic or for reasons over which GGNS has control, i.e. residence of responders, delay in notification of responders, delay in accessing facilities, delay of activities to setup a facility, etc., then GGNS should implement appropriate corrective actions to ensure the times can be met.



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## 6.2 Assignment of Emergency Response Organization Personnel

- 6.2.1 The Director, Regulatory and Performance Improvement through the Manager, Emergency Planning shall assign personnel to the ERO to provide the minimum coverage of the positions listed in Attachment II of this procedure. Permanent changes to the ERO must be made in accordance with Attachment IV of this procedure.
- 6.2.2 Manager, Emergency Planning should ensure that at least 1/2 of the personnel required, listed in Attachment II, are maintained in each ERO position. This ensures there are an adequate number of qualified ERO members in each position to allow a rotation schedule to be established in order to support a protracted event. If a position is staffed less than 50%, special measures are taken to support a rotation schedule.
- 6.2.3 The Emergency Planning staff must update the ERO Call-In Notification System when permanent changes are made.
- 6.2.4 The Manager, Emergency Planning, or his designee, must provide a copy of reference 3.13 and the FDA KI Information Sheet to all ERO members.
- 6.2.5 The Manager, Emergency Planning, or his designee, must ensure that ERO members who self-report themselves as being allergic to KI are assigned to offsite facilities equipped with emergency ventilation systems which are effective for iodine removal (charcoal filters) or facilities located farther than 10 miles from the plant.

## 6.3 Training and Qualification of Emergency Response Organization Personnel

- 6.3.1 Manager, Emergency Planning and Discipline Training Coordinators must ensure that training and qualification of individuals assigned to the Emergency Response Organization (On-Call and On-Shift) remain current in accordance with References 3.5 and 3.11. If an assigned individual's training expires, the Manager, Emergency Planning must ensure that the individual is removed from the ERO duty roster.
- 6.3.2 Access Authorization, Radiation Protection, Training, and Safety (as appropriate) must notify the Manager, Emergency Planning within one business day if any of the following occur with respect to any Entergy Employee or Security personnel:
  - a. Loss of access to the GGNS Protected Area or GGNS EOF, or
  - b. Invoking any Radworker Restriction, or
  - c. Failure of any training specified in Reference 3.5, or
  - d. Any "restricted duty" status imposed due to medical conditions.
- 6.3.3 The Manager, Emergency Planning will, upon notification, temporarily remove from the ERO Duty Roster the Emergency Response Organization qualification of any person identified for any reason listed in section 6.3.2 of this procedure.

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- 6.3.4 Discipline Training Coordinators must provide Emergency Planning with the names of personnel who fill Emergency Plan On-Shift positions. Emergency Planning will ensure the names are entered and tracked in the EP Training report under the proper qualification code.
- 6.3.5 Discipline Training Coordinator, ERO Member, and Emergency Planning must review the ERO training on a monthly basis. The training should be reviewed for accuracy and to ensure assigned personnel are qualified.
- 6.3.6 Emergency Response Organization personnel are required to verify their qualification status in accordance with References 3.11 and 3.12. Any problems or concerns with ERO member qualification status will be brought to the attention of the responsible management for resolution.
- 6.3.7 If any ERO member fails to properly maintain their qualification in accordance with management expectations listed in Section 6.4, a Condition Report must be initiated and the individual and their supervisor must resolve the reason for failure to maintain their qualifications.

#### 6.4 Emergency Response Organization Personnel Requirements

##### 6.4.1 Personnel assigned to the Emergency Response Organization must:

- a. Maintain ERO qualifications for your position including EP Training and additional specific training such as licenses, respirator qualifications, RWT training, FFD training, etc., and inform the Emergency Planning Staff immediately of any change in status in accordance with References 3.11 and 3.12.
- b. Attend scheduled training and, if unable to attend, provide prior notification to your supervisor and to the instructor.
- c. Always strive to maintain on their person, especially during their on-call week, their assigned pager.
- d. Be fit for duty and available to respond to the appropriate emergency response facility, within your designated response time listed in Attachment II, for your entire assigned duty period if notified or instructed to report. Personnel should report promptly but safely.
- e. If circumstances prohibit response within the required times, ensuring that an alternate (from the same ERO position) has agreed to and is available for emergency response coverage, and notify Emergency Planning of the arrangements made.
- f. If unable to perform their duty on any given assigned duty day, the individual needing replacement must find a like qualified replacement, update the on-line ERO duty roster found on the EP webpage, and inform their Emergency Director and EP Duty Planner of the duty swap.

##### 6.4.2 In addition, ERO personnel should meet the expectation of Nuclear Management Manual PL-147, Reference 3.12.

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#### 6.5 Management expectation of Non-Emergency Response Organization Personnel

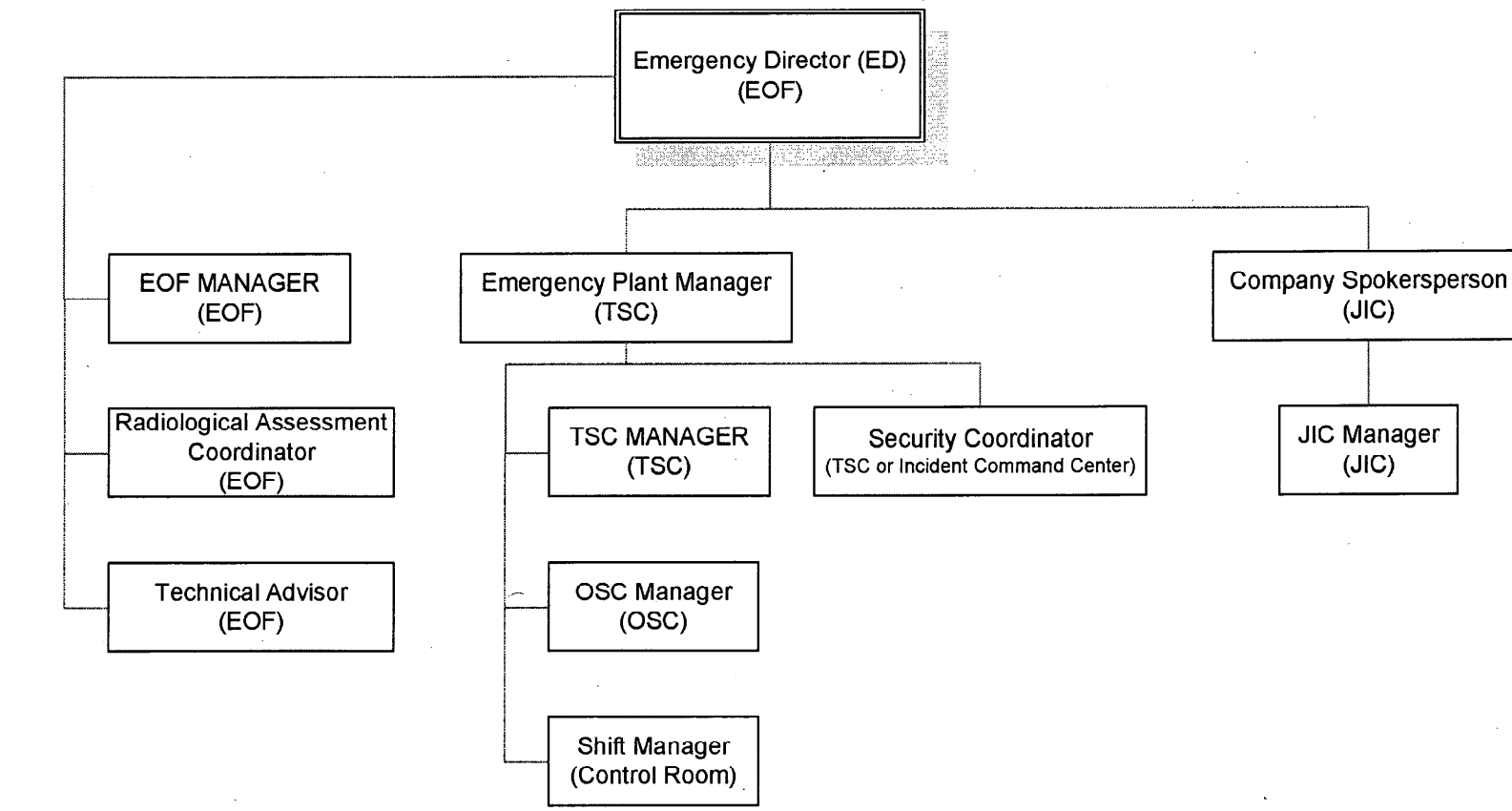
6.5.1 The full response to an event at GGNS consists of all available resources. Therefore, Management has the following expectations for those persons not specifically assigned to the ERO, who may be called upon to support the emergency response effort:

- a. Every company employee is eligible for assignment.
- b. Personnel are assigned emergency positions based on their experience, expertise, knowledge and ability.
- c. Company employees should respond to perform specific duties, as requested, in support of the emergency response.
- d. Employee compensation for supporting emergency response is to be handled in accordance with company policies and procedures.

