



**Pacific Gas and
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PG&E Letter DCL-16-120
PG&E Letter DIL-16-018

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

10 CFR 50.54, 10 CFR 72.32

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Docket No. 72-26, Materials License No. SNM-2511
Diablo Canyon Independent Spent Fuel Storage Installation
Emergency Plan Implementing Procedure Updates

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54 and the requirements of 10 CFR 72.32, Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedures EP G-2, "Interim Emergency Response Organization," EP G-3, "Emergency Notification of Off-Site Agencies," EP G-4, "Assembly and Accountability," EP EF-1, "Activation and Operation of the Technical Support Center," EP EF-2, "Activation and Operation of the Operational Support Center," EP EF-3, "Activation and Operation of the Emergency Operations Facility," and EP EF-9, "Backup Emergency Response Facilities."

The associated enclosures are listed below:

Enclosure	Title
1	Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures
2	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-2, Revision 50, "Interim Emergency Response Organization"
3	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-3, Revision 59, "Emergency Notification of Off-Site Agencies"
4	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-4, Revision 29, "Assembly and Accountability"

AX45
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NRB
NM55



Enclosure	Title
5	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-1, Revision 52, "Activation and Operation of the Technical Support Center"
6	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-2, Revision 39, "Activation and Operation of the Operational Support Center"
7	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-3, Revision 44, "Activation and Operation of the Emergency Operations Facility"
8	Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-9, Revision 12, "Backup Emergency Response Facilities"

PG&E evaluated the changes for a reduction in effectiveness, as defined in 10 CFR 50.54(q), and concluded that the changes do not reduce the effectiveness of the E-Plan. The E-Plan continues to meet the requirements in Appendix E to 10 CFR Part 50 and the planning standards of 10 CFR 50.47(b). Therefore, prior NRC approval of the associated changes was not required.

This update does not contain any privacy and proprietary information in accordance with NRC Generic Letter 81-27, "Privacy and Proprietary Material in Emergency Plans."

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If there are questions regarding this update, please contact me at (805) 545-3446.

Sincerely,

Michael A. Ginn
Emergency Planning Manager

aph8/6470/ 50876578, 50876579, 50876502,
50876575, 50876501, 50876576, 50876577

Enclosures

cc/enc: John M. Goshen, P.E., NMSS Project Manager
Kriss M. Kennedy, NRC Region IV Administrator
Christopher W. Newport, NRC Senior Resident Inspector
Balwant K. Singal, NRC Senior Project Manager
Senior Emergency Preparedness Inspector (RGN-IV/DR)

Enclosure 1
PG&E Letter DCL-16-120
PG&E Letter DIL-16-018

**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

Revision Numbers for Emergency Plan Implementing Procedures

DIABLO CANYON POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURES

<u>Proc. No.</u>	<u>Rev.</u>	<u>Title</u>
OM10.ID1	14	Maintaining Emergency Preparedness
OM10.DC1	8	Emergency Preparedness Drills and Exercises
EP G-1	44	Emergency Classification and Emergency Plan Activation
EP G-2*	50	Interim Emergency Response Organization
EP G-3*	59	Emergency Notification of Off-Site Agencies
EP G-4*	29	Assembly and Accountability
EP G-5	14	Evacuation of Non-Essential Site Personnel
EP OR-3	10	Emergency Recovery
EP RB-1	8	Personnel Dosimetry
EP RB-2	8	Emergency Exposure Guides
EP RB-3	7	Stable Iodine Thyroid Blocking
EP RB-4	5	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	8	Alternate Personnel Decontamination Facilities
EP RB-8	27	Instructions for Field Monitoring Teams
EP RB-9	15	Calculation of Release Rate
EP RB-10	19	Protective Action Recommendations
EP RB-11	14	Emergency Offsite Dose Calculations
EP RB-12	11	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	9	Core Damage Assessment Procedure
EP RB-14A	2	Initial Detection of Fuel Cladding Damage
EP RB-15	15	Post Accident Sampling System
EP RB-16	14	Operating Instructions for the EARS Computer Program
EP R-2	33	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	16A	Off-Site Transportation Accidents
EP EF-1*	52	Activation and Operation of the Technical Support Center
EP EF-2*	39	Activation and Operation of the Operational Support Center
EP EF-3*	44	Activation and Operation of the Emergency Operations Facility
EP EF-4	20	Activation of the Off-Site Emergency Laboratory
EP EF-9*	12	Backup Emergency Response Facilities
EP EF-10	17	Activation and Operation of the Joint Information Center
EP EF-11	2	Alternate Emergency Response Facilities / Incident Command Post (ICP)

***Revised Document**

**Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP G-2, Revision 50
Interim Emergency Response Organization**

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-2, Revision 50

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 1 – Note at top of page 1</p> <p>N/A – new content added</p>	<p>Attachment 1 – Note at top of page 1</p> <p>Steps in this checklist may need to be performed in an order other than listed based on sequence of events.</p>	<p>Change #1 - Sponsor edit – no change in intent with respect to the Emergency Plan (E-Plan).</p> <p>Added in note to be consistent with other implementing procedures. The note informs the user that steps may need to be performed in a different order than listed because emergencies vary. Note provides clarity to the user that they do not have to abide by strict place keeping if the sequence of events they are faced with do not line up with the way the procedure is ordered.</p>
<p>Attachment 1 – Step 1.a – 1.a-4)</p> <p>N/A – new content added</p> <p>a. Classify and declare an emergency condition within 15 minutes per EP G-1.</p> <p>1) Date/Time of Event:</p> <p>2) Emergency Action Level (EAL):</p> <p>3) Date/Time of Classification:</p> <p>4) Upgrade Criteria:</p>	<p>Attachment 1 – Step 1.a – 1.a-1).a)</p> <p>a. Emergency Classification [TIME CRITICAL]</p> <p>1) Classify and declare emergency conditions within 15 minutes per EP G-1.</p> <p>a) Document:</p> <ul style="list-style-type: none"> • Date/Time of Event: • Emergency Action Level (EAL): • Date/Time of Classification: • Upgrade Criteria: 	<p>Change #2 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for emergency classification.</p> <p>Added in the “[TIME CRITICAL]” phrase to make it clear that emergency classification requires a high level of attention.</p> <p>There is no change of intent as the requirements for emergency classification are not altered in any way. This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 1 – step 1.c – 1.c.7)</p> <p>c. Initiate ERO actions:</p> <p>NOTE: VANS should be activated immediately after an event declaration (Alert or higher).</p> <p>1) Ensure Communicator #2 activates VANS per Attachment 3.</p> <p>2) Ensure Communicator #1 completes the Emergency Notification Form (ENF) for approval per Attachment 2.^{T30899}</p> <p>3) Direct Shift Phone Talker to make offsite verbal notifications to the County and State per Attachment 11.^{T04380}</p> <p>4) Direct the Work Control Shift Foreman to initiate Attachment 4.</p> <p>5) Direct a Work Control Lead (WCL), or other licensed operator, to initiate Attachment 5.</p> <p>6) IF a General Emergency is declared, THEN determine AND approve protective action</p>	<p>Attachment 1 – step 1.b – 1.b.4)</p> <p>b. Initiate ERO Actions</p> <p>NOTE: VANS should be activated immediately after an event declaration (Alert or higher).</p> <p>1) Direct Communicator #2, or other qualified operator, to activate VANS per Attachment 3.</p> <p>2) Direct available operator to make a Public Address Announcement per Attachment 6.</p> <p>3) Direct available operator to send a SmartMSG pager message per Attachment 10.^{T36779}</p> <p>4) Update the Control Room (unless time critical actions are being performed). Record Time:</p>	<p>Change #3 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance.</p> <p>Added in the phrase “or other qualified operator” for voice activated notification system (VANS) activation to account for situations in which Communicator #2 may not activate VANS. Multiple operators are trained and qualified on the activation of VANS. This change aligns with E-Plan Section 5 and Appendix F for on-shift responsibilities.</p> <p>The actions to make the PA announcement and send out the SmartMSG were moved up in the sequence of steps as they belong next to the activation of VANS as they are also means by which the ERO are notified.</p> <p>Revision 49 step 1.c.3) was relocated to step 1.d.3) in Revision 50 based on reformatting of the attachment.</p> <p>Revision 49 steps 1.c.4) and 1.c.5) were relocated to steps 1.e.1) and 1.e.2) respectively in Revision 50 based on reformatting of the attachment.</p> <p>Revision 49 step 1.c.6) was relocated to step 1.c.1) in Revision 50 based on reformatting of the attachment.</p> <p>Revision 49 step 1.c.7) was relocated to step 1.e.3) in Revision 50 based on reformatting of the attachment.</p> <p>There is no change of intent as all of the actions are still being performed. The relocation of the steps from</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>recommendation (PAR) per EP RB-10.</p> <p>7) Initiate logging declarations and actions taken.</p>		<p>Revision 49 to Revision 50 is acceptable because the attachment is a guideline and not necessarily a step by step sequence of instructions. Many of the tasks get implemented in parallel, which is hard to reflect in the procedure. The time requirements for all of the tasks remain the same. There are no changes to the start or stop times for any task in the attachment.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 1.c.6)</p> <p>N/A – new content added</p> <p>6) IF a General Emergency is declared, THEN determine AND approve protective action recommendation (PAR) per EP RB-10.</p> <p>N/A – new content added</p>	<p>Attachment 1 – step 1.c – 1.c.1).a)</p> <p>c. Emergency Protective Actions [TIME CRITICAL]</p> <p>1) IF GENERAL EMERGENCY declared, THEN determine and approve protective action recommendation (PAR) per EP RB-10.</p> <p>a) Obtain independent recommendation if time permits.</p>	<p>Change #4 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for PARs.</p> <p>Added in the “[TIME CRITICAL]” phrase to make it clear that PARs require a high level of attention.</p> <p>Added in “Obtain independent recommendation if time permits” to be consistent with other implementing procedures for the TSC and EOF decision makers.</p> <p>There is no change of intent as the requirements for PARs are not altered in any way. The assignments of responsibilities for PARs are not altered by this change. This change continues to provide alignment with the content of the current E-Plan.</p>

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<p>Attachment 1 – steps 1.c.2) and 1.c.3)</p> <p>N/A – new content added</p> <p>N/A – new content added</p> <p>2) Ensure Communicator #1 completes the Emergency Notification Form (ENF) for approval per Attachment 2.^{T30899}</p> <p>3) Direct Shift Phone Talker to make offsite verbal notifications to the County and State per Attachment 11.^{T04380}</p>	<p>Attachment 1 – step 1.d – 1.d.1).b)</p> <p>d. Emergency Notifications [TIME CRITICAL]</p> <p>1) Complete offsite notifications within 15 minutes of event declaration per EP G-3.</p> <p>a) Direct Communicator #1, or other qualified operator, to complete the Emergency Notification Form (ENF) for approval per Attachment 2.^{T30899}</p> <p>b) Direct Shift Phone Talker, or other qualified operator, to make offsite verbal notifications to the County and State per Attachment 11.^{T04380}</p>	<p>Change #5 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for emergency notifications.</p> <p>Added in the phrase “or other qualified operator” for notifications to account for situations in which Communicator #1 may not fill out the ENF. Multiple operators are trained and qualified on filling out the ENF. This change aligns with E-Plan Section 5 and Appendix F for on-shift responsibilities.</p> <p>Added in the phrase “or other qualified operator” for notifications to account for situations in which Shift Phone Talker may not make the phone calls to the County and State. Multiple operators are trained and qualified on making the phone calls to the County and State. This change aligns with E-Plan Section 5 and Appendix F for on-shift responsibilities.</p>
<p>Attachment 1 – Multiple steps</p> <p>N/A – new content added</p> <p>1.c.4) Direct Work Control Shift Foreman (WCSFM) to initiate Attachment 4.</p> <p>1.c.5) Direct a Work Control Lead (WCL), or other licensed</p>	<p>Attachment 1 – step 1.e – 1.e.3)</p> <p>e. Additional Actions:</p> <p>1) Direct Work Control Shift Foreman (WCSFM) to initiate Attachment 4.</p> <p>2) Direct Work Control Lead (WCL), or other licensed operator, to initiate</p>	<p>Change #6 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for additional actions.</p> <p>Multiple steps were relocated. There is no change of intent as all of the actions are still being performed. The relocation of the steps from Revision 49 to Revision 50 is</p>

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<p>operator, to initiate Attachment 5.</p> <p>1.c.7) Initiate logging declarations and actions taken</p>	<p>Attachment 5.</p> <p>3) Log declarations, decisions, and actions taken.</p>	<p>acceptable because the attachment is a guideline and not necessarily a step-by-step sequence of instructions. Many of the tasks get implemented in parallel, which is hard to reflect in the procedure. The time requirements for all of the tasks remain the same. There are no changes to the start or stop times for any task in the attachment. This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 1.d – 1.d.3)</p> <p>CAUTION: Special consideration should be given to performing Assembly, Accountability and/or evacuation when the action place personnel in danger (security event, toxic gases, fires, weather conditions, etc.).</p> <p>d. Inform plant personnel of the emergency as follows:</p> <p>1) IF SAE, GE, security event, or any other event warranting Assembly and Accountability as determined by SM, THEN initiate Assembly and Accountability PER EP G-4.^{T36223}</p> <p>a) Record time of site emergency signal activation _____</p> <p>2) IF not implementing EP G-4, THEN direct an operator to</p>	<p>Attachment 1 – step 2.a – 2.a.1).b)</p> <p>CAUTION: Special consideration should be given to performing Assembly, Accountability and/or evacuation when the action place personnel in danger (security event, toxic gases, fires, weather conditions, etc.).</p> <p>a. Assembly and Accountability</p> <p>1) IF SAE, GE, security event, or any other event warranting Assembly and Accountability, THEN initiate Assembly and Accountability PER EP G-4.^{T36223/T04336}</p> <p>a) Record time of site emergency signal activation _____</p> <p>b) Direct Communicator #2, or other available operator, to complete EP</p>	<p>Change #7 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>The PA message and SmartMSG steps were relocated (see Change #3).</p> <p>Assembly and accountability actions were relocated from initial actions to subsequent actions based on reformatting of the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for assembly and accountability.</p> <p>There is no change of intent as all of the actions associated with assembly and accountability are still being performed. The relocation of the steps from the last step of the initial actions to the first step of subsequent actions is acceptable because the attachment is a guideline and not necessarily a step-by-step sequence of instructions.</p> <p>The intent of initial actions is to group tasks that need to be performed within the first 15 minutes of entering the E-Plan. Assembly and accountability is a task that has a 30-minute requirement, which is beyond the 15-minute</p>

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<p>initiate Attachment 6, "Public Address Announcement Templates."^{T36779}</p> <p>3) Direct an operator to send a pager message to the entire site through the SmartMSG system per Attachment 10.^{T36779}</p>	<p>G-4 (Form 69-13231), "Accountability Roster."</p>	<p>initial action threshold.</p> <p>The time requirements for assembly and accountability remain the same. There are no changes to the start or stop times. This change does not alter any responsibilities currently assigned for performing assembly and accountability.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 2.b</p> <p>N/A – new content added</p> <p>b. Evaluate initiation of an early work release, or site evacuation. (Refer to EP G-5.)^{T04336}</p>	<p>Attachment 1 – step 2.b – 2.b.2)</p> <p>b. Early Work Release and Site Evacuation</p> <p>1) IF at a UE or Alert, THEN evaluate early work release per EP G-5.^{T04336}</p> <p>2) IF at a SAE or GE, THEN evaluate site evacuation per EP G-5.^{T04336}</p>	<p>Change #8 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to "bin" like tasks with each other based on user feedback to improve performance. This change includes a new "bin" for early work release and site evacuation.</p> <p>Added in specific criteria for early work release for the Unusual Event (UE) and Alert levels, which is when an early work release is applicable per EP G-5. Also added in specific criteria for site evacuation for the Site Area Emergency (SAE) and General Emergency (GE) levels, which is when a site evacuation is applicable per EP G-5.</p> <p>This change does not create any new requirements or responsibilities. This change aligns EP G-2 with existing content in EP G-5.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 1 – step 2.c</p> <p>N/A – new content added</p> <p>c. Authorize exceeding normal dose limits, if required. (Refer to EP RB-2.)^{T04336}</p>	<p>Attachment 1 – step 2.c -2.c.1)</p> <p>C. Emergency Exposures</p> <p>1) Authorize exceeding normal dose limits, if required (PER EP RB 2.)^{T04336}</p>	<p>Change #9 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for emergency exposures.</p> <p>Made an editorial change: “Refer” changed to “PER” to align with other implementing procedures.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 2.d</p> <p>N/A – new content added</p> <p>d. Authorize KI administration, if required. (Refer to EP RB-3.)^{T04336}</p>	<p>Attachment 1 – step 2.d – 2.d.1)</p> <p>d. Administration of KI</p> <p>1) Authorize KI administration, if required (PER EP RB-3.)^{T04336}</p>	<p>Change #10 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for administration of potassium iodide (KI).</p> <p>Made an editorial change: “Refer” changed to “PER” to align with other implementing procedures.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 2.e</p> <p>N/A – new content added</p>	<p>Attachment 1 – step 2.e – 2.e.1)</p> <p>e. Control Room Habitability</p>	<p>Change #11 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each</p>

