

Attachment 1

SONGS Permanently Defueled Emergency Action Levels Technical Bases Manual Revision 3

**San Onofre Nuclear
Generating Station (SONGS)
Permanently Defueled
Emergency Plan**

**Emergency Action Level
Technical Bases Manual**

(Volume 2, PDEP-2)

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1 INTRODUCTION

1.1 Purpose

This document contains the Nuclear Regulatory Commission (NRC) approved set of INITIATING CONDITIONS (ICs), their associated EMERGENCY ACTION LEVEL (EAL) thresholds, and their site-specific technical bases, for the Permanently Defueled (PD) San Onofre Nuclear Generating Station (SONGS), including the INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI).

Any changes to this document will be made in accordance with the requirements of 10 CFR 50.54(q).

Decision-makers responsible for implementation of SO123-VIII-ERO-2, Shift Manager / Emergency Director Checklist, may use this document as a technical reference and an aid in EAL interpretation¹.

This document is also used to facilitate review of any proposed changes to the SONGS PD EALs.

1.2 Background and Licensing Basis

SONGS has previously been operated under a 10 CFR § 50 license. In 2013 Southern California Edison Co. (SCE) notified the NRC that plant operations had ceased and that all fuel had been permanently removed from the associated reactor vessels. Spent fuel will continue to be stored wet within the associated spent fuel pools for some period of time until it can all be relocated to the ISFSI and ultimately turned over to the Department of Energy.

A permanently defueled station is essentially an interim spent fuel storage facility where the fuel is stored in a pool of water that serves as both a cooling medium (i.e., removal of decay heat) and shield from direct radiation. These primary functions of the spent fuel storage pool are the focus of the PD ICs and EALs.

SCE has received approval from the NRC for exemption from specific emergency planning requirements. The exemption is reflected in a Permanently Defueled Emergency Plan (PDEP). The exemption and corresponding plan changes reflect the lowered radiological source term and risks associated with spent fuel pool storage relative to reactor at-power operation. Source terms and accident analyses associated with design basis accidents are documented in the SONGS Final Safety Analysis Report (FSAR).

With regard to event recognition and classification, regulations specific to the declaration of emergencies are provided in planning standard 10 CFR 50.47(b)(4) and 10 CFR 50 Appendix E.IV.B.

¹ Emergency event declaration is required to be made as soon as conditions warranting classification are present and recognizable, but within 30 minutes in all cases of conditions being present. Use of this document for assistance is not intended to delay event declaration.

The NRC, by letter to Nuclear Energy Institute (NEI) dated 03/28/13 (ML12346A436), documented its review of the draft version of NEI 99-01, Revision 6, dated November 2012 (ML12326A805), and found it acceptable for use by licensees seeking to upgrade their EMERGENCY ACTION LEVELS (EAL) in accordance with 10 CFR 50 Appendix E. The regulatory and technical analysis for this endorsement can be retrieved through ADAMS Accession No. ML13008A736.

1.3 EMERGENCY CLASSIFICATION LEVELS (ECLs)

As defined in NUREG-0654/FEMA-REP-1, nuclear power plant emergencies are separated into four EMERGENCY CLASSIFICATION LEVELS (ECLs):

- NOTIFICATION OF UNUSUAL EVENT
- ALERT
- Site Area Emergency
- General Emergency

The ECLs are escalated from least severe to most severe according to the relative threat to the health and safety of the public and emergency workers. An ECL is determined to be met by identifying abnormal conditions and then comparing them to ICs through EAL threshold values as discussed below. When multiple EALs are met, event declaration is based in the highest ECL reached.

The permanently defueled ICs and EALs within this document use the two lower of the four ECLs. The source terms and release motive forces associated with a permanently defueled plant are not sufficient to require declaration of a Site Area Emergency or General Emergency.

1.4 INITIATING CONDITIONS (ICs)

An IC is a general description of an event or condition that aligns with the definition of one of the four ECLs by virtue of the potential or actual effects or consequences.

Each IC is given a unique identification code consisting of two letters and one number. The first letter identifies the recognition category, the second letter identifies the ECL, and the number identifies the sequence of the IC within the recognition category. The EAL identification codes are developed as follows:

Permanently Defueled Recognition Categories

- PD-A – Abnormal Rad Levels / Radiological Effluent
- PD-H – Hazards and Other Conditions Affecting Plant Safety
- PD-S – System Malfunctions

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI) Recognition Categories

- E-H– Hazards and Other Conditions Affecting ISFSI

Permanently Defueled EMERGENCY CLASSIFICATION LEVELS (lowest to highest)

- U – NOTIFICATION OF UNUSUAL EVENT
- A – ALERT

For a permanently defueled station, the NOTIFICATION OF UNUSUAL EVENT ICs provide for an increased awareness of abnormal conditions while the ALERT ICs are specific to actual or potential impacts to spent fuel. Radiological effluent IC and EALs were included to provide a basis for classifying events that cannot be readily classified based on an observable events or plant conditions alone.

1.5 EMERGENCY ACTION LEVELs (EALs)

An EAL is a pre-determined, site-specific, observable threshold for an IC that, when met or exceeded, places the plant in a given ECL.

EAL thresholds may utilize a variety of criteria including instrument readings and status indications; observable events; results of calculations and analyses; entry into particular procedures; and the occurrence of natural phenomena.

EALs are individually identified by the IC identification code followed by the EAL number, such as PD-AA1.1 for an effluent release or PD-HU1.1 for a SECURITY CONDITION.

All EAL classification assessments shall be based upon valid indications, reports or conditions. A valid indication, report, or condition, is one that has been verified through appropriate means such that there is no doubt regarding the indicator's operability, the condition's existence, or the report's accuracy.

For EALs that have a stipulated time duration (e.g., 15 minutes, 30 minutes, etc.), the Emergency Director should not wait until the applicable time has elapsed, but should declare the event as soon as it is determined that the condition has exceeded, or will likely exceed, the applicable time. If an ongoing radiological release is detected and the release start time is unknown, it should be assumed that the release duration specified in the IC/EAL has been exceeded, absent data to the contrary. When an EAL that specifies a time duration for the off-normal condition is assessed, the "clock" for the EAL time duration runs concurrently with the emergency classification process "clock". For a full discussion of this timing requirement, refer to NSIR/DPR-ISG-01.

The assessment of some EALs is based on the results of analyses that are necessary to ascertain whether a specific EAL threshold has been exceeded (e.g., dose assessments); the EAL and/or the associated basis discussion will identify the necessary analysis. In these cases, the 30-minute declaration period starts with the availability of the analysis results that show the threshold to be exceeded (i.e., this is the time that the EAL information is first available). The NRC expects licensees to establish the capability to initiate and complete EAL-related analyses within a reasonable period of time (e.g., maintain the necessary expertise on-shift).

A planned work activity that results in an expected event or condition which meets or exceeds an EAL does not warrant an emergency declaration provided that the activity proceeds as planned and the site remains within the limits imposed by the license. Such activities include planned work to test, manipulate, repair, maintain or modify a system or component. In these cases, the controls associated with the planning, preparation and execution of the work will ensure that compliance is maintained with all aspects of the license provided that the activity proceeds and concludes as expected. Events or conditions of this type may be subject to the reporting requirements of 10 § CFR 50.72.

1.6 EAL Technical Bases Manual Content

EAL Matrix Table

This manual contains an EAL matrix table that addresses all of the recognition categories for the PD and ISFSI EAL thresholds.

The EAL matrix table is designed as an evaluation tool that organizes the ECLs from the highest (ALERT) on the left to the lowest (NOTIFICATION OF UNUSUAL EVENT) on the right. Evaluating the EALs for each ECL from highest to lowest reduces the possibility that an event will be under classified. All EALs are to be reviewed for applicability prior to event declaration.

Other user aids such as wallboards may be developed from the EAL matrix table to support evaluation of abnormal conditions in other human factored formats.

EAL Documentation Format

Each EAL within the technical bases manual is documented in the following manner:

- IC Identification Number
- INITIATING CONDITION
- EALs Threshold Value(s)
- Basis
- Basis Reference(s)

2 DEFINITIONS, ACRONYMS AND ABBREVIATIONS

2.1 Definitions

ADVANCED HORIZONTAL STORAGE MODULE (AHSM)

The Transnuclear AHSM is a reinforced concrete structure for storage of a loaded DRY SHIELDED CANISTER (DSC) at a spent fuel storage facility.

ALERT

Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA PAG exposure levels.

CONFINEMENT BOUNDARY

The outside surfaces of a storage canister containing spent fuel that act as a barrier between the radioactive substances contained within and the environment.

DRY SHIELDED CANISTER (DSC)

A Transnuclear welded pressure vessel that provides confinement of intact or damaged fuel assemblies in an inert atmosphere.

EMERGENCY ACTION LEVEL (EAL)

A pre-determined, site-specific, observable threshold for an INITIATING CONDITION that, when met or exceeded, places the plant in a given EMERGENCY CLASSIFICATION LEVEL.

EMERGENCY CLASSIFICATION LEVEL (ECL)

One of a set of names or titles established by the US Nuclear Regulatory Commission (NRC) for grouping off-normal events or conditions according to potential or actual effects or consequences, and resulting onsite and offsite response actions. The EMERGENCY CLASSIFICATION LEVELS, in ascending order of severity, are:

- NOTIFICATION OF UNUSUAL EVENT (NOUE)
- ALERT
- Site Area Emergency (SAE)
- General Emergency (GE)

EXCLUSION AREA BOUNDARY (EAB)

The exclusion area is that area surrounding the reactor, in which the reactor licensee has the authority to determine all activities including exclusion or removal of personnel and property from the area. For SONGS, the EAB is roughly formed by two semicircles with radii of 1967.5 ft. each, centered on the Unit 2 Containment dome and a point 134 ft. southeast of the Unit 3 Containment dome, with a tangent connecting the landward arcs and seaward arcs of the two semicircles. The EAB is depicted in UFSAR Figure 2.1-5.

EXPLOSION

A rapid, violent and catastrophic failure of a piece of equipment due to combustion, chemical reaction or over-pressurization. A release of steam (from high energy lines or components) or an electrical component failure (caused by short circuits, grounding, arcing, etc.) should not automatically be considered an EXPLOSION. Such events may require a post-event inspection to determine if the attributes of an EXPLOSION are present.

FIRE

Combustion characterized by heat and light. Sources of smoke such as slipping drive belts or overheated electrical equipment do not constitute FIRES. Observation of flame is preferred but is NOT required if large quantities of smoke and heat are observed.

HOSTAGE

A person(s) held as leverage against the station to ensure that demands will be met by the station.

HOSTILE ACTION

An act toward SONGS or its personnel that includes the use of violent force to destroy equipment, take HOSTAGES, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, PROJECTILES, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. HOSTILE ACTION should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on SONGS. Non-hostile-action-based EALs are used to address such activities (i.e., this may include violent acts between individuals within the VEHICLE BARRIER SYSTEM area).

HOSTILE FORCE

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

INDEPENDENT SPENT FUEL STORAGE INSTALLATION (ISFSI)

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

INITIATING CONDITION (IC)

An event or condition that aligns with the definition of one of the four EMERGENCY CLASSIFICATION LEVELS by virtue of the potential or actual effects or consequences.

MULTI-PURPOSE CANISTER (MPC)

Holtec MPCs are the sealed spent nuclear fuel canisters that provide the CONFINEMENT BOUNDARY for the contained radioactive materials.

NORMAL LEVELS

As applied to radiological IC/EALs, the highest reading in the past twenty-four hours excluding the current peak value.

NOTIFICATION OF UNUSUAL EVENT (NOUE)

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

OWNER CONTROLLED AREA

For SONGS, the OWNER CONTROLLED AREA is the SCE SONGS controlled property, to include facilities and parking lots located on the west side of the Interstate 5 freeway, extending westward from Old Highway 101 to the median high-tide line, bordered on the north and south by the State Beach Park.

PROJECTILE

An object directed toward SONGS that could cause concern for its continued operability, reliability, or personnel safety.

PROTECTED AREA

That onsite area within the security boundary as defined in the station's Security Plan.

SAFETY SYSTEM

A system required for cooling the spent fuel pool in the permanently defueled mode of operation.

SECURITY CONDITION

Any Security Event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A SECURITY CONDITION does not involve a HOSTILE ACTION.

TRANSFER CASK

Containers designed to contain the Transnuclear DSC or Holtec MPC during and after loading of spent fuel assemblies, prior to and during unloading, and to transfer the DSC or MPC to or from the Transnuclear AHSM or Holtec VERTICAL VENTILATED MODULE (VVM).

UNPLANNED

A parameter change or an event that is not the result of an intended evolution or an expected plant response to a transient. The cause of the parameter change or event may be known or unknown.

VEHICLE BARRIER SYSTEM

Vehicle control measures (passive or active) used to protect against the malevolent use of a land vehicle. The VEHICLE BARRIER SYSTEM consists of both active and passive components, terrain features, man-made structural features, and vehicle access checkpoints as defined in the SONGS Security Plan.

VERTICAL VENTILATED MODULE (VVM)

The Holtec VVM is a subterranean type of overpack that receives and contains the sealed Holtec MPC for interim spent fuel storage at an ISFSI. The Holtec VVM supports the MPC in a vertical orientation and provides gamma and neutron shielding, and also provides air flow through cooling passages to promote heat transfer from the MPC to the environs.

VISIBLE DAMAGE

Damage to a component or structure that is readily observable without measurements, testing, or analysis. The visual impact of the damage is sufficient to cause concern regarding the operability or reliability of the affected component or structure.

2.2 Acronyms and Abbreviations

| | |
|--------------------|---|
| AHSM..... | Advanced Horizontal Storage Module |
| CDE | Committed Dose Equivalent |
| CFR..... | Code of Federal Regulations |
| DSC | Dry Shielded Canister |
| EAB..... | EXCLUSION AREA BOUNDARY |
| EAL | Emergency Action Level |
| ECL..... | EMERGENCY CLASSIFICATION LEVEL |
| EPA..... | Environmental Protection Agency |
| FAA..... | Federal Aviation Administration |
| FBI | Federal Bureau of Investigation |
| FEMA..... | Federal Emergency Management Agency |
| FSAR | Final Safety Analysis Report |
| IC | INITIATING CONDITION |
| ISFSI..... | INDEPENDENT SPENT FUEL STORAGE INSTALLATION |
| MPC..... | Multi-Purpose Canister |
| NEI | Nuclear Energy Institute |
| NRC | Nuclear Regulatory Commission |
| NORAD..... | North American Aerospace Defense Command |
| NOUE..... | NOTIFICATION OF UNUSUAL EVENT |
| OCA | OWNER CONTROLLED AREA |
| ODCM..... | Offsite Dose Calculation Manual |
| PA | PROTECTED AREA |
| PAG | Protective Action Guideline |
| R | Roentgen |
| Rem, rem, REM..... | Roentgen Equivalent Man |
| SCE..... | Southern California Edison |
| SONGS..... | San Onofre Nuclear Generating Station |
| TEDE | Total Effective Dose Equivalent |
| VVM | Vertical Ventilated Module |