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ERO ORGANIZATIONAL CHART

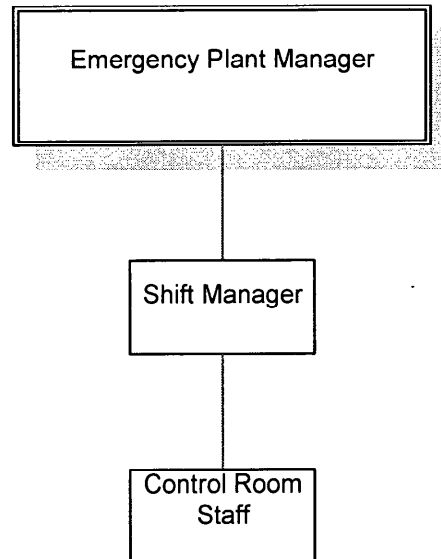
## ERO Management Leads



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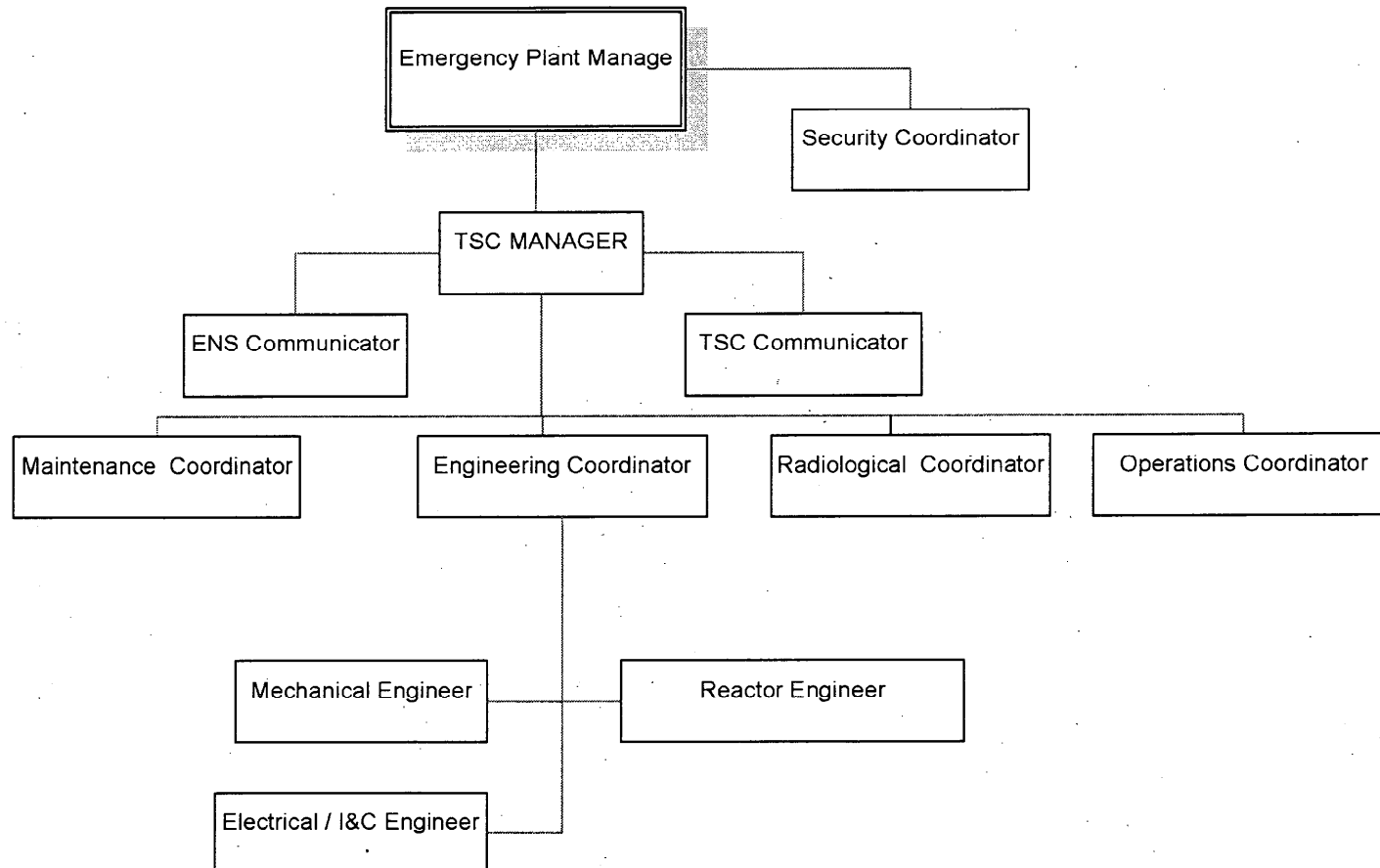
ERO ORGANIZATIONAL CHART

## Control Room



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## ERO ORGANIZATIONAL CHART

**Technical Support Center (TSC)**

01-S-10-6

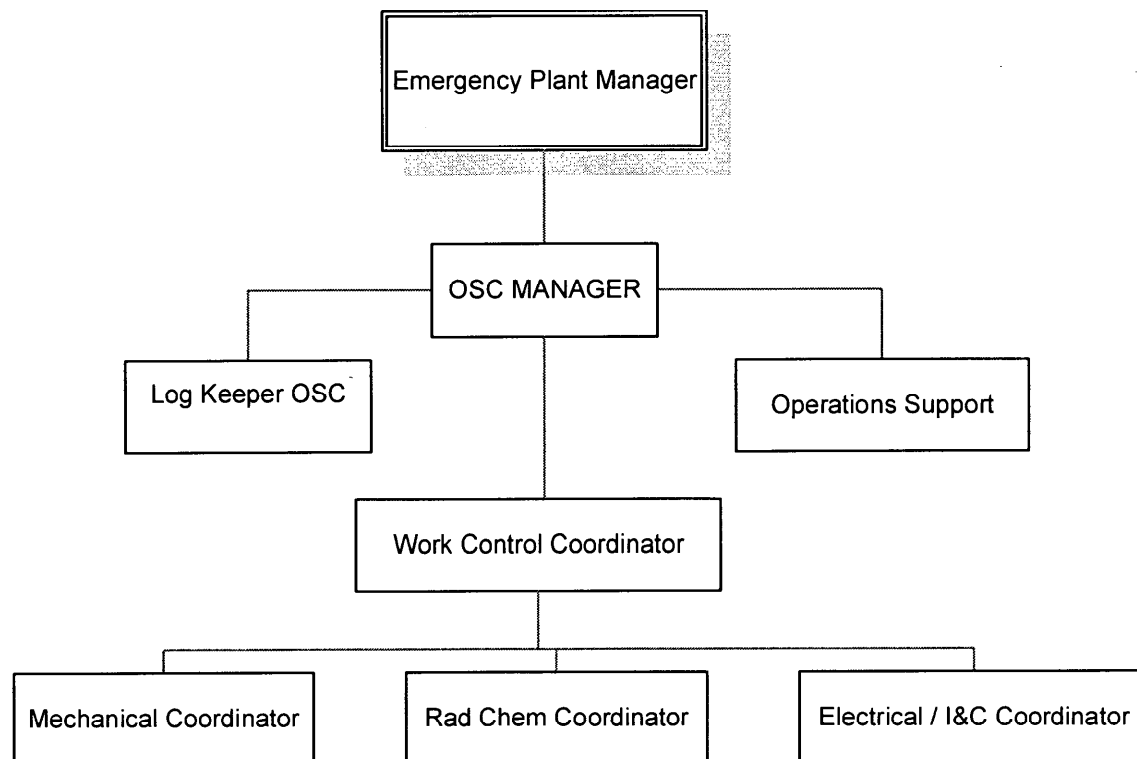
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## ERO ORGANIZATIONAL CHART