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<p>e. IF in Mode 3 (Recirc) ventilation, THEN evaluate need for sampling Control Room air quality for CO₂ build-up. (REFER to OP H-5:IV).</p>	<p>1) IF in Mode 3 (Recirc) ventilation, THEN evaluate need for sampling Control Room air quality for CO₂ build-up. (REFER to OP H-5:IV).</p>	<p>other based on user feedback to improve performance. This change includes a new "bin" for control room habitability.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 2.f</p> <p>N/A – new content added</p> <p>f. Authorize overtime and other expenses associated with establishing and maintaining an appropriate site emergency organization.</p>	<p>Attachment 1 – step 2.f – 2.f.1)</p> <p>f. Other Duties</p> <p>1) Authorize overtime and other expenses associated with establishing and maintaining an appropriate site emergency organization.</p>	<p>Change #12 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to "bin" like tasks with each other based on user feedback to improve performance. This change includes a new "bin" for other duties. This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 2.h</p> <p>N/A – new content added</p> <p>h. For termination of an UNUSUAL EVENT, initiate Attachment 7 (Form 69-21273), "Guidelines for Terminating an Unusual Event."</p>	<p>Attachment 1 – step 2.g – 2.g.1)</p> <p>g. Emergency Termination</p> <p>1) For termination of an UNUSUAL EVENT, initiate Attachment 7 (Form 69-21273), "Guidelines for Terminating an Unusual Event."</p>	<p>Change #13 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to "bin" like tasks with each other based on user feedback to improve performance. This change includes a new "bin" for emergency termination.</p> <p>Step was also relocated from 2.h to 2.g to improve flow. This is a subsequent action that has no time requirement; therefore, there is no impact on relocating it. This change continues to provide alignment with the content of the current E-Plan.</p>

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<p>Attachment 1 – step 2.g – 2.g.2)</p> <p>N/A – new content added</p> <p>g. When ready to turn over Command and Control of the emergency, then perform all of the following:</p> <p>1) Use EP EF-1 (Form 69-20437), “Command and Control Turnover Checklist,” to turnover responsibilities.</p> <p>N/A – new content added</p> <p>2) Ensure that copies of ENFs created in the Control Room have been provided to the TSC and EOF.</p>	<p>Attachment 1 – step 2.h – 2.h.1).c)</p> <p>h. Command and Control Turnover</p> <p>1) WHEN the SEC or ED is ready to take command and control, THEN:</p> <p>a) Use EP EF-1 (Form 69-20437), “Command and Control Turnover Checklist” to turnover responsibilities</p> <p>b) Update the CR that you have turned over command and control and include which duties the CR is responsible for.</p> <p>c) Ensure that copies of ENFs created in the Control Room have been provided to the TSC and EOF.</p>	<p>Change #14 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for command and control turnover.</p> <p>Step was also relocated from 2.g to 2.h to improve flow. This is a subsequent action that has no time requirement; therefore, there is no impact on relocating it.</p> <p>Added in a new step for the Shift Manager (SM) to update the crew on the transfer of command and control to enhance the guidance for improved recognition of what E-Plan tasks the control room is responsible for after turnover.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 3.a – 3.a.1) & 3.b – 3.b.1)</p> <p>N/A – new content added</p> <p>a. Continue reviewing EP G-1 EAL criteria.</p> <p>1) Report any potential changes in event classification to the Site</p>	<p>Attachment 1 – step 3.a – 3.a.2).a)</p> <p>a. Plant Monitoring and Assessment</p> <p>1) Continue reviewing EP G-1 EAL criteria.</p> <p>a) Report changes in any of the following to the Site Emergency</p>	<p>Change #15 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for plant monitoring and assessment.</p> <p>Steps 3.a and 3.b from Revision 49 were combined into step 3.a in Revision 50. Both of these tasks are ongoing</p>

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<p>Emergency Coordinator or Emergency Director (2002 Bridgeline is preferred).</p> <p>b. Monitor radiological effluent conditions.</p> <p>1) Report significant changes to the Radiological Advisor in the TSC (2002 Bridgeline is preferred).</p>	<p>Coordinator or Emergency Director (2002 Bridgeline is preferred):</p> <ul style="list-style-type: none"> Escalations in event classification Concurrent EAL thresholds that are met <p>2) Continue monitoring radiological effluent conditions.</p> <p>a) Report significant changes in radiological effluent conditions to the Radiological Advisor in the TSC (2002 Bridgeline is preferred).</p>	<p>actions that have no time requirements; therefore, there is no impact on combining them.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – steps 3.c and 3.d</p> <p>N/A – new content added</p> <p>c. Assist the TSC in determining station priorities for repair and mitigation actions onsite (2002 Bridgeline is preferred).</p> <p>d. Brief the TSC Operations Advisor of significant changes in plant/system/ equipment status and actions being taken in the Control Room.</p>	<p>Attachment 1 – step 3.b – 3.b.2)</p> <p>b. Plant Priorities</p> <p>1) Assist the TSC in determining station priorities for repair and mitigation actions onsite (2002 Bridgeline is preferred).</p> <p>2) Brief the TSC Operations Advisor of significant changes in plant/system/equipment status and actions being taken in the Control Room.</p>	<p>Change #16 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted the attachment to “bin” like tasks with each other based on user feedback to improve performance. This change includes a new “bin” for plant priorities.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 1 – step 3.e</p> <p>N/A – new content added</p>	<p>Attachment 1 – step 3.c – 3.c.1)</p> <p>c. Periodic Briefs</p>	<p>Change #17 - Sponsor edit – no change in intent with respect to the E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
e. Perform periodic intra-facility teleconference / video conference tailboards. Refer to EP EF-3 (Form 69-20788), "Emergency Response Facility Tailboard Checklist."	1) Perform periodic intra-facility teleconference / video conference tailboards. Refer to EP EF-3 (Form 69-20788), "Emergency Response Facility Tailboard Checklist."	Reformatted the attachment to "bin" like tasks with each other based on user feedback to improve performance. This change includes a new "bin" for periodic briefs. This change continues to provide alignment with the content of the current E-Plan.
Attachment 2 – note at top of page 1 N/A – new content added	Attachment 2 – note at top of page 1 Steps in this checklist may need to be performed in an order other than listed based on sequence of events.	Change #18 - Sponsor edit – no change in intent with respect to the E-Plan. Added in note to be consistent with other implementing procedures. The note informs the user that steps may need to be performed in a different order than listed because emergencies vary. The note provides clarity to the user that they do not have to abide by strict place keeping if the sequence of events they are faced with do not line up with the way the procedure is ordered.
Attachment 2 – step 2.a.5) Ensure that the Shift Phone Talker completes verbal notifications to the County and State within approximately 45 minutes of the previous verbal notification.	Attachment 2 – step 2.a.5) Ensure that the Shift Phone Talker completes verbal notifications to the County and State within approximately 45 minutes or less of the previous verbal notification.	Change #19 - Sponsor edit – no change of intent with respect to the E-Plan. Added in the words "or less" to align with the notification procedure EP G-3. There is no change of intent as the requirement is not altered as follow-up notifications are still required to be completed approximately every 45 minutes. This change continues to provide alignment with the content of the current E-Plan.

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 3 – note at top of page 1</p> <p>N/A – new content added</p>	<p>Attachment 3 – note at top of page 1</p> <p>Steps in this checklist may need to be performed in an order other than listed based on sequence of events.</p>	<p>Change #20 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Added in note to be consistent with other implementing procedures. The note informs the user that steps may need to be performed in a different order than listed because emergencies vary. Note provides clarity to the user that they do not have to abide by strict place keeping if the sequence of events they are faced with do not line up with the way the procedure is ordered.</p>
<p>Attachment 3 – step 1.b.2)</p> <p>IF the initial event classification is an ALERT or higher, THEN activate VANS immediately after time of classification.</p>	<p>Attachment 3 – step 1.b.2)</p> <p>Activate VANS immediately after time of classification for ALERT or higher.</p>	<p>Change #21 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – step 1.b.3)</p> <p>IF the event classification is an UNUSUAL EVENT, THEN activate VANS as soon as possible.</p>	<p>Attachment 3 – step 1.b.3)</p> <p>Activate VANS as soon as possible after time of classification for UNUSUAL EVENT.</p>	<p>Change #22 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 3 – step 1.b.6).b)</p> <p>6) Determine appropriate VANS scenario ID:</p> <p>b) Non-Security Event Scenarios</p> <p>(1) 0112: Non-Security UNUSUAL EVENT with no further action required</p> <p>(2) 2012: Non-Security UNUSUAL EVENT with ERO reporting to their emergency response facilities</p> <p>(3) 0113: Non-Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY</p>	<p>Attachment 3 – step 1.b.4) - 1.b.4).a)</p> <p>4) Determine appropriate VANS scenario ID:</p> <p>a) NON-SECURITY Event Scenarios</p> <ul style="list-style-type: none"> • 0112: Non-Security UNUSUAL EVENT with no further action required • 2012: Non-Security UNUSUAL EVENT with ERO reporting to emergency response facilities • 0113: Non-Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY 	<p>Change #23 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS. This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – step 1.b.6).a)</p> <p>a) Security Event Scenarios</p> <p>(1) 1010: Security UNUSUAL EVENT</p> <p>(2) 0114: Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY</p> <p>(3) 1012: ERO Notification Homeland Security Elevated Threat Alert</p>	<p>Attachment 3 – step 1.b.4).b)</p> <p>b) SECURITY Event Scenarios</p> <ul style="list-style-type: none"> • 1010: Security UNUSUAL EVENT • 0114: Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY <p>Content relocated (see change # 25)</p>	<p>Change #24 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>The “ERO Notification Homeland Security Elevated Threat Alert” was moved from the security events heading to the non-emergency events heading where it belongs. An elevated homeland security threat is not a declared emergency by itself and as such the scenario ID belongs under the non-emergency heading.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		This change continues to provide alignment with the content of the current E-Plan.
<p>Attachment 3 – step 1.b.6).d)</p> <p>d) Non-Emergency Scenarios</p> <p>(1) 0111: 1 Hr. / 4 Hr. / 8 Hr. Non-Emergency Notification</p> <p>(2) 0555: 12Kv Power Outage Call out</p> <p>(3) 0777: OCC Call out</p> <p>(4) 0999: DCPD Fire Fighters Call out</p> <p>(5) 0116: Congregate Care Callout</p> <p>Content relocated (see change #24)</p> <p>(6) 1007: Training Scenario</p>	<p>Attachment 3 – step 1.b.4).d)</p> <p>d) Non-Emergency Scenarios</p> <ul style="list-style-type: none"> • 0111: 1-Hr. / 4 Hr. / 8 Hr. Non-Emergency Notification • 0555: 12Kv Power Outage Call out • 0777: OCC Call out • 0999: DCPD Fire Fighters Call out • 0116: Congregate Care Callout • 1012: ERO Notification Homeland Security Elevated Threat Alert • 1007: Training Scenario 	<p>Change #25 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – step 1.b.4) – 1.b.5)</p> <p>4) Determine appropriate “On the fly Template” to use:</p> <p>a) IF a non-security event, THEN use applicable non-security event template.</p> <p>b) IF a security event, THEN use the security event template.</p>	<p>Attachment 3 – step 1.b.5) – 1.b.5).a)</p> <p>5) Determine which “On the fly Template” to use:</p> <ul style="list-style-type: none"> • TEMPLATE 1: Non-Security UNUSUAL EVENT • TEMPLATE 2: Non-Security ALERT or HIGHER. • TEMPLATE 3: ALL Security Events. 	<p>Change #26 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>The different on-the-fly templates were designated as 1-4 to help differentiate them based upon user feedback.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>c) IF event has been terminated, THEN use the event termination template.</p> <p>5) Obtain enough information from the SM or Communicator #1 to fill out applicable "On the fly Message" template.</p>	<ul style="list-style-type: none"> • TEMPLATE 4: Emergency event termination. <p>a) Obtain information from the SM or Communicator #1 to fill out template.</p>	<p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – Non-Security UNUSUAL EVENT template</p> <p>N/A – new content added</p>	<p>Attachment 3 – Non-Security UNUSUAL EVENT template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Reformatted template • Added "TEMPLATE 1" 	<p>Change #27 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of activating VANS.</p> <p>The different on-the-fly templates were designated as 1-4 to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – Non-Security ALERT or HIGHER template</p> <p>N/A – new content added</p>	<p>Attachment 3 – Non-Security ALERT or HIGHER template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Reformatted template • Added "TEMPLATE 2" 	<p>Change #28 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of activating VANS.</p> <p>The different on-the-fly templates were designated as 1-4 to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 3 – Security Event template</p> <p>N/A – new content added</p>	<p>Attachment 3 – Security Event template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Reformatted template • Added "TEMPLATE 3" 	<p>Change #29 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of activating VANS.</p> <p>The different on-the-fly templates were designated as 1-4 to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – Emergency Event Termination template</p> <p>N/A – new content added</p>	<p>Attachment 3 – Emergency Event Termination template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Reformatted template • Added "TEMPLATE 4" 	<p>Change #30 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of activating VANS.</p> <p>The different on-the-fly templates were designated as 1-4 to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – step 1.c.1).b)</p> <p>b) Correct scenario ID determined from step 1.b.6) above:</p>	<p>Attachment 3 – step 1.c.1. a)</p> <p>a) Correct scenario ID determined from step 1.b.4) above</p>	<p>Change #31 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		This change continues to provide alignment with the content of the current E-Plan.
Attachment 3 – step 1.c.1).a) a) Correct on-the-fly template filled out from step 1.b.5) above.	Attachment 3 – step 1.c.1. b) b) Correct on-the-fly template filled out from step 1.b.5) above	Change #32 - Sponsor edit – no change in intent with respect to the E-Plan. Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS. This change continues to provide alignment with the content of the current E-Plan.
Attachment 3 – step 1.c.6) – 1.c.6).d) 6) Listen to the prompts. a) Press “2”, to record on-the-fly message. b) Wait for prompt. c) Record message using applicable template d) Then press “#.”	Attachment 3 – step 1.c.6) – 1.c.6).c) 6) Listen to the prompts. a) Press “2”, to record on the fly message. b) When prompted, record message using template. c) Then press “#.”	Change #33 - Sponsor edit – no change in intent with respect to the E-Plan. Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS. This change continues to provide alignment with the content of the current E-Plan.
Attachment 3 – new step N/A – new content added	Attachment 3 – step 1.c.7) – 1.c.7).b).(1)	Change #34 - Sponsor edit – no change in intent with respect to the E-Plan.