3 PERMANENTLY DEFUELED EAL MATRIX TABLE

| ALERT | NOTIFICATION OF UNUSUAL EVENT |
|---|--|
| <p>PD-AA1 Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.</p> <p>Notes:</p> <ul style="list-style-type: none"> • The Emergency Director should declare the ALERT promptly upon determining that the applicable time has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes. • If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes. • The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until dose assessment results are available. <ol style="list-style-type: none"> 1. Reading on EITHER of the following radiation monitors equal to or greater than the reading shown for 15 minutes or longer: <ul style="list-style-type: none"> • Plant Vent (2RE7865)1.0E+8 μCi/sec • Plant Vent (3RE7865)1.0E+8 μCi/sec 2. Dose assessment using actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the EAB. 3. Sample analysis for a liquid release indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the EAB for one hour of exposure. 4. Field survey results indicate EITHER of the following at or beyond the EAB: <ul style="list-style-type: none"> • Dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer • Analyses of field survey samples indicate thyroid CDE greater than 50 mrem for one hour of inhalation. | <p>PD-AU1 Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.</p> <p>Notes:</p> <ul style="list-style-type: none"> • The Emergency Director should declare the NOTIFICATION OF UNUSUAL EVENT promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded. • If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes. • If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes. <ol style="list-style-type: none"> 1. Reading on ANY effluent radiation monitor greater than 2 times the ODCM limits for 60 minutes or longer. 2. Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times the ODCM limits for 60 minutes or longer. |

| ALERT | NOTIFICATION OF UNUSUAL EVENT |
|---|---|
| <p>PD-AA2 UNPLANNED rise in plant radiation levels that impedes plant access required to maintain spent fuel integrity.</p> <ol style="list-style-type: none"> UNPLANNED dose rate greater than 15 mR/hr in EITHER of the following areas requiring continuous occupancy to maintain control of radioactive material or operation of systems needed to maintain spent fuel integrity: <ul style="list-style-type: none"> Command Center Central Alarm Station UNPLANNED area radiation monitor readings or survey results indicate a rise of 100 mR/hr over NORMAL LEVELS that impedes access to EITHER of the following areas needed to maintain control of radioactive material or operation of systems needed to maintain spent fuel integrity: <ul style="list-style-type: none"> U2 63' Fuel Handling Building U3 63' Fuel Handling Building | <p>PD-AU2 UNPLANNED rise in plant radiation levels.</p> <ol style="list-style-type: none"> <ol style="list-style-type: none"> UNPLANNED water level drop in the spent fuel pool as indicated by Local Level Indicator <p>AND</p> <ol style="list-style-type: none"> UNPLANNED rise in area radiation levels as indicated by 2(3)RE7850, Fuel Handling Building Spent Fuel Cask Area Radiation Monitor. Area radiation monitor reading or survey result indicates an UNPLANNED rise of 25 mR/hr over NORMAL LEVELS. |
| | <p>PD-SU1 UNPLANNED spent fuel pool temperature rise.</p> <ol style="list-style-type: none"> UNPLANNED spent fuel pool temperature rise to greater than 140°F. |
| <p>PD-HA1 HOSTILE ACTION within the VEHICLE BARRIER SYSTEM or airborne attack threat within 30 minutes.</p> <ol style="list-style-type: none"> A HOSTILE ACTION is occurring or has occurred within the VEHICLE BARRIER SYSTEM as reported by the Nuclear Security Shift Supervisor. A validated notification from the NRC of an aircraft attack threat within 30 minutes of the site. | <p>PD-HU1 Confirmed SECURITY CONDITION or threat.</p> <ol style="list-style-type: none"> A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the Nuclear Security Shift Supervisor. Notification of a credible security threat directed at the site. A validated notification from the NRC providing information of an aircraft threat. |

| ALERT | NOTIFICATION OF UNUSUAL EVENT |
|--|--|
| | <p>PD-HU2</p> <p>Hazardous event affecting SAFETY SYSTEM equipment necessary for spent fuel cooling.</p> <p>1. a. The occurrence of ANY of the following hazardous events:</p> <ul style="list-style-type: none"> • Seismic event (earthquake) • Internal or external flooding event • High winds or tornado strike • FIRE • EXPLOSION • Other events with similar hazard characteristics as determined by the Shift Manager <p>AND</p> <p>b. The event has damaged at least one train of a SAFETY SYSTEM needed for spent fuel cooling</p> <p>AND</p> <p>c. The damaged SAFETY SYSTEM train(s) cannot, or potentially cannot, perform its design function based on EITHER:</p> <ul style="list-style-type: none"> • Indications of degraded performance • VISIBLE DAMAGE |
| <p>PD-HA3</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.</p> <p>1. Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.</p> | <p>PD-HU3</p> <p>Other conditions exist which in the judgment of the Emergency Director warrant declaration of a NOTIFICATION OF UNUSUAL EVENT.</p> <p>1. Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of SAFETY SYSTEMS occurs.</p> |

| ALERT | NOTIFICATION OF UNUSUAL EVENT |
|-------|---|
| | <p>E-HU1 Damage to a loaded canister CONFINEMENT BOUNDARY.</p> <ol style="list-style-type: none"> 1. Damage to a loaded Transnuclear canister CONFINEMENT BOUNDARY as indicated by dose rates greater than EITHER of the following: <ul style="list-style-type: none"> • 520 mR/hr (gamma) 3 feet from the surface at the top centerline. • 190 mR/hr (gamma) 3 feet from the surface of the neutron shield at the mid-height centerline. 2. Damage to a loaded Holtec canister CONFINEMENT BOUNDARY as indicated by dose rates greater than EITHER of the following: <ul style="list-style-type: none"> • 60 mR/hr (neutron plus gamma) on the top of the VVM (closure lid cover plate). A minimum of four dose rate measurements shall be taken on the top of the VVM. These measurements shall be taken approximately 18 inches radially inward from the edge of the lid at the center point of each side. • 7,000 mR/hr (neutron plus gamma) on the side of the TRANSFER CASK. A minimum of four dose rate measurements shall be taken on the side of the TRANSFER CASK, approximately at the cask mid-height plane. The measurement locations shall be approximately 90 degrees apart around the circumference of the cask. Dose rates shall be measured between the radial ribs of the water jacket. |

4 EAL TECHNICAL BASES

4.1 PD-AA1

INITIATING CONDITION:

Release of gaseous or liquid radioactivity resulting in offsite dose greater than 10 mrem TEDE or 50 mrem thyroid CDE.

EALs:

Notes:

- The Emergency Director should declare the ALERT promptly upon determining that the applicable time has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 15 minutes.
- If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes.
- The pre-calculated effluent monitor values presented in EAL #1 should be used for emergency classification assessments until dose assessment results are available.

1. Reading on **EITHER** of the following radiation monitors equal to or greater than the reading shown for 15 minutes or longer:
 - Plant Vent Stack (2RE7865)..... 1.0E+08 $\mu\text{Ci/sec}$
 - Plant Vent Stack (3RE7865)..... 1.0E+08 $\mu\text{Ci/sec}$

OR
2. Dose assessment using actual meteorology indicates doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the EAB.

OR
3. Sample analysis for a liquid release indicates a concentration or release rate that would result in doses greater than 10 mrem TEDE or 50 mrem thyroid CDE at or beyond the EAB for one hour of exposure.

OR
4. Field survey results indicate **EITHER** of the following at or beyond the EAB:
 - Dose rates greater than 10 mR/hr expected to continue for 60 minutes or longer.
 - Analyses of field survey samples indicate thyroid CDE greater than 50 mrem for one hour of inhalation.

Basis:

This IC addresses a release of gaseous or liquid radioactivity that results in projected or actual offsite doses greater than or equal to 1% of the EPA Protective Action Guides (PAGs). It includes both monitored and unmonitored releases. Releases of this magnitude represent an actual or potential substantial degradation of the level of safety of the plant as indicated by a radiological release that significantly exceeds regulatory limits (e.g., a significant uncontrolled release).

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

The TEDE dose is set at 1% of the EPA PAG of 1,000 mrem while the 50 mrem thyroid CDE was established in consideration of the 1:5 ratio of the EPA PAG for TEDE and thyroid CDE.

Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes.

If dose rates are obtained with portable instruments, then closed window readings are used. The largest contributor to total body exposure is gamma radiation, which is represented by closed window readings.

Additional SONGS Site-Specific Bases Information:

Dose assessment calculations using SONGS dose assessment computer model (RADDOSE-V Version RD5v3.0i) for a fuel handling building accident with a KR-85 noble gas release, wind speed of 6.7 mph and stability class D (prevalent values for 2011 and 2012) indicates that a dose of 10 mrem for one hour of exposure at the EAB would require a noble gas release rate of $5.60\text{E}+08$ $\mu\text{Ci/sec}$. The Plant Vent Stack Wide Range Gas Monitors 2RE7865 and 3RE7865 have a readable range of $1.0\text{E}-04$ to $1.0\text{E}+08$ $\mu\text{Ci/sec}$, therefore a reading corresponding to 10 mrem at the EAB would be off-scale high. The upper limit (max readable value, indicator will go beyond value before reaching offscale-high) of the monitors' range has been selected as the threshold to classify an ALERT in accordance with EAL PD-AA1, this will correspond to 3.6 mrem for one hour of exposure, assuming a wind speed of 6.7 mph and stability class D.

Since the gases mix in the continuous exhaust plenum before entering the stack, a reading on any unit monitor would correspond to a similar reading in the other monitor, and only one valid reading will be needed to classify this event.

Plant Vent Stack radiation monitor 2/3RE7808G is not used for this EAL because the upper limit is $4.0\text{E}+07$ $\mu\text{Ci/sec}$ (Action Request 070100476-7), and it will be off-scale high before the wide range monitors listed above.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-AA1

4.2 PD-AU1**INITIATING CONDITION:**

Release of gaseous or liquid radioactivity greater than 2 times the ODCM limits for 60 minutes or longer.

EALs:**Notes:**

- The Emergency Director should declare the NOTIFICATION OF UNUSUAL EVENT promptly upon determining that 60 minutes has been exceeded, or will likely be exceeded.
- If an ongoing release is detected and the release start time is unknown, assume that the release duration has exceeded 60 minutes.
- If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes.

1. Reading on **ANY** effluent radiation monitor greater than 2 times the ODCM limits for 60 minutes or longer.

OR

2. Sample analysis for a gaseous or liquid release indicates a concentration or release rate greater than 2 times the ODCM limits for 60 minutes or longer.

Basis:

This IC addresses a potential decrease in the level of safety of the plant as indicated by a low-level radiological release that exceeds regulatory commitments for an extended period of time (e.g., an uncontrolled release). It includes any gaseous or liquid radiological release, monitored or unmonitored, including those for which a radioactivity discharge permit is normally prepared.

Nuclear power plants incorporate design features intended to control the release of radioactive effluents to the environment. Further, there are administrative controls established to prevent unintentional releases, and to control and monitor intentional releases. The occurrence of an extended, uncontrolled radioactive release to the environment is indicative of degradation in these features and/or controls.

Radiological effluent EALs are also included to provide a basis for classifying events and conditions that cannot be readily or appropriately classified on the basis of plant conditions alone. The inclusion of both plant condition and radiological effluent EALs more fully addresses the spectrum of possible accident events and conditions.

Classification based on effluent monitor readings assumes that a release path to the environment is established. If the effluent flow past an effluent monitor is known to have stopped, indicating that the release path is isolated, the effluent monitor reading is no longer valid for classification purposes.

Releases should not be prorated or averaged. For example, a release exceeding 4 times release limits for 30 minutes does not meet the EAL.

EAL #1 - This EAL addresses radioactivity releases that cause effluent radiation monitor readings to exceed 2 times the ODCM limit. This EAL is associated with continuous releases (e.g., Turbine Plant Sump, North Industrial Area Yard Drain Sump, Plant Vent Stack) and planned batch releases (e.g., radwaste).

EAL #2 - This EAL addresses uncontrolled gaseous or liquid releases that are detected by sample analyses or environmental surveys, particularly on unmonitored pathways (e.g., spills of radioactive liquids into storm drains, heat exchanger leakage in river water systems, etc.).

Escalation of the EMERGENCY CLASSIFICATION LEVEL would be via IC PD-AA1.

Additional SONGS Site-Specific Bases Information:

None.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-AU1

4.3 PD-AA2**INITIATING CONDITION:**

UNPLANNED rise in plant radiation levels that impedes plant access required to maintain spent fuel integrity.

EALs:

1. UNPLANNED dose rate greater than 15 mR/hr in **EITHER** of the following areas requiring continuous occupancy to maintain control of radioactive material or operation of systems needed to maintain spent fuel integrity:
 - Command Center
 - Central Alarm Station
- OR**
2. UNPLANNED area radiation monitor readings or survey results indicate a rise of 100 mR/hr over NORMAL LEVELS that impedes access to **EITHER** of the following areas needed to maintain control of radioactive material or operation of systems needed to maintain spent fuel integrity:
 - U2 63' Fuel Handling Building
 - U3 63' Fuel Handling Building

Basis:

This IC addresses increased radiation levels that impede necessary access to areas containing equipment that must be operated manually or that requires local monitoring, in order to maintain systems needed to maintain spent fuel integrity. As used here, 'impede' includes hindering or interfering, provided that the interference or delay is sufficient to significantly threaten necessary plant access. It is this impaired access that results in the actual or potential substantial degradation of the level of safety of the plant.

This IC does not apply to anticipated temporary increases in radiation levels due to planned events.

If dose rates are obtained with portable instruments, then closed window readings are used. This IC is based on access impediments due to a total body exposure to plant personnel. The largest contributor to total body exposure is gamma radiation, which is represented by closed window readings.

Additional SONGS Site-Specific Bases Information:

EAL #1 applies to dose rates in the CAS or Command Center even if personnel were able to relocate from those areas.

Areas for EAL #2 are based on areas inhabited during an operator walkdown of equipment needed to maintain or restore spent fuel cooling or water level.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-AA2
2. SO23-13-23, Loss of Spent Fuel Pool Cooling

4.4 PD-AU2**INITIATING CONDITION:**

UNPLANNED rise in plant radiation levels.

EALs:

1. a. UNPLANNED water level drop in the spent fuel pool as indicated by Local Level Indicator

AND
b. UNPLANNED rise in area radiation levels as indicated by 2(3)RE7850, Fuel Handling Building Spent Fuel Cask Area Radiation Monitor

OR
2. Area radiation monitor reading or survey result indicates an UNPLANNED rise of 25 mR/hr over NORMAL LEVELS.

Basis:

This IC addresses elevated plant radiation levels caused by a decrease in water level above irradiated (spent) fuel or other UNPLANNED events. The increased radiation levels are indicative of a minor loss in the ability to control radiation levels within the plant or radioactive materials. Either condition is a potential degradation in the level of safety of the plant.

A water level decrease will be primarily determined by indications from available level instrumentation. Other sources of level indications may include reports from plant personnel or video camera observations (if available). A significant drop in the water level may also cause an increase in the radiation levels of adjacent areas that can be detected by monitors in those locations.

The effects of planned evolutions should be considered. Note that EAL #1 is applicable only in cases where the elevated reading is due to an UNPLANNED water level drop. EAL #2 excludes radiation level increases that result from planned activities such as use of radiographic sources and movement of radioactive waste materials.

If dose rates are obtained with portable instruments, then closed window readings area used. The largest contributor to total body exposure is gamma radiation, which is represented by closed window readings.

Escalation of the EMERGENCY CLASSIFICATION LEVEL would be via IC PD-AA1 or PD-AA2.

Additional SONGS Site-Specific Bases Information:

Tech Spec 3.1.1 documents the minimum requirement of 23' over the top of irradiated fuel assemblies seated in the storage racks.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-AU2
2. SONGS Tech Spec 3.1.1

4.5 PD-SU1**INITIATING CONDITION:**

UNPLANNED spent fuel pool temperature rise.

EALs:

1. UNPLANNED spent fuel pool temperature rise to greater than 140°F.

Basis:

This IC addresses a condition that is a precursor to a more serious event and represents a potential degradation in the level of safety of the plant. If uncorrected, boiling in the pool will occur, and result in a loss of pool level and increased radiation levels.

Escalation of the EMERGENCY CLASSIFICATION LEVEL would be via IC PD-AA1 or PD-AA2.

Additional SONGS Site-Specific Bases Information:

Per procedure SO23-13-23, Loss of Spent Fuel Pool Cooling, a spent fuel pool temperature >140°F is the point at which operators must take actions to restore cooling capabilities.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-SU1
2. SO23-13-23, Loss of Spent Fuel Pool Cooling

4.6 PD-HA1**INITIATING CONDITION:**

HOSTILE ACTION within the VEHICLE BARRIER SYSTEM or airborne attack threat within 30 minutes.

EALs:

1. A HOSTILE ACTION is occurring or has occurred within the VEHICLE BARRIER SYSTEM as reported by the Nuclear Security Shift Supervisor.
- OR**
2. A validated notification from NRC of an aircraft attack threat within 30 minutes of the site.

Basis:

This IC addresses the occurrence of a HOSTILE ACTION within the VEHICLE BARRIER SYSTEM or notification of an aircraft attack threat. This event will require rapid response and assistance due to the possibility of the attack progressing to the PROTECTED AREA, or the need to prepare the plant and staff for a potential aircraft impact.

Timely and accurate communications between Nuclear Security Shift Supervision and the Control Room is essential for proper classification of a security-related event.

Security plans and terminology are based on the guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and INDEPENDENT SPENT FUEL STORAGE INSTALLATION Security Program].

As time and conditions allow, these events require a heightened state of readiness by the plant staff and implementation of onsite protective measures (e.g., evacuation, dispersal or sheltering). The ALERT declaration will also heighten the awareness of Offsite Response Organizations, allowing them to be better prepared should it be necessary to consider further actions.

This IC does not apply to incidents that are accidental events, acts of civil disobedience, or otherwise are not a HOSTILE ACTION perpetrated by a HOSTILE FORCE. Examples include the crash of a small aircraft, shots from hunters, physical disputes between employees, etc. Reporting of these types of events is adequately addressed by other EALs, or the requirements of 10 CFR § 73.71 or 10 CFR § 50.72.

EAL #1 is applicable for any HOSTILE ACTION occurring, or that has occurred, within the VEHICLE BARRIER SYSTEM. This includes any action directed against an ISFSI that is located within the VEHICLE BARRIER SYSTEM.

EAL #2 addresses the threat from the impact of an aircraft on the plant, and the anticipated arrival time is within 30 minutes. The intent of this EAL is to ensure that threat-related notifications are made in a timely manner so that plant personnel and OROs are in a heightened state of readiness. This EAL is met when the threat-related information has been validated in accordance with SO23-13-25, Operator Actions During Security Events.