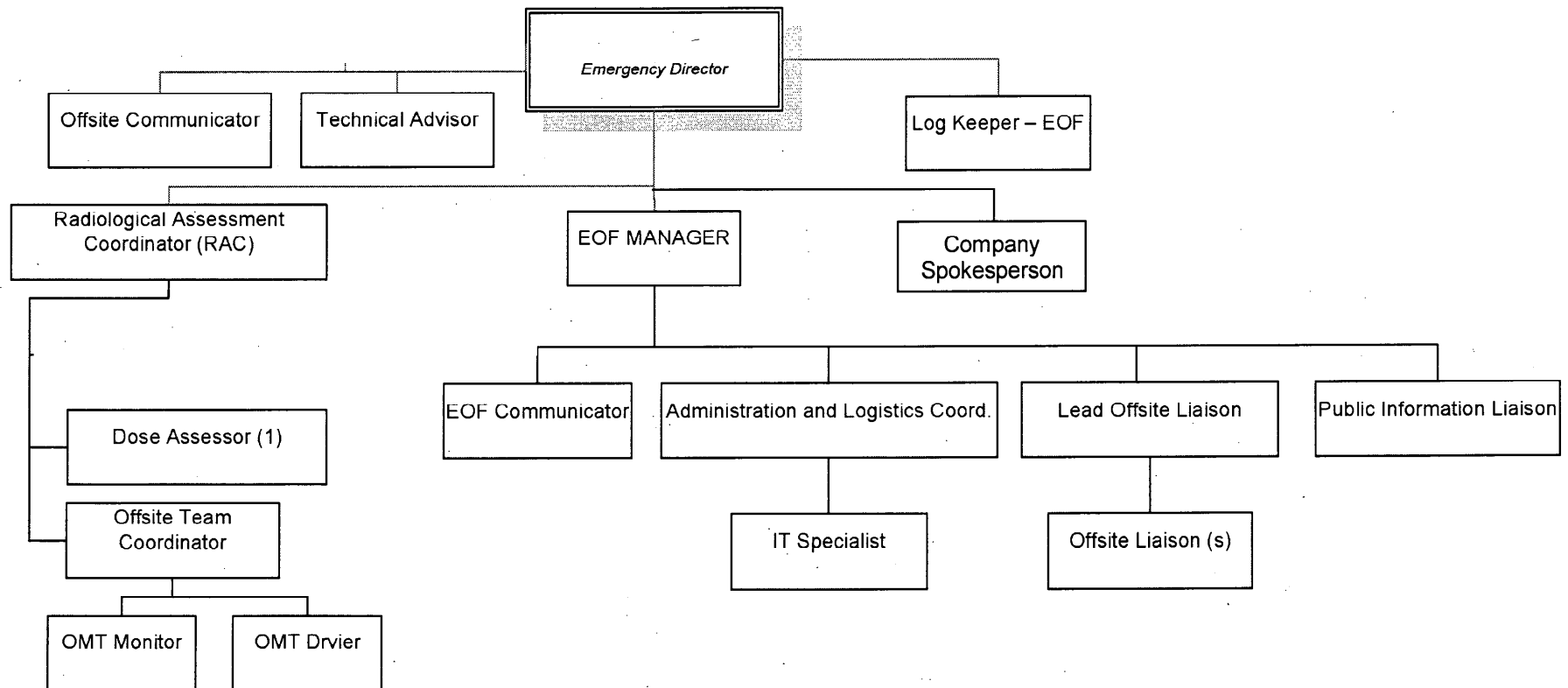
## Operations Support Center (OSC)



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## ERO ORGANIZATIONAL CHART

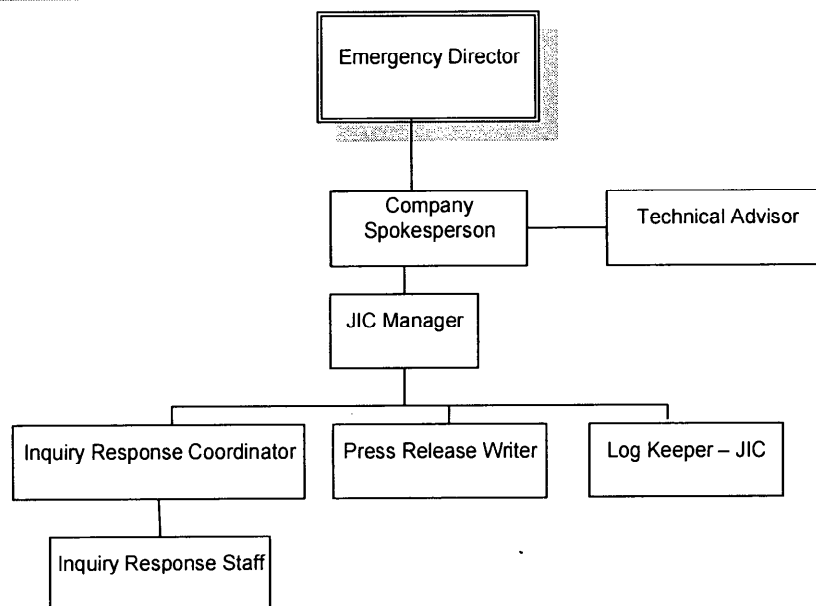
# Emergency Operations Facility (EOF)





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## ERO ORGANIZATIONAL CHART

**Joint Information Center (JIC)**

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ERO ASSIGNMENT RESPONSIBILITY MATRIX

Facility Process Owner	Major Functional Area and/or Task	Emergency Response Position (Regulatory Requirement)	Personnel <sup>1</sup> Required	Response Time Requirement	Comment
Control Room	Plant Operation Emergency Direction and Control	Shift Manager (Shift Manager) <sup>2</sup> (Emergency Coordinator) <sup>2,3</sup>	1/shift	on shift <sup>2,6</sup>	Requires 24-hour on site coverage. The Shift Manager will cover both functions until relieved by responding On-call Manager as Emergency Director.
	Plant Operations	Control Room Supervisor <sup>2</sup>	1/shift	on shift <sup>2,6</sup>	Requires 24-hour on site coverage.
		Control Room Operator (Control Room Operator) <sup>2</sup>	3/shift	on shift <sup>2,6, 10</sup>	Requires 24-hour on site coverage.
		Plant Operator (Auxiliary Operator) <sup>2</sup>	3/shift	on shift <sup>2,6</sup>	Requires 24-hour on site coverage. One of these is the plant response NOB
		STA (Shift Technical Advisor) <sup>2</sup> (Core/Thermal Hydraulics) <sup>2</sup>	1/shift <sup>4</sup>	on shift <sup>2,6</sup>	Requires 24-hour on site coverage per GGNS Tech. Spec. Will cover core thermal hydraulics function until relieved by TSC Coordinator.
	Notification and Communication	Control Room Communicator (Communicator) <sup>2</sup>	1/shift	on shift <sup>2,6</sup>	Requires 24-hour on site coverage. Covered by a non-NLO or non-NOB that is qualified as a Control room communicator, until relieved by responding EOF Offsite Communicator.
		Control Room Communicator (Communicator) <sup>2</sup>	1/shift	on shift <sup>2,6</sup>	Covered by a non-NLO or non-NOB that is qualified as a Control room communicator, until relieved by responding TSC ENS Communicator.
	Repair & Corrective Actions	RWO/Plant Operator (Rad Waste Operator) <sup>2</sup>	1/shift <sup>4</sup>	on shift <sup>2,6</sup>	Covered by on-shift RWO or Operator after relief from Control Room Communicator duties by responding TSC Communicator. Once relieved, reports to the OSC.
	Firefighting, Firefighting Communications, Rescue, First Aid	Fire Brigade <sup>2</sup> (per Tech Spec)	5/shift <sup>4</sup>	on shift <sup>2,6</sup>	Requires 24-hour on site coverage.
		(Local Support) <sup>2</sup>			Per agreement with local firefighting organization.
	Radiological Assessment	Onshift Chemist (Chemistry/Radio Chemistry)	1/shift	on shift <sup>2,6</sup>	Requires 24 hour coverage. (these personnel can provide Dose Assessment function, if needed)