Original Content	Content Change	Change Number Type of Change Reason for Change
	<p>7) The system should replay the recorded on-the-fly message and ask if it is correct:</p> <p>a) If correct, press "1" for yes.</p> <p>b) If incorrect, press "2" for no.</p> <p>(1) The system will direct you to re-record the message.</p>	<p>Added in new step to fix an issue identified by the end user. This prompt exists in the VANS activation process but it was missing from the procedure. This change makes the procedure accurate for the task of activating VANS.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 3 – step 1.d</p> <p>IF Assembly and Accountability is initiated, THEN fax the on-shift accountability roster to the DCPW Watch Commander at (x3115) within 15 minutes from the time the site emergency signal was sounded, per EP G-4.</p>	<p>Attachment 3 – step 2.a</p> <p>IF Assembly and Accountability is initiated, THEN fax the on-shift accountability roster to the DCPW Watch Commander at (x3115) within 15 minutes from the time the site emergency signal was sounded, per EP G-4.</p>	<p>Change #35 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Assembly and accountability actions were relocated from the last step of initial actions to the first step of subsequent actions based on reformatting of the attachment</p> <p>There is no change of intent as all of the actions associated with assembly and accountability are still being performed. The relocation of the steps from initial actions to subsequent actions is acceptable because the intent of initial actions is to group together tasks that need to be performed within the first 15 minutes of entering the E-Plan. Assembly and accountability is a task that has a 30-minute requirement, which is beyond the 15-minute initial action threshold.</p> <p>The time requirements for assembly and accountability remain the same. There are no changes to the start or stop times. This change does not alter any responsibilities currently assigned for performing</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		assembly and accountability. This change continues to provide alignment with the content of the current E-Plan.
Attachment 4 – note at top of page 1 N/A – new content added	Attachment 4 – note at top of page 1 Steps in this checklist may need to be performed in an order other than listed based on sequence of events.	Change #36 - Sponsor edit – no change in intent with respect to the E-Plan. Added in note to be consistent with other implementing procedures. The note informs the user that steps may need to be performed in a different order than listed because emergencies vary. Note provides clarity to the user that they do not have to abide by strict place keeping if the sequence of events they are faced with do not line up with the way the procedure is ordered.
Attachment 6 – step 1.a a. For Security events, GO TO Section 2.	Attachment 6 – step 1.a a. IF security event, THEN GO TO step 2.	Change #37 - Sponsor edit – no change in intent with respect to the E-Plan. Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. This change continues to provide alignment with the content of the current E-Plan.
Attachment 6 – steps 1.b – 1.d.2).c). b. Based upon plant conditions, use one of the following templates to develop a PA message. ^{T36779} c. For an UNUSUAL EVENT or	Attachment 6 – step 1.b – 1.b.3).a).(2) b. Based upon plant conditions, use one of the following templates to develop and make a PA message. ^{T36779} 1) UNUSUAL EVENT use	Change #38 - Sponsor edit – no change in intent with respect to the E-Plan. Reformatted steps to clean them up and make them simpler and more direct to enhance user performance. The intent of the steps remains unchanged. The same actions are taken at the same emergency classification levels.

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>ALERT:</p> <p>1) Make a PA announcement using the appropriate template.</p> <p>2) Repeat the PA announcement.</p> <p>CAUTION: Assembly, Accountability and/or evacuation when in a security event or other hazardous condition (i.e., toxic gases, fires or weather conditions) may place personnel in danger.</p> <p>d. When a SITE AREA EMERGENCY or GENERAL EMERGENCY is declared, determine if it is safe to move personnel.^{T36779}</p> <p>1) IF it is NOT safe to move personnel: a) Make a PA announcement using the "NOT SAFE TO MOVE PERSONNEL" template.</p> <p>b) Repeat the PA announcement.</p> <p>2) IF it is safe to move personnel: a) Make a PA announcement using the "SAFE TO MOVE</p>	<p>TEMPLATE A.</p> <p>2) ALERT use TEMPLATE B.</p> <p>CAUTION: Assembly, Accountability and/or evacuation when in a security event or other hazardous condition (i.e., toxic gases, fires or weather conditions) may place personnel in danger.</p> <p>3) SITE AREA EMERGENCY or GENERAL EMERGENCY:</p> <p>a) Determine if it is safe to move personnel.^{T36779}</p> <p>(1) IF NOT safe to move personnel, THEN make a PA announcement using TEMPLATE C.</p> <p>(2) IF safe to move personnel, THEN make a PA announcement using TEMPLATE D, AND sound the site emergency signal for 60 seconds.</p>	<p>The non-security PA templates were designated as A-D to help differentiate them based upon user feedback.</p> <p>Relocated "repeat the announcement" from the body of the instruction into the body of the templates to improve usability.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>PERSONNEL" template.</p> <p>b) Sound the site emergency signal for 60 seconds.</p> <p>c) Repeat the PA announcement.</p>		
<p>Attachment 6 – UNUSUAL EVENT template</p> <p>N/A – new content added</p>	<p>Attachment 6 – UNUSUAL EVENT template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Added "TEMPLATE A" • Added "repeat the announcement" • Reformatted template 	<p>Change #39 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a public announcement (PA).</p> <p>Relocated "repeat the announcement" from the body of the instruction into the body of the template to improve usability.</p> <p>The PA templates were designated as A-D to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – ALERT template</p> <p>N/A – new content added</p>	<p>Attachment 6 – ALERT template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Added "TEMPLATE B" • Added "repeat the announcement" • Reformatted template 	<p>Change #40 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a PA.</p> <p>Relocated "repeat the announcement" from the body of the instruction into the body of the template to improve usability.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		<p>The PA templates were designated as A-D to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – SITE AREA EMERGENCY or GENERAL EMERGENCY & Not Safe to Move Personnel template</p> <p>N/A – new content added</p>	<p>Attachment 6 – SITE AREA EMERGENCY or GENERAL EMERGENCY & Not Safe to Move Personnel template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Added “TEMPLATE C” • Added “repeat the announcement” • Reformatted template 	<p>Change #41 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a PA.</p> <p>Relocated “repeat the announcement” from the body of the instruction into the body of the template to improve usability.</p> <p>The PA templates were designated as A-D to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – SITE AREA EMERGENCY or GENERAL EMERGENCY & Safe to Move Personnel template</p> <p>N/A – new content added</p>	<p>Attachment 6 – SITE AREA EMERGENCY or GENERAL EMERGENCY & Safe to Move Personnel template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Added “TEMPLATE D” • Added “repeat the announcement” • Reformatted template 	<p>Change #42 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a PA.</p> <p>Relocated “repeat the announcement” from the body of the instruction into the body of the template to improve usability.</p> <p>The PA templates were designated as A-D to help</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		<p>differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – step 2.a</p> <p>a. For Aircraft based threats, use PA message scripts located in CP M-15A.^{T36779}</p>	<p>Attachment 6 – step 2.a</p> <p>a. IF aircraft based threat, THEN GO TO CP M-15A for PA message scripts.^{T36779}</p>	<p>Change #43 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – step 2.b – 2.d.2).d)</p> <p>b. For a non-Aircraft based threat, determine if it is safe to move personnel.^{T36779}</p> <p>c. IF NOT safe to move personnel: 1) Develop and make a PA announcement using template A “SECURITY NOT SAFE TO MOVE PERSONNEL”. 2) Repeat the PA announcement.</p> <p>d. IF safe to move personnel: 1) For an UNUSUAL EVENT:</p>	<p>Attachment 6 – step 2.b – 2.b.2).b).(3)</p> <p>b. Determine if it is safe to move personnel.^{T36779}</p> <p>1) IF NOT safe to move personnel, THEN make PA announcement using TEMPLATE E.</p> <p>2) IF safe to move personnel:</p> <p>a) UNUSUAL EVENT make PA announcement using TEMPLATE F.</p>	<p>Change #44 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted steps to clean them up and make them simpler and more direct to enhance user performance.</p> <p>The intent of the steps remains unchanged. The same actions are taken at the same emergency classification levels.</p> <p>The security event PA templates were designated as E-G to help differentiate them based upon user feedback.</p> <p>Relocated “repeat the announcement” from the body of the instruction into the body of the templates to improve usability.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>a) Develop and make a PA announcement using template B "SECURITY UNUSUAL EVENT SAFE TO MOVE PERSONNEL".</p> <p>b) Repeat the PA announcement.</p> <p>2) For an ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY:</p> <p>a) Develop and make a PA announcement using template C "SECURITY ALERT OR HIGHER SAFE TO MOVE PERSONNEL".</p> <p>b) Sound the Site Emergency Signal for 60 seconds.</p> <p>c) Repeat the PA announcement.</p> <p>d) Go to CP M-15A Attachment 20 for subsequent actions.</p>	<p>b) ALERT, SITE AREA EMERGENCY or GENERAL EMERGENCY:</p> <p>(1) Make PA announcement using TEMPLATE G.</p> <p>(2) Sound the Site Emergency Signal for 60 seconds.</p> <p>(3) GO TO CP M-15A Attachment 20 for subsequent actions.</p>	
<p>Attachment 6 – Security Event & Not Safe to Move Personnel template</p> <p>N/A – new content added</p>	<p>Attachment 6 – Security Event & Not Safe to Move Personnel template</p> <p>Changes made:</p> <ul style="list-style-type: none"> • Changed "TEMPLATE A" to "TEMPLATE E" • Added "repeat the 	<p>Change #45 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a PA.</p> <p>Relocated "repeat the announcement" from the body of the instruction into the body of the template to improve</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
	<p>announcement”</p> <ul style="list-style-type: none"> Reformatted template 	<p>usability.</p> <p>The security event PA templates were designated as E-G to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – Security UNUSUAL EVENT & Safe to Move Personnel template</p> <p>N/A – new content added</p>	<p>Attachment 6 – Security UNUSUAL EVENT & Safe to Move Personnel template</p> <p>Changes made:</p> <ul style="list-style-type: none"> Added Changed “TEMPLATE B” to “TEMPLATE F” Added “repeat the announcement” Reformatted template 	<p>Change #46 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a PA.</p> <p>Relocated “repeat the announcement” from the body of the instruction into the body of the template to improve usability.</p> <p>The security event PA templates were designated as E-G to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – Security ALERT or HIGHER & Safe to Move Personnel template</p> <p>N/A – new content added</p>	<p>Attachment 6 – Security ALERT or HIGHER & Safe to Move Personnel template</p> <p>Changes made:</p> <ul style="list-style-type: none"> Changed “TEMPLATE C” to “TEMPLATE G” Added “repeat the announcement” 	<p>Change #47 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted template to make the flow better with the performance of the task of making a PA.</p> <p>Relocated “repeat the announcement” from the body of the instruction into the body of the template to improve usability.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
	<ul style="list-style-type: none"> Reformatted template 	<p>The security event PA templates were designated as E-G to help differentiate them based upon user feedback.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – new step</p> <p>N/A – new content added</p>	<p>Attachment 6 – step 3</p> <p>PUBLIC ADDRESS SYSTEM UNAVAILABILITY</p>	<p>Change #48 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged.</p> <p>This step did not belong in section 2 which is for security events. This step is generic guidance that is applicable to all situations and as such needed its own section.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 6 – step 2.e</p> <p>e. IF the public address system is unavailable, THEN call the DCPD Security Watch Commander (x3330) and request the following:</p>	<p>Attachment 6 – step 3.a</p> <p>a. IF the public address system is unavailable, THEN use SmartMSG to communicate with plant staff, AND call the DCPD Security Watch Commander (x3330) and request the following:</p>	<p>Change #49 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Added in the use of SmartMSG as another means of communicating with plant staff in the event that the PA system is unavailable. SmartMSG is an existing communications tool that is available in the Control Room. It uses the pager system to send a message to all personnel onsite with pagers.</p> <p>Operators are trained on the use of this system.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		This change continues to provide alignment with the content of the current E-Plan.
<p>Attachment 6 – step 2.f -2.f.1)</p> <p>f. IF the public address system AND security are unavailable, THEN email the above PA message to “DCPP *NPG Nuclear Power Generation Business Unit” and,</p> <p>1) Add the PA message to bridge line ext. 2800:</p>	<p>Attachment 6 – step 3.b – 3.b.3)</p> <p>b. IF the public address system AND security are unavailable, THEN:</p> <p>1) Use SmartMSG to communicate with plant staff.</p> <p>2) Email the content of the applicable PA message to “DCPP *NPG Nuclear Power Generation Business Unit”.</p> <p>3) Add the content of the applicable PA message to bridge line ext. 2800:</p>	<p>Change #50 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged.</p> <p>Added in the use of SmartMSG as another means of communicating with plant staff in the event that the PA system is unavailable. SmartMSG is an existing communications tool that is available in the Control Room. It uses the pager system to send a message to all personnel onsite with pagers.</p> <p>Operators are trained on the use of this system.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 7 – step 2.e</p> <p>e. Notify Senior Plant Management and PG&E External Communications that the event has been terminated by activating VANS per Attachment 8 using SCENARIO ID 0200.</p>	<p>Attachment 7 – step 2.e</p> <p>e. Notify Senior Plant Management and PG&E External Communications that the event has been terminated by activating VANS using SCENARIO ID 0200.</p>	<p>Change #51 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Removed the reference to attachment 8 because it is unnecessary. The personnel that would be tasked with the action to activate VANS are familiar with where the procedure guidance is that provides direction. The intent of the step remains unchanged.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 8 – step 1.b.2) – 1.b.2).c)</p> <p>b. Determine appropriate VANS scenario ID:</p> <p>2) NON-SECURITY Event Scenarios</p> <p>a) 0112: Non-Security UNUSUAL EVENT with no further action required</p> <p>b) 2012: Non-Security UNUSUAL EVENT with ERO reporting to their normal emergency response facilities</p> <p>c) 0113: Non-Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY</p>	<p>Attachment 8 – step 1.b – 1.b.1)</p> <p>b. Determine appropriate VANS scenario ID:</p> <p>1) NON-SECURITY Event Scenarios</p> <ul style="list-style-type: none"> • 0112: Non-Security UNUSUAL EVENT with no further action required • 2012: Non-Security UNUSUAL EVENT with ERO reporting to their normal emergency response facilities • 0113: Non-Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY 	<p>Change #52 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 8 – step 1.b.1) – 1.b.1).c)</p> <p>1) Security Event Scenarios</p> <p>a) 1010: Security UNUSUAL EVENT</p> <p>b) 0114: Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY</p> <p>c) 1012: ERO Notification Homeland Security Elevated Threat Alert</p>	<p>Attachment 8 – step 1.b.2)</p> <p>2) SECURITY Event Scenarios</p> <ul style="list-style-type: none"> • 1010: Security UNUSUAL EVENT • 0114: Security ALERT, SITE AREA EMERGENCY, or GENERAL EMERGENCY <p>Content relocated (see change # 54)</p>	<p>Change #53 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>The “ERO Notification Homeland Security Elevated Threat Alert” was moved from the security events heading to the non-emergency events heading where it belongs. An elevated homeland security threat is not a declared emergency by itself and as such the scenario ID belongs</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		<p>under the non-emergency heading.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 8 – step 1.b.4) – 1.b.4).f)</p> <p>4) Non-Emergency Scenarios</p> <p>a) 0111: 1 Hr. / 4 Hr. / 8 Hr. Non-Emergency Notification</p> <p>b) 0555: 12Kv Power Outage Call out</p> <p>c) 0777: OCC Call out</p> <p>d) 0999: DCPD Fire Fighters Call out</p> <p>e) 0116: Congregate Care Callout</p> <p>f) 1007: Training Scenario</p>	<p>Attachment 8 – step 1.b.4)</p> <p>4) Non-Emergency Scenarios</p> <ul style="list-style-type: none"> • 0111: 1 Hr. / 4 Hr. / 8 Hr. Non-Emergency Notification • 0555: 12Kv Power Outage Call out • 0777: OCC Call out • 0999: DCPD Fire Fighters Call out • 0116: Congregate Care Callout • 1012: ERO Notification Homeland Security Elevated Threat Alert • 1007: Training Scenario 	<p>Change #54 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 8 – step 1.h – 1.h.4)</p> <p>h. Listen to the prompts.</p> <p>1) Press “2”, to record on-the-fly message.</p> <p>2) Wait for prompt.</p> <p>3) Record message using applicable template</p>	<p>Attachment 8 – step 1.h – 1.h.3)</p> <p>h. Listen to the prompts.</p> <p>1) Press “2”, to record on the fly message.</p> <p>2) When prompted, record message using applicable template.</p> <p>3) Then press “#.”</p>	<p>Change #55 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Reformatted step to clean it up and make it simpler and more direct to enhance user performance. The intent of the step remains unchanged. The step was relocated to make the flow of the procedure line up better with the performance of the task of activating VANS.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
4) Then press “#.”		
Attachment 8 – new step N/A – new content added	Attachment 8 – step 1.i – 1.i.2).a) i. The system should replay the recorded on-the-fly message and ask if it is correct: 1) If correct, press “1” for yes. 2) If incorrect, press “2” for no. a) The system will direct you to re-record the message.	Change #56 - Sponsor edit – no change in intent with respect to the E-Plan. Added in new step to fix an issue identified by the end user. This prompt exists in the VANS activation process but it was missing from the procedure. This change makes the procedure accurate for the task of activating VANS. This change continues to provide alignment with the content of the current E-Plan.
Attachment 11 – note at top of page 1 N/A – new content added	Attachment 11 – note at top of page 1 Steps in this checklist may need to be performed in an order other than listed based on sequence of events.	Change #57 - Sponsor edit – no change in intent with respect to the E-Plan. Added in note to be consistent with other implementing procedures. The note informs the user that steps may need to be performed in a different order than listed because emergencies vary. Note provides clarity to the user that they do not have to abide by strict place keeping if the sequence of events they are faced with do not line up with the way the procedure is ordered.
Attachment 11 – step 2 note Follow-up notifications per EP G-3 (Form 69-21638), “DCPP Follow-Up Emergency Notification Form”, should be performed	Attachment 11 – step 2 note Follow up notifications per EP G-3 (Form 69-21638), “DCPP Follow Up Emergency Notification Form”, should be performed approximately	Change #58 - Sponsor edit – no change of intent with respect to the E-Plan. Added in the words “or less” to align with the notification procedure EP G-3.