The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may be provided by NORAD through the NRC.

In some cases, it may not be readily apparent if an aircraft impact within the VEHICLE BARRIER SYSTEM was intentional (i.e., a HOSTILE ACTION). It is expected, although not certain, that notification by an appropriate Federal agency to the site would clarify this point. In this case, the appropriate federal agency is intended to be NORAD, FBI, FAA, or NRC. The emergency declaration, including one based on other ICs/EALs, should not be unduly delayed while awaiting notification by a Federal agency.

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.

Additional SONGS Site-Specific Bases Information:

VEHICLE BARRIER SYSTEM is utilized in place of the OWNER CONTROLLED AREA (OCA) due to the extreme size of the current OCA.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-HA1
2. SO23-13-25, Operator Actions During Security Events

4.7 PD-HU1**INITIATING CONDITION:**

Confirmed SECURITY CONDITION or threat.

EALs:

1. A SECURITY CONDITION that does not involve a HOSTILE ACTION as reported by the Nuclear Security Shift Supervisor.
OR
2. Notification of a credible security threat directed at the site.
OR
3. A validated notification from the NRC providing information of an aircraft threat.

Basis:

This IC addresses events that pose a threat to plant personnel or the equipment necessary to maintain cooling of spent fuel, and thus represent a potential degradation in the level of plant safety. Security events which do not meet one of these EALs are adequately addressed by the requirements of 10 CFR § 73.71 or 10 CFR § 50.72. Security events assessed as HOSTILE ACTIONS are classifiable under IC PD-HA1.

Timely and accurate communications between Nuclear Security Shift Supervision and the Control Room is essential for proper classification of a security-related event. Classification of these events will initiate appropriate threat-related notifications to plant personnel and OROs.

Security plans and terminology are based on the guidance provided by NEI 03-12, Template for the Security Plan, Training and Qualification Plan, Safeguards Contingency Plan [and INDEPENDENT SPENT FUEL STORAGE INSTALLATION Security Program].

EAL #1 references Nuclear Security Shift Supervisor because these are the individuals trained to confirm that a security event is occurring or has occurred. Training on security event confirmation and classification is controlled due to the nature of Safeguards and 10 CFR § 2.39 information.

EAL #2 addresses the receipt of a credible security threat. The credibility of the threat is assessed in accordance with the SONGS Security Contingency Plan and SO123-IV-13.100, Security Tactical Response Plan.

EAL #3 addresses the threat from the impact of an aircraft on the plant. The NRC Headquarters Operations Officer (HOO) will communicate to the licensee if the threat involves an aircraft. The status and size of the plane may also be provided by NORAD through the NRC. Validation of the threat is performed in accordance with SO23-13-25, Operator Actions During Security Events.

Emergency plans and implementing procedures are public documents; therefore, EALs should not incorporate Security-sensitive information. This includes information that may be advantageous to a potential adversary, such as the particulars concerning a specific threat or threat location. Security-sensitive information should be contained in non-public documents such as the Security Plan.

Escalation of the EMERGENCY CLASSIFICATION LEVEL would be via IC PD-HA1.

Additional SONGS Site-Specific Bases Information:

None.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-HU1
2. SONGS Security Contingency Plan
3. SO123-IV-13.100, Security Tactical Response Plan
4. SO23-13-25, Operator Actions During Security Events

4.8 PD-HU2

INITIATING CONDITION:

Hazardous event affecting SAFETY SYSTEM equipment necessary for spent fuel cooling.

EALs:

1. a. The occurrence of **ANY** of the following hazardous events:
 - Seismic event (earthquake)
 - Internal or external flooding event
 - High winds or tornado strike
 - FIRE
 - EXPLOSION
 - Other events with similar hazard characteristics as determined by the Shift Manager

AND

-
- b. The event has damaged at least one train of a SAFETY SYSTEM needed for spent fuel cooling.

AND

-
-
- c. The damaged SAFETY SYSTEM train(s) cannot, or potentially cannot, perform its design function based on **EITHER**:
 - Indications of degraded performance
 - VISIBLE DAMAGE

Basis:

This IC addresses a hazardous event that causes damage to at least one train of a SAFETY SYSTEM needed for spent fuel cooling. The damage must be of sufficient magnitude that the system(s) train cannot, or potentially cannot, perform its design function. This condition reduces the margin to a loss or potential loss of the fuel clad barrier, and therefore represents a potential degradation of the level of safety of the plant.

For EAL 1.a, the event titled "Tsunami" has not been included in the PD EALs because it is already covered under "Internal or external flooding event" and does not constitute a separate and distinct hazardous event.

For EAL 1.c, the first bullet addresses damage to a SAFETY SYSTEM train that is in service/operation since indications for it will be readily available.

For EAL 1.c, the second bullet addresses damage to a SAFETY SYSTEM train that is not in service/operation or readily apparent through indications alone. Operators will make this determination based on the totality of available event and damage report information. This is intended to be a brief assessment not requiring lengthy analysis or quantification of the damage.

Escalation of the EMERGENCY CLASSIFICATION LEVEL could, depending upon the event, be based on any of the ALERT ICs; PD-AA1, PD-AA2, PD-HA1 or PD-HA3.

Additional SONGS Site-Specific Bases Information:

Electrical power is a SAFETY SYSTEM that is required for cooling the SFP. The SONGS boundary for the electrical power SAFETY SYSTEM, as it applies to this EAL, is the onsite equipment including the switchyard. EAL #1 applies to both units if offsite power is lost due to a listed hazardous event that damages onsite equipment and the onsite backup power supply (Diesel Generator) is unavailable for any reason. Damage to onsite equipment must be visible or apparent via degraded performance. Time can be taken to walk down SAFETY SYSTEMs to determine if damage exists due to the hazardous event when there is no indication of degraded performance.

The SFP Cooling System is considered to have two trains; therefore, EAL #1 is applicable when damage occurs to either train due to a listed hazardous event. This is true even though the secondary cooling systems may be cross-tied between units. EAL #1 applies if one of the SFP Cooling System chillers is damaged by a listed hazardous event such that it cannot operate and perform its design function.

The SFP liner, at or below the level of the SFP Primary Cooling Pump suction (see Note 1), is considered a component of the SFP Cooling SAFETY SYSTEM. EAL #1 applies if a listed hazardous event causes a leak in the SFP liner that is beyond makeup capacity and the SFP inventory is approaching the level at which the SFP Primary Cooling Pumps take a suction. This is true even if the SFP Primary Cooling Pump is secured prior to vacuum breaker uncover to prevent equipment damage.

NOTE 1:

Vacuum breaker (anti-siphon) holes in the SFP Primary Cooling Pump suction pipe are at 23'6".

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-HU2

4.9 PD-HA3**INITIATING CONDITION:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of an ALERT.

EALs:

1. Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment because of HOSTILE ACTION. Any releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

Basis:

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the EMERGENCY CLASSIFICATION LEVEL description for an ALERT.

Additional SONGS Site-Specific Bases Information:

None.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-HA3
2. EPA-400, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents

4.10 PD-HU3**INITIATING CONDITION:**

Other conditions exist which in the judgment of the Emergency Director warrant declaration of a NOTIFICATION OF UNUSUAL EVENT.

EALs:

1. Other conditions exist which in the judgment of the Emergency Director indicate that events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of SAFETY SYSTEMS occurs.

Basis:

This IC addresses unanticipated conditions not addressed explicitly elsewhere but that warrant declaration of an emergency because conditions exist which are believed by the Emergency Director to fall under the EMERGENCY CLASSIFICATION LEVEL description for a NOTIFICATION OF UNUSUAL EVENT.

Additional SONGS Site-Specific Bases Information:

None.

Basis Reference(s):

1. NEI 99-01 Rev 6, PD-HU3

4.11 E-HU1

INITIATING CONDITION:

Damage to a loaded canister CONFINEMENT BOUNDARY.

EALs:

1. Damage to a loaded Transnuclear canister CONFINEMENT BOUNDARY as indicated by dose rates greater than **EITHER** of the following:
 - 520 mR/hr (gamma) 3 feet from the surface at the top centerline.
 - 190 mR/hr (gamma) 3 feet from the surface of the neutron shield at the mid-height centerline.
2. Damage to a loaded Holtec canister CONFINEMENT BOUNDARY as indicated by dose rates greater than **EITHER** of the following:
 - 60 mR/hr (neutron plus gamma) on the top of the VVM (closure lid cover plate). A minimum of four dose rate measurements shall be taken on the top of the VVM. These measurements shall be taken approximately 18 inches radially inward from the edge of the lid at the center point of each side.
 - 7,000 mR/hr (neutron plus gamma) on the side of the TRANSFER CASK. A minimum of four dose rate measurements shall be taken on the side of the TRANSFER CASK, approximately at the cask mid-height plane. The measurement locations shall be approximately 90 degrees apart around the circumference of the cask. Dose rates shall be measured between the radial ribs of the water jacket.

Basis:

This IC addresses an event that results in damage to the CONFINEMENT BOUNDARY of a storage canister containing spent fuel. It applies to irradiated fuel that is licensed for dry storage beginning at the point that the loaded storage canister is sealed. The issues of concern are the creation of a potential or actual release path to the environment, degradation of one or more fuel assemblies due to environmental factors, and configuration changes which could cause challenges in removing the canister or fuel from storage.

The existence of "damage" is determined by radiological survey. The technical specification multiple of "2 times", which is also used in PD-AU1, is used here to distinguish between non-emergency and emergency conditions. The emphasis for this classification is the degradation in the level of safety of the spent fuel canister and not the magnitude of the associated dose or dose rate. It is recognized that in the case of extreme damage to a loaded canister, the fact that the "on-contact" dose rate limit is exceeded may be determined based on measurement of a dose rate at some distance from the canister.

Security-related events for ISFSIs are covered under ICs PD-HU1 and PD-HA1.

Additional SONGS Site-Specific Bases Information:

SONGS Transnuclear storage canister Technical Specifications are based on values three feet from the top and mid-height surfaces.

Basis Reference(s):

1. NEI 99-01 Rev 6, E-HU1
2. Certificate of Compliance No. 1029, Appendix A, Technical Specifications for the Advanced NUHOMS System 5.2.4.d
3. Certificate of Compliance No. 1040, Appendix A, Technical Specifications for the HI-STORM UMAX Canister Storage System 5.3.4 and 5.3.8

Attachment 2

Report and Analysis Summary of Changes to Permanently Defueled Emergency Action Level Technical Bases Document

San Onofre Nuclear Generating Station
Report and Analysis Summary
10 CFR 50.54(q)(5)

| Document Number: PDEP-2 Title: San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan Emergency Action Level Technical Bases Manual, Revision 3 SONGS Action Request: AR 0417-33056 | |
|---|---|
| Change Description | Analysis Summary |
| <p>The 10CFR50.54(q) evaluation for PDEP-2 Revision 3 was performed under AR-0417-33056 assignment 4.</p> <p>Changes to PDEP-2 Revision 3 include:</p> <ul style="list-style-type: none">• EAL E-HU1.2 addition to over Holtec spent fuel transport and storage system.• EAL E-HU1.1 revision to add the word Transnuclear to differentiate between the existing Transnuclear system in Emergency Action Level E-HU1.1, and the Holtec system being introduced in Emergency Action Level E-HU1.2.• Addition of definitions due to the introduction of Emergency Action Level E-HU1.2.• Editorial changes | <p>After incorporation of the changes in PDEP-2, Revision 3, the Permanently Defueled Emergency Plan continues to have a standard scheme of emergency classification and action levels in use.</p> <p>The Permanently Defueled Emergency Plan continues to meet the regulatory requirements of 10CFR50.47(b) and 10CFR50 Appendix E, Section IV, as exempted.</p> <p>The changes do not modify the licensing basis with regards to a reduction in effectiveness. The capability and timeliness to perform the planning functions are not altered by the changes described above. The capability and timeliness to perform the associated elements are also maintained. The changes can be implemented without prior NRC approval.</p> |
| PREPARED BY: Lucia Sischo DATE: 12-18-2017 | REVIEWED BY: Kevin Sheek DATE: 1-8-2018 |

Attachment 3

Revised Permanently Defueled Emergency Plan Implementing Procedures

| | | |
|--|---|--|
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| Procedure Usage Requirements | Sections |
|--|----------|
| REFERENCE USE <ul style="list-style-type: none"> • Review and understand the procedure before performing any steps, including the prerequisite section. • Have a copy or applicable pages/sections open at the work site. • Use Placekeeping method according to SO123-XV-HU-3. • If any portion of the document is performed from memory, do so in the sequence specified. Perform each step as written, except when an approved process specifically allows deviation. • Refer to the procedure or instruction at least once to ensure completion of the task in accordance with the requirements. • Review the document at the completion of the task to verify that all appropriate steps are performed and documented. | ALL |

| Color Usage | Location |
|---|----------|
| This Document Does Not Contain Relevant Color | All |

QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / 50.54(q) APPLIES

| Procedure Type |
|----------------|
| General |

| Procedure Owner |
|-----------------|
| Kelli Gallion |

| | | |
|--|--|----------------------------------|
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1.0 **PURPOSE AND SCOPE**

- 1.1 To ensure the Permanently Defueled Emergency Plan (PDEP), consisting of San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan (PDEP-1) and San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan Emergency Action Level Technical Bases Manual (PDEP-2), and its implementing procedures (listed on Appendix 2 of PDEP-1), required by 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, and other Emergency Preparedness related documents, equipment and facilities, are maintained current.
- 1.2 To provide guidance for maintenance and control of the following:
 - San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan (PDEP-1),
 - San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan Emergency Action Level Technical Bases Manual (PDEP-2),
 - PDEP Implementing Procedures (listed on Appendix 2 of PDEP-1),
 - Manual of Emergency Events (MOEE),
 - Letters of Agreement (listed on Appendix 3 of PDEP-1),
 - ERO recall information,
 - Records Management PDEP-1, PDEP-2, and MOEE Distribution Matrix,
 - Matrix of Periodic Drill and Exercises Objectives
- 1.3 To ensure equipment used for emergency classification and response is properly maintained in a state of readiness. Equipment whose surveillance or testing is covered by Technical Specifications or Licensee Controlled Specifications is outside the scope of this program.
- 1.4 To define the responsibilities for surveillance and maintenance of emergency response equipment and the reporting of equipment status.
- 1.5 To provide the process for identifying emergency response equipment, communicating equipment issues, using appropriate compensatory measures, and applying an appropriate priority to the restoration of the equipment or facilities.
- 1.6 To test emergency communications with State, Local, and Federal authorities and to test telecommunication equipment in the Command Center in accordance with 10 CFR 50, Appendix E, Section IV.E.9.a-d, as exempted.
- 1.7 To identify, report and track emergency communications equipment malfunctions.

| | | |
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2.0 **RESPONSIBILITIES**

NOTE

Some Permanently Defueled Emergency Plan Equipment program elements are administered by other departments with Emergency Preparedness (EP) oversight. Refer to Attachment 1 to identify the Cognizant Divisions for specific equipment.

2.1 **Emergency Preparedness Manager:**

- 2.1.1 Maintaining and controlling the PDEP and related documents, and coordinating reviews and changes to those documents as specified in this procedure.
- 2.1.2 Designating technical reviewers for changes other than editorial for PDEP-1, PDEP-2, or Implementing Procedures as needed.
- 2.1.3 Maintaining oversight of emergency response equipment and facilities, as well as ensuring work and change-related processes include appropriate screening requirements to identify impacts to the PDEP.
- 2.1.4 Maintaining and inspecting emergency response equipment and supplies not assigned to other groups.

2.2 **Onsite Review Committee (OSRC):**

- 2.2.1 Reviewing and approving changes other than editorial for PDEP-1 and PDEP-2.

2.3 **Cognizant Divisions (SCE and SDS) (listed in Attachment 1):**

- 2.3.1 Scheduling, inspecting, and maintaining equipment contained under their area of responsibility in accordance with associated procedures and SONGS Preventive Maintenance Program.
- 2.3.2 Notifying the Shift Manager when maintenance and inspection activities reveal deficiencies resulting in equipment being out of service for other than planned maintenance.

2.4 **Shift Manager (SM) / Emergency Director (ED):**

- 2.4.1 Performing SO123-XV-52, Operability Determinations and Functionality Assessments.
- 2.4.2 Performing SO123-0-A7, Notification and Reporting of Significant Events.
- 2.4.3 Ensuring appropriate actions, including identification, tracking, and compensatory measures, are taken when Emergency Response equipment or facilities are degraded or removed from service.

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2.4.4 Maintaining the Command Center in a state of readiness as the primary Emergency Response Facility.

2.5 Engineering Managers (SCE and SDS):

NOTE

Each Engineering group, DA Engineering or SDS Engineering, provides support for equipment under their responsibility, e.g., DA Engineering provides support for ISFSI equipment.