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ERO ASSIGNMENT RESPONSIBILITY MATRIX (CONTINUED)

Facility Process Owner	Major Functional Area and/or Task	Emergency Response Position (Regulatory Requirement)	Personnel <sup>1</sup> Required	Response Time Requirement	Comment
TSC	Emergency Direction and Control	Emergency Plant Manager (Emergency Coordinator) <sup>2</sup>	4	90 Minutes <sup>2,7</sup>	Reports to the site within 90 minutes following the declaration of an Alert or higher classification. <u>This is a TSC minimum staffing position</u> for declaring the TSC operational.
	Technical Support	Reactor Engineer (Core/Thermal Hydraulics)	4	75 Minutes <sup>2,7</sup>	Reports to the site, within 75 minutes following the declaration of an Alert or higher classification to provide staff augmentation. <u>This is a TSC minimum staffing position</u> for declaring the TSC operational.
		Maintenance Coordinator	4	None See Note 5,7	Reports to the site within 90 minutes following the declaration of an Alert or higher classification. <u>This is a TSC minimum staffing position</u> for declaring the TSC operational.
	Notification and Communication	ENS Communicator	4	75 Minutes <sup>2,7</sup>	Reports to the site, within 75 minutes following the declaration of an Alert or higher classification to provide staff augmentation. <u>This is a TSC minimum staffing position</u> for declaring the TSC operational.
	Radiological Assessment	Radiological Coordinator	4	None See Note 5,7	Reports to the site within 90 minutes following the declaration of an Alert or higher classification. <u>This is a TSC minimum staffing position</u> for declaring the TSC operational.
		Engineering Coordinator	4	None See Note 5,7	Reports to the TSC following the declaration of an Alert or higher classification
	Corrective Action Engineering Support	Engineering Elect. (Systems Engineer Electrical) <sup>2</sup>	4	90 minutes <sup>2,7</sup>	Reports to the site within 90 minutes following the declaration of an Alert or higher classification.
		Engineering Mech. (Systems Engineer Mechanical) <sup>2</sup>	4	90 minutes <sup>2,7</sup>	Reports to the site within 90 minutes following the declaration of an Alert or higher classification.

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ERO ASSIGNMENT RESPONSIBILITY MATRIX (CONTINUED)

Facility Process Owner	Major Functional Area and/or Task	Emergency Response Position (Regulatory Requirement)	Personnel <sup>1</sup> Required	Response Time Requirement	Comment
TSC (Cont.)	Site Access Control & Personnel Accountability	Security Coordinator	Per Security Plan	None See Note 5,7	A Security Supervisor covers this function until relieved by Security Management.
		Security Force (Security personnel) <sup>2</sup>	Per Security Plan	on shift <sup>2</sup>	Requires 24-hour on site coverage.
OSC	Radiation Protection Access Control HP Job Coverage Personnel Monitoring Dosimetry	On-Shift HP  (In Plant, Onsite and Offsite surveys, First Aid Functions) <sup>2</sup>	2/shift	On shift <sup>2,6</sup>	Requires 24-hour on site coverage. All functions covered by on shift HP personnel until relieved by augmenting staff.
		On-call HP (In-plant Surveys) <sup>2</sup>	6 <sup>9</sup>	90 minutes <sup>2,7</sup>	Reports to the site within 90 minutes following the declaration of an Alert or higher classification. 4 of the 6 reporting On-call HP's must be qualified as Senior HP's.
		Rad Chem Coordinator	4	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification to provide oversight of the Radiation Protection function in the OSC. <u>This is an OSC minimum staffing position for declaring the OSC operational.</u>
	OSC Pool, Emergency Corrective Actions, Search and Rescue, First Aid	Mechanical Maintenance (Mechanical Maint Function) <sup>2</sup>	1/shift <sup>4</sup>	on shift <sup>2,6</sup>	Requires 24-hour on site coverage. All functions covered by same individual. Covered by on-shift RWO or Operator until relieved by responding Mechanic.
		Mechanical Maintenance (Mechanical Maint Function, Rescue Function)	2 <sup>9</sup>	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.
		Electrical/I&C Maintenance (Electrical Maint Function/I&C Maint Function) <sup>2</sup>	2/shift	on shift <sup>2,6</sup>	Requires 24-hour on site coverage. On-shift function is covered by two I&C, two Electrical Maintenance personnel, or one Electrical and one I&C Maintenance for a total of two maintenance personnel at all times. On shift function is covered by Electrical or I&C maintenance who is on shift. Reports to the Control Room following the declaration of an Alert or higher classification.
		Electrical Maintenance (Electrical Maintenance Function, First Aid Function) <sup>2</sup>	2 <sup>9</sup>	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.
		I&C Maintenance (I&C Maintenance Function) <sup>2</sup>	1 <sup>9</sup>	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.

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ERO ASSIGNMENT RESPONSIBILITY MATRIX (CONTINUED)

Facility Process Owner	Major Functional Area and/or Task	Emergency Response Position (Regulatory Requirement)	Personnel <sup>1</sup> Required	Response Time Requirement	Comment
OSC (Cont.)	Corrective Actions	OSC Manager	4	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification. <u>This is an OSC minimum staffing position for declaring the OSC operational.</u>
		OSC Communicator	4	None See Note 5,7	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.
		OSC Planner	8	None See Note 5,7	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.
	Accident Assessment	On-call Chemist (Chemistry Samples) <sup>2</sup>	4	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.
	Onsite Surveys	Onsite Monitor (Onsite Surveys) <sup>2</sup>	4	90 minutes <sup>2,7</sup>	Reports to the OSC within 90 minutes following the declaration of an Alert or higher classification.
EOF	Radiological Accident Assessment and Support of Operational Accident Assessment	Emergency Director (Emergency Operations Facility Director) <sup>2,3</sup>	4	75 minutes <sup>2,7</sup>	Reports to the site within 75 minutes following the declaration of an Alert or higher classification to provide staff augmentation. <u>This is an EOF minimum staffing position for declaring the EOF operational.</u>
	Technical Advisor	Technical Advisor	4	None See Note 5,7	Reports to the EOF following the declaration of an Alert or higher classification.
	Radiological Assessment	Radiological Assessment Coordinator	4	75 minutes <sup>2,7</sup>	Reports to the site within 75 minutes following the declaration of an Alert or higher classification to provide staff augmentation. <u>This is an EOF minimum staffing position for declaring the EOF operational.</u> (Dose Assessor (1) (EOF) may be substituted for this position.)
		Dose Assessor (EOF) (Offsite Dose Assessment) <sup>2</sup>	4	75 minutes <sup>2,7</sup>	Reports to the site within 75 minutes following the declaration of an Alert or higher classification to provide staff augmentation. <u>This is an EOF minimum staffing position for declaring the EOF operational.</u> (The Radiological Assessment Coordinator may be substituted for this position.)
		Offsite Team coordinator	4	90 minutes <sup>2,7</sup>	Reports to the EOF within 90 minutes following the declaration of an Alert or higher classification. <u>This is an EOF minimum staffing position for declaring the EOF operational.</u>