Original Content	Content Change	Change Number Type of Change Reason for Change
approximately every 45 minutes. (Refer to EP G-3.)	every 45 minutes or less. (Refer to EP G-3.)	There is no change of intent as the requirement is not altered as follow-up notifications are still required to be completed approximately every 45 minutes. This change continues to provide alignment with the content of the current E-Plan.

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP G-3, Revision 59
Emergency Notification of Off-Site Agencies

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-3, Revision 59

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Step 2.1.1.a 1st bullet</p> <ul style="list-style-type: none"> A new emergency classification level 	<p>Step 2.1.1.a 1st bullet</p> <ul style="list-style-type: none"> A new emergency classification level (ECL) 	<p>Change #1 - Sponsor edit – no change in intent with respect to the Emergency Plan (E-Plan).</p> <p>Added in acronym for emergency classification level for consistency and alignment with writer's guide.</p>
<p>Step 2.1.1.a.1.b)</p> <p>On-Going Event: This is used when the DCPD Station is already in a declared emergency. This gives notice of an upgrade to an emergency classification level on either Unit, or a new PAR. The message number of an On-Going Event is the next sequential number.</p>	<p>Step 2.1.1.a.1.b)</p> <p>On-Going Event: This is used when the DCPD Station is already in a declared emergency. This gives notice of an upgrade to a higher emergency classification level or a new PAR. The message number of an On-Going Event is the next sequential number.</p>	<p>Change #2 - Sponsor edit – no change in intent with respect to the E-Plan.</p> <p>Cleaned up the language around upgrading to a higher classification level to remove the term “on either unit” based on user feedback that it is potentially misleading. For example if U1 was in an alert and then U2 met the conditions for an alert the Revision 58 language infers that upgrade would be required which is incorrect. Revision 59 fixes the language to be consistent with the DCPD classification process, which only escalates to higher levels based on changes in classification level at the site; not on each individual unit.</p> <p>This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Step 2.1.1.b 1st paragraph</p> <p>Follow-Up Notifications: Required to be performed approximately every 45 minutes during an ongoing</p>	<p>Step 2.1.1.b 1st paragraph</p> <p>Follow-Up Notifications: Required to be performed approximately every 45 minutes or less of the previous verbal notification during an ongoing</p>	<p>Change #3 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Added in the words “or less of the previous verbal notification” to clarify the time requirements for follow-up notifications. Feedback from the users of the</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
event using Attachment 4 (Form 69-21638), "DCPP Follow-Up Emergency Notification Form."	event using Attachment 4 (Form 69-21638), "DCPP Follow-Up Emergency Notification Form."	<p>procedure was that it wasn't specifically clear on when the clock starts for the next follow-up. This change provides enhanced language to clarify the requirements.</p> <p>There is no change of intent as the requirement is not altered as follow-up notifications are still required to be completed approximately every 45 minutes. This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Step 2.1.1.b 2nd paragraph</p> <p>The appropriate notification is a Follow-Up ENF due to a significant change in plant conditions (message number 4). This is an example of meeting a secondary ECL.</p>	<p>Step 2.1.1.b 2nd paragraph</p> <p>The appropriate notification is a Follow-Up ENF due to a significant change in plant conditions (message number 4). This is an example of meeting a concurrent EAL.</p>	<p>Change #4 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Changed the phrase "secondary ECL" to "concurrent EAL". Feedback from the users of the procedure was that it wasn't specifically clear on what a secondary ECL was. The term concurrent EAL was decided upon as it provides a better description of the condition in which another EAL at the same classification level is met compared to the previous language.</p> <p>This change is an enhancement to improve use by the ERO. This change has no impact on the E-Plan as the terms "secondary ECL" and "concurrent EAL" do not appear anywhere in the E-Plan.</p>
<p>Step 2.1.2</p> <p>The official notification to the NRC is made when the NRC is</p>	<p>Step 2.1.2</p> <p>The official notification to the NRC is made when the NRC is called. The</p>	<p>Change #5 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Editorial change to correct language that is not</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
called. The ENF Form is not used by the NRC.	DCPP ENF is not used by the NRC.	<p>technically correct. The Revision 58 language "ENF form" was repetitive in the ENF stands for emergency notification form, so the rev 58 language read as emergency notification form.</p> <p>The Revision 59 change corrects the grammatical error.</p>
<p>Step 2.1.4</p> <p>San Luis Obispo County (SLO) and the State of California are to be notified within 15 minutes of:</p> <ul style="list-style-type: none"> • An initial classification of an emergency • A new PAR • Changes to emergency classification levels • Changes to PARs • Corrections for an inaccurate PAR 	<p>Step 2.1.4</p> <p>San Luis Obispo County (SLO) and the State of California are to be notified within 15 minutes of:</p> <ul style="list-style-type: none"> • An initial classification of an emergency • A new PAR • Changes to emergency classification levels • Changes to PARs 	<p>Change #6 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>The last bullet "Corrections for an inaccurate PAR" was removed from this section as it was erroneously added in the previous Revision 57. The intent of the Revision 57 addition was to provide some type of guidance for the ERO on how to handle an inaccurate PAR as nothing existed prior to Revision 57.</p> <p>There is no E-Plan requirement to correct inaccurate PARs within 15 minutes. Feedback from the ERO identified that this 5th bullet was confusing as they were unsure if they were forced into a 15-minute clock for something that had no defined requirement in the E-Plan.</p> <p>A concurrent change was made to Section 6.3 under Revision 59 as well to clarify the process for correcting inaccurate PARs.</p> <p>This change is an enhancement to improve use by the ERO. This change has no impact on the E-Plan as the process for correcting inaccurate PARs is not</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		described in the E-Plan.
<p>Step 6.1.3</p> <p><u>Within 15 minutes</u> of ECL or PAR declaration, SLO County and the State of California shall be notified by transmittal of information on an approved Form.^{T32164}</p>	<p>Step 6.1.3</p> <p><u>[TIME CRITICAL]: Within 15 minutes</u> of new ECL or new PAR declaration, SLO County and the State of California shall be notified by transmittal of information on an approved Form.^{T32164}</p>	<p>Change #7 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Added in “[TIME CRITICAL]” to identify the need for urgency on initial notifications as they need to be completed within 15 minutes.</p> <p>Added in “new ECL” and “new PAR” to clarify the language and address user feedback that the wording could be enhanced.</p> <p>This change is an enhancement to improve use by the ERO. This change has no impact on the content of the current E-Plan.</p>
<p>Step 6.2.3</p> <p>Perform a follow-up notification <u>approximately every 45 minutes or less.</u></p> <p>a. Some conditions (not all) that may trigger making a follow-up notification in less than 45 minutes are:</p> <p>1. (Primary Reason) Change in Radiological Release status (start, or stop)</p>	<p>Step 6.2.3</p> <p>Perform follow-up notifications <u>approximately every 45 minutes or less</u> of the previous verbal notification.</p> <p>a. Routine Follow-Up notifications indicate that conditions are stable and have not significantly changed since the last notification.</p> <p>b. Some conditions (not all) that may trigger making an expedited follow-up notification in less than 45 minutes</p>	<p>Change #8 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Guidance was re-written to provide enhanced details and clearer instructions for when to perform follow-up notifications.</p> <p>Added in the words “or less of the previous verbal notification” to clarify the time requirements for follow-up notifications. Feedback from the users of the procedure was that it wasn't specifically clear on when the clock starts for the next follow-up. This change provides enhanced language to clarify the requirements.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>2. Change in unit status (mode change for affected or unaffected unit)</p> <p>3. Change in spent fuel pool conditions</p> <p>4. Notification of meeting additional secondary ECLs</p> <p>5. A correction for an inaccurate PAR</p>	<p>are:</p> <ul style="list-style-type: none"> • (Primary Reason) change in radiological release status (start, or stop) • Change in unit status (e.g. mode change for affected or unaffected unit, loss of important plant components or systems) • Concurrent EALs met (e.g. Alert declared on Unit 1, then Alert met on Unit 2 would be a concurrent EAL with no declaration needed but Follow-Up ENF needed to communicate change to offsite agencies) • Change in spent fuel pool conditions • Declared Emergency Classification Level (ECL) that was not communicated due to being immediately surpassed by a higher ECL (e.g. Alert declared at 0815; SAE declared at 0820; only communicated SAE; Follow-Up ENF needed to convey Alert was met and was declared) <p>c. Follow-up notifications to an off-site agency may be waived or extended to intervals greater than 45 minutes if the off-site agency agrees.</p>	<p>There is no change of intent as the requirement is not altered as follow-up notifications are still required to be completed approximately every 45 minutes. This change continues to provide alignment with the content of the current E-Plan.</p> <p>The five examples under the section on when to perform follow-up notifications in less than 45 minutes were enhanced based upon user feedback. All of the Revision 58 content remains in Revision 59 with the addition of clarifying content. The exceptions being:</p> <ul style="list-style-type: none"> • The removal of the "correction for an inaccurate PAR". Refer to Change #6 for additional details on this. • The inclusion of the "Declared Emergency Classification Level (ECL) that was not communicated due to being immediately surpassed by a higher ECL". This bullet was added to provide an additional example of when the offsite agencies should be notified sooner than the 45 minute requirement. <p>These changes align with the E-Plan Section 4.1.2.3.6 which states that at the Alert level or higher DCP plant staff will provide, "periodic plant status updates to off-site authorities (approximately every 45 minutes or immediately if situation warrants)."</p> <p>The E-Plan does not specify which conditions would require expedited follow-up notifications. The examples provided in Revision 59 align with agreed</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		upon conditions with the offsite agencies on when expedited follow-ups should be done.
<p>Step 6.2.4 Perform the following to correct previously transmitted ENFs:</p> <p>a. Provide a verbal update/correction to the County, State, and NRC</p> <p>b. Create a new ENF to correct the issue</p> <p>1. Use an initial or follow-up form to correct the issue based on which form contained the original error.</p>	<p>Step 6.3 <u>Correcting Errors on Previously Transmitted ENFs or Follow-Up ENFs</u></p> <p>6.3.1 Provide a verbal update/correction to the County, State, and NRC</p> <p>6.3.2 For corrections to an incorrect PAR:</p> <p>a. <u>IF</u> the correct PAR is more conservative (i.e. includes more PAZs or more protective actions) than the previously transmitted incorrect PAR, <u>THEN</u> send an updated initial ENF to correct the issue.</p> <p>b. <u>IF</u> the correct PAR is less conservative (i.e. includes less PAZs or less protective actions) than the previously transmitted incorrect PAR, <u>THEN</u> the previously transmitted PAR should remain on all subsequent ENFs and Follow-Up ENFs.</p> <p>1. The verbal update is the only update allowed, as once a PAR is issued for an area (PAZ or ocean) it</p>	<p>Change #9 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>This content was added in the previous Revision 57. The intent of the Revision 57 addition was to provide some type of guidance for the ERO on how to handle an inaccurate ENF that had been transmitted to offsite agencies as nothing existed prior to Revision 57 on how to handle that situation.</p> <p>There is no E-Plan requirement to correct inaccurate notifications.</p> <p>This change is an enhancement to improve use by the ERO. This change has no impact on the E-Plan as the process for correcting inaccurate notifications is not described in the E-Plan, nor is it described in any regulatory guidance or requirements.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
	<p>stays in effect for the duration of the event.</p> <p>6.3.3 For all corrections <u>other than PAR corrections</u>, send an initial or follow-up ENF to correct the issue, based on which type of ENF contained the original error.</p>	
<p>Step 6.2.5</p> <p>Follow-up notifications to an off-site agency may be waived or extended to intervals greater than 45 minutes if the off-site agency agrees.</p>	<p>Relocated to step 6.2.3.c</p>	<p>Change #10 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Step was relocated verbatim. This is an editorial change that was done to move the instruction to the applicable section of the procedure.</p> <p>The relocation does not alter any requirements or timeliness aspects associated with the performance of follow-up notifications.</p>
<p>Attachment 2 step 1.a</p> <p>a. Follow-Up Notifications are made using Form 69-21638 <u>approximately every 45 minutes</u> (time may be changed based upon agreement with offsite agencies) OR when significant changes to event or plant status occur. Examples of significant changes are:</p>	<p>Attachment 2 step 1.a</p> <p>a. Follow-Up Notifications are made using Form 69-21638 <u>approximately every 45 minutes or less</u> of the previous verbal notification (time may be changed based upon agreement with offsite agencies) OR when significant changes to event or plant status occur. Examples of significant changes are:</p>	<p>Change #11 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Refer to Change #8 for details associated with this change.</p> <p>Change #11 is a copy and paste of the Change #8 content for alignment throughout the procedure.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>1) Change of plant operating mode</p> <p>2) Change of radiological release status</p> <p>3) Evacuation of onsite Personnel</p> <p>4) Call for outside assistance (Fire, Ambulance or Police)</p> <p>5) Notification of meeting secondary ECLs</p>	<p>1) Change in radiological release status (start, or stop)</p> <p>2) Change in unit status (e.g., mode change for affected or unaffected unit, loss of important plant components or systems)</p> <p>3) Concurrent EALs met (e.g., Alert declared on Unit 1, then Alert met on Unit 2 would be a concurrent EAL with no declaration needed but Follow-Up ENF needed to communicate change to offsite agencies)</p> <p>4) Change in spent fuel pool conditions</p> <p>5) Declared Emergency Classification Level (ECL) that was not communicated due to being immediately surpassed by a higher ECL (e.g. Alert declared at 0815; SAE declared at 0820; only communicated SAE; Follow-Up ENF needed to convey Alert was met and was declared)</p>	
<p>Attachment 2 block 4 instructions</p> <p>“Change in Plant Status” is used for:</p>	<p>Attachment 2 block 4 instructions</p> <p>“Change in Plant Status” is used for:</p> <ul style="list-style-type: none"> • Change in radiological release 	<p>Change #12 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Refer to Change #8 for details associated with this</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<ul style="list-style-type: none"> • Change in radiological release status (start or stop) • Unit mode change (affected or unaffected unit) • Change in Spent Fuel Pool (SFP) Condition • Or significant plant status changes 	<p>status (start, or stop)</p> <ul style="list-style-type: none"> • Change in unit status (e.g. mode change for affected or unaffected unit, loss of important plant components or systems) • Concurrent EALs met (e.g. Alert declared on Unit 1, then Alert met on Unit 2 would be a concurrent EAL with no declaration needed but Follow-Up ENF needed to communicate change to offsite agencies) • Change in spent fuel pool conditions • Declared Emergency Classification Level (ECL) that was not communicated due to being immediately surpassed by a higher ECL (e.g. Alert declared at 0815; SAE declared at 0820; only communicated SAE; Follow-Up ENF needed to convey Alert was met and was declared) 	<p>change.</p> <p>Change #12 is a copy and paste of the Change #8 content for alignment throughout the procedure.</p>
<p>Attachment 2 block 7 instructions</p> <p>N/A new content added</p>	<p>Attachment 2 block 7 instructions</p> <p>PIC data may be found at:</p> <ul style="list-style-type: none"> • http://pdnserver/PIC.aspx • FMT Communicator in the UDAC • Rad Data Processor in the TSC 	<p>Change #13 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Added in instructions on where to obtain pressurized ion chamber (PIC) data based on user feedback.</p> <p>This change is an enhancement to improve use by the ERO. This change has no impact on the content of</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		the current E-Plan.
<p>Attachment 5 step 3.d.1</p> <p>"Routine update" - Used routine updates provided ~ every 45 minutes.</p>	<p>Attachment 5 step 3.d.1</p> <p>"Routine update" - Used for routine updates provided ~ every 45 minutes or less of the previous verbal notification.</p>	<p>Change #14 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Added in the words "or less of the previous verbal notification" to clarify the time requirements for follow-up notifications. Feedback from the users of the procedure was that it wasn't specifically clear on when the clock starts for the next follow-up. This change provides enhanced language to clarify the requirements.</p> <p>There is no change of intent as the requirement is not altered as follow-up notifications are still required to be completed approximately every 45 minutes. This change continues to provide alignment with the content of the current E-Plan.</p>
<p>Attachment 5 step 3.g.1</p> <p>N/A new content added</p>	<p>Attachment 5 step 3.g.1</p> <p>1) PIC data may be found at:</p> <ul style="list-style-type: none"> • http://pdnserver/PIC.aspx • FMT Communicator in the UDAC • Rad Data Processor in the TSC 	<p>Change #15 - Sponsor edit – no change of intent with respect to the E-Plan.</p> <p>Added in instructions on where to obtain PIC data based on user feedback.</p> <p>This change is an enhancement to improve use by the ERO. This change has no impact on the content of the current E-Plan.</p>