2.5.1 Determining equipment and system availability when equipment deficiencies are identified.

2.5.2 Ensuring a design change process identifies any impacts to emergency plan commitments and emergency response capabilities.

2.6 SCE NRA Manager:

2.6.1 Providing guidance on compliance with the station licensing basis and related reportability issues.

2.7 Maintenance and Work Control Managers (SDS):

2.7.1 Ensuring that work on emergency response equipment within the scope of the work control program is appropriately prioritized and scheduled.

2.8 SDS will perform Emergency Preparedness functions and support per SDS-EP1-PLN-0001, including but not limited to the following:

2.8.1 Performing inventory and restocking equipment and supplies for the Emergency Kits.

2.8.2 Performing routine and emergent maintenance on onsite EP equipment when the appropriate functional areas have been implemented.

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3.0 **DEFINITIONS**

NOTE

PDEP contains additional definitions and acronyms applicable to Emergency Preparedness Program.

- 3.1 **Annual:** At least once per calendar year, January 1 to December 31
- 3.2 **Compensatory Measure:** A temporary means of mitigating the degradation or loss of an emergency response function, or of maintaining the emergency response function until the equipment is restored to a fully functional condition.
- 3.3 **Emergency Response Equipment:** Systems, structures, and components, as well as tools and equipment, necessary to implement the emergency plan.
- 3.4 **Monthly:** At least once per calendar month.
- 3.5 **Quarterly:** At least once in each of the following four periods: January 1 through March 31; April 1 through June 30; July 1 through September 30; October 1 through December 31.

4.0 **PRECAUTIONS**

- 4.1 The Permanently Defueled Emergency Plan is designed as a last line of defense to address design basis accident events at a nuclear power plant, including the capability of protecting public health and safety during and following the event. Therefore, regulations that govern emergency plan equipment may require more timely restoration than technical specifications or other administrative controls.
- 4.2 Emergency Response Equipment must be capable of functioning at all times. If there is a loss of function, compensatory measures must be evaluated and used to restore the function until the equipment is repaired.
- 4.3 A loss of function of the Permanently Defueled Emergency Plan requires a determination regarding reportability in accordance with SO123-0-A7 (10 CFR 50.72).

5.0 **PREREQUISITES**

- 5.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.
- 5.2 **VERIFY** Level of Use requirements on the first page of this procedure.

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NOTE

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

6.0 **PROCEDURE**

6.1 **PDEP-1, PDEP-2, and Implementing Procedures Revisions**

- 6.1.1 Revise PDEP-1, PDEP-2 or Implementing Procedures (listed on Appendix 2 of PDEP-1) in accordance with station procedure revision requirements (reference SO123-XV-109.1).
- 6.1.2 Prior to issuing PDEP-1, PDEP-2, or Implementing Procedures, ensure:
 - 6.1.2.1 10 CFR 50.54(q) screen/evaluation has been performed in accordance with SO123-VIII-ADMIN-4, and the results indicate that the changes can be made without prior NRC approval,
 - OR
 - 6.1.2.2 approval from the NRC to make the changes has been received.
- 6.1.3 Changes other than editorial to PDEP-1 and PDEP-2 require the following additional review and approval:
 - Independent technical review
 - Third party review of 10 CFR 50.54(q) Screening/Evaluation
 - NRA compliance review
 - Onsite Review Committee (OSRC) review and approval
- 6.1.4 Changes to PDEP-2 EALs require validation to ensure the EALs can be implemented in a timely manner.
- 6.1.5 PDEP-1, PDEP-2, and Implementing Procedures are distributed to locations responsible for PDEP implementation on a controlled basis in accordance with Records Management Distribution List.
- 6.1.6 Communicate changes to Emergency Preparedness documents to affected ERO personnel as directed by the Emergency Preparedness Manager.
- 6.1.7 Initiate an Action Request assignment for the 30-day NRC notification requirement when PDEP-1, PDEP-2, or Implementing Procedures are issued.

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- 6.1.8 Provide EP(123) SOA form to Licensing Engineer within 15 days of PDEP-1, PDEP-2, or Implementing Procedure issuance, when the revision of these documents required a full 10 CFR 50.54(q) Evaluation using EP(123) QEV.

6.2 **Lower-tiered Document Revisions**

- 6.2.1 Revise lower-tiered documents not listed in Appendix 2 of PDEP-1 in accordance with station procedure revision requirements (reference SO123-XV-109.1).
- 6.2.2 Review technical changes to EP(123) NF, Notification Form, that affect items covered in PDEP-1, Part II, Section E, with Cal OES, Marine Corps Camp Pendleton, Orange County, and San Diego County.
- 6.2.2.1 Document review and concurrence under the Action Request tracking the changes.
- 6.2.3 A change to lower-tiered documents does not normally require a 10 CFR 50.54(q) screen/evaluation
- IF an Emergency Plan requirement is removed from the Emergency Plan **AND** relocated to a lower tiered document, THEN the lower tiered document must be reviewed in accordance with 10 CFR 50.54(q). In this case, the lower tiered document now contains the Emergency Plan license requirement **AND** should be listed in Appendix 2 of PDEP-1.
- 6.2.4 Communicate changes to Emergency Preparedness documents to affected ERO personnel as directed by the Emergency Preparedness Manager.

6.3 **Review of Emergency Preparedness Documents**

- 6.3.1 Emergency Preparedness personnel or designee shall review PDEP-1 annually to identify changes to be incorporated in the next revision.
- 6.3.1.1 Document review on Attachment 2.
- 6.3.2 Emergency Preparedness personnel or designee shall review PDEP-2, MOEE and EP(123) EAL annually to identify changes to be incorporated in the next revision (CA 202827656-0018).
- 6.3.2.1 Document review on Attachment 2.
- 6.3.3 Emergency Preparedness personnel or designee shall coordinate PDEP requirements with Physical Security Plan (PSP) and Safeguards Contingency Plan (SCP) requirements and review them annually.
- 6.3.3.1 Document review on Attachment 3.

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- 6.3.4 Emergency Preparedness personnel or designee shall be responsible for reviewing the EALs with the State and local jurisdictions on an annual basis.
- 6.3.4.1 Document review on Attachment 4.
- 6.3.5 Emergency Preparedness personnel or designee shall review agreements involving firefighting, rescue, transport of injured person, medical treatment, law enforcement, local agencies, and laboratory contracts annually to ensure documents are current.
- 6.3.5.1 Document review on Attachment 5.
- 6.3.6 Emergency Preparedness personnel or designee shall review Emergency Response Directory quarterly to ensure ERO recall information (names and numbers), support personnel, and applicable offsite organizations is maintained current.
- 6.3.6.1 Document review on Attachment 6.
- 6.3.7 Emergency Preparedness personnel or designee will review Records Management Distribution Matrix for PDEP-1 and MOEE annually to verify distribution information is maintained current.
- 6.3.7.1 Document review on Attachment 7.
- 6.3.8 Emergency Preparedness personnel or designee shall review EP(123) PDE against accomplished objectives frequently enough to ensure all required objectives have been accomplished or scheduled within their periodicity (recommend review completed by second quarter).
- 6.3.8.1 Document review on Attachment 8.
- 6.3.8.2 Emergency Preparedness personnel or designee shall complete EP(123) PDE during the fourth quarter.
- 6.3.8.3 Document completion on Attachment 8.
- 6.3.9 Emergency Preparedness personnel or designee will review On-Shift ERO Roster Exception Report quarterly to ensure On-Shift requirements are met.
- 6.3.9.1 Document review on Attachment 9.
- 6.3.10 Emergency Preparedness personnel will **NOTIFY** offsite response organizations of updates to the PDEP-1, PDEP-2, or Implementing Procedures (listed on Appendix 2 of PDEP-1) on an annual basis.
- 6.3.10.1 Document review on Attachment 20.

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6.4 Emergency Response Equipment Inspections

- 6.4.1 SDS Maintenance personnel or designee will perform inventory of damage control and mitigation equipment under their responsibility in EP(123) EKIL, quarterly, or within 7 days after each use, and forward a copy of the inventory to Emergency Preparedness.
 - 6.4.1.1 A system of sealed containers may be used versus actual performance of item-by-item inventory.
 - 6.4.1.2 Document inventory receipt on Attachment 10.
- 6.4.2 SDS Radiation Protection personnel or designee will perform inventory of radiation protection equipment and supplies under their responsibility in EP(123) EKIL, quarterly, or within 7 days after each use, and forward a copy of the inventory to Emergency Preparedness.
 - 6.4.2.1 A system of sealed containers may be used versus actual performance of item-by-item inventory.
 - 6.4.2.2 Document inventory receipt on Attachment 10.
- 6.4.3 Emergency Preparedness personnel or designee will perform visual inspection and supplies inventory of the Site Assembly Areas quarterly, or within 7 days after each use.
 - 6.4.3.1 A system of sealed containers may be used versus actual performance of item-by-item inventory.
 - 6.4.3.2 NOTIFY site personnel of changes in Site Assembly Area locations or availability.
 - 6.4.3.3 Document inspection and inventory on Attachment 10.
- 6.4.4 Operations personnel or designee will perform inventory of the ERO Notebooks, First Aid Kit, and miscellaneous supplies under their responsibility in EP(123) EKIL, quarterly, or within 7 days after each use, and forward a copy of the inventory to Emergency Preparedness.
 - 6.4.4.1 A system of sealed containers may be utilized versus actual performance of item-by-item inventory.
 - 6.4.4.2 Document inventory on Attachment 10.
- 6.4.5 Emergency Preparedness personnel or designee will perform visual inspection of Site Evacuation Route signs annually.
 - 6.4.5.1 Document inventory on Attachment 19.

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6.4.6 Emergency Preparedness personnel or designee will perform an inventory of supplies maintained at Hospitals annually, or within 7 days after each use.

6.4.6.1 Document inventory on EP(123) HIL.

6.4.6.2 Document completion of inventory on Attachment 21.

6.5 **Emergency Response Communication Tests**

6.5.1 Operations personnel or designee shall perform communications test with the Cal OES, Orange County, San Diego County and Marine Corps Base, Camp Pendleton monthly.

6.5.1.1 Document test on Attachment 11.

6.5.2 Operations personnel or designee shall perform communications test with the NRC Headquarters monthly.

6.5.2.1 Document test on Attachment 11.

6.5.3 Operations personnel or designee will perform communications test of Command Center Emergency Kit Radios and cellular phones quarterly.

6.5.3.1 Document test on Attachment 12.

6.5.4 Security personnel or designee will perform communications test of Command Center satellite phones and staging area satellite phones quarterly.

6.5.4.1 Document test on Attachment 12.

6.6 **Onsite Emergency Siren Systems Tests**

6.6.1 Operations personnel or designee shall perform PA Siren Tone Generator test annually.

6.6.1.1 Document test on Attachment 13.

6.6.2 Operations personnel or designee shall perform Units 2/3 Thunderbolt Siren test annually.

6.6.2.1 Document test on Attachment 14.

6.6.3 Operations personnel or designee shall perform Units 2/3 Buildings and Grounds OESS test annually.

6.6.3.1 Document test on Attachment 15.

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6.6.4 Operations personnel or designee shall perform Units 2/3 Containment OESS test annually if Containment is open and accessible.

6.6.4.1 Document test on Attachment 16.

6.6.5 Operations personnel or designee shall perform Perimeter Public Address System (PPAS) test quarterly from different locations based on the calendar quarter in which the surveillance is scheduled.

6.6.5.1 Document test on Attachment 17.

6.7 **Identifying Emergency Response Equipment**

6.7.1 Emergency response equipment may be identified by checking the list contained in Attachment 1.

6.7.2 Personnel discovering emergency response equipment not listed in Attachment 1 should **GENERATE** appropriate deficiency tracking documents (e.g., Trouble Ticket, IT request, Action Request, Condition Report).

6.8 **Discovery of Degraded or Nonfunctional Emergency Response Equipment**

6.8.1 Personnel discovering problems with emergency response equipment should:

6.8.1.1 **GENERATE** appropriate deficiency tracking documents (e.g., Trouble Ticket, IT request, Action Request, Condition Report).

6.8.1.2 **NOTIFY** the Shift Manager.

6.8.2 WHEN notified of nonfunctional or degraded emergency response equipment, THEN the Shift Manager will consult Attachment 1 to identify compensatory measures.

6.8.3 **VERIFY** compensatory measures are available:

6.8.3.1 **USE** compensatory measures (if action is required) immediately following equipment loss or facility functional failure.

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- 6.8.4 IF compensatory measures are **NOT** available, OR Attachment 1 only states repair or replacement, THEN
- 6.8.4.1 The Shift Manager should complete Attachment 18 to identify and evaluate the appropriate use of interim compensatory measures.
- 6.8.4.1.1 The Shift Manager may consult with the Emergency Preparedness Manager or other subject matter experts when developing and approving interim compensatory measures in Attachment 18.
- 6.8.4.1.2 IF an appropriate reviewer is not available, THEN the Shift Manager may sign Attachment 18 as the reviewer.
- 6.8.5 The Shift Manager will **NOTIFY** the Emergency Preparedness Manager of the nonfunctional or degraded emergency response equipment and compensatory measures used.
- 6.8.6 The Shift Manager will **PRIORITIZE** equipment restoration in a timely manner.
- 6.8.7 The Shift Manager will **ADD** nonfunctional or degraded emergency response equipment requiring compensatory actions to the Shift Manager Shift Relief Status Sheet, including the compensatory measures being used.
- 6.8.7.1 Where Attachment 1 equipment includes multiple components (i.e., phones, PA speakers, sirens, computer systems, emergency kits), the equipment should only be included in the Shift Manager Shift Relief Status Sheet if there is a complete loss of the system/function, or a significant portion thereof.
- 6.8.7.2 For an **UNPLANNED** loss of equipment used to determine if EAL criteria are met (i.e., rad monitors), the equipment should be included in the "Operations Focus Items" section of the Shift Manager Shift Relief Status Sheet to support the timely repair of this equipment.

6.9 **Planned Maintenance Affecting Emergency Response Equipment**

- 6.9.1 Personnel identifying emergency response equipment that will be degraded or rendered nonfunctional as the result of planned maintenance should consult the Shift Manager to identify compensatory measures. The Shift Manager will:
- 6.9.2 **VERIFY** compensatory measures listed in Attachment 1 are available.
- 6.9.2.1 **ENSURE** compensatory measures are established prior to starting work.

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6.9.3 IF compensatory measures are **NOT** available, OR Attachment 1 only states repair or replacement, THEN

6.9.3.1 The Shift Manager may permit equipment to be removed from service for maintenance or surveillance testing if:

- Personnel removing the equipment from service remain in the immediate area.

AND

- The equipment can be restored to service immediately when notified by the Control Room.

6.9.3.2 IF the conditions of Step 6.9.3.1 cannot be met, THEN the Shift Manager may implement interim compensatory measures according to Attachment 18.

- **COMPLETE** Attachment 18.
- **ENSURE** interim compensatory measures from Attachment 18 are established prior to starting work.

6.9.4 The Shift Manager will **NOTIFY** the Emergency Preparedness Manager of the nonfunctional or degraded emergency response equipment and compensatory measures used.

6.9.5 SDS Work Control should **PLAN** work activities to minimize the time equipment is degraded or nonfunctional.

6.9.6 The Shift Manager will **ADD** nonfunctional or degraded emergency response equipment requiring compensatory actions to the Shift Manager Shift Relief Status Sheet; including the compensatory measures being used.

6.9.6.1 Where Attachment 1 equipment includes multiple components (i.e., phones, PA speakers, sirens, computer systems, emergency kits), the equipment should only be included in the Shift Manager Shift Relief Status Sheet if there is a complete loss of the system/function, or a significant portion thereof.

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6.10 **Restoration of Emergency Response Equipment**

- 6.10.1 Emergency Response equipment and facilities should be restored to service with a priority commensurate with the significance of the associated emergency response function.
- 6.10.2 Work Control should notify the Shift Manager of any work on Emergency Response equipment that is over schedule or at risk.
 - 6.10.2.1 The Shift Manager will **NOTIFY** the Emergency Preparedness Manager.
- 6.10.3 The organization completing the work should **NOTIFY** the Shift Manager when work is complete and the equipment is restored to service.
 - 6.10.3.1 The Shift Manager will **NOTIFY** the Emergency Preparedness Manager.
 - 6.10.3.2 The Shift Manager will remove the equipment and compensatory measures from the Shift Manager Shift Relief Status Sheet.