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ERO ASSIGNMENT RESPONSIBILITY MATRIX (CONTINUED)

Facility Process Owner	Major Functional Area and/or Task	Emergency Response Position (Regulatory Requirement)	Personnel <sup>1</sup> Required	Response Time Requirement	Comment
EOF (Cont.)	Notification and Communication	EOF Offsite Communicator (Communicator) <sup>2</sup>	4	75 minutes <sup>2,7</sup>	Reports to the site within 75 minutes following the declaration of an Alert or higher classification to provide staff augmentation. <u>This is an EOF minimum staffing position</u> for declaring the EOF operational.
	Offsite Surveys	Offsite Monitoring Team Monitor (Offsite Surveys) <sup>2</sup>	8	90 minutes <sup>2,7</sup>	Reports to the EOF within 90 minutes following the declaration of an Alert or higher classification. <u>This is an EOF minimum staffing position</u> for declaring the EOF operational.
		Offsite Monitoring Team Driver Assistant (Offsite Surveys) <sup>2</sup>	8	90 minutes <sup>2,7</sup>	Reports to the EOF within 90 minutes following the declaration of an Alert or higher classification. <u>This is an EOF minimum staffing position</u> for declaring the EOF operational.
	EOF Administrative Support	EOF Manager	4	90 minutes <sup>7</sup>	Reports to the EOF within 90 minutes following the declaration of an Alert or higher classification. <u>This is an EOF minimum staffing position</u> for declaring the EOF operational.
	Computer Services	IT Specialist	4	None See Note 5,7	Reports to the EOF following the declaration of an Alert or higher classification.
	EOF Logistic Support	Administration and Logistics Coordinator	4	None See Note 5,7	Reports to the EOF following the declaration of an Alert or higher classification.

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ERO ASSIGNMENT RESPONSIBILITY MATRIX (CONTINUED)

Facility Process Owner	Major Functional Area and/or Task	Emergency Response Position (Regulatory Requirement)	Personnel <sup>1</sup> Required	Response Time Requirement	Comment
EOF (Cont.)	Provides Emergency Information to the Company Spokesperson	Public Information Liaison	4	None See Note 5,7	Reports to the EOF following the declaration of an Alert or higher classification.
	Rescue Operations and First Aid <sup>2</sup>	(Local Support) <sup>2</sup>			Per agreement with local organization.
	Emergency Licensing Activities	Licensing Coordinator	4	N/A	Reports to the EOF upon request.
JIC	Emergency Information Distribution Control	Company Spokesperson	4	None See Note 8	Reports to the JIC following the declaration of an Alert or higher classification.
	Assists With Emergency Information Technical Questions	Technical Spokesperson	4	None See Note 8	Reports to the JIC following the declaration of an Alert or higher classification.
	JIC Operation Coordination	JIC Manager	4	None See Note 8	Reports to the JIC following the declaration of an Alert or higher classification.
	State and Local EOC Technical Advisor	Technical Advisor	16	N/A	Must be able to respond to the requesting state or local agency upon request.
	Inquiry Response Operation Coordination	Inquiry Response Coordinator	4	None See Note 8	Reports to the JIC following the declaration of an Alert or higher classification.
	Rumor Control	Inquiry Response Staff	16	None See Note 8	Reports to the JIC following the declaration of an Alert or higher classification.

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- Notes:
1. Number of personnel indicated in this column are required to maintain minimum four (4) section Emergency Response Organization coverage unless otherwise noted.
  2. Regulatory requirement.
  3. Overall direction of the emergency response effort will be assumed by the Emergency Director when all facilities are fully manned. Direction of the minute-to-minute operation and control of the plant remains with the Emergency Plant Manager in the TSC or Control Room.
  4. May be covered by personnel assigned other functions.
  5. This position does not have a fixed time response requirement. However, personnel assigned to this position are expected to be able to respond to their facility on a not-to-delay basis but within 90 minutes. When responding, personnel are expected to observe all traffic regulations and safety rules.
  6. These ERO positions may be vacant for not more than two hours, in order to provide for unexpected absences, provided action is taken to fill the required positions. This allowance is not applicable during declared emergencies.
  7. If personnel are on-site, they will report and augment shift personnel as soon as possible without delay, but no later than 45 minutes.
  8. This position does not have a fixed time response requirement. However, personnel assigned to this position are expected to be able to respond to their facility on a not-to-delay basis but within 120 minutes. When responding, personnel are expected to observe all traffic regulations and safety rules.
  9. Number of personnel are drawn from a pool, not on four section rotation.
  10. The role of the third Control Room Operator may be fulfilled using an AO as allowed by TRM based upon GGNS on-shift staffing analysis.



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### **ERO POSITION DESCRIPTIONS**

#### **EOF Emergency Director (ED)**

The ED is responsible for the direction of the total emergency response. The ED's responsibilities include:

- a. Activation/operation of the EOF, assuming responsibility from the Shift Manager;
- b. Classification of the emergency (non-delegable);
- c. Recommend protective action recommendations (PAR's) to the offsite agencies(non-delegable);
- d. Notification of the event to the offsite agencies(non-delegable);
- e. Coordinate accident information with offsite governmental agencies;
- f. Request assistance from offsite agencies to support recovery operations;
- g. Authorize radiation exposure in excess of 10CFR limits for the EOF personnel;
- h. Approve press releases (non-delegable);
- i. Direct the activities of the EOF organization in support of the Technical Support Center and offsite agencies.

#### **EOF Manager**

The EOF Manager reports to the ED and oversees the activities in the EOF. Responsibilities include:

- a. Assures timely activation of the EOF;
- b. Obtains additional resources as necessary to support EOF activities;
- c. Assists the Radiological Assessment Coordinator with EOF Habitability;
- d. Assist offsite authorities responding to the EOF;
- e. Ensures the offsite notifications are conducted within the regulatory requirements.

#### **Radiological Assessment Coordinator (RAC)**

The Radiological Assessment Coordinator is responsible for conducting assessment activities for offsite radiological conditions. During operation of the EOF, the Radiological Assessment Coordinator reports to the ED. Responsibilities include:

- a. Direct the activities of the Dose assessment/radiological field monitoring.
- b. Provide input to the ED regarding protective actions.
- c. Provide radiological /radiation protection support to the EOF.
- d. Keep the ED appraised of offsite radiological conditions.
- e. Provide overall liaison and coordination of efforts in the area of field team data with State Radiological Personnel.
- f. Contact for NRC on Health Physics Network (HPN) Line.(Can be designated to a RP staff member)

#### **Technical Advisor (EOF)**

The Technical Advisor reports to the ED. Responsibilities include:

- a. Maintaining contact with the TSC and Control Room and obtains current plant status and emergency operations.
- b. Monitor plant computer system parameters.
- c. Recommend actions on classification of emergencies.

#### **Admin/Logistics Coordinator**

The Admin/Logistics Coordinator is responsible for providing support to the EOF Manager and the TSC Emergency Response Organization. Responsibilities include:

- a. Manage logistics for supporting the onsite and offsite emergency response such as additional support personnel or equipment, meals, lodging, etc.
- b. Manage 24 hr staffing for ERF's

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**ERO POSITION DESCRIPTIONS (Continued)****Public Information Liaison**

The Public Information Liaison reports to the EOF Manager and provides the primary interface between the JIC and EOF. Responsibilities include:

- a. Ensuring JIC is provided with current plant status.
- b. Reviews press releases and provide to the ED for approval

**Offsite Communicator**

The Offsite Communicator reports to the ED. Responsibilities include:

- a. Transmitting information to the offsite agencies as required by regulations.
- b. Ensuring ED approves all notification forms to State/Local agencies.

**EOF Communicator**

The EOF Communicator reports to the EOF Manager. Responsibilities include:

- a. Transmitting and receiving information from onsite ERF's.
- b. Reviewing plant data and ensuring the EOF is notified of changing plant conditions.