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP G-4, Revision 29
Assembly and Accountability

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-4, Revision 29

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Step 15 Assembly Area Leader Checklist</p> <p>N/A - New Content</p>	<p>Step 15 Assembly Area Leader Checklist</p> <p>CAUTION: The second floor breezeway, between building 109 and building 119, should not be used as an assembly area.</p>	<p>Change #1 - Editorial change with no change of intent.</p> <p>SAPN 50846295 – Task 2 – “Insert a caution prior to step 15.1”</p> <p>Building 109 and 119, 2nd floor breezeway Evaluation Summary:</p> <p>In order to be an assembly area the breezeway is required to provide life safety exits, designed for exiting. This breezeway was not designed to as an assembly area. Per guidance from the CBC (California Building Code) in order for using this space as an assembly area we need to meet all the requirements of an assembly area. There need to be exits that lead you directly away from the building into a safe haven location.</p> <p>Since the current door location led you back into a building this does not qualify as an assembly area. Per code, you are not allow the exit people into buildings as part of the egress pattern. There are no exit signs and the doors swings in the wrong direction. Also the exit path directing them back into the building is not fire rated. This space does not and was not designed to be an assembly area.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
Title: Assembly and Accountability	Title: Assembly and Accountability	<p>Change #2 - Editorial change with no change of intent.</p> <p>50846295 – Task 4 - The title of the procedure is spelled wrong. Specifically, the word accountability.</p>
<p>Step 2.1.16</p> <p>If a radiological release is in progress, radiological monitors will be dispatched to the assembly areas to check dose rates are within acceptable limits. In the event dose rates exceed acceptable limits, personnel will be evacuated as quickly as possible.</p>	<p>Step 2.1.16</p> <p>If a radiological release is in progress, Viewpoint will be used to monitor assembly area dose rates, or radiological monitors will be dispatched to the assembly areas to check dose rates, to ensure dose rates are within acceptable limits. In the event dose rates exceed acceptable limits, personnel will be evacuated as quickly as possible.</p>	<p>Change #3 - Process change with no change of intent.</p> <p>RDS31, remote radiation monitors, are now installed in the assembly areas. Viewpoint is a software program that allows for remote monitoring of the radiation monitors. A chemistry and radiation protection (C&RP) technician is not needed at the assembly areas unless dose rates exceed 3 mR/hr or dose rates are not available on Viewpoint. In these cases an air sample would need to be performed by a C&RP technician.</p> <p>This change enhances an existing process through the use of new technology that is available at the assembly areas. This change does not remove or alter the requirement to monitor the assembly areas, nor does it remove or alter the thresholds at which additional monitoring actions are required at the assembly areas (i.e., above 3mR/hr). If the new monitors are available, they will be used to provide real time monitoring of the assembly areas. If they are</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		not available, then a radiation protection (RP) technician will be dispatched to the assembly areas to perform general area surveys as they currently do. Reference SAPN 50452062, Task 16.
<p>Step 3.7</p> <p>3.7.1 Performing general area surveys of the on-site assembly areas.</p> <p>3.7.3 Performing air sampling at the onsite assembly areas, as necessary.</p>	<p>Step 3.7</p> <p>3.7.1 Monitoring the assembly area dose rates on Viewpoint, Or locally if viewpoint is unavailable.</p> <p>3.7.2 Performing general area surveys of the on-site assembly areas, as necessary.</p> <p>3.7.3 Performing air sampling at the onsite assembly areas, as necessary.</p>	<p>Change #4 - Process change with no change of intent.</p> <p>RDS31, remote radiation monitors, are now installed in the assembly areas. Viewpoint is a software program that allows for remote monitoring of the radiation monitors. A C&RP technician is not needed at the assembly areas unless dose rates exceed 3 mR/hr or dose rates are not available on Viewpoint. In these cases an air sample would need to be performed by a C&RP technician.</p> <p>This change enhances an existing process through the use of new technology that is available at the assembly areas. This change does not remove or alter the requirement to monitor the assembly areas, nor does it remove or alter the thresholds at which additional monitoring actions are required at the assembly areas (i.e., above 3mR/hr). If the new monitors are available, they will be used to provide real time monitoring of the assembly areas. If they are not available, then a RP tech will be dispatched to the assembly areas to perform general area surveys as they currently do. Reference SAPN 50452062, Task 16.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Step 10.1.3.a.1.a</p> <p>Dispatch available RP technician to assembly areas to perform general area survey using Section 16, "Radiation Protection Checklist."</p>	<p>Step 10.1.3.a.1.a</p> <p>Ensure Radiation Protection is following Section 16, "Radiation Protection Checklist."</p>	<p>Change #5 - Process change with no change of intent.</p> <p>RDS31, remote radiation monitors, are now installed in the assembly areas. Viewpoint is a software program that allows for remote monitoring of the radiation monitors. A C&RP technician is not needed at the assembly areas unless dose rates exceed 3 mR/hr or dose rates are not available on Viewpoint. In these cases an air sample would need to be performed by a C&RP technician.</p> <p>This change enhances an existing process through the use of new technology that is available at the assembly areas. This change does not remove or alter the requirement to monitor the assembly areas, nor does it remove or alter the thresholds at which additional monitoring actions are required at the assembly areas (i.e., above 3mR/hr). If the new monitors are available, they will be used to provide real time monitoring of the assembly areas. If they are not available, then a RP tech will be dispatched to the assembly areas to perform general area surveys as they currently do. Reference SAPN 50452062, Task 16.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Section 16 Radiation Protection Checklist</p> <p>16.1 Initial Actions 16.1.1 Perform assembly area monitoring: a. Obtain dose rate instrument. b. Obtain air sampling equipment. c. Go to assigned assembly area (Building 109, Building 119 and/or Warehouse B) and perform the following: 1. Perform a general area dose rate survey to determine background radiological conditions. 2. IF any radiation above normal background detected, THEN recommend restrictions on eating and drinking. 3. IF general area dose rates exceed 3mR/hr, THEN immediately inform the Control Room or TSC. a) Start air sampling of the assembly area for radioiodine d. Report assembly area monitoring results to the TSC Radiological Advisor or Shift</p>	<p>Section 16 Radiation Protection Checklist</p> <p>16.1.1 Monitor the assembly area dose rates on Viewpoint. a. IF the assembly area dose rates are not available on Viewpoint, OR dose rates exceed 3 mR/hr, THEN direct a C&RP tech to the affected assembly areas to perform the following: 1. Obtain dose rate instrument. 2. Obtain air sampling equipment. 3. Go to assigned assembly area (Building 109, Building 119 and/or Warehouse B) and perform the following: a) Perform a general area dose rate survey to determine background radiological conditions. b) IF any radiation above normal background detected, THEN recommend restrictions on eating and drinking. c) IF general area dose rates exceed 3mR/hr, THEN immediately notify the Control Room or TSC. 1) Start air sampling of the assembly area for radioiodine 4. Report assembly area monitoring</p>	<p>Change #6 - Process change with no change of intent.</p> <p>RDS31, remote radiation monitors, are now installed in the assembly areas. Viewpoint is a software program that allows for remote monitoring of the radiation monitors. A C&RP technician is not needed at the assembly areas unless dose rates exceed 3 mR/hr or dose rates are not available on Viewpoint. In these cases an air sample would need to be performed by a C&RP technician.</p> <p>This change enhances an existing process through the use of new technology that is available at the assembly areas. This change does not remove or alter the requirement to monitor the assembly areas, nor does it remove or alter the thresholds at which additional monitoring actions are required at the assembly areas (i.e., above 3mR/hr). If the new monitors are available, they will be used to provide real time monitoring of the assembly areas. If they are not available, then a RP tech will be dispatched to the assembly areas to perform general area surveys as they currently do. Reference SAPN 50452062, Task 16.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Manager.</p> <p>16.2 Subsequent Actions</p> <p>16.2.1 Continue Monitoring Assembly Area:</p> <p>a. Inform Assembly Area Leader of survey results.</p> <p>b. For further instructions or resource requests, contact the Control Room or TSC.</p> <p>c. Continue to monitor assembly areas until directed otherwise by the Shift Manager or SEC.</p>	<p>results to the TSC Radiological Advisor or Shift Manager.</p> <p>16.2 Subsequent Actions</p> <p>16.2.1 Continue Monitoring Assembly Area on Viewpoint, or locally:</p> <p>a. Notify Assembly Area Leader of local survey results.</p> <p>b. For further instructions or resource requests, contact the Control Room or TSC.</p> <p>c. Continue to monitor assembly area until directed otherwise by the Shift Manager or SEC.</p>	
<p>N/A</p>	<p>Step 1.4 – deleted, not a rewrite revision</p> <p>Section 11.3.2, steps are a, b, c... not 1, 2, 3</p>	<p>Change #7 - Editorial and formatting changes</p>

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP EF-1, Revision 52
Activation and Operation of the Technical Support Center

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-1, Revision 52

Original Content	Content Change	Change Number Type of Change Reason for Change
3.16.2 Directing clerical staff to requested emergency response facilities.	3.16.2 Directing clerical administrative staff to requested emergency response facilities.	<p>Change #1 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>
3.17 TSC clerical is responsible for providing clerical support to the TSC staff.	3.17 TSC Admin Assistant is responsible for providing administrative support to the TSC staff.	<p>Change #2 - Editorial change with no change of intent.</p> <p>Reflect title change of Company Emergency Operations Center made in 2014 in the Company Emergency Response Plan. Refer to SAPN 50449609, Task 25.</p>
<p><u>6.17 TSC Clerical Support</u></p> <p>6.17.1 Upon declaration of an emergency, use Attachment 17, "TSC Clerical Support Checklist," Form 69 21165, to guide performance of required actions.</p>	<p><u>6.17 TSC Administrative Support</u></p> <p>6.17.1 Upon declaration of an emergency, use Attachment 17, "TSC Administrative Support Checklist," Form 69 21165, to guide performance of required actions.</p>	<p>Change #3 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Site Emergency Coordinator Checklist</p> <p><u>3. Situational Actions</u></p> <p>a) Risk Significant Actions (Classification, Notification, Dose Assessment, PARs)</p> <p>1) Classify and declare an emergency condition within 15 minutes per EP G-1. REFER TO Tab 12.</p> <p>a) If time permits, get at least one peer check from Ops Advisor, ED, and/or SM on EAL recommendation.</p>	<p>Site Emergency Coordinator Checklist</p> <p><u>3. Situational Actions</u></p> <p>a) Risk Significant Actions (Classification, Notification, Dose Assessment, PARs)</p> <p>1) Classify and declare an emergency condition within 15 minutes per EP G-1. REFER TO Tab 12.</p> <p>a. Confer with Ops Advisor on EALs.</p> <p>b. If time permits, get at least one peer check from ED and/or SM on EAL recommendation.</p>	<p>Change #4 - Process change with no change of intent.</p> <p>Change is being made to delineate that an independent peer check is needed, if time permits. The Operations Advisor is not considered a peer as they report to the SEC and are located in the same facility. The Operations Advisor is properly trained to perform the task and should be conferred with prior to a declaration being made. This change does not alter the authority or responsibility of the Operations Advisor or the SEC with respect to performing their emergency assignments in accordance with the E-Plan.</p>
<p>Operations Advisor Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Assist the SEC with evaluating plant conditions against EALs and upgrade criteria as needed.</p>	<p>Operations Advisor Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Confer with the SEC on evaluating plant conditions against EALs and upgrade criteria as needed.</p>	<p>Change #5 - Process change with no change of intent.</p> <p>Change is being made to delineate that an independent peer check is needed, if time permits. The Operations Advisor is not considered a peer as they report to the SEC and are located in the same facility. The Operations Advisor is properly trained to perform the task and should be conferred with prior to a declaration being made. This change does not alter the authority or responsibility of the Operations Advisor or the SEC with respect to performing their emergency assignments in accordance with the E-Plan.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Site Emergency Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: Direct the communications advisor to perform routine follow-up offsite notifications to County, State, and NRC officials per EP G-3. REFER TO Tab 10 and 11.</p>	<p>Site Emergency Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: Direct the communications advisor to perform routine and expedited follow-up offsite notifications to County, State, and NRC officials per EP G-3. REFER TO Tab 10 and 11.</p>	<p>Change #6 - Editorial change with no change of intent.</p> <p>The information pertaining to both routine and expedited notifications exists in EP G-3. This change is being made for consistency between EP G-3 and EP EF-1.</p>
<p>TSC Director Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: DCPD emergency notifications to the County and State are required to be completed within 15 minutes following the declaration of a new event classification or new PAR at the GE level (notifications to the NRC within one hour). Follow-up notifications should be made <u>approximately</u> every 45 minutes.</p>	<p>TSC Director Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: DCPD emergency notifications to the County and State are required to be completed within 15 minutes following the declaration of a new event classification or new PAR at the GE level (notifications to the NRC within one hour). Follow-up notifications should be made <u>approximately</u> every 45 minutes or less.</p>	<p>Change #7 - Editorial change with no change of intent.</p> <p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-1 in line with EP G-3 to provide better alignment between the procedures.</p>
<p>Communications Advisor - TSC Checklist</p>	<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p>	<p>Change #8 - Editorial change with no change of intent.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p><u>2. Ongoing Actions</u></p> <p>b. Until relieved by the EOF, ensure the County and State are notified of new classification levels or new PARS within 15 minutes of declaration (one hour for NRC), and updated on 45 minute intervals.</p>	<p>b. Until relieved by the EOF, ensure the County and State are notified of new classification levels or new PARS within 15 minutes of declaration (one hour for NRC), and updated on 45 minute or less intervals.</p>	<p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-1 in line with EP G-3 to provide better alignment between the procedures.</p>
<p>Agency/ENS Communicator Checklist</p> <p><u>1. Initial Actions</u></p> <p>g. <u>IF</u> requested to assist with off-site agency emergency notifications, <u>THEN</u> complete the notifications per EP G-3, "Emergency Notification of Off-Site Agencies." REFER TO Tabs 2, 3, and 4.</p> <p>3) Follow-up notifications should be made within <u>approximately</u> 45 minutes.</p>	<p>Agency/ENS Communicator Checklist</p> <p><u>1. Initial Actions</u></p> <p>g. <u>IF</u> requested to assist with off-site agency emergency notifications, <u>THEN</u> complete the notifications per EP G-3, "Emergency Notification of Off-Site Agencies." REFER TO Tabs 2, 3, and 4.</p> <p>3) Follow-up notifications should be made within <u>approximately</u> 45 minutes or less.</p>	<p>Change #9 - Editorial change with no change of intent.</p> <p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-1 in line with EP G-3 to provide better alignment between the procedures.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Administrative Advisor Checklist</p> <p><u>1. Initial Actions</u></p> <p>d. Determine clerical staffing needs in each of the following facilities by contacting the appropriate position:</p> <p>f. Assign clerical personnel to:</p> <p>j. Establish 24-hour shift manning schedules (12 hour shifts) for the TSC, OSC, EOF, and JIC. Coordinate with each facility. REFER TO Tab 2.</p> <p>1) For the OSC, walk down and work with the OSC clerical staff to develop the list.</p>	<p>Administrative Advisor Checklist</p> <p><u>1. Initial Actions</u></p> <p>d. Determine administrative staffing needs in each of the following facilities by contacting the appropriate position:</p> <p>f. Assign administrative personnel to:</p> <p>j. Establish 24-hour shift manning schedules (12 hour shifts) for the TSC, OSC, EOF, and JIC. Coordinate with each facility. REFER TO Tab 2.</p> <p>1) For the OSC, walk down and work with the OSC administrative staff to develop the list.</p>	<p>Change #10 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>
<p>TSC Clerical Support Position Binder Tab Index</p> <p>EP EF-1, Form 69-21165, "TSC Clerical Support Checklist"</p>	<p>TSC Administrative Support Position Binder Tab Index</p> <p>EP EF-1, Form 69-21165, "TSC Administrative Support Checklist"</p>	<p>Change #11 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609,</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		Task 17.