7.0 **RETENTION OF RECORDS**

- 7.1 A history file for revised PDEP-1, PDEP-2, or Implementing Procedures (listed on Appendix 2 of PDEP-1), and MOEE shall be retained in SAP for six years after the date of each change.
- 7.2 Completed Attachments for monthly and quarterly reviews and inspections shall be scanned into eDMRM on a quarterly basis prior to the end of the following quarter using RPA 99-0119E.
- 7.3 Completed Attachments for annual reviews and inspections shall be scanned into eDMRM on an annual basis within three months prior to the end of the following quarter using RPA 99-0119E.
- 7.4 Completed copies of Attachments for monthly, quarterly, and annual reviews and inspections shall be retained in EP files for at least six years for the purpose of facilitating inspections and assessments.

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8.0 REFERENCES / COMMITMENTS

8.1 Implementing Reference

8.1.1 Procedures

- 8.1.1.1 SO123-XVIII-11.8, Perimeter Public Address System (PPAS) Surveillance and Inspection
- 8.1.1.2 SO123-XV-HU-3, Human Performance Program
- 8.1.1.3 SO123-XV-109.1, Processing Procedures, Instructions, Periodic Reviews, and Forms
- 8.1.1.4 SO123-XV-52, Operability Determinations and Functionality Assessments
- 8.1.1.5 SO123-0-A7, Notification and Reporting of Significant Events
- 8.1.1.6 SO123-VIII-ADMIN-4, 10CFR50.54(q) Screenings and Evaluations
- 8.1.1.7 SO123-VIII-ERO-2, Shift Manager/Emergency Director Checklist
- 8.1.1.8 SO23-3-2.11.2, Spent Fuel Pool Cooling Island Operation
- 8.1.1.9 SO23-3-2.11.3, Spent Fuel Pool Cooling Island Off-Normal Actions
- 8.1.1.10 SO23-3-2.20.1, Meteorological Display System Operation
- 8.1.1.11 SO23-6-31, Communication Systems Operation
- 8.1.1.12 SDS-EP1-PLN-0001, Emergency Preparedness and Response Support Plan

8.1.2 Forms

- 8.1.2.1 EP(123) PDE, Matrix of Periodic Drill and Exercises Objectives
- 8.1.2.2 EP(123) EKIL, Emergency Kit Inventory List
- 8.1.2.3 EP(123) EAL, Emergency Action Levels
- 8.1.2.4 EP(123) HIL, Hospital Inventory List
- 8.1.2.5 EP(123) NF, Notification Form
- 8.1.2.6 EP(123) SOA, San Onofre Nuclear Generating Station Report and Analysis Summary 10 CFR 50.54(q)(5)

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8.2 Developmental References

8.2.1 Commitments

- 8.2.1.1 SONGS Permanently Defueled Emergency Plan, Volume 1
- 8.2.1.2 SONGS Permanently Defueled Emergency Plan, Volume 2, EAL Technical Bases Manual
- 8.2.1.3 Technical Specifications
- 8.2.1.4 SO123-ODCM, SONGS Offsite Dose Calculation Manual (ODCM)
- 8.2.1.5 SONGS 2 & 3 UFSAR Section 9.5.2.2.1.3, Emergency Evacuation Alarm System
- 8.2.1.6 SONGS 2 & 3 UFSAR Section 2.1.2, Exclusion Area Authority and Control
- 8.2.1.7 SONGS 2 & 3 UFSAR Figure 2.1-5

8.2.2 Procedures

- 8.2.2.1 SO123-V-19, SONGS Preventive Maintenance (PM) Program
- 8.2.2.2 SO123-VI-29, Records Management
- 8.2.2.3 SO123-VIII-ADMIN-2, Emergency Preparedness Program Training
- 8.2.2.4 SO123-VIII-ADMIN-3, Emergency Preparedness Program Drill Development and Evaluation
- 8.2.2.5 SO123-XII-18.1, Audit Program Implementation

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| Emergency Plan Equipment | Attachment 1 |
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| Equipment | Description / Function | Equipment ID / Functional Location | Compensatory Measures (See Procedure Sections 6.8, 6.9, and 6.10) | Reference | Cognizant Division |
|---|---|------------------------------------|---|--|---------------------------|
| Unit 2 Plant Vent Stack Radiation Monitor | Gaseous Effluent Radiation Monitor Unit 2 PVS | 2RE7865 | 1. Ensure 3RE7865 is functional and aligned to the plant vent stack. 2. If 3RE7865 is nonfunctional or not aligned to the plant vent stack, <u>then</u> monitor 2/3RE7808. 2.1 If 2/3RE7808 reaches 2 times the ODCM limit, <u>then</u> : 2.1.1 Evaluate for EAL PD-AU1.2 entry; 2.1.2 Perform dose assessment based on sample analysis or field readings, and evaluate for EALS PD-AA1.2 or PD-AA1.4 entry. 3. If 2/3RE7808 is nonfunctional, <u>then</u> collect grab samples at least once per 12 hours, and analyze them within 4 hours of collection time. 3.1 If sample analysis shows increase in radioactivity, <u>then</u> increase grab sample frequency to at least once per 4 hours, and analyze samples as soon as possible following collection. 3.2 If analysis result reaches 2 times the ODCM limit, <u>then</u> : 3.2.1 Evaluate for EAL PD-AU1.2 entry; 3.2.2 Perform dose assessment based on sample analysis or field readings, and evaluate for EALS PD-AA1.2 or PD-AA1.4 entry. | PDEP-2: PD-AU1, PD-AA1 Effluent Monitor; PDEP-1: H.5, I.1 | MAINT/ENG/RP, CHEM, & ENV |
| Unit 3 Plant Vent Stack Radiation Monitor | Gaseous Effluent Radiation Monitor Unit 3 PVS | 3RE7865 | 1. Ensure 2RE7865 is functional and aligned to the plant vent stack. 2. If 2RE7865 is nonfunctional or not aligned to the plant vent stack, <u>then</u> monitor 2/3RE7808. 2.1 If 2/3RE7808 reaches 2 times the ODCM limit, <u>then</u> : 2.1.1 Evaluate for EAL PD AU1.2 entry; 2.1.2 Perform dose assessment based on sample analysis or field readings, and evaluate for EALS PD-AA1.2 or PD-AA1.4 entry. 3. If 2/3RE7808 is nonfunctional, <u>then</u> collect grab samples at least once per 12 hours, and analyze them within 4 hours of collection time. 3.1 If sample analysis shows increase in radioactivity, <u>then</u> increase grab sample frequency to at least once per 4 hours, and analyze samples as soon as possible following collection. 3.2 If analysis result reaches 2 times the ODCM limit, <u>then</u> : 3.2.1 Evaluate for EAL PD-AU1.2 entry; 3.2.2 Perform dose assessment based on sample analysis or field readings, and evaluate for EALS PD-AA1.2 or PD-AA1.4 entry. | PDEP-2: PD-AU1, PD-AA1 Effluent Monitor; PDEP-1: H.5, I.1 | MAINT/ENG/RP, CHEM, & ENV |
| Unit 2/3 Plant Vent Stack Radiation Monitor | Gaseous Effluent Radiation Monitor Unit 2/3 PVS | 2/3RE7808 | 1. Ensure 2RE7865 or 3RE7865 is functional and aligned to the plant vent stack. 2. If 2RE7865 and 3RE7865 is nonfunctional or not aligned to the plant vent stack, <u>then</u> collect grab samples at least once per 12 hours, and analyze them within 4 hours of collection time. 2.1 If sample analysis shows increase in radioactivity, <u>then</u> increase grab sample frequency to at least once per 4 hours, and analyze samples as soon as possible following collection. 2.2 If analysis result reaches 2 times the ODCM limit, <u>then</u> : 2.2.1 Evaluate for EAL PD-AU1.2 entry; 2.2.2 Perform dose assessment based on sample analysis or field readings, and evaluate for EALS PD-AA1.2 or PD-AA1.4 entry. | PDEP-2: PD-AU1 Effluent Monitor; PDEP-1: H.5, I.1 | MAINT/ENG/RP, CHEM, & ENV |
| NIA Yard Drain Sump Radiation Monitor | Liquid Effluent Radiation Monitor North Industrial Area Yard Drainage Sump | 2/3RE2101 | 1. If 2/3RE2101 is nonfunctional and an operationally required release is in progress, <u>then</u> collect grab samples at least once per 12 hours, and analyze samples within 4 hours of collection time. 1.1 If sample analysis shows increase in radioactivity, <u>then</u> increase grab sample frequency to at least once per 4 hours, and analyze samples as soon as possible following collection. 1.2 If analysis result reaches 2 times the ODCM limit, <u>then</u> evaluate for EAL PD-AA1.3 or PD-AU1.2 entry. | PDEP-2: PD-AU1 Effluent Monitor; PDEP-1: H.5, I.1 | MAINT/ENG/RP, CHEM, & ENV |

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| Emergency Plan Equipment | Attachment 1 |
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| Equipment | Description / Function | Equipment ID / Functional Location | Compensatory Measures (See Procedure Sections 6.8, 6.9, and 6.10) | Reference | Cognizant Division |
|--|---|--------------------------------------|--|--|------------------------------|
| Radwaste Discharge to Outfall Radiation Monitor | Liquid Radwaste Effluent Radiation Monitor | 2/3RE7813 | 1. If 2/3RE7813 is nonfunctional and a release is operationally required, <u>then</u> 1.1 Effluent releases may continue provided that prior to initiating a release, at least two independent samples are analyzed in accordance with ODCM Specification 1.1.1, and at least two technically qualified members independently verify the release rate calculation and discharge line valving. 1.1.1 If a release is in progress, <u>then</u> collect grab samples at least once per 12 hours, and analyze them within 4 hours of collection time. 1.1.1.1 If sample analysis shows increase in radioactivity, <u>then</u> increase grab sample frequency to at least once per 4 hours, and analyze samples as soon as possible following collection. 1.1.1.2 If analysis result reaches 2 times the ODCM limit, <u>then</u> evaluate for EAL PD-AA1.3 or PD-AU1.2 entry. | PDEP-2: PD-AU1 Effluent Monitor; PDEP-1: H.5, I.1 | MAINT/ENG/RP, CHEM, & ENV |
| Unit 2 Turbine Plant Sump Radiation Monitor | Liquid Effluent Radiation Monitor Unit 2 Turbine Plant Sump | 2RE7821 | 1. If 2RE7821 is nonfunctional and an operationally required release is in progress, <u>then</u> collect grab samples at least once per 12 hours and analyze samples within 4 hours of collection time. 1.1 If sample analysis shows increase in radioactivity, <u>then</u> increase grab sample frequency to at least once per 4 hours, and analyze samples as soon as possible following collection. 1.2 If analysis result reaches 2 times the ODCM limit, <u>then</u> evaluate for EAL PD-AA1.3 or PD-AU1.2 entry. | PDEP-2: PD-AU1 Effluent Monitor; PDEP-1: H.5, I.1 | MAINT/ENG/RP, CHEM, & ENV |
| Control Room Area Radiation Monitor | Area Radiation Monitor Control Room/Command Center/Central Alarm Station | 2/3RE7851 | 1. If 2/3RE7851 is nonfunctional, <u>then</u> 1.1 Perform closed window radiation surveys near the Control Room/Command Center/Central Alarm Station at least once per 4 hours, OR install portable radiation monitoring equipment near the Control Room/Command Center/Central Alarm Station and obtain readings at least once per 4 hours. 1.2 Evaluate results per PD-AA2.1 and PD-AU2.2. | PDEP-2: PD-AA2; PDEP-1: H.5, I.1 | MAINT/ENG |
| Unit 2 Fuel Handling Building Spent Fuel Cask Area Radiation Monitor | Area Radiation Monitor Unit 2 Fuel Handling Building Fuel Cask | 2RE7850 | 1. If 2RE7850 is nonfunctional, <u>then</u> 1.1 Perform closed window radiation surveys near the 2SFP at least once per 4 hours, OR install portable radiation monitoring equipment near the 2SFP and obtain readings at least once per 4 hours. 1.2 Evaluate results per PD-AA2.2, PD-AU2.1, and PD-AU2.2. | PDEP-2: PD-AU2, PD-AA2; PDEP-1: H.5, I.1 | MAINT/ENG |
| Unit 3 Fuel Handling Building Spent Fuel Cask Area Radiation Monitor | Area Radiation Monitor Unit 3 Fuel Handling Building Fuel Cask | 3RE7850 | 1. If 3RE7850 is nonfunctional, <u>then</u> 1.1 Perform closed window radiation surveys near the 3SFP at least once per 4 hours, OR install portable radiation monitoring equipment near the 3SFP and obtain readings at least once per 4 hours. 1.2 Evaluate results per PD-AA2.2, PD-AU2.1, and PD-AU2.2. | PDEP-2: PD-AU2, PD-AA2; PDEP-1: H.5, I.1 | MAINT/ENG |
| Spent Fuel Pool Temperature Indication | Temperature Indication Spent Fuel Pool | TI PW2(3)-POOL | Verify alternate indicator(s) [i.e., SFP Heat Exchanger Inlet Temperature TI HX2(3)-PW-IN] available for evaluation when primary indicator unavailable. | PDEP-2, PD-SU1; PDEP-1: I.1 | MAINT/ENG |
| Protected Area Access Control and Personnel Accountability System | System that provides accountability of site personnel, visitors and contract personnel inside the Protected Area. | Security computer SA.SECS.2/3L292 | Timely repair of equipment. Use manual tracking of personnel inside PA. | PDEP-1: D.1.b, J.1 | SEC/ENG |

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|--------------------------|--------------|
| Emergency Plan Equipment | Attachment 1 |
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| Equipment | Description / Function | Equipment ID / Functional Location | Compensatory Measures (See Procedure Sections 6.8, 6.9, and 6.10) | Reference | Cognizant Division |
|---|--|------------------------------------|--|----------------------------------|---------------------------|
| Meteorological Tower, Primary | Meteorological equipment with wind speed (mph), wind direction (degrees), and delta temperature (ΔT), indications used to provide onsite meteorological parameters to determine protective actions and dose assessment. | SA.METS.S1-METS-TOWER-1 | SO23-3-2.20.1, Attachment 4. Use the following compensatory measures when primary tower wind speed or direction (10m and 40m) instrumentation is not functional. Backup meteorological instrumentation is available. If not, contact National Weather Service to obtain current local weather information. Otherwise use other available current local weather reports (e.g., weatherlink.com, weather.com, wunderground.com). | PDEP-1: H.8, I.5; PDEP-2: PD-AA1 | MAINT/ENG/RP, CHEM, & ENV |
| Assembly Area | Designated assembly location to relocate and monitor personnel evacuated from areas of the plant. | AWS MPR | Timely correction of deficiencies. Use Staging Area North of Parking Lot 4. | PDEP-1: K.2 | FAC/MAINT |
| Decontamination sinks and showers | Collect decontamination/medical treatment liquid wastes. | | Set up temporary decontamination areas. Arrange for portable storage containers. | PDEP-1: H.10, K.4.b, K.5.a, L.2 | RP, CHEM & ENV |
| Command Center | Onsite Emergency Response Facility. The operations center of the station from which the plant can be monitored. | | Alternate Command Center (70', K10/K20, AWS D44) Staging Area North of Parking Lot 4. | PDEP-1: H.1 | OPS/FAC/MAINT |
| Alternate Command Center (70', K10/K20, AWS D44) | Location for the Command Center relocation in the event it is threatened with security events or hazardous conditions. | | Determine ad hoc location. | PDEP-1: H.1 | FAC/MAINT |
| NRC Emergency Telecommunications System (ETS) [ENS] | NRC dedicated telephone line to NRC Operations Center. | 0R2TRD1 | Timely repair of equipment. Use commercial telephone lines, PAX telephone system, cellular phones, satellite phones. | PDEP-1: E.2.b.2; F.1.c, F.1.f | IT/TELECOM |
| PA Siren Tone Generator | Public Address System and Alarm Activation System. Paging and Siren PAX Phone System. Routine and emergency site announcements and PAX siren tone generators operated entirely through the PAX phone system (SO23-6-31). | | Timely repair of equipment. Units 2/3 Onsite Emergency Siren System and Onsite Emergency Thunderbolt sirens. Commercial telephone lines, cellular phones, satellite phones, PAX telephone system, or radios. | PDEP-1: D.1, E.2.a, F.1.e, J.1 | MAINT/IT/TELECOM |
| Units 2/3 Onsite Emergency Siren System (OESS) | Alarm Activation System. Sirens located through the Protected Area Buildings, Grounds and Containment. | Multiple IDs CR57 STARTS THEM | Timely repair of equipment. PA Siren Tone Generator and Onsite Emergency Thunderbolt sirens. Rovers for notifying personnel in outside areas. Commercial telephone lines, cellular phones, satellite phones, PAX telephone system, or radios. | PDEP-1: D.1, E.2.a, J.1 | MAINT/IT/TELECOM |