**Lead Offsite Liaison**

The Lead Offsite Liaison reports to the EOF Manager. Responsibilities include obtaining plant information and ensuring the offsite agencies located in the EOF and the offsite liaisons are briefed on the plant conditions.

**Offsite Liaison**

The Offsite Liaison reports to the Lead Offsite Liaison. Responsibilities include:

- a. Obtaining plant information and ensuring the offsite agencies located in the EOC are briefed on the plant conditions.
- b. Clarifying plant conditions, responding to questions, etc. for the offsite agencies.

**Dose Assessor**

The Dose Assessor reports to the Radiological Assessment Coordinator. Responsibilities include:

- a. Calculate offsite dose projections.
- b. Provide offsite dose projection information to the RAC.

**Offsite Team Coordinator (OTC)**

The Offsite Coordinator reports to the Radiological Assessment Coordinator. Responsibilities include:

- a. Maintain communications with offsite monitoring teams (OMT).
- b. Direct OMT based on radiological /met information.
- c. Log communications with OMT to include dose /air sample survey results,
- d. Ensure radiological information is communicated to the RAC for possible modifications to the dose calculations.

**Offsite Monitoring Team (OMT)**

The Offsite monitoring team reports to the Offsite Team Coordinator (OTC). Responsibilities include:

- a. Perform activities directed by the OTC to support plume tracking and measurements.
- b. Monitor self reading dosimeters and report results back to the OTC.

**Information Technology (IT) Specialist - EOF**

The Information Technology (IT) Specialist reports to the Admin/Logistics Coordinator and is responsible for monitoring facility equipment (computer related and communications) to ensure adequate operation.

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**ERO POSITION DESCRIPTIONS (Continued)****EOF Log Keeper**

The EOF Log keeper reports to the ED. Responsibilities include:

- a. Maintain facility log
- b. Ensure timeliness of facility briefs
- c. Support the EOF Manager/ED as requested.

**Emergency Plant Manager (EPM)**

The EPM has the direct responsibility for accident mitigation at the plant and performs these duties from the Technical Support Center (TSC). The EPM reports to the EOF ED. Responsibilities include:

- a. Provide information and recommendations to the ED regarding the declaration of an emergency.
- b. Coordinate the activities of the CR, TSC and OSC.
- c. Direct personnel assembly, accountability and evacuation of non-essential personnel.
- d. Provide information and recommendations to the ED regarding plant activities.
- e. Direct the organization and coordination of repair corrective action teams.
- f. Initiate protective actions at the site.
- g. Authorize radiation exposure in excess of 10CFR20 limits to onsite personnel.
- h. Make operational decisions involving the safety of the plant and its personnel and make recommendations to the Control Room Personnel.

**TSC Manager**

The TSC Manager reports to the EPM. Responsibilities include:

- a. Perform technical assessments and communicating the conclusions to the EPM.
- b. Assures staffing/timely activation of the TSC.
- c. Set priorities for the Engineering and Technical personnel.
- d. In conjunction with the EPM, make operational decisions concerning the safety of the plant.

**TSC Communicator**

The TSC Communicator reports to the TSC Manager. Responsibilities include:

- a. Maintain facility log
- b. Ensure timeliness of facility briefs
- c. Support the EPM/TSC Manager as requested.

**Security Coordinator**

The Security Coordinator reports to the EPM. Responsibilities include:

- a. Overall coordination of the offsite assistance for the security related response.
- b. Designated NIMS Liaison between the Incident Command Post and Site Organization.

**ENS Communicator**

The ENS Communicator reports to the TSC Manager. Responsibilities include:

- a. Establishes and maintains communications with the NRC via the ENS phone.
- b. Monitor plant computer parameters and provide plant status to the NRC as requested.

**Maintenance Coordinator**

The Maintenance Coordinator reports to the TSC Manager. Responsibilities include:

- a. Communicate the request for repair and corrective teams to the OSC Work Control Coordinator.
- b. Prioritizes the requests with the TSC Manager.

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**ERO POSITION DESCRIPTIONS (Continued)****Engineering Coordinator**

The Engineering Coordinator reports to the TSC Manager. He is responsible for coordinating Engineering work requests with the Engineering support team.

**Radiological Coordinator**

The Radiological Coordinator reports to the TSC Manager. Responsibilities include:

- Radiological assessments and the development of radiological plans.
- Keeping the TSC Manager informed of the radiological conditions.
- Advise the TSC, OSC and EOF of changes in radiological release status.
- Coordinate with the Security Coordinator to determine the routes to be used for evacuation of non-essential personnel and BRE's.
- Arranging for additional radiation protection personnel, as necessary.

**Operations Coordinator**

The Operations Coordinator reports to the TSC Manager. Responsibilities include:

- Coordinate TSC efforts in determining the nature and extent of emergencies pertaining to equipment and plant facilities in support of Control Room actions.
- Assist the EPM in evaluating changes in event classification.
- Ensure the Control Room, TSC, and EOF is informed of significant changes in event status.
- Coordinate operations activities outside of the Control Room with the TSC Manager and OSC Manager.

**Engineers (Mechanical/ I&C/ Electrical)**

The Engineers report to the Engineering Coordinator. The Engineers are responsible for responding to engineering requests from the Engineering Coordinator.

**Reactor Engineer**

The Reactor Engineer reports to the TSC Manager. Responsibilities include:

- Support the TSC in calculating and tracking core reactivity (core damage assessment).
- Assist in Severe Accident Procedure implementation.

**OSC Manager**

The OSC Manager has the overall responsibility for the activation and operation of the Operational Support Center. The OSC Manager reports to the EPM located in the TSC. Responsibilities Include:

- Direct the activation, operation and deactivation of the OSC.
- Ensures timely dispatching of the repair/corrective action teams, search and rescue teams, onsite monitoring teams and mobilizing other required support personnel.
- Ensures work task priorities are being maintained.
- Maintain OSC accountability.

**Log Keeper –OSC**

The Log Keep – OSC reports to the OSC Manager. Responsibilities include:

- Maintain facility log.
- Ensure timeliness of facility briefs.
- Support the OSC Manager as requested.

**Operations Support**

The Operations Support position reports to the OSC Manager and is manned by a spare NLO. The Operations Support is responsible for supporting the OSC in locations of plant equipment. This position is filled as needed.

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**ERO POSITION DESCRIPTIONS (Continued)****Work Control Coordinator**

The Work Control Coordinator reports to the OSC Manager. Responsibilities include:

- a. Direct the formation, briefing and debriefing of repair and corrective action teams and offsite monitoring teams.
- b. Maintain communications with the Maintenance Coordinator in the TSC.

**Mechanical /I & C/ Electrical Coordinator**

The Mechanical, I&C, and Electrical Coordinators report to the Work Control Coordinator. Responsibilities include:

- a. Assist the conduct of the briefing and debriefing for the assigned tasks.
- b. Ensures communications with repair and corrective action teams.

**RadChem Coordinator**

The RadChem Coordinator reports to the Work Control Coordinator. Responsibilities include:

- a. Determining emergency radiological survey requirements.
- b. Ensure use of protective clothing, respiratory protection, and access control within the plant is deemed appropriate to control personnel exposures.
- c. Ensures the dispatching of the onsite monitoring teams.
- d. Ensures habitability of the OSC
- e. Conduct/provide assistance for the rad briefings to support the dispatching of the repair/corrective action teams and chemistry/ RP sampling.
- f. Communicate rad/chemistry sample results to the TSC and CR.

**Company Spokesperson**

The Company Spokesperson is responsible for overall public information. Responsibilities include:

- a. Obtain briefing from the EOF ED to ensure timely development of news releases.
- b. Ensures that news media briefings are held regularly during the course of the emergency.
- c. Serves as spokesperson at media briefings.

**Technical Advisor - JIC**

The Technical Advisor reports to the Company Spokesperson and is responsible for answering technical questions from the news media regarding the emergency situation.

**JIC Manager**

The JIC Manager reports to the Company Spokesperson. Responsibilities include:

- a. Overall activation and operation of the Joint Information Center.
- b. Notify the Corp Emergency Center.