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP EF-2, Revision 39
Activation and Operation of the Operational Support Center

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-2, Revision 39

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 1 Step 2.h.4</p> <p>Updated team status</p>	<p>Attachment 1 Step 2.h.4</p> <p>Updated team status and estimated completion time</p>	<p>Change #1 - Administrative with no change of intent.</p> <p>SAPN 50872299 recommends including the team estimated completion time Objective I.5.2 Demonstration Criteria 8 requirement in EP EF-2.</p>
<p>Attachment 6 Step 1.e</p> <p>New Content</p>	<p>Attachment 6 Step 1.e</p> <p>Update the Emergency Planning Zone (EPZ) map with the wind direction. Wind direction may be obtained from the PDN Server or the Rad Data Processor.</p> <p>1) Check that the wind direction indicated on the OSC EPZ map corresponds with the TSC EPZ map.</p>	<p>Change #2 - Process with no change of intent.</p> <p>SAPN 50872109 requests that updating wind chart be added to one of the coordinator's checklists.</p>
<p>Attachment 6 Step 2.d</p> <p>New Content</p>	<p>Attachment 6 Step 2.d</p> <p>Monitor the wind direction from the PDN Server or the Rad Data Processor.</p> <p>1) Update the EPZ map with the wind</p>	<p>Change #3 - Process with no change of intent.</p> <p>SAPN 50872109 requests that updating wind chart be added to one of the coordinator's checklists.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
	<p>direction.</p> <p>2) Check that the wind direction indicated on the OSC EPZ map corresponds with the TSC EPZ map.</p>	
<p>Attachment 10 Team Return and Debrief</p> <p>10 Mission Status: _____</p> <p>11 Return Time: _____ Debrief Time: _____ Debrief By: _____</p>	<p>Attachment 10 Team Return and Debrief 10 Mission Status: _____</p> <p>11 Return Time: _____ 12 Debrief With: [] I&C/MM/Elect/Chem Coordinator [] SRPC (Rad Teams) [] Team Coordinator</p>	<p>Change #4 - Administrative with no change of intent.</p> <p>SAPN 50872171 "9/21/16 DR EP EF-2 Debrief Process" recommends that Attachment 10 "Team Pre-Departure Checklist," be updated to include debriefing the teams with the appropriate coordinators.</p>
<p>N/A</p>	<p>Att 1, position binder: tab #2 – changed title of AD2.ID1 to Procedure and Work Plan Use and Adherence tab #9 - changed from Attachment 24 to Form 69-21676 Position binder tab 4 – Attachment 12 to form 69-20512</p>	<p>Change #5 - Administrative with no change of intent.</p> <p>Multiple editorial and formatting changes</p>

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP EF-3, Revision 44
Activation and Operation of the Emergency Operations Facility

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-3, Revision 44

Original Content	Content Change	Change Number Type of Change Reason for Change
3.17 EOF clerical support is responsible for providing communications, copying, distribution, and other administrative support to the EOF staff as needed.	3.17 EOF administrative support is responsible for providing communications, copying, distribution, and other administrative support to the EOF staff as needed.	<p>Change #1 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>
<p>3.20.1 Providing a single point of contact between the EOF and the corporate emergency response center.</p> <p>3.20.3 Responding to the corporate emergency operations center when requested or directed to do so.</p>	<p>3.20.1 Providing a single point of contact between the EOF and the company emergency operations center.</p> <p>3.20.3 Responding to the company emergency operations center when requested or directed to do so.</p>	<p>Change #2 - Editorial change with no change of intent.</p> <p>Reflect title change of Company Emergency Operations Center made in 2014 in the Company Emergency Response Plan. Refer to SAPN 50449609, Task 25.</p>
<u>EOF Clerical Support</u>	<u>6.17 EOF Administrative Support</u>	<p>Change #3 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Emergency Director Checklist</p> <p>1. Classify and declare an emergency condition within 15 minutes per EP G-1. REFER TO Tab 4.</p> <p>a) If time permits, obtain at least one peer check from EOF Director, SEC, and/or SM on EAL recommendation.</p>	<p>Emergency Director Checklist</p> <p>2. Classify and declare an emergency condition within 15 minutes per EP G-1. REFER TO Tab 4.</p> <p>a. Confer with EOF Director on EALs.</p> <p>b. If time permits, obtain at least one peer check from SEC and/or SM on EAL recommendation.</p>	<p>Change #4 - Administrative change with no change of intent.</p> <p>Change is being made to delineate that an independent peer check is needed, if time permits. The EOF Director is not considered a peer as they report to the ED and are located in the same facility. The EOF Director is properly trained to perform the task and should be conferred with prior to a declaration being made. This change does not alter the authority or responsibility of the EOF Director or the ED with respect to performing their emergency assignments in accordance with the E-Plan.</p>
<p>Emergency Director Checklist</p> <p>6. Direct the following individuals to make announcements:</p>	<p>Emergency Director Checklist</p> <p>6. Direct the following individuals to make PA announcements:</p>	<p>Change #5 - Editorial change with no change of intent.</p> <p>Editorial change to add PA in front of announcement to be consistent with designation in sections a) and b).</p>
<p>Emergency Director Checklist</p> <p>9.) Direct Communications Coordinator to perform routine follow-up offsite notifications to County, State, and NRC officials</p>	<p>Emergency Director Checklist</p> <p>9.) Direct Communications Coordinator to perform routine and expedited follow-up offsite notifications to County, State, and NRC officials per EP G-3.</p>	<p>Change #6 - Editorial change with no change of intent.</p> <p>The information pertaining to both routine and expedited notifications exists in EP G-3. This change is being</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
per EP G-3. REFER TO Tab 7 .	REFER TO Tab 7 .	made for consistency between EP G-3 and EP EF-3.
<p>Emergency Director Checklist</p> <p>b. Other Functions and Responsibilities</p> <p>1) Personnel Protective Measures</p> <p>a) Authorize emergency exposures as needed per EP RB-2. REFER TO Tab 8.</p> <p>b) Authorize administration of potassium iodide (KI) to PG&E offsite emergency workers per EP RB-3. REFER TO Tab 9.</p>	<p>Emergency Director Checklist</p> <p>b. Other Functions and Responsibilities</p> <p>1) Personnel Protective Measures</p> <p>a) Authorize emergency exposures as needed per EP RB-2. REFER TO Tab 8.</p> <p>b) Authorize administration of potassium iodide (KI) to PG&E offsite emergency workers (including FMTs) per EP RB-3. REFER TO Tab 9.</p>	<p>Change #7 - Administrative change with no change of intent.</p> <p>Added FMT's to clarify that they are included as offsite emergency workers. This is a clarification and does not impact the tasks the ED performs.</p>
<p>Emergency Director Checklist</p> <p>b. Other Functions and Responsibilities</p> <p>2) Site Evacuation</p> <p>a) <u>IF</u> informed by SEC of pending Site Evacuation of non-essential personnel</p>	<p>Emergency Director Checklist</p> <p>b. Other Functions and Responsibilities</p> <p>2) Early Work Release or Site Evacuation</p> <p>a) <u>IF</u> informed by SEC of pending Early Work Release or</p>	<p>Change #8 - Editorial change with no change of intent.</p> <p>EP G-5 designates that the ED is provided information on and coordination of both Early Work Release and Site Evacuation. This change is being made for consistency between EP G-5 and EP EF-3.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>from DCPD, <u>THEN:</u></p> <p>(1) Ensure evacuation is coordinated with County.</p> <p>(2) Notify company spokesperson of upcoming site evacuation.</p>	<p>Site Evacuation of non-essential personnel from DCPD, <u>THEN:</u></p> <p>(1) Ensure Early Work Release or Site Evacuation is coordinated with County.</p> <p>(2) Notify company spokesperson of upcoming Early Work Release or Site Evacuation.</p>	
<p>EOF Director Checklist</p> <p>New content</p>	<p>EOF Director Checklist</p> <p>g. Assign individuals to maintain facility status boards (e.g. Electrical Bus Loads, Sequence of Events, ENF Tracking, Unit 1 and 2 Plant Status).</p>	<p>Change #9 - Administrative change with no change of intent.</p> <p>Added step 1.g to formalize a process already in place. Change is being made to align with position expectations and for clarity. This is not a change of intent within the E-Plan as the responsibilities have not changed. This is an administrative task and does not require any specific qualification.</p>
<p>EOF Director Checklist</p> <p>New content</p>	<p>EOF Director Checklist</p> <p>4) Ensuring all facility status boards are being maintained.</p>	<p>Change #10 - Administrative change with no change of intent.</p> <p>Added step 2.d.4 to formalize a process already in place. Change is being made to align with position expectations and for clarity. This is not a change of</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		intent within the E-Plan as the responsibilities have not changed. This is an administrative task and does not require any specific qualification.
<p>Radiological Manager Checklist</p> <p>f. Check the following staffing positions have been filled (* designates "minimum staffing" position.)</p> <p>7) UDAC Clerk</p>	<p>Radiological Manager Checklist</p> <p>f. Check the following staffing positions have been filled (* designates "minimum staffing" position.)</p> <p>7) UDAC Admin Assistant</p>	<p>Change #11 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609 task 17.</p>
<p>FMT Coordinator Checklist</p> <p>i. Establish EOF/EOC radiological protection.</p> <p>2) Complete County Exposure Tracking Sheet and submit copy to Emergency Worker Exposure Coordinator (EWEC) via County UDAC Coordinator. REFER TO Tab 5.</p>	<p>FMT Coordinator Checklist</p> <p>i. Establish EOF/EOC radiological protection.</p> <p>2) Complete County Agency Personnel Exposure Log and submit copy to Emergency Worker Exposure Coordinator (EWEC) via County UDAC Coordinator. REFER TO Tab 5.</p>	<p>Change #12 - Editorial change with no change of intent.</p> <p>This is a reference to a San Luis Obispo (SLO) County form. SLO County renamed the form and this change is being made to accurately reflect the new form name.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>FMT Coordinator Checklist</p> <p>a. Dispatch and coordinate activities of FMTs and offsite emergency lab.</p> <p>8) Provide copies, or direct UDAC Clerk to provide copies, of FMT Data Sheets to the following individuals:</p> <p>9) Maintain, or direct the UDAC Clerk to maintain, FMT and UDAC status boards (team assignment and location).</p>	<p>FMT Coordinator Checklist</p> <p>a. Dispatch and coordinate activities of FMTs and offsite emergency lab.</p> <p>8) Provide copies, or direct UDAC Admin Assistant to provide copies, of FMT Data Sheets to the following individuals:</p> <p>9) Maintain, or direct the UDAC Admin Assistant to maintain, FMT and UDAC status boards (team assignment and location).</p>	<p>Change #13 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>
<p>FMT Coordinator Checklist</p> <p>NOTE:UDAC Clerk may assist with communication requirements for this function.</p>	<p>FMT Coordinator Checklist</p> <p>NOTE:UDAC Admin Assistant may assist with communication requirements for this function.</p>	<p>Change #14 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>
<p>FMT Coordinator Position Binder Tab Index</p> <p>Form CC-12, "County Exposure Tracking Sheet" (111.06, HP-11)</p>	<p>FMT Coordinator Position Binder Tab Index</p> <p>Form 2, "Agency Personnel Exposure Log" (111.06, HP-11)</p>	<p>Change #15 - Editorial change with no change of intent.</p> <p>This is a reference to a San Luis Obispo (SLO) County</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		form. SLO County renamed the form and this change is being made to accurately reflect the new form name.
<p>EOF Security Liaison Checklist</p> <p>New content</p>	<p>EOF Security Liaison Checklist</p> <p>b. Coordinate with County for Early Work Release and Site Evacuations.</p>	<p>Change #16 - Process change with no change of intent.</p> <p>This change is being made to reflect an enhancement request from the ERO. The security liaison may be available to support coordination of early work release / site evacuation. As such this guidance is being added to the checklist as an option to assist in the process if available. Refer to SAPN 5086829.</p>
<p>Communications Coordinator Checklist</p> <p><u>1. Initial Actions</u></p> <p>d. Obtain all Emergency Notification Forms (ENF) from the ENF software program.</p> <p>1) Approved ENFs may be obtained by clicking the "View/Edit Archived Notification Form Events" link in the ENF software program.</p> <p>a) Have support staff (clerks) distribute hard copies of all ENFs.</p>	<p>Communications Coordinator Checklist</p> <p><u>1. Initial Actions</u></p> <p>d. Obtain all Emergency Notification Forms (ENF) from the ENF software program.</p> <p>1) Approved ENFs may be obtained by clicking the "View/Edit Archived Notification Form Events" link in the ENF software program.</p> <p>a) Have support staff (Admin) distribute hard copies of all ENFs.</p> <p>2) Notify support staff (Admin) that</p>	<p>Change #17 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
2) Notify support staff (clerks) that you are to immediately receive copies of all emergency notifications received by fax.	you are to immediately receive copies of all emergency notifications received by fax.	
<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: Notifications to the County and State are required to be completed within 15 minutes from the time of a new emergency classification or PAR. Follow up notifications should be made within approximately 45 minutes of the last notification.</p>	<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: Notifications to the County and State are required to be completed within 15 minutes from the time of a new emergency classification or PAR. Follow up notifications should be made within approximately 45 minutes or less of the last notification.</p>	<p>Change #18 - Administrative change with no change of intent.</p> <p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-3 in line with EP G-3 to provide better alignment between the procedures.</p>
<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Oversee transmittal and distribution of notifications.</p> <p>3) Provide or direct Offsite Communicator to provide a copy of completed notification</p>	<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Oversee transmittal and distribution of notifications.</p> <p>3) Provide or direct Offsite Communicator to provide a copy of completed notification forms to EOF Admin Assistant for</p>	<p>Change #19 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
forms to EOF Clerk for distribution and posting.	distribution and posting.	
<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Oversee transmittal and distribution of notifications.</p> <p>4) Ensure follow-up emergency notifications are issued approximately every 45 minutes.</p>	<p>Communications Coordinator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Oversee transmittal and distribution of notifications.</p> <p>4) Ensure follow-up emergency notifications are issued approximately every 45 minutes or less.</p>	<p>Change #20 - Editorial change with no change of intent.</p> <p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-3 in line with EP G-3 to provide better alignment between the procedures.</p>
<p>Offsite Communicator Checklist</p> <p><u>1. Initial Actions</u></p> <p>f. Coordinate with EOF clerk and UDAC clerk to ensure copies of ENFs are immediately distributed to the EOF staff upon receipt.</p>	<p>Offsite Communicator Checklist</p> <p><u>1. Initial Actions</u></p> <p>f. Coordinate with EOF Admin Assistant and UDAC Admin Assistant to ensure copies of ENFs are immediately distributed to the EOF staff upon receipt.</p>	<p>Change #21 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>
<p>Offsite Communicator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: Notifications to the County and State are required to be completed within 15 minutes</p>	<p>Offsite Communicator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>NOTE: Notifications to the County and State are required to be completed within 15 minutes from the time of a</p>	<p>Change #22 - Editorial change with no change of intent.</p> <p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-3 in line with</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
from the time of a new emergency classification or PAR. Follow up notifications should be made within approximately 45 minutes of the last notification.	new emergency classification or PAR. Follow up notifications should be made within approximately 45 minutes or less of the last notification.	EP G-3 to provide better alignment between the procedures.
<p>Offsite Communicator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Transmit, receive, and document notification information.</p> <p>8) Assist in completing follow-up emergency notifications to be issued approximately every 45 minutes.</p>	<p>Offsite Communicator Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. Transmit, receive, and document notification information.</p> <p>8) Assist in completing follow-up emergency notifications to be issued approximately every 45 minutes or less.</p>	<p>Change #23 - Editorial change with no change of intent.</p> <p>The statement "or less" already exists in EP G-3. Adding "or less" in this note brings EP EF-3 in line with EP G-3 to provide better alignment between the procedures.</p>
<p>Government Relations Coordinator Checklist</p> <p><u>1. Initial Actions</u></p> <p>g. Provide initial notification to company personnel as follows:</p> <p>2) Initiate videoconference or teleconference contact with government relations</p>	<p>Government Relations Coordinator Checklist</p> <p><u>1. Initial Actions</u></p> <p>g. Provide initial notification to company personnel as follows:</p> <p>2) Initiate videoconference or teleconference contact with government relations representatives in Sacramento,</p>	<p>Change #24 - Administrative change with no change of intent.</p> <p>Reflect specific location in General Office of Emergency Operations Center where videoconference and teleconference capability exists. Videoconference is set up with automatic connection to this location. This change enhances the capability to effectively communicate with the General office.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>representatives in Sacramento, Washington, and PG&E General Office to provide initial event status and establish a schedule for communications updates.</p>	<p>Washington, and PG&E General Office Emergency Operations Center (EOC) to provide initial event status and establish a schedule for communications updates.</p>	
<p>New content</p>	<p>Government Relations Coordinator Checklist</p> <p><u>1. Initial Actions</u></p> <p>h. Make contact with General Office Technical Liaison (GOTL) and request that they report to PG&E General Office and act as a liaison to company EOC.</p> <p>1) Maintain contact with GOTL to ensure that they are kept informed of event status.</p>	<p>Change #25 - Process change with no change of intent</p> <p>Role of GOTL is evolving as the Company Emergency Response Plan (ERP) is developed. ERP designates point at which the Company EOC will activate in the event of an incident at DCP. If Company EOC is activated they expect a Nuclear Liaison to respond to the EOC to provide information between the EOF and EOC. The GOTL acts as the Nuclear Liaison. The Government Relations Coordinator provides the link to the GOTL for providing information on the event. Both the Government Relations Coordinator and GOTL checklists are being revised to support this change. This revision is necessary to clarify information exchange and dissemination between the EOF and the Company EOC.</p> <p>This is not a change of intent within the E-Plan as the responsibilities have not changed. The change adds clarity and alignment with the ERP.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>a. Monitor actions and events from EOF to provide information to other government relations representatives, and JIC personnel.</p>	<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>a. Monitor actions and events from EOF to provide information to other government relations representatives, GOTL and JIC personnel.</p>	<p>Change #26 - Process change with no change of intent</p> <p>Role of GOTL is evolving as the Company Emergency Response Plan (ERP) is developed. ERP designates point at which the Company EOC will activate in the event of an incident at DCP. If Company EOC is activated they expect a Nuclear Liaison to respond to the EOC to provide information between the EOF and EOC. The GOTL acts as the Nuclear Liaison. The Government Relations Coordinator provides the link to the GOTL for providing information on the event. Both the Government Relations Coordinator and GOTL checklists are being revised to support this change. This revision is necessary to clarify information exchange and dissemination between the EOF and the Company EOC.</p> <p>This is not a change of intent within the E-Plan as the responsibilities have not changed. The change adds clarity and alignment with the ERP.</p>
<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>d. Update the Policy Group Chair of designee, and External Communications</p>	<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>d. Update the Company EOC Incident Commander or GOTL (if activated), and External</p>	<p>Change #27 - Editorial change with no change of intent.</p> <p>Change title of Policy Group Chair to Company EOC Incident Commander and specify GOTL rather than designee to reflect updates in the Company Emergency</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>and Coordination Center (EXCCC) (if activated) at least every classification change of the following:</p> <p>e. Obtain information from the Policy Group Chair (or designee) regarding:</p>	<p>Communications and Coordination Center (EXCCC) (if activated) at least every classification change of the following:</p> <p>e. Obtain information from the Company EOC Incident Commander or GOTL (if activated), regarding:</p>	<p>Response Plan. Refer to SAPN 50449609, Task 25.</p>
<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>f. IF requested by Policy Group Chair (or designee) to provide a liaison at company EOC or PG&E General Office,</p> <p><u>THEN</u> contact General Office Technical Liaison to report to PG&E General Office.</p>	<p>Content moved to section 1.h</p>	<p>Change #28 - Process change with no change of intent.</p> <p>Content moved to initial actions. The role of the GOTL evolved when the Company Emergency Response Plan (ERP) was modified to comply with the Incident Command System (ICS). The ERP designates point at which the Company EOC will activate in the event of an incident at DCP. If Company EOC is activated they expect a Nuclear Liaison to respond to the EOC to provide information between the EOF and EOC. This is an automatic action and does not need to be requested.</p> <p>This is not a change of intent within the E-Plan as the responsibilities have not changed. The change adds clarity and alignment with the ERP.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>g. Communicate PG&E public information from JIC to County EOC and EOF personnel.</p> <p>1) Represent JIC in interactions with EO and County Public Information Manager (PIM) in EOC.</p>	<p>Government Relations Coordinator Checklist</p> <p><u>2. Continuing Actions</u></p> <p>g. Communicate PG&E public information from JIC to County EOC and EOF personnel.</p> <p>1) Represent JIC in interactions with EOF and County Public Information Manager (PIM) in EOC.</p>	<p>Change #29 - Editorial change with no change of intent.</p> <p>This change is correcting a typo which left off a letter.</p>
<p>EOF Security Checklist</p> <p><u>1. Initial Actions</u></p> <p>c. Initiate and maintain a position log (use Emergency Log Sheets) to documenting significant actions performed and communications related to your position. REFER TO Tab 1.</p>	<p>EOF Security Checklist</p> <p><u>1. Initial Actions</u></p> <p>c. Initiate and maintain a position log (use Emergency Log Sheets) to documenting significant actions performed and communications related to your position. REFER TO Tab 1.</p>	<p>Change #30 - Editorial change with no change of intent.</p> <p>This change is correcting a grammatical error.</p>
<p>EOF Security Checklist</p> <p><u>1. Initial Actions</u></p> <p>e. Setup</p>	<p>EOF Security Checklist</p> <p><u>1. Initial Actions</u></p> <p>e. Setup</p>	<p>Change #31 - Administrative change with no change of intent.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>1) Use Attachment 3, "Emergency Operations Facility Security Set Up," of this procedure as guidance to position access tables and chairs at facility entry point. REFER TO Tab 2.</p> <p>2) Obtain position vests and ID badges.</p> <p>3) Locate access lists and EOF ID badges.</p>	<p>1) Use Attachment 3, "Emergency Operations Facility Security Set Up," of this procedure as guidance to position access tables and chairs at facility entry point. REFER TO Tab 2.</p> <p>2) Obtain position vests, tables and chairs and ID badges.</p> <p>3) Locate access list and EOF ID badges.</p>	<p>This change is being made as the position vests contain an ID of the position and the need for ID badges is redundant. In addition, PG&E is no longer responsible for checking in county staff or visitors. PG&E is only responsible for maintaining a list of PG&E and NRC personnel that are reporting to the EOF. None of the changes to this checklist change or add responsibilities and there is no impact on the E-Plan. Refer to SAPNs 50872169 and 5082167.</p>
<p>EOF Security Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>a. Provide building access controls for PG&E and NRC personnel to EOF.</p> <p>1) Check for proper access identification:</p> <p style="padding-left: 40px;">a) PG&E ID badge.</p> <p style="padding-left: 40px;">b) EOF ID badge.</p> <p style="padding-left: 40px;">c) NRC ID badge.</p> <p style="padding-left: 40px;">d) Name appears on visitor list.</p> <p>2) Record entry and exit time</p>	<p>EOF Security Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>a. Provide building access controls for PG&E and NRC personnel to EOF.</p> <p>1) Check for proper access identification:</p> <p style="padding-left: 40px;">a) PG&E ID badge.</p> <p style="padding-left: 40px;">b) EOF ID badge.</p> <p style="padding-left: 40px;">c) NRC ID badge.</p> <p style="padding-left: 40px;">d) Name appears on visitor list.</p> <p>2) Record entry and exit time of</p>	<p>Change #32 - Process change with change of intent</p> <p>This change is needed to bring the procedure up to date with upgrades that have occurred. The position vests contain an ID of the position and the need for ID badges is redundant. In addition, PG&E is no longer responsible for checking in county staff or visitors. PG&E is only responsible for maintaining a list of PG&E and NRC personnel that are reporting to the EOF. None of the changes to this checklist change or add responsibilities and there is no impact on the E-Plan. Refer to SAPNs 50872169 and 5082167.</p>