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| Emergency Plan Equipment | Attachment 1 |
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| Equipment | Description / Function | Equipment ID / Functional Location | Compensatory Measures (See Procedure Sections 6.8, 6.9, and 6.10) | Reference | Cognizant Division |
|---|--|--------------------------------------|--|--|--------------------|
| Perimeter Public Address System (PPAS) | Public Address System. Audible message to public near plant perimeter. | 2/3L210 | 1. If a speaker is nonfunctional, then use Attachment 17 to perform a System Functional Test at the applicable test location (forward Attachment to EP). 1.1. If the System Functional Test fails, then develop a plan to assign personnel to cover applicable test location. Document the plan in the Shift Manager Shift Relief Status Sheet. 2. Timely repair of equipment. | PDEP-1: D.1, J.1 | MAINT/IT/TELECOM |
| Onsite Emergency Thunderbolt Sirens | Alarm Activation System. | M033, M034, M035 CR57 STARTS THEM | Timely repair of equipment. Unit 2/3 Onsite Emergency Siren System and PA Siren Tone Generator. Rovers for notifying personnel in outside areas. Commercial telephone lines, cellular phones, satellite phones, PAX telephone system, or radios. | PDEP-1: D.1, E.2.a, J.1 | MAINT |
| Spent Fuel Pool Cooling System | Emergency classification, accident assessment, onsite monitoring equipment. | | Timely repair or replacement of equipment. Perform actions per SO23-3-2.11.2 and/or SO23-3-2.11.3. | PDEP-2: PD-HU2 | ENG |
| Command Center Data Acquisition System (CDAS) | CDAS provides monitoring capability to plant parameters required for SONGS in the decommissioned state. | SA.CDAS | Timely repair or replacement of equipment. | PDEP-1: B.5.b, D.1, H.1, I.3, I.4, I.10; PDEP-2: PD-AA1 | ENG |
| Solid contaminated waste control system | Protective response, exposure control. | | Timely repair or replacement of equipment. | PDEP-1: K.4.b | RP, CHEM, & ENV |
| Radiological Laboratory Facilities | Emergency response support and resources, accident assessment. | | Timely repair or replacement of equipment. | PDEP-1: C.3, I.9; PDEP-2: PD-AA1 | RP, CHEM, & ENV |
| Private Automatic Exchange (PAX) Telephone System | Site telephone system. Provides communication capability between telephones located within the plant by dialing a five digit station code. It also provides for outside communications through interconnections with the corporate telephone communications system and commercial telephone lines. | 70': 2/3D870T AWS | 1. If PAX phone(s) is(are) nonfunctional, then validate sufficient PAX phones are available to support communications within the Command Center and plant locations. 1.1 If no sufficient PAX phones are available, then use commercial telephone lines, cellular phones, satellite phones, or radios. 2 Timely repair of equipment. | PDEP-1: F.1.d.1 | IT/TELECOM |
| Cellular Phones | Communications between Command Center and State, local agencies, NRC, Federal Organizations, ERO, Hospitals, Field Teams, and others. Voice, text messaging, email capabilities. | | Timely repair of equipment. Use commercial telephone lines, PAX telephone system, satellite phones or radios. | PDEP-1: E.2.a, E.2.b, 1E.2.c, E.3, F.1.b, F.1.c, F.1.e, F.1.f, I.8 | IT/TELECOM |

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| Emergency Plan Equipment | Attachment 1 |
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| Equipment | Description / Function | Equipment ID / Functional Location | Compensatory Measures (See Procedure Sections 6.8, 6.9, and 6.10) | Reference | Cognizant Division |
|------------------------------|---|------------------------------------|--|--|--------------------|
| Control Room Satellite Phone | Communications between Command Center and other organizations. Backup communications in CR. Connects CR to Generation Control Center (GCC) Rosemead and Irvine, CA. | 2/3CRSATELLITEPHONE | Timely repair of equipment. Use commercial telephone lines, PAX telephone system, cellular phones or radios. | PDEP-1: F.1.b, F.1.c, F.1.f | IT/TELECOM |
| Portable Satellite Phones | Communications between Command Center and other organizations. Backup Communications to State, local agencies, NRC, Federal Organizations. | | Timely repair of equipment. Use commercial telephone lines, PAX telephone system, cellular phones or radios. | PDEP-1: F.1.b, F.1.c, F.1.f | IT/TELECOM |
| Commercial Telephone Lines | Communications between Command Center and other organizations. Communications to State, local agencies, NRC, Federal Organizations, ERO, Hospitals, and others. | | Timely repair of equipment. Use PAX telephone system, cellular phones, satellite phones or radios. | PDEP-1: E.2.a, E.2.b, E.2.c, A.1.a.2, F.1.b, F.1.c, F.1.d, F.1.e, F.1.f, F.2 | IT/TELECOM |
| 800MHz Radio System | Radio communication between Command Center and field teams. General use communications equipment. | 2/3L425-1, 3L414 | Timely repair of equipment. Use cellular phones, PAX telephone system, commercial telephone lines, satellite phones. | PDEP-1: H.10, I.8 | MAINT/ENG/TELECOM |
| | | 2/3L425-5, 2L428 | | | |
| Command Center KIT 1 | Damage Control and Mitigation Equipment. | | Timely repair or replacement of equipment / supplies (similar equipment / supplies may be available onsite for use until repair or replacement is obtained). | PDEP-1: H.10 | MAINT |
| Command Center KIT 2 | Radiation Monitoring Equipment, Contamination and Exposure Control Supplies, Decontamination Equipment and Supplies, Protective Clothing. Includes Respirators, SCBAs, dosimetry capable of measuring dose and dose rate, portable instrumentation to determine radioactivity in counts per minute and mR/hr, portable air samples, air and water sampling devices. | | Timely repair or replacement of equipment / supplies (similar equipment / supplies may be available onsite for use until repair or replacement is obtained). | PDEP-1: H.5, H.10, I.6, I.7, I.9, J.1, K.1, K.2, K.3.a, K.4, K.5, K.6.a, K.6.b; PDEP-2: PD-AA1, PD-AA2, E-HU1 | RP, CHEM & ENV |
| Command Center KIT 3 | Communications and Radio Equipment, Supplemental Lighting, First aid supplies and equipment, ERO Notebook, Miscellaneous Office Supplies. | | Timely repair or replacement of equipment / supplies (similar equipment / supplies may be available onsite for use until repair or replacement is obtained). | PDEP-1: H.10, L.2 | EP |

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| Emergency Plan Equipment | Attachment 1 |
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| Equipment | Description / Function | Equipment ID / Functional Location | Compensatory Measures (See Procedure Sections 6.8, 6.9, and 6.10) | Reference | Cognizant Division |
|---|--|---------------------------------------|--|-------------------------------------|--------------------|
| Gamma detector / Multi-Channel Analyzer | Emergency response support and resources, accident assessment. | | Timely repair or replacement of equipment. | PDEP-1: C.3, I.9; PDEP-2: PD-AA1 | RP, CHEM, & ENV |
| Tritium Analyzer | Emergency response support and resources, accident assessment. | | Timely repair or replacement of equipment. | PDEP-1: C.3, I.9; PDEP-2: PD-AA1 | RP, CHEM, & ENV |
| Effluent Release Software | Emergency response support and resources, accident assessment. | | Timely repair or replacement of equipment. Perform manual calculation. | PDEP-1: C.3; PDEP-2: PD-AA1 | RP, CHEM, & ENV |
| Computers with network access | Accident assessment, onsite monitoring equipment. | | Timely repair or replacement of equipment. | PDEP-1: H.8 | IT |

COGNIZANT DIVISION(S):

| | |
|-----------------|--|
| EP | Emergency Planning (SCE) |
| MAINT | Maintenance (SDS) |
| RP, CHEM, & ENV | Radiation Protection, Chemistry, and Environmental (SDS) |
| ENG | Engineering (SCE and SDS) |
| OPS | Operations (SCE) |
| IT | Information Technology (SCE) |
| SEC | Security (SCE) |
| FAC | Facilities (SDS) |
| TELECOM | Telecommunications (SCE) |

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| PDEP, EALs, and MOEE Review | Attachment 2 |
|-----------------------------|---------------------|

1.0 Review PDEP-1 annually to ensure document is current (Reference Step 6.3.1).

Comments: _____

2.0 Perform the following steps to complete the annual review of PDEP-2, MOEE, and EP(123) EAL (Reference Step 6.3.2) (CA 202827656-0018).

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

 Name of NEI Contact

 Date

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

 Name of Contact(s)

 Date

2.3 IF issues or problems are identified, THEN initiate an Action Request to track any subsequent items and resolve issues. Record Action Request number or N/A.

 Action Request # or
 N/A

2.4 Record additional contact names and dates or any comments or issues not discussed in the Action Request.

COMMENTS: _____

PERFORMED BY: _____
 Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
 Manager, Emergency Preparedness

DATE: _____

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| Security and Emergency Plan Coordination | Attachment 3 |
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- 1.0 Coordinate PDEP-1 requirements with PSP and SCP (Reference Step 6.3.3).
- 1.1 Identify changes to PDEP-1 and PSP and SCP since the last review.
- 1.2 Confirm review of changes to PDEP-1 by Security Management.
- 1.3 Confirm review of changes to SCP and PSP by EP.
- 1.4 If any changes have not been reviewed by appropriate management, initiate review for impact and document results by Action Request. Record Action Request number or N/A.

Action Request # or
N/A

Comments: _____

PERFORMED BY: _____
Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
Manager, Emergency Preparedness

DATE: _____

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| State and Local Jurisdictions EAL Review | Attachment 4 |
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1.0 Review EALs with State and Local jurisdictions annually (Reference Step 6.3.4).

Comments (include how review/task was performed): _____

PERFORMED BY: _____
Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
Manager, Emergency Preparedness

DATE: _____

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| Letters of Agreement Review | Attachment 5 |
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1.0 Review the following letters of agreement annually (Reference Step 6.3.5).

1.1 Firefighting, Rescue, and Transport of Injured Person with Marine Corps Base, Camp Pendleton Agreement(s).

Comments (include how review/task was performed): _____

PERFORMED BY: _____ **DATE:** _____
Emergency Preparedness Staff or designee

1.2 Medical Treatment with Tri-City Medical Center and Mission Hospital Agreement(s).

Comments (include how review/task was performed): _____

PERFORMED BY: _____ **DATE:** _____
Emergency Preparedness Staff or designee

1.3 Transport of Injured Person with Air Methods Corporation and Orange County Fire Authority Agreement(s).

Comments (include how review/task was performed): _____

PERFORMED BY: _____ **DATE:** _____
Emergency Preparedness Staff or designee

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| Letters of Agreement Review | Attachment 5 |
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1.4 Law Enforcement Support Agreement(s).

Comments (include how review/task was performed): _____

PERFORMED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

1.5 Local Agencies Agreement(s)

Comments (include how review/task was performed): _____

PERFORMED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

1.6 Sierra Analytical Labs support (chemical analysis) and GEL Laboratories support (radiological analysis) capability for terrestrial, marine, and air samples contracts or agreements.

Comments (include how review/task was performed): _____

PERFORMED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

1.7 Letters of agreement have been reviewed. Deficiencies identified have been corrected or an Action Request generated.

REVIEWED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

APPROVED BY: _____ **DATE:** _____

Manager, Emergency Preparedness

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| Emergency Response Directory Review | Attachment 6 |
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- 1.0 Review Emergency Response Directory quarterly to ensure ERO recall information (names and numbers), support personnel, and applicable offsite organizations is maintained current (Reference Step 6.3.6).
- 1.1 Replace outdated Emergency Response Directories per the distribution list.

Comments: _____

PERFORMED BY: _____
Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
Manager, Emergency Preparedness

DATE: _____

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| Matrix of Periodic Drill and Exercise Objectives Review | Attachment 8 |
|---|---------------------|

- 1.0 Review EP(123) PDE against accomplished objectives frequently enough to ensure all required objectives have been accomplished or scheduled within their periodicity (recommend review completed by second quarter) (Reference Step 6.3.8).

Comments: _____

PERFORMED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

APPROVED BY: _____ **DATE:** _____

Manager, Emergency Preparedness

- 2.0 Complete EP(123) PDE during the fourth quarter to ensure all required objectives for the year have been accomplished. Attach EP(123) PDE to this review.

Comments: _____

PERFORMED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

APPROVED BY: _____ **DATE:** _____

Manager, Emergency Preparedness

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| On-Shift ERO Roster Exception Report | Attachment 9 |
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- 1.0 Review On-Shift ERO Roster Exception Report quarterly to ensure On-Shift requirements are met (Reference Step 6.3.9).
- 1.1 Verify work groups have correctly assigned On-shift ERO personnel. If discrepancies are found, create an Action Request to the respective group and document it on Comments section of this attachment.

Comments: _____

PERFORMED BY: _____
Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
Manager, Emergency Preparedness

DATE: _____

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| Emergency Response Equipment and Supplies Inspection | Attachment 10 |
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- 1.0 Maintenance personnel or designee have inventoried damage control and mitigation equipment portion of EP(123) EKIL (Reference Step 6.4.1).

| INVENTORY ITEM | ORDER NUMBER / TRACKING NUMBER | DATE COMPLETED | SEALED CONTAINER (YES/NO) | PERFORMED BY |
|---------------------------------|-----------------------------------|----------------|------------------------------|--------------|
| Command Center KIT 1 (Tools) | | | | |

- 2.0 Radiation Protection personnel or designee have inventoried radiation protection equipment and supplies portion of EP(123) EKIL (Reference Step 6.4.2).

| INVENTORY ITEM | ORDER NUMBER / TRACKING NUMBER | DATE COMPLETED | SEALED CONTAINER (YES/NO) | PERFORMED BY |
|---------------------------------------|-----------------------------------|----------------|------------------------------|--------------|
| Command Center KIT 2 (RP Supplies) | | | | |

- 3.0 The Site Assembly Area listed below have been inspected for cleanliness and general usability, and their supplies have been inventoried (Reference Step 6.4.3).

| SITE ASSEMBLY AREA | ORDER NUMBER / TRACKING NUMBER | DATE COMPLETED | SEALED CONTAINER (YES/NO) | PERFORMED BY |
|-----------------------|-----------------------------------|----------------|------------------------------|--------------|
| AWS MPR | | | | |
| Parking Lot 4 | | | | |

- 4.0 The Operations portion of EP(123) EKIL has been inventoried and updated (Reference Step 6.4.4).

| INVENTORY ITEM | ORDER NUMBER / TRACKING NUMBER | DATE COMPLETED | SEALED CONTAINER (YES/NO) | PERFORMED BY |
|-------------------------|-----------------------------------|----------------|------------------------------|--------------|
| Command Center KIT 3 | | | | |

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| Emergency Response Equipment and Supplies Inspection | Attachment 10 |
|---|----------------------|

- 5.0 The Emergency Response equipment and supplies quarterly inspections have been completed. Deficiencies identified have been corrected or an Action Request generated.

Comments: _____

REVIEWED BY: _____
Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
Manager, Emergency Preparedness

DATE: _____

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| Emergency Response Communications Monthly Inspection | Attachment 11 |
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- 1.0 **Cal OES, Orange County, San Diego County and Marine Corps Base, Camp Pendleton Test**
(Reference Step 6.5.1):
- 1.1 Contact Cal OES, Orange County, San Diego County, and Marine Corps Base Camp Pendleton from a PAX phone in the Command Center using their primary contact number located in the Emergency Response Directory.
- 1.2 Provide the following message for each call:
 "This is San Onofre Nuclear Generating Station."
 "We are conducting a communication test."
 "Please provide your last name, and verify message content is understood and communications are clear and audible."
- 1.3 Record the participants' last name on the table below.
- 1.4 Circle "Y" or "N" to verify content was understood and communications are clear and audible.

| Agency | Participant Last Name | Content Understood | Communication clear and audible | Trouble Ticket | Action Request | Performed by | Date |
|------------------|-----------------------|--------------------|---------------------------------|----------------|----------------|--------------|------|
| Cal OES | | Y N | Y N | | | | |
| Orange County | | Y N | Y N | | | | |
| San Diego County | | Y N | Y N | | | | |
| Camp Pendleton | | Y N | Y N | | | | |

- 1.5 Provide the following message at the end of each call
 "This communication test is complete. Thank you."
- 1.6 If an agency did not respond to the primary contact number, or if equipment or communication problems were encountered:
- 1.6.1 Re-contact non-responding agencies using alternate contact number.
- 1.6.2 Repeat steps 1.1 through 1.5.
- 1.6.3 If alternate contact cannot be established, notify Emergency Preparedness Manager for assistance in making contact with the agency.
- 1.7 If equipment or communication problems were encountered, notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request. Record Trouble Ticket and Action Request on table above; otherwise N/A.