**Log Keeper – JIC**

The Log keeper- JIC reports to the JIC Manager. Responsibilities include:

- a. Maintain facility log.
- b. Support the JIC Manager as requested.

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**ERO POSITION DESCRIPTIONS (Continued)****Inquiry Response Coordinator**

The Inquiry Response Coordinator reports to the JIC Manager. Responsibilities include:

- a. Ensures activation of rumor control activities for response to questions from the general public.
- b. Monitor the public/media inquiry calls and track trends.

**Press Release Writer**

The Press Release Writer reports to the JIC Manager and generates press releases as directed by the JIC Manager.

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**ERO PERSONNEL ASSIGNMENT MEMO** (Example)

NAME: \_\_\_\_\_ UCAMS ID # \_\_\_\_\_

ERO POSITION: \_\_\_\_\_

HOME # \_\_\_\_\_ WORK # \_\_\_\_\_

PAGER # \_\_\_\_\_

**TRAINING REQUIRED FOR ERO POSITION**

COURSE	DATE COMPLETED	VERIFIED BY

The above listed person is qualified to fill the above listed ERO position and can be placed on the ERO effective \_\_\_\_\_.

Approved: \_\_\_\_\_ Date \_\_\_\_\_  
                    Manager, Emergency Planning

Concurrence: \_\_\_\_\_ Date \_\_\_\_\_  
                    FPO or Director, Regulatory and Performance Improvement

**EP Use Only**

Data entered into:	ERO Call-In Notification System	_____
Notified EP Training	P.I. Database	_____
Call Tree	Notified Training Records	_____
Emergency Telephone Book	Notified Document Control	_____
EP Pager List	ERO Member Response Time	_____
ERO Team Assignment	ERO Position Expectations	_____
Communicated	Communicated	_____

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Revision: 31

Equipment/Facility/Other: Grand Gulf Nuclear Station

Title: Emergency Response Organization

**Part I. Description of Activity Being Reviewed** (event or action, or series of actions that may result in a change to the emergency plan or affect the implementation of the emergency plan):

1. Changed responsibility for notifying Emergency Planning upon loss of access for any Entergy employee or Security Personnel from 'Corporate Security' to 'Access Authorization' in sections 2.5 and 6.3.2.
2. Changed section 6.4.2 to clarify wording. changed the sentence "In addition, ERO personnel should recognize the expectation of Nuclear Management Manual PL-147, Reference 3.12." to "In addition, ERO personnel should meet the expectation of Nuclear Management Manual PL-147, Reference 3.12." The word 'recognize' was changed to 'meet' to clarify the intent of PL-147 which is that ERO members meet the expectations, rather than just recognize them.
3. Correct the title of Manager, Emergency Preparedness to Manager, Emergency Planning (HCM Change)
4. Correct the title of the Emergency Preparedness Department to Emergency Planning Department (HCM Change)
5. Correct the title of Reference 3.5, EN-TQ-110, from Emergency Preparedness Training Program to Emergency Response Organization Training Program.

**Part II. Activity Previously Reviewed?**

Is this activity fully bounded by an NRC approved 10 CFR 50.90 submittal or Alert and Notification System Design Report?

If YES, identify bounding source document number/approval reference and ensure the basis for concluding the source document fully bounds the proposed change is documented below:

**Justification:**

☐ Bounding document attached (optional)

☐ YES  
50.54(q)(3)  
Evaluation is  
NOT required.  
Enter  
justification  
below and  
complete Part  
VI.

☒ NO  
Continue to  
next part

**Part III. Applicability of Other Regulatory Change Control Processes**

Check if any other regulatory change processes control the proposed activity. (Refer to EN-LI-100)

**NOTE:** For example, when a design change is the proposed activity, consequential actions may include changes to other documents which have a different change control process and are **NOT** to be included in this 50.54(q)(3) Screening.

**APPLICABILITY CONCLUSION**

- ☒ If there are no controlling change processes, continue the 50.54(q)(3) Screening.
- ☐ One or more controlling change processes are selected, however, some portion of the activity involves the emergency plan or affects the implementation of the emergency plan; continue the 50.54(q)(3) Screening for that portion of the activity. Identify the applicable controlling change processes below.
- ☐ One or more controlling change processes are selected and fully bounds all aspects of the activity. 50.54(q)(3) Evaluation is NOT required. Identify controlling change processes below and complete Part VI.

**CONTROLLING CHANGE PROCESSES**



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**Part IV. Editorial Change**

Is this activity an editorial or typographical change such as formatting, paragraph numbering, spelling, or punctuation that does not change intent?

**Justification:** Changes #3-5 are editorial changes as described in EN-EP-305 and EN-AD-101; Organization and Job Title Changes Not Affecting Function and Responsibility and References to Procedure Titles. No is checked at the right because the remaining changes are non-editorial.

☐ YES  
50.54(q)(3)  
Evaluation is  
NOT required.  
Enter  
justification and  
complete Part  
VI.

☒ NO  
Continue to next  
part

**Part V. Emergency Planning Element/Function Screen** (Associated 10 CFR 50.47(b) planning standard function identified in brackets) Does this activity affect any of the following, including program elements from NUREG-0654/FEMA REP-1 Section II?

1. Responsibility for emergency response is assigned. [1]	<input type="checkbox"/>
2. The response organization has the staff to respond and to augment staff on a continuing basis (24/7 staffing) in accordance with the emergency plan. [1]	<input checked="" type="checkbox"/>
3. The process ensures that on shift emergency response responsibilities are staffed and assigned. [2]	<input type="checkbox"/>
4. The process for timely augmentation of onshift staff is established and maintained. [2]	<input type="checkbox"/>
5. Arrangements for requesting and using off site assistance have been made. [3]	<input type="checkbox"/>
6. State and local staff can be accommodated at the EOF in accordance with the emergency plan. [3]	<input type="checkbox"/>
7. A standard scheme of emergency classification and action levels is in use. [4]	<input type="checkbox"/>
8. Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 15 minutes after declaration of an emergency and providing follow-up notifications. [5]	<input type="checkbox"/>
9. Administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway. [5]	<input type="checkbox"/>
10. The public ANS meets the design requirements of FEMA-REP-10, Guide for Evaluation of Alert and Notification Systems for Nuclear Power Plants, or complies with the licensee's FEMA-approved ANS design report and supporting FEMA approval letter. [5]	<input type="checkbox"/>
11. Systems are established for prompt communication among principal emergency response organizations. [6]	<input type="checkbox"/>
12. Systems are established for prompt communication to emergency response personnel. [6]	<input type="checkbox"/>
13. Emergency preparedness information is made available to the public on a periodic basis within the plume exposure pathway emergency planning zone (EPZ). [7]	<input type="checkbox"/>
14. Coordinated dissemination of public information during emergencies is established. [7]	<input type="checkbox"/>
15. Adequate facilities are maintained to support emergency response. [8]	<input type="checkbox"/>
16. Adequate equipment is maintained to support emergency response. [8]	<input type="checkbox"/>
17. Methods, systems, and equipment for assessment of radioactive releases are in use. [9]	<input type="checkbox"/>
18. A range of public PARs is available for implementation during emergencies. [10]	<input type="checkbox"/>
19. Evacuation time estimates for the population located in the plume exposure pathway EPZ are available to support the formulation of PARs and have been provided to State and local governmental authorities. [10]	<input type="checkbox"/>
20. A range of protective actions is available for plant emergency workers during emergencies, including those for hostile action events. [10]	<input type="checkbox"/>

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21. The resources for controlling radiological exposures for emergency workers are established. [11]	<input type="checkbox"/>
22. Arrangements are made for medical services for contaminated, injured individuals. [12]	<input type="checkbox"/>
23. Plans for recovery and reentry are developed. [13]	<input type="checkbox"/>
24. A drill and exercise program (including radiological, medical, health physics and other program areas) is established. [14]	<input type="checkbox"/>
25. Drills, exercises, and training evolutions that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process in order to identify weaknesses. [14]	<input type="checkbox"/>
26. Identified weaknesses are corrected. [14]	<input type="checkbox"/>
27. Training is provided to emergency responders. [15]	<input type="checkbox"/>
28. Responsibility for emergency plan development and review is established. [16]	<input checked="" type="checkbox"/>
29. Planners responsible for emergency plan development and maintenance are properly trained. [16]	<input type="checkbox"/>

**APPLICABILITY CONCLUSION**

- ☐ If no Part V criteria are checked, a 50.54(q)(3) Evaluation is NOT required; document the basis for conclusion below and complete Part VI.
- ☐ If any Part V criteria are checked, complete Part VI and perform a 50.54(q)(3) Evaluation.