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<p>of individuals entering and exiting EOF</p> <p>3) Personnel not having approved ID or on access list may be granted access by EOF Director.</p>	<p>individuals entering and exiting EOF on access list.</p> <p>a) Do not delay facility activation to record entry times. Allow PG&E badged personnel to bypass, and obtain entry times from EOF sign-in board after facility activation.</p>	
<p>EOF Administrative Support Checklist</p> <p><u>1. Initial Actions</u></p> <p>e. Coordinate with other Clerical staff and Emergency Director Administrative Assistant to assume one of the following support roles:</p> <p>1) EOF Clerk (REFER TO step 2.b)</p> <p>2) UDAC Clerk (REFER TO steps 1.f and 2.c)</p> <p>f. UDAC Clerk:</p> <p>1) Report to Radiological Manager and inform him or her that you are performing UDAC Clerk duties.</p>	<p>EOF Administrative Support Checklist</p> <p><u>1. Initial Actions</u></p> <p>e. Coordinate with other Administrative staff and Emergency Director Administrative Assistant to assume one of the following support roles:</p> <p>1) EOF Admin Assistant (REFER TO step 2.b)</p> <p>2) UDAC Admin Assistant (REFER TO steps 1.f and 2.c)</p> <p>f. UDAC Admin Assistant:</p> <p>1) Report to Radiological Manager and inform him or her that you are performing UDAC Admin Assistant duties.</p>	<p>Change #33 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609 Task 17.</p>

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<p>EOF Administrative Support Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. EOF Clerk:</p> <p>c. UDAC Clerk:</p> <p>d. Position Relief Turnover</p> <p>3) Notify the individual specified that you have turned over your ERO responsibilities.</p> <p>a) EOF Clerk – notify EOF Director</p> <p>b) UDAC Clerk – notify Radiological Manager</p>	<p>EOF Administrative Support Checklist</p> <p><u>2. Ongoing Actions</u></p> <p>b. EOF Admin Assistant:</p> <p>c. UDAC Admin Assistant:</p> <p>d. Position Relief Turnover</p> <p>3) Notify the individual specified that you have turned over your ERO responsibilities.</p> <p>a) EOF Admin Assistant – notify EOF Director</p> <p>b) UDAC Admin Assistant– notify Radiological Manager</p>	<p>Change #34 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from “Clerical” to “Administrative” and “Clerk” with “Admin”. Refer to SAPN 50449609, Task 17.</p>
<p>EOF Clerical Support Position Binder Tab Index</p> <p>EP EF-3, Form 69-21134, “EOF Clerical Support Checklist”</p>	<p>EOF Administrative Support Position Binder Tab Index</p> <p>EP EF-3, Form 69-21134, “EOF Administrative Support Checklist”</p>	<p>Change #35 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from “Clerical” to “Administrative” and “Clerk” with “Admin”. Refer to SAPN 50449609, Task 17.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Emergency Director Admin Assistant Checklist</p> <p><u>1. Initial Actions</u></p> <ul style="list-style-type: none"> c. Check in with ED and EOF Director. 1) Confirm role expectations for: <ul style="list-style-type: none"> a) Phone Coverage b) White board communications (Admin. Assistant or EOF Director). c) Maintaining ED log. 	<p>Emergency Director Admin Assistant Checklist</p> <p><u>1. Initial Actions</u></p> <ul style="list-style-type: none"> c. Check in with ED and EOF Director. d. Maintain Phone coverage. e. Verify that the EOF director has assigned individuals to maintain status boards. f. Maintaining ED log. 	<p>Change #36 - Administrative change with no change of intent</p> <p>Change is being made to align with position expectations and to reorder steps for clarity. This is not a change of intent within the E-Plan as the responsibilities have not changed. The change adds clarity and alignment.</p>
<p>Emergency Director Admin Assistant Checklist</p> <p><u>1. Initial Actions</u></p> <ul style="list-style-type: none"> e. Assign clerical to location/department as needed: g. Contact Administrative Advisor at TSC. 1) Administrative Advisor may provide: <ul style="list-style-type: none"> a) Additional clerical 	<p>Emergency Director Admin Assistant Checklist</p> <p><u>1. Initial Actions</u></p> <ul style="list-style-type: none"> e. Assign administrative support to location/department as needed: g. Contact Administrative Advisor at TSC. 1) Administrative Advisor may provide: 	<p>Change #37 - Editorial change with no change of intent.</p> <p>Reflect title change made in 2012 for all DCPD IBEW Physical Clerical staff from "Clerical" to "Administrative" and "Clerk" with "Admin". Refer to SAPN 50449609, Task 17.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>support for the EOF.</p> <p><u>2. Ongoing Actions</u></p> <p>b. Ensure EOF clerical staff is adequate to support ERO functions.</p>	<p>a) Additional administrative support for the EOF.</p> <p><u>2. Ongoing Actions</u></p> <p>b. Ensure EOF administrative support is adequate to support ERO functions.</p>	
<p>General Office Technical Liaison Checklist</p> <p><u>1. Initial Actions</u></p> <p>g. IF requested by Policy Group Chair (or designee) to provide a liaison at company EOD or PG&E General Office,</p> <p>THEN report to PG&E General office.</p> <p><u>2. Continuing Actions</u></p> <p>a. Monitor actions and events from EOF to provide information to corporate response personnel.</p> <p>1) Coordinate with EOF Director and Engineering Liaison to develop</p>	<p>General Office Technical Liaison Checklist</p> <p><u>1. Initial Actions</u></p> <p>g. IF requested report to Company EOC and act as liaison.</p> <p>h. Upon arrival at Company EOC, establish contact with the following:</p> <p>1) Incident Commander</p> <p>2) Operations Section Chief</p> <p>i. Provide event status update to the Company EOC.</p> <p>j. Contact Government Relations Coordinator in EOF to remain current on events and response actions taking place at site.</p>	<p>Change #38 - Process change with no change of intent.</p> <p>The role of the GOTL evolved when the Company Emergency Response Plan (ERP) was modified to comply with the Incident Command System (ICS). The ERP designates point at which the Company EOC will activate in the event of an incident at DCP. If Company EOC is activated they expect a Nuclear Liaison to respond to the EOC to provide information between the EOF and EOC. This is an automatic action and does not need to be requested.</p> <p>The change adds clarity and alignment with the ERP.</p>