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| Emergency Response Communications Monthly Inspection | Attachment 11 |
|---|----------------------|

2.0 NRC Test (Reference Step 6.5.2)

- 2.1 Contact the NRC Headquarters Operations Center using their primary contact number located in the Emergency Response Directory from the Command Center ENS phone (700-791-0615).
- 2.2 Provide the following message for the call:
 "This is San Onofre Nuclear Generating Station."
 "We are conducting a communication test of the SONGS ENS Phone."
 "Please provide your last name, and verify communications are clear and audible."
- 2.3 Record the participants' last name on the table below.
- 2.4 Circle "Y" or "N" to verify communications are clear and audible.
- 2.5 Identify your ENS telephone number (700-791-0615) and request a return phone call.
- 2.6 Verify return call communications are clear and audible.
- 2.7 Record return call information on the table below.

| Agency | Participant Last Name | Communication clear and audible | Trouble Ticket | Action Request | Performed by | Date |
|---------------|--------------------------|------------------------------------|-------------------|-------------------|--------------|------|
| NRC HQ call | | Y N | | | | |
| NRC HQ Return | | Y N | | | | |

- 2.8 Provide the following message at the end of the call
 "This communication test is complete. Thank you."
- 2.9 If equipment or communication problems were encountered, notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request. Record Trouble Ticket and Action Request on table above; otherwise N/A.
- 3.0 Monthly communications test has been completed. Deficiencies identified have been corrected or a Trouble Ticket and Action Request generated.

Comments: _____

REVIEWED BY: _____
 Operations personnel or designee

DATE: _____

APPROVED BY: _____
 Manager, Emergency Preparedness

DATE: _____

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| Emergency Response Communications Quarterly Test | Attachment 12 |
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- 1.0 **Emergency Kit Radios Test** (Reference Step 6.5.3)
- 1.1 Turn two Emergency Kit Radios power on and select a specific channel for the test.
- 1.2 Test Emergency Kit Radios transmission and reception for clear and audible communications.
- 1.3 Turn Emergency Kit Radios power off.
- 1.4 Record test results on the table below.
- 1.5 Repeat steps 1.1 through 1.4 until all Emergency Kit Radios are tested.
- 1.6 If equipment or communication problems were encountered, notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request. Record Trouble Ticket and Action Request on table below; otherwise N/A.

| Emergency Kit Radio # | Location | Communication clear and audible | Trouble Ticket | Action Request | Performed by | Date |
|-----------------------|----------------|---------------------------------|----------------|----------------|--------------|------|
| 1 | Command Center | Y N | | | | |
| 2 | Command Center | Y N | | | | |
| 3 | Command Center | Y N | | | | |
| 4 | Command Center | Y N | | | | |
| 5 | Command Center | Y N | | | | |
| 6 | Command Center | Y N | | | | |
| 7 | Command Center | Y N | | | | |
| 8 | Command Center | Y N | | | | |
| 9 | Command Center | Y N | | | | |
| 10 | Command Center | Y N | | | | |

NOTES

Cellular Phones may be located in the hallway between the Units on the Command Center Kit 3.

- 2.0 **Cellular Phones Test** (Reference Step 6.5.3).
- 2.1 Turn cellular phone on.
- 2.2 Place a call to a nearby phone and test transmission and reception for clear and audible communications.
- 2.3 Request a return phone call.
- 2.4 Test return call transmission and reception for clear and audible communications.

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| Emergency Response Communications Quarterly Test | Attachment 12 |
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- 2.5 Turn cellular phone off.
- 2.6 Record test results on the table below.
- 2.7 Repeat steps 2.1 through 2.6 until all cellular phones are tested.
- 2.8 If equipment or communication problems were encountered, notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request. Record Trouble Ticket and Action Request on table below; otherwise N/A.

| Cell # | Location | Communication clear and audible | Trouble Ticket | Action Request | Performed by | Date |
|--------------|----------------|------------------------------------|----------------|-------------------|--------------|------|
| 949.392.2884 | Command Center | Y N | | | | |
| 949.392.2883 | Command Center | Y N | | | | |
| 949.392.2894 | Command Center | Y N | | | | |
| 949.392.2646 | Command Center | Y N | | | | |

NOTES

1. The following section is performed by Security.
2. Emergency Response Directory contains satellite phone dialing instructions.

- 3.0 **Satellite Phones Test** (Reference Step 6.5.3)
- 3.1 Place a call to another satellite phone and test transmission and reception for clear and audible communications.
- 3.2 Request a return phone call.
- 3.3 Test return call transmission and reception for clear and audible communications.
- 3.4 Record test results on the table below.
- 3.5 Repeat steps 3.1 through 3.4 until all satellite phones are tested.

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| Emergency Response Communications Quarterly Test | Attachment 12 |
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- 3.6 If equipment or communication problems were encountered, notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request. Record Trouble Ticket and Action Request on table below; otherwise N/A.

| Satellite # | Location | Communication clear and audible | Trouble Ticket | Action Request | Performed by | Date |
|--|----------------|------------------------------------|----------------|-------------------|--------------|------|
| 8816-2144-4660 | Command Center | Y N | | | | |
| 8816-3144-6714 | Command Center | Y N | | | | |
| 800-758-9599 (GOC Satellite Hardwired) | Command Center | Y N | | | | |
| 8816-2144-4668 | Staging Area | Y N | | | | |
| 8816-2144-4669 | Staging Area | Y N | | | | |

- 4.0 Quarterly communications test has been completed. Deficiencies identified have been corrected or a Trouble Ticket and Action Request generated.

Comments: _____

REVIEWED BY: _____
 Operations personnel or designee

DATE: _____

APPROVED BY: _____
 Manager, Emergency Preparedness

DATE: _____

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| PA Siren Tone Generator Test | Attachment 13 | |

1.0 **PA SIREN TONE GENERATOR TEST** (Reference Step 6.6.1)

NOTE

SO123-VIII-ERO-2 provides controls for announcements and siren activation. If the annual PA Siren Tone Generator Test is performed during a drill, SO123-VIII-ERO-2 will be used to activate the sirens.

- 1.1 The PA Siren Tone Generator test can be performed during siren activations for a scheduled Emergency Plan drill or on a different occasion. A minimum of three separate locations must be evaluated during the test.
- 1.2 WHEN performing this test outside of a drill, THEN complete the following:
 - 1.2.1 Verify test participants are in position.
 - 1.2.2 Contact State Parks using number located in ERD and notify them of the test.
 - 1.2.3 Make the following announcement on the PA System using "Page All", and on the Perimeter Public Address System (PPAS):
 - 1.2.3.1 "Attention all personnel, attention all personnel. This is a test of the PA Siren Tone Generator. No response is required. All personnel continue with your normal activities."
 - 1.2.4 Activate "Siren All" for one minute from PAX phone.
 - 1.2.5 Make the following announcement on the PA System using the "Page All", and on the PPAS:
 - 1.2.5.1 "Attention all personnel, attention all personnel. This completes the test of the PA Siren Tone Generator. Continue with your normal activities."
- 1.3 Audibility of PA announcements and the Sire Tone Generator shall be recorded by test participants.
- 1.4 Gather all test data from test participants after test termination.
- 1.5 Transcribe all test data from applicable documents to the table below. Include location evaluated, participants' name, Equip Status, and test date.

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| PA Siren Tone Generator Test | | Attachment 13 |

1.6 Complete the "EQUIP STATUS" column of the table below as follows:

1.6.1 IF test is satisfactory, THEN initial column.

1.6.2 IF equipment had problems, THEN record the corresponding number from the "NOTES" section in the "EQUIP STATUS" column.

1.6.2.1 Notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request.

1.6.3 Record Trouble Ticket(s), Action Request(s), and any additional comments in the "REMARKS " section using the next number.

PERFORMED BY: _____ **DATE:** _____
Operations Personnel or designee

APPROVED BY: _____ **DATE:** _____
Manager, Emergency Preparedness

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| PA Siren Tone Generator Test | Attachment 13 |
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PA SIREN TONE GENERATOR TEST LOCATIONS

| LOCATION EVALUATED PLANT AREA | PARTICIPANT'S NAME | EQUIP STATUS | TEST DATE |
|----------------------------------|--------------------|-----------------|-----------|
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NOTES

- 1 No Activation
- 2 Garbled Sound
- 3 Volume Too Low
- 4 Inaccessible Area
- 5 Equipment Damaged

REMARKS

6 _____

7 _____

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| | |
|----------------------------------|---------------|
| Units 2/3 Thunderbolt Siren Test | Attachment 14 |
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1.0 **UNITS 2/3 THUNDERBOLT SIREN TEST** (Reference Step 6.6.2)

NOTE

SO123-VIII-ERO-2 provides controls for announcements and siren activation. If the annual Units 2/3 Thunderbolt Siren Test is performed during a drill, SO123-VIII-ERO-2 will be used to activate the sirens.

- 1.1 The thunderbolt sirens test can be performed during the siren activations for a scheduled Emergency Plan drill or on a different occasion.
- 1.2 Coordinate with test participants prior to the test date and provide approximate siren activation times.
- 1.3 WHEN performing this test outside of a drill, THEN complete the following:
 - 1.3.1 Verify test participants are in position.
 - 1.3.2 Contact State Parks using number located in ERD and notify them of the test.
 - 1.3.3 Make the following announcement on the PA System using "Page All", and on the Perimeter Public Address System (PPAS):
 - 1.3.3.1 "Attention all personnel, attention all personnel. This is a test of the Thunderbolt Sirens. No response is required. All personnel continue with your normal activities."
 - 1.3.4 Activate Emergency Evacuation Siren (HS-7890-1) on CR 57 for one minute.
 - 1.3.5 Make the following announcement on the PA System using the "Page All", and on the PPAS:
 - 1.3.5.1 "Attention all personnel, attention all personnel. This completes the test of the Thunderbolt Sirens. Continue with your normal activities."
- 1.4 Gather all test data from the test participants.
- 1.5 Transcribe all test data to the table below.

| | | |
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| Units 2/3 Thunderbolt Siren Test | | Attachment 14 |

1.6 Complete the "EQUIP STATS" column of the worksheet as follows:

1.6.1 IF test is satisfactory, THEN initial column.

1.6.2 IF equipment had problems, THEN record the corresponding number from the "NOTES" section in the "EQUIP STATUS" column.

1.6.2.1 Notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request.

1.6.3 Record Trouble Ticket(s), Action Request(s), and any additional comments in the "REMARKS" section using the next number.

PERFORMED BY: _____ **DATE:** _____
Operations Personnel or designee

APPROVED BY: _____ **DATE:** _____
Manager, Emergency Preparedness

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| Units 2/3 Thunderbolt Siren Test | Attachment 14 |
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THUNDERBOLT SIREN TEST LOCATIONS

| PLANT AREA | ELEV. | SIREN NO. | LOCATION (Room name and number) | EQUIP STATS | TEST DATE |
|-------------------|-------|-----------|------------------------------------|-------------|-----------|
| Unit 2 Fuel Bldg. | 114' | MO-33 | Fuel Building Roof SE Corner | | |
| Control Bldg. | 85' | MO-34 | Control Building Roof NW Corner | | |
| Reservoir Area | 100' | MO-35 | Near Meteorological Tower | | |

NOTES

- 1 No Activation
- 2 Garbled Sound
- 3 Volume too Low
- 4 Inaccessible Area
- 5 Equipment Damaged

REMARKS

- 6 _____

- 7 _____

| | | |
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| | Emergency Preparedness Program Maintenance | SO123-VIII-ADMIN-1 REVISION 5 |
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| Units 2/3 Buildings and Ground OESS Test | | Attachment 15 |

- 1.0 **UNITS 2/3 BUILDINGS AND GROUNDS OESS TEST** (Reference Step 6.6.3)
- 1.1 When completing any part of this attachment during a scheduled Emergency Plan Drill, then use Section 2.0 and mark Steps in 1.2 through 1.7 "N/A".
- 1.2 Contact State Parks using number located in ERD and notify them of the test.
- 1.3 Request a plant operator to perform the following alignment.
- 1.3.1 Open breaker BQ-13 for panel 2/3 L211-1 (MCC 2/3 BQ). _____
Initial
- 1.3.2 Open breaker BQ-26 for panel 2/3 L211-4 (MCC 2/3 BQ). _____
Initial
- 1.3.3 Open breaker MCC1 BKR11 (located in the AWS). _____
Initial
- 1.4 Contact Test Coordinator and verify all Monitors are in position, then coordinate performing the following steps with Operations.
- 1.4.1 Make the following announcement on the PA System using "Page All" - **AND** on the Perimeter Public Address System (PPAS):
- 1.4.1.1 "Attention all personnel, attention all personnel: This is a test of the Emergency Siren System. No response is required. All personnel continue with your normal activities."
- 1.4.2 Request Operator to press the "START" button for the Emergency Siren System on CR57.
- 1.4.2.1 Direct the Operator to press the "STOP" button at the required time (1 to 3 minutes) to deactivate the sirens.
- 1.5 Contact Test Coordinator and verify all Monitors were able to monitor the assigned sirens. If not, then repeat Step 1.4.
- 1.6 Make the following announcement on the PA System using "Page All" **AND** on the Perimeter Public Address System:
- 1.6.1 "Attention all personnel, attention all personnel: This completes the test of the Emergency Siren System. Continue with your normal activities."

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| Units 2/3 Buildings and Ground OESS Test | Attachment 15 |
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| | | <u>PERF BY INITS</u> | <u>VERIF BY INITS</u> |
|-------|---|--------------------------|---------------------------|
| 1.7 | Request an Operator to perform the following alignment. | | |
| 1.7.1 | Close breaker BQ-13 on panel 2/3 L211-1 (MCC 2/3 BQ). | _____ | _____ |
| 1.7.2 | Close breaker BQ-26 on panel 2/3 L211-4 (MCC 2/3 BQ). | _____ | _____ |
| 1.7.3 | Close breaker MCC1 BKR11 (located in the AWS). | _____ | _____ |

2.0 **DRILL INSTRUCTIONS**

NOTE

SO123-VIII-ERO-2 provides controls for announcements and siren activation.

- 2.1 When completing this attachment at a time other than a scheduled Emergency Plan Drill, use Section 1.0 and mark Section 2.0 "N/A".
- 2.2 Coordinate with the Test Coordinator prior to the drill date and provide approximate siren activation times in accordance with drill scenario.

3.0 **DATA COLLECTION**

- 3.1 Gather all test data from the Test Coordinator.
- 3.2 Transcribe all test data on the table below.
- 3.3 Complete the "EQUIP STATS" column of the worksheet as follows:
- 3.3.1 IF test is satisfactory, THEN initial column.
- 3.3.2 IF equipment had problems, THEN record the corresponding number from the "NOTES" section in the "EQUIP STATUS" column.
- 3.3.2.1 Notify TCC at PAX 51200 to initiate repairs. In addition, initiate an Action Request.
- 3.3.3 Record Trouble Ticket(s), Action Request(s), and any additional comments in the "REMARKS" section using the next number.

PERFORMED BY: _____ **DATE:** _____
Operations Personnel or designee

APPROVED BY: _____ **DATE:** _____
Manager, Emergency Preparedness

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Units 2/3 Buildings and Ground OESS Test

Attachment 15

UNIT 2/3 OESS COMMON EQUIPMENT LOCATIONS

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

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|--|---------------|
| Units 2/3 Buildings and Ground OESS Test | Attachment 15 |
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UNIT 2 OESS EQUIPMENT LOCATIONS

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

UNIT 3 OESS EQUIPMENT LOCATIONS

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

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| Units 2/3 Buildings and Ground OESS Test | Attachment 15 |
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NOTES

- 1 No Activation
- 2 Garbled Sound
- 3 Volume too Low
- 4 Inaccessible Area
- 5 Equipment Damaged

REMARKS

6 _____

7 _____

| | | |
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| Units 2/3 Containment OESS Test | Attachment 16 |
|---------------------------------|----------------------|

1.0 **UNITS 2/3 CONTAINMENT OESS TEST** (Reference 6.6.4)

1.1 Notify RP Control Point prior to starting the test.

Initial

1.2 Verify physical signage is posted at the containment control point entrance to inform workers of siren test.

Initial

1.3 Contact Test Coordinator and verify all monitors are in position, then coordinate performing the following steps with Operations.

1.3.1 Make the following announcement on the PA System using "Page All":

1.3.1.1 "Attention all personnel, attention all personnel: There will be a test of the Unit ☐ 2 ☐ 3 Containment Siren System. No response is required. All personnel continue with your normal activities."

1.3.2 Request an Operator to press the "START" button for the Containment Siren System.

1.3.2.1 Direct the Operator to press the "STOP" button at the required time (1 to 3 minutes) to deactivate the sirens.

1.4 Contact Test Coordinator and verify all Monitors were able to monitor the assigned sirens. If not, then repeat Step 1.3.

1.5 Make the following announcement on the PA System using "Page All":

1.5.1 "Attention all personnel, attention all personnel: This completes the test of the Containment Siren System. Continue with your normal activities."

1.6 Request Test Coordinator to verify sirens are silenced.

Initial

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| Units 2/3 Containment OESS Test | | Attachment 16 |

2.0 **DATA COLLECTION**

2.1 Gather all test data from the Test Coordinator.

2.2 Transcribe all test data on to table below.

2.3 COMPLETE the "EQUIP STATS" column of the worksheet as follows:

2.3.1 IF test is satisfactory, THEN initial column.

2.3.2 IF equipment had problems, THEN record the corresponding number from the "NOTES" section in the "EQUIP STATUS" column.

2.3.2.1 Initiate an Action Request.

2.3.3 **RECORD** Action Request(s), and any additional comments in the "REMARKS" section using the next number.

2.4 Notify RP Control Point that the test is complete.

Initial

PERFORMED BY: _____ **DATE:** _____
Operations Personnel or designee

APPROVED BY: _____ **DATE:** _____
Manager, Emergency Preparedness

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| Units 2/3 Containment OESS Test | Attachment 16 |
|---------------------------------|---------------|

UNIT 2 CONTAINMENT OESS EQUIPMENT LOCATIONS

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

| | | |
|--|--|----------------------------------|
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| | |
|---------------------------------|----------------------|
| Units 2/3 Containment OESS Test | Attachment 16 |
|---------------------------------|----------------------|

UNIT 3 CONTAINMENT OESS EQUIPMENT LOCATIONS

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

NOTES

- 1 No Activation
- 2 Garbled Sound
- 3 Volume too Low
- 4 Inaccessible Area
- 5 Equipment Damaged

REMARKS

6 _____

7 _____

| | | |
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|---|----------------------|
| Perimeter Public Address System (PPAS) Test | Attachment 17 |
|---|----------------------|

1.0 **PERIMETER PUBLIC ADDRESS SYSTEM (PPAS) TEST** (Reference Step 6.6.5)

| <u>NOTES</u> | |
|---------------------|--|
| 1. | System Functional Tests are performed once per quarter throughout the year. Tests are conducted at five different locations each quarter. |
| 2. | The purpose of the System Functional Test is to ensure the message is audible with sufficient clarity to be understood at the test location. <u>If</u> the acceptance criteria for the System Functional Test is not satisfactory, <u>then</u> an individual speaker test will be performed to determine the speaker(s) with problems. |
| 3. | Besides the quarterly test, the System Functional Test at the applicable test location is performed to determine compensatory measures when individual speaker(s) is found nonfunctional. |
| 4. | <u>If</u> the System Functional Test is satisfactory but Test Personnel notice any speaker problem, <u>then</u> Test Personnel will ensure an Action Request addressing the problem is written. |
| 5. | Visual inspection will be performed per SO123-XVIII-11.8 by Telecom personnel. |

2.0 **SYSTEM FUNCTIONAL TEST**

- 2.1 Provide Test Personnel with a copy of the page appropriate to the quarter or test location in which the test is being conducted.
- 2.2 Have Test Personnel circle their assigned test location number(s).
- 2.3 Have Test Personnel report to the assigned location(s) at the time determined by the Test Coordinator. (Refer to Figure 1.)
- 2.4 Perform a short count test at the predetermined time.
- 2.5 Complete System Functional Test table section in accordance with reports from Test Personnel.
- 2.6 If any Test Personnel report System Functional Test is unsatisfactory at their test location, then:
 - 2.6.1 Perform Step 3.0 of this Attachment for the unsatisfactory System Functional Test location(s).
 - 2.6.2 Perform Step 6.8 of this procedure.

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| Perimeter Public Address System (PPAS) Test | Attachment 17 |
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- 2.7 If all Test Personnel report the System Functional Test is satisfactory at their test location, then leave individual speaker test table section blank.
 - 2.7.1 If any Test Personnel report the System Functional Test was satisfactory at their test location but they noticed a speaker problem, then ensure there is an Action Request for the speaker problem and the Action Request specifies the System Functional Test for the location is satisfactory.
- 2.8 Complete the Performed By line and forward to EP.
- 3.0 **INDIVIDUAL SPEAKER TEST** (N/A if System Functional Test was satisfactory)
- 3.1 Perform a short count test at the predetermined time(s) until speaker(s) at the failed location are individually tested.
- 3.2 If Test Personnel report the Individual Speaker Test is unsatisfactory, then notify TCC at PAX 51200 to initiate repairs. In addition, generate an Action Request to track deficiencies noting the System Functional Test for the location is unsatisfactory, and notify EP by Email.

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| Perimeter Public Address System (PPAS) Test | Attachment 17 |
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FIRST QUARTER SYSTEM FUNCTIONAL TEST

NOTE

1. System Functional Test acceptance criteria: Speakers must be audible with sufficient clarity to be understood at each location.
2. Individual Speaker Test Acceptance Criteria: Clear and audible voice tested at a minimum of 10 feet from base of speaker pole in direction the speaker is facing.

| SYSTEM FUNCTIONAL TEST | | | INDIVIDUAL SPEAKER TEST | | |
|------------------------|--|--------------------------|-------------------------|--------|-------------------------|
| Test | Location | Audible? (circle one) | Location | PPAS # | Voice Test (circle one) |
| 11 | On Railroad loop road at State Park storage area | SAT / UNSAT | Parking Lot #3 | S111 | SAT / UNSAT |
| | | | | S261 | SAT / UNSAT |
| 12 | Old Hwy 101 opposite Main Gate and L50 | SAT / UNSAT | Parking Lot #2 | S114 | SAT / UNSAT |
| | | | | S121 | SAT / UNSAT |
| 13 | Old Hwy 101 just South of the South Access Gate | SAT / UNSAT | Plant South End | S133 | SAT / UNSAT |
| | | | | S252 | SAT / UNSAT |
| 14 | SYF North end of Parking Lot #4 at fence near exit | SAT / UNSAT | Units 2/3 PA | S256 | SAT / UNSAT |
| | | | | S137 | SAT / UNSAT |
| 15 | NIA at Seawall | SAT / UNSAT | NIA | S245 | SAT / UNSAT |
| | | | | S126 | SAT / UNSAT |
| | | | | S267 | SAT / UNSAT |
| | | | | S117 | SAT / UNSAT |

Indicate Trouble Ticket, Action Request, or N/A. _____

COMMENTS: _____

PERFORMED BY: _____ DATE: _____
Operations or designee

APPROVED BY: _____ DATE: _____
Manager, Emergency Preparedness

Test Coordinator: **FORWARD** this page to EP.

| | | |
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| Perimeter Public Address System (PPAS) Test | Attachment 17 |
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SECOND QUARTER SYSTEM FUNCTIONAL TEST

NOTE

1. System Functional Test acceptance criteria: Speakers must be audible with sufficient clarity to be understood at each location.
2. Individual Speaker Test Acceptance Criteria: Clear and audible voice tested at a minimum of 10 feet from base of speaker pole in direction the speaker is facing.

| SYSTEM FUNCTIONAL TEST | | | INDIVIDUAL SPEAKER TEST | | |
|------------------------|---|--------------------------|-------------------------|--------|-------------------------|
| Test | Location | Audible? (circle one) | Location | PPAS # | Voice Test (circle one) |
| 21 | On Railroad loop between the State Park storage area and intersection of Old Hwy 101 | SAT / UNSAT | Parking Lot #3 | S112 | SAT / UNSAT |
| 22 | On Old Hwy 101 halfway between U2 and U3 Containment buildings | SAT / UNSAT | Parking Lot #2 | S241 | SAT / UNSAT |
| | | | | S122 | SAT / UNSAT |
| 23 | On Old Hwy 101 at Southeast Corner of OCA wall | SAT / UNSAT | Plant South End | S132 | SAT / UNSAT |
| | | | | S251 | SAT / UNSAT |
| 24 | On West road, inside PA fence, south end of U3, Across from holdup tank, at the Seawall | SAT / UNSAT | Units 2/3 PA | S128 | SAT / UNSAT |
| | | | | S247 | SAT / UNSAT |
| | | | | S127 | SAT / UNSAT |
| 25 | On Reservoir road near Metrological (MET) Tower | SAT / UNSAT | Reservoir and Bluff | S266 | SAT / UNSAT |

Indicate Trouble Ticket, Action Request, or N/A. _____

COMMENTS: _____

PERFORMED BY: _____ DATE: _____

Operations or designee

APPROVED BY: _____ DATE: _____

Manager, Emergency Preparedness

Test Coordinator: **FORWARD** this page to EP.

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| Perimeter Public Address System (PPAS) Test | Attachment 17 |
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THIRD QUARTER SYSTEM FUNCTIONAL TEST

NOTE

1. System Functional Test acceptance criteria: Speakers must be audible with sufficient clarity to be understood at each location.
2. Individual Speaker Test Acceptance Criteria: Clear and audible voice tested at a minimum of 10 feet from base of speaker pole in direction the speaker is facing.

| SYSTEM FUNCTIONAL TEST | | | INDIVIDUAL SPEAKER TEST | | |
|------------------------|---|--------------------------|-------------------------|--------|-------------------------|
| Test | Location | Audible? (circle one) | Location | PPAS # | Voice Test (circle one) |
| 31 | On Old Highway 101 at the stop sign across from Building L50 | SAT / UNSAT | Parking Lot #3 | S262 | SAT / UNSAT |
| 32 | On Old Highway 101 opposite the microwave tower in Parking lot #2 | SAT / UNSAT | Parking Lot #2 | S242 | SAT / UNSAT |
| | | | | S257 | SAT / UNSAT |
| 33 | Minimum of 300 feet south of the OCA wall on the Bluff | SAT / UNSAT | Plant South End | S131 | SAT / UNSAT |
| | | | | S254 | SAT / UNSAT |
| | | | | S135 | SAT / UNSAT |
| 34 | On West Road, inside PA fence, across from intake bridge at the Seawall | SAT / UNSAT | Units 2/3 PA | S246 | SAT / UNSAT |
| | | | | S124 | SAT / UNSAT |
| 35 | On Reservoir road at west entrance gate | SAT / UNSAT | Reservoir and Bluff | S116 | SAT / UNSAT |
| | | | | S265 | SAT / UNSAT |
| | | | | S115 | SAT / UNSAT |

Indicate Trouble Ticket, Action Request, or N/A. _____

COMMENTS: _____

PERFORMED BY: _____ DATE: _____

Operations or designee

APPROVED BY: _____ DATE: _____

Manager, Emergency Preparedness

Test Coordinator: **FORWARD** this page to EP.

| | | |
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|---|----------------------|
| Perimeter Public Address System (PPAS) Test | Attachment 17 |
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FOURTH QUARTER SYSTEM FUNCTIONAL TEST

NOTE

1. System Functional Test acceptance criteria: Speakers must be audible with sufficient clarity to be understood at each location.
2. Individual Speaker Test Acceptance Criteria: Clear and audible voice tested at a minimum of 10 feet from base of speaker pole in direction the speaker is facing.

| SYSTEM FUNCTIONAL TEST | | | INDIVIDUAL SPEAKER TEST | | |
|------------------------|--|--------------------------|-------------------------|--------|----------------------------|
| Test | Location | Audible? (circle one) | Location | PPAS # | Voice Test (circle one) |
| 41 | On Old Highway 101 across of NIA | SAT / UNSAT | Parking Lot #3 | S113 | SAT / UNSAT |
| | | | | S263 | SAT / UNSAT |
| 42 | On Old Hwy 101 near phone pole across from HFMUD in Parking Lot #2 | SAT / UNSAT | Parking Lot #2 | S243 | SAT / UNSAT |
| | | | | S134 | SAT / UNSAT |
| | | | | S253 | SAT / UNSAT |
| 43 | In SYF Parking Lot near OCA fence opposite Machine Shop roll-up door | SAT / UNSAT | Plant South End | S255 | SAT / UNSAT |
| | | | | S136 | SAT / UNSAT |
| 44 | On West road, inside PA fence across from fire hydrant near B51, at the Seawall | SAT / UNSAT | Units 2/3 PA | S244 | SAT / UNSAT |
| | | | | S125 | SAT / UNSAT |
| 45 | In Parking Lot #4, near the concrete drain located on west side near the bluff | SAT / UNSAT | Reservoir and Bluff | S264 | SAT / UNSAT |
| | | | | S115 | SAT / UNSAT |

Indicate Trouble Ticket, Action Request, or N/A. _____

COMMENTS: _____

PERFORMED BY: _____ DATE: _____
Operations or designee

APPROVED BY: _____ DATE: _____
Manager, Emergency Preparedness

Test Coordinator: **FORWARD** this page to EP.

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| | |
|--|----------------------|
| Emergency Response Equipment - Compensatory | Attachment 18 |
|--|----------------------|

| | |
|-----------------------|--|
| Equipment ID | |
| Equipment Description | |
| ERF / Location | |
| Action Request | |

1.0 Describe Emergency Plan Function (Reference Section 6.8 and 6.9):

1.1 Category: Check the appropriate box

- ☐ Indication for a parameter used to assess and Emergency Action Level Threshold.
- ☐ Means of fulfilling an emergency response function other than above.

1.2 List compensatory measures used:

1.3 List the time period approved for compensatory measures (e.g., 90 days). For periodic monitoring or sampling, list the event trigger(s) designated to increase the frequency:

| | | |
|--|---|--|
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| | |
|--|----------------------|
| Emergency Response Equipment - Compensatory | Attachment 18 |
|--|----------------------|

2.0 Do compensatory measures fully maintain the emergency response function?

YES ☐ NO ☐

Basis:

3.0 Communication

3.1 For planned maintenance activities, and for unplanned maintenance expected to result in the equipment unavailable for more than 30 days, create an Action Request assigned to EP for evaluation of compensatory measures under 10 CFR 50.54(q).

3.1.1 Planned maintenance shall not proceed until the evaluation is approved.

3.1.2 Compensatory measures should be used immediately in the case of unplanned maintenance without waiting for the evaluation to be completed.

3.2 Notification of ERO

3.2.1 For planned maintenance, generate an Action Request to EP Manager to notify the ERO.

3.2.2 For unplanned maintenance, direct the EP Manager or designee to notify the ERO as soon as practical.

3.3 Generate an Action Request assignment under Action Request created in Step 3.1 for EP to track compensatory measures.

3.4 Review SO123-0-A7 for reportability requirements and actions.

Emergency Preparedness Program Maintenance

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Attachment 18

- NOTE**

| | | |
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|---------------------------------------|----------------------|
| Site Evacuation Route Sign Inspection | Attachment 19 |
|---------------------------------------|----------------------|

1.0 Verify signs listed on the below table are in place and in good condition (Reference Step 6.4.5).

1.1 IF signs are missing or defaced, THEN generate an Action Request to replace or repair.

| SIGN LOCATION | SIGN IN PLACE AND IN GOOD CONDITION | Action Request | PERFORMED BY | DATE |
|-------------------------------|---|----------------|--------------|------|
| Parking Lot 3 South Turnstile | Y N | | | |
| Parking Lot 3 North Turnstile | Y N | | | |
| Parking Lot 4 East Turnstile | Y N | | | |
| Parking Lot 4 West Turnstile | Y N | | | |
| South Gate Guard House | Y N | | | |
| North Gate Entrance | Y N | | | |

COMMENTS: _____

REVIEWED BY: _____ DATE: _____

Emergency Preparedness Staff or designee

APPROVED BY: _____ DATE: _____

Manager, Emergency Preparedness

| | | |
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|---|----------------------|
| Offsite Response Organization PDEP and Procedures Update Notification | Attachment 20 |
|---|----------------------|

- 1.0 Notify offsite response organizations of updates to the PDEP-1, PDEP-2, or Implementing Procedures (listed on Appendix 2 of PDEP-1) annually (Reference Step 6.3.10).

Comments (include how task was performed): _____

PERFORMED BY: _____
Emergency Preparedness Staff or designee

DATE: _____

APPROVED BY: _____
Manager, Emergency Preparedness

DATE: _____

| | | |
|--|---|--|
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| | |
|------------------------------|----------------------|
| Hospital Supplies Inspection | Attachment 21 |
|------------------------------|----------------------|

1.0 Emergency Preparedness personnel or designee have inventoried supplies maintained at hospitals (Reference Step 6.4.6):

1.1 Tri-City Medical Center

| | DATE COMPLETED | PERFORMED BY |
|---------------------------------|-----------------------|---------------------|
| Radiological Emergency Supplies | | |

1.2 Mission Hospital Regional Medical Center

| | DATE COMPLETED | PERFORMED BY |
|---------------------------------|-----------------------|---------------------|
| Radiological Emergency Supplies | | |

2.0 The Hospital supplies' inspections have been completed. Deficiencies identified have been corrected or an Action Request generated.

Comments: _____

REVIEWED BY: _____ **DATE:** _____

Emergency Preparedness Staff or designee

APPROVED BY: _____ **DATE:** _____

Manager, Emergency Preparedness

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|--------------------|---------------|
| Summary of Changes | Attachment 22 |
|--------------------|---------------|

Action Request tracking 10 CFR 50.54(q): 1017-57551

| Action Request, Order, or Other Action | Description of Change | Reviewer(s) | Step, Section, Attachment or Page |