**BASIS FOR CONCLUSION**

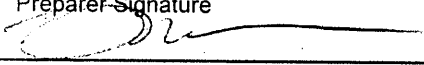
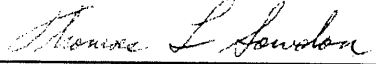

Changes #3-5 are editorial changes and do not require evaluation.

Change #1 reassigns the responsibility for notifying EP of personnel that lose their Protected Area (PA) Access so that EP can ensure that the ERO maintains a staff that can respond to their Emergency Response Facilities, some of which are inside the PA. The term 'Corporate Security' was used in the past to refer to site security management, but the specific group that would remove access, and therefore the most logical group to inform EP, is the Security Access Authorization group. This change removes the vague term 'Corporate Security' and more clearly defines who would notify EP. This change may affect 10CFR50.47 (b) [1] which requires licensees to ensure that the response organization has the staff to respond and to augment staff on a continuing basis (24/7 staffing) in accordance with the emergency plan.

Change #2 changes the sentence "In addition, ERO personnel should recognize the expectation of Nuclear Management Manual PL-147, Reference 3.12." to "In addition, ERO personnel should meet the expectation of Nuclear Management Manual PL-147, Reference 3.12." The word 'recognize' was changed to 'meet' to clarify the intent of PL-147 which is that ERO members meet the expectations, rather than just recognize them. Site management expectations are not based on regulatory requirements but on industry best practices. The clarification of this statement will not affect any of the planning standard functions or program elements.

An evaluation will be performed for Change #1.

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<b>Part VI. Signatures:</b>		
Preparer Name (Print) Richard Van Den Akker	Preparer Signature 	Date: 3-30-16
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Tom Sowdon Nuclear EP Project Manager	Reviewer Signature 	Date: 4-7-2016
Approver Name (Print) <del>JFF SEAR</del> EP manager or designee	Approver Signature 	Date: 4-8-16

Procedure/Document Number: 01-S-10- <del>6</del> <i>52-6</i>	Revision: <i>21 31</i> <i>2 5-2-16</i>
Equipment/Facility/Other: Grand Gulf Nuclear Station	
Title: <del>Emergency Planning Department Responsibilities</del> <i>ERO</i> <i>2 5-2-16</i>	

**Part I. Description of Proposed Change:**

1. Changed responsibility for notifying Emergency Planning upon loss of access for any Entergy employee or Security Personnel from 'Corporate Security' to 'Access Authorization' in sections 2.5 and 6.3.2.

**Part II. Description and Review of Licensing Basis Affected by the Proposed Change:**

Performed electronic search of the Emergency Plan, Technical Requirements Manual, TS Bases, Operating License, COLR, ODCM, NRC Orders. Keywords used; "Unrestricted Access", "loss of access", and "protected area access". Only relevant sections identified were GGNS Emergency Plan Section 8.2, *Training*.

A Process Applicability Determination (PAD) was performed and concluded that the change being made to this procedure does not affect the GGNS Emergency Plan or any other GGNS Licensing Basis Documents.

**Part III. Describe How the Proposed Change Complies with Relevant Emergency Preparedness Regulation(s) and Previous Commitment(s) Made to the NRC:**

There are requirements about training of ERO personnel, and when someone loses access their General Employee Training is pulled restricting their access to the site, preventing them from entering the PA and making them ineligible for their ERO position. The notification described in 01-S-10-6 is different in that it is a more immediate notification so EP can start assessing gaps in the ERO, especially if the person is currently on call. EP could identify no regulations or commitments specific to notifying EP of the loss of access to the protected area.

**Part IV. Description of Emergency Plan Planning Standards, Functions and Program Elements Affected by the Proposed Change:**

**Planning Standard:** 10 CFR 50.47(b)(1) - Assignment of Responsibility/Organizational Control  
**Function:** The response organization has the staff to respond and to augment staff on a continuing basis (i.e., 24/7 support).

**Program Elements:** Sections IV.A.1-IV.A.9 of Appendix E to 10 CFR 50 provide supporting requirements. Informing criteria appear in Section II.A of NUREG-0654 and the licensee's emergency plan.

Procedure/Document Number: 01-S-10-26 *2-5-16* Revision: *2131* *2-5-2-16*

Equipment/Facility/Other: Grand Gulf Nuclear Station

Title: ~~Emergency Planning Department Responsibilities~~ *ERO 2-5-2-16*

**Part V. Description of Impact of the Proposed Change on the Effectiveness of Emergency Plan Functions:**

This change to 01-S-10-6 reassigns the responsibility for notifying EP of personnel that lose their Protected Area (PA) Access so that EP can ensure that the ERO maintains a staff that can respond to their Emergency Response Facilities, some of which are inside the PA.

The term 'Corporate Security' was used in the past to refer to site security management, but there is no longer a Corporate Security presence on site on a daily basis. The specific group that would remove access, and therefore the most logical group to inform EP of that removal, is the Security Access Authorization group, which would be the group that actually removes plant access.

In practice the Security Access Authorization group has been making this notification to the EP department for years and only recently questioned the use of the term 'Corporate Security' and recommended this change (CR-GGN-2015-6337 CA #3). The change to this procedure would only remove the vague term used in the procedure and will not affect who makes the notification.

The changes being made to 01-S-10-6, Emergency Response Organization, will not reduce the effectiveness of the GGNS Emergency Plan and will not affect GGNS' ability to implement any 10CFR50.47(b) planning standards or associated program elements.

Procedure/Document Number: 01-S-10- <del>26</del> <sup>26</sup> 5-2-16	Revision: <del>21</del> 31 2-2-16
Equipment/Facility/Other: Grand Gulf Nuclear Station	
Title: <del>Emergency Planning Department Responsibility</del> <sup>2</sup> ERD 5-2-16	

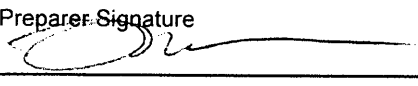
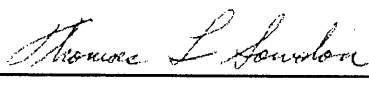

**Part VI. Evaluation Conclusion**

Answer the following questions about the proposed change.

- |   |   |
|---|---|
| 1. Does the proposed change comply with 10 CFR 50.47(b) and 10 CFR 50 Appendix E?                                   | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 2. Does the proposed change maintain the effectiveness of the emergency plan (i.e., no reduction in effectiveness)? | <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO |
| 3. Does the proposed change constitute an emergency action level scheme change?                                     | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO |

If questions 1 or 2 are answered NO, or question 3 answered YES, reject the proposed change, modify the proposed change and perform a new evaluation or obtain prior NRC approval under provisions of 10 CFR 50.90. If questions 1 and 2 are answered YES, and question 3 answered NO, implement applicable change process(es). Refer to step 5.6[8].

**Part VII. Signatures**

Preparer Name (Print) Richard Van Den Akker	Preparer Signature 	Date: 1-26-16
(Optional) Reviewer Name (Print)	Reviewer Signature	Date:
Reviewer Name (Print) Tom Sowdon Nuclear EP Project Manager	Reviewer Signature 	Date: 4-7-2016
Approver Name (Print) <del>JEFF SEPTER</del> EP Manager or designee	Approver Signature 	Date: 4-8-16