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<p>information about significant emergency events.</p> <p>c. Evaluate and respond to external company issues and inform the ED of corporate status and decisions.</p> <p>d. Assist the Government Relations Coordinator with updating the Policy Group Chair, or designee, and External Communications and Coordination Center (EXCCC) (if activated) at least every classification change of the following:</p> <p>e. Position Relief Turnover 3) Notify EOF Director that you have turned over your ERO responsibilities.</p>	<p><u>2. Continuing Actions</u></p> <p>a. Monitor actions and events from EOF to provide information to corporate response personnel. 1) Coordinate with Government Relations Coordinator to develop information about significant emergency events.</p> <p>c. Evaluate and respond to external company issues and inform the Government Relations Coordinator of corporate status and decisions.</p> <p>d. Update the Company EOC Incident Commander , or designee, and External Communications and Coordination Center (EXCCC) (if activated) at least every classification change of the following:</p> <p>e. Position Relief Turnover 3) Notify Government Relations Coordinator that you have turned over your ERO</p>	

Original Content	Content Change	Change Number Type of Change Reason for Change
	responsibilities.	
<p>General Office Technical Liaison Checklist</p> <p>3. Situation Actions</p> <ul style="list-style-type: none"> a. IF travel to the corporate emergency operations center has been requested, THEN upon arrival at G.O. EOC, establish contact with the following: b. Corporate Security c. Lead officers in the Operations group d. Officers in the policy group e. Provide lead officers status update. f. Contact Government Relations Coordinator in EOF to remain current on events and response actions taking place at site. 	<p>General Office Technical Liaison Checklist</p> <p>3. Situation Actions</p> <p>Content relocated to Section 1.g, h, i and j.</p>	<p>Change #39 - Administrative change with no change of intent</p> <p>Content was moved into Sections 1.g, h, i, and j of the checklist as position is expected to travel to Company Emergency Operations Center upon request. Role of GOTL is evolving as the Company Emergency Response Plan (ERP) is developed. ERP designates point at which the Company EOC will activate in the event of an incident at DCP. If Company EOC is activated they expect a Nuclear Liaison to respond to the EOC to provide information between the EOF and EOC. This is now an initial action as opposed to a situational specific.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 24 FMT Briefing Sheet Part 2</p> <p>New content</p>	<p>Attachment 24 FMT Briefing Sheet Part 2</p> <p>Verify that each FMT member completes Record of Distribution of Potassium Iodide (KI) form 69-9395 and review the KI Consumer Package Insert. Tell them "Do not ingest KI until directed".</p> <p>Gamma instrument exposure rate turn-back values:</p> <p>20 mr/hr for offsite FMTs unless told otherwise</p> <p>200 mr/hr for onsite FMTs unless told otherwise</p>	<p>Change #40 - Administrative change with no change of intent</p> <p>This change is being made to ensure that KI Authorization for the PG&E Field Monitoring Teams (FMT) is documented and that FMTs are provided the IOSAT KI pharmaceutical precautions as directed by EP RB-3. In addition this change adds in missing language with respect to turn-back values. These changes clarify and align requirements with EP RB-3. There is no effect on the implementation of the E Plan.</p>
<p>Communications Coordinator Checklist</p> <p><u>1.Initial Actions</u></p> <p>g. Perform the following bridge line monitoring actions:</p> <p>2)Monitor or have the Offsite Coordinator monitor bridge line x2002</p>	<p>Communications Coordinator Checklist</p> <p><u>1.Initial Actions</u></p> <p>g. Perform the following bridge line monitoring actions:</p> <p>2)Monitor or have the Offsite Communicator monitor bridge line x2002</p>	<p>Change #41 - Editorial Change with no change in intent.</p> <p>Change is being made to correct a typo in a position title. Refer to SAPN 50449609, Task 27.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
<p>Attachment 30 Dose Assessment Data Sheet</p> <p>ESE distribute copies to:</p>	<p>Attachment 30 Dose Assessment Data Sheet</p> <p>Admin Assistant distribute copies to:</p>	<p>Change #42 - Editorial change with no change in intent.</p> <p>Change is being made to correct an obsolete position title and replace with appropriate position title. Refer to SAPN 50449609, Task 13.</p>
<p>3. RESPONSIBILITIES</p> <p>3.10 EOF security liaison is responsible for:</p> <p>3.10.2 This position is not an ERO minimum staff or ERO support staff position. This position serves an advisory role only and would be called out as needed.</p>	<p>3. RESPONSIBILITIES</p> <p>3.10 EOF security liaison is responsible for:</p> <p>3.10.2 Deleted content</p>	<p>Change #43 - Administrative change with no change of intent.</p> <p>This change is being made to align EP EF-3 with Section 5 of the E-Plan step 3.10.2 is no longer necessary as Revision 4.15 to E-Plan Section 5 made the Security Liaison position an ERO support staff position. Refer to SAPN 50449609, Task 14.</p>

Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP EF-9, Revision 12
Backup Emergency Response Facilities

Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP EF-9, Revision 12

Original Content	Content Change	Change Number Type of Change Reason for Change
N/A	Procedure converted to new template. Editorial changes made throughout procedure.	Change #1 - Editorial change with no change of intent. Converted procedure to new template and made editorial changes to align with AD1.ID1 requirements.
<p>Section 2.1</p> <p>The characteristics of an alternative facility should include: 1) accessibility, 2) communication links with the EOF, control room, and security [...] plan mitigative actions).</p>	<p>Section 2.1</p> <p>The characteristics of a backup facility should include:</p> <ul style="list-style-type: none"> • Accessibility • Communication links with other facilities (e.g. EOF) control room, and security • [...] • plan mitigative actions). 	<p>Change #2 - Process change with no change of intent.</p> <p>SAPN 50432078, Task 3, states that EP EF-9 should be revised to replace the term alternative with backup so as to reduce confusion between the two. EP Rulemaking established a new definition of alternate facility, and the alternate TSC/OSC is discussed in EP EF-11, not EP EF-9. Replacing alternative with backup restores the original intent, which is aligned with the DCPPE-Plan as well as industry guidance.</p>
<p>Section 2.3</p> <p>Designated on-site ERFs and their backup facilities include the following:</p>	<p>Section 2.3</p> <p>Designated ERFs and their backup facilities include the following:</p>	<p>Change #3 - Process change with change of intent.</p> <p>During the Ocean PAR Root Cause Extent of Condition, it was determined</p>

Original Content				Content Change				Change Number Type of Change Reason for Change
ERF Function	Primary Facility	First Backup	Second Backup	ERF Function	Primary Facility	First Backup	Second Backup	<p>that DCCP was not fully implementing the commitment in the E-Plan for a backup Emergency Operations Facility (EOF). This was documented in SAPN 50627794, tasks 11 and 78, and is now being tracked via SAPN DA 50796556. Section 7.1.7.2 of the E-Plan (Revision 4.20) states that the Energy Education Center (EEC) is the first choice for a backup EOF, and Section 7.1.8.2 states that the Electrical Control Center Operations (ECCO) could be used as a backup location for the EOF.</p> <p>This revision adds the EOF as a designated ERF and identifies the first backup as the EEC, and the second backup as SLO ECCO. This ensures that the commitment in the DCCP E-Plan is fully implemented.</p> <p>Note that SAPN 50432078, Task 4, also documents that the EEC should be listed as the first choice for the backup EOF.</p> <p>SAPN 50432078, Task 2, states that "TM/Trng Bldg" is vague, and recommends that it should be referred to as "Bldg. 109." This revision also</p>
Control Room	Control Room	Hot S/D Panel (SM/SFM); TSC (SM, STA, SFM)	(None)	Control Room	Control Room	SM/SFM - Hot S/D Panel SM, STA, SFM - TSC	(None)	
TSC	TSC	Control Room (Min. Staff); TM/Trng. Bldg. (Supp.)	Hot S/D Panel (Min. Staff); EOF (Support)	TSC	TSC - 104' Buttr ess Area	Min. Staff - Control Room Support Staff - Bldg. 109	Min. Staff - Hot S/D Panel Support Staff - EOF	
OSC - Command Center	OSC - 104' Buttr ess Area	140' Turbine Building - Northeast Corner	Administration Building Room 215	OSC - Command Center	OSC - 104' Buttr ess Area	140' Turbine Building - Northeast Corner	Administration Building Room 215	
OSC - Maintenance Assembly Area	OSC - 104' Buttr ess Area	140' Turbine Building - Northeast Corner	Canyon Rm/Trng Bldg	OSC - Maintenance Craft Assembly Area	OSC - 104' Buttr ess Area	140' Turbine Building - Northeast Corner	Canyon Rm or Training Bldg. 109	

Original Content				Content Change				Change Number Type of Change Reason for Change
CR/OSC - Nuclear Operator Assembly Area	Control Room	OPs Ready Room	119' Turbine Building Ofc/Cyn Rm	CR/OSC - Nuclear Operator Assembly Area	Control Room	OPS Ready Room	119' Work Control Center or Canyon Rm	<p>incorporates this enhancement, as well as others to clarify locations and increase readability.</p> <p>The words "on-site" were removed, as the EOF is not onsite and it is no longer applicable.</p> <p>These changes are being made to align with the current DCPPE-Plan, or are clearly enhancements for procedure usability; therefore, there is no impact on how the E-Plan meets the planning standards, functions or elements.</p>
OSC - C&RP Technician Assembly Area	85' Access Control	140' Access Control	TSC Lab	OSC - C&RP Technician Assembly Area	85' Access Control	140' Access Control	TSC Lab	
				EOF	EOF	Energy Education Center – Ontario Road	SLO ECCO – PG&E Service Center S. Higuera	
Section 2.4 Control Room Function, TSC Function, & Access Control Function Tables				Section 2.4 Control Room Function & TSC Function Tables <ul style="list-style-type: none"> Deleted "Black Net phone" Access Control Function Table				Change #4 - Process change with change of intent. SAPN 50432078, Task 5, documents that EP EF-9 should be updated to remove "Black Net phones," that were

Original Content	Content Change	Change Number Type of Change Reason for Change
	<ul style="list-style-type: none"> Changed "PICs" to "PEDs" 	<p>removed from the Control Room and have not been in service since 2001. This is documented in AR A0503950.</p> <p>The Black Net function provided a direct link between the Control Room and the County and State EOC – this capability remains available today via automatic tie lines (ATL).</p> <p>Removal of the Black Net phone system was previously evaluated under 10 CFR 50.54q 2015-65. The current E-Plan makes no mention of the Black Net system. The Black Net function provided a direct link between the CR and the County Emergency Operations Center (EOC) and the State EOC. This capability remains available today via dedicated lines; it just isn't called Black Net anymore. The proposed change removes a piece of equipment that has not been used since at least 2001. All other existing phone capabilities will remain available and unchanged. Therefore, the proposed change continues to provide for the requisite systems for prompt communication to emergency response personnel.</p> <p>PICs were changed to PEDs as PICs are obsolete.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		The proposed change is being made to ensure that the procedure remains technically accurate by removing a piece of equipment that is no longer used.
Section 4.2 N/A – New content	Section 3.2 Added “EOF Emergency Director”	<p>Change #5 - Process change with change of intent.</p> <p>During the Ocean PAR Root Cause Extent of Condition, it was determined that DCPD was not fully implementing the commitment in the E-Plan for a backup Emergency Operations Facility (EOF). This was documented in SAPN 50627794, Tasks 11 and 78, and is now being tracked via SAPN DA 50796556.</p> <p>Section 7.1.7.2 of the E-Plan (rev 4.20) states that the Energy Education Center (EEC) is the first choice for a backup EOF, and Section 7.1.8.2 states that the Electrical Control Center Operations (ECCO) could be used as a backup location for the EOF.</p> <p>EP EF-9 is being revised to incorporate the backup EOF. This change is being made to fully implement the backup EOF, and as such, the E-Plan commitment.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		There is no impact on how the E-Plan meets the planning standards, functions or elements.
<p>Section 5.1</p> <p>A backup ERF shall be activated when an ERF is determined uninhabitable or otherwise may not start up or continue operations. See Section 2.1 above for the recommended succession of ERFs.</p>	<p>Section 6.1</p> <p>A backup ERF shall be activated when a primary ERF is determined uninhabitable or otherwise may not start up or continue operations. See Section 2.1 above for the recommended succession of ERFs.</p>	<p>Change #6 - Editorial change with no change of intent.</p> <p>"Primary" being added for clarification only – no change of intent.</p>
<p>Section 5.3</p> <p>5.3.1 Backup Control Room: OP AP-8A</p> <p>5.3.2 Backup TSC: Attachment 7.1</p> <p>5.3.3 Backup OSC: Attachment 7.2</p> <p>5.3.4 Backup Access Control: Attachment 7.3</p>	<p>Section 6.4</p> <p>6.4.1 Backup Control Room: OP AP-8A</p> <p>6.4.2 Backup TSC: Attachment 1</p> <p>6.4.3 Backup OSC: Attachment 2</p> <p>6.4.4 Backup Access Control: Attachment 3</p> <p>6.4.5 Backup EOF: Attachment 5</p>	<p>Change #7 - Process change with change of intent.</p> <p>During the Ocean PAR Root Cause Extent of Condition, it was determined that DCPD was not fully implementing the commitment in the E-Plan for a backup Emergency Operations Facility (EOF). This was documented in SAPN 50627794, Tasks 11 and 78, and is now being tracked via SAPN 50796556.</p> <p>Section 7.1.7.2 of the E-Plan (Revision 4.20) states that the Energy Education Center (EEC) is the first choice for a backup EOF, and Section 7.1.8.2 states that the Electrical Control Center Operations (ECCO) could be used as a</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
		<p>backup location for the EOF.</p> <p>EP EF-9 is being revised to incorporate the backup EOF. This change is being made to fully implement the backup EOF, and as such, the E-Plan commitment.</p> <p>There is no impact on how the E-Plan meets the planning standards, functions or elements.</p>
<p>Section 6, Records</p> <p>Checklists completed due to use of this procedure in a drill or actual event shall be forwarded to the Emergency Planning Manager for entry into Records Management System.</p>	<p>Section 7.1 & 7.2, Records</p> <p>Documents generated by this procedure during drills are non-quality records and are maintained per emergency preparedness administrative procedures.</p> <p>Documents generated by this procedure during actual events are non-quality records and are maintained for the life of the plant, per AD10.ID2, "Storage and Control of Non-quality Assurance Records."</p>	<p>Change #8 - Editorial change with no change of intent.</p> <p>Updated the records section to align with other E-Plan Implementing Procedures and AD10.ID2. This change aligns the EP EF-9 with the current plant process.</p>
<p>Attachments 1, 2, 3, and 4</p>	<p>Reformatted attachments 1, 2, 3, and 4 in accordance with AD1.ID1 requirements for new template.</p>	<p>Change #9 - Editorial change with no change of intent.</p> <p>Attachments reformatted to comply with AD1.ID1 requirements. Editorial changes were made throughout attachments as well.</p>

Original Content	Content Change	Change Number Type of Change Reason for Change
N/A – New Content	Attachment 5 Added new attachment, "Backup EOF Activation"	<p>Change #10 - Process change with change of intent.</p> <p>During the Ocean PAR Root Cause Extent of Condition, it was determined that DCCP was not fully implementing the commitment in the E-Plan for a backup Emergency Operations Facility (EOF). This was documented in SAPN 50627794, Tasks 11 and 78, and is now being tracked via SAPN 50796556.</p> <p>Section 7.1.7.2 of the E-Plan (Revision 4.20) states that the Energy Education Center (EEC) is the first choice for a backup EOF, and Section 7.1.8.2 states that the Electrical Control Center Operations (ECCO) could be used as a backup location for the EOF.</p> <p>EP EF-9 is being revised to incorporate the backup EOF. This change is being made to fully implement the backup EOF, and as such, the E-Plan commitment.</p> <p>There is no impact on how the E-Plan meets the planning standards, functions or elements.</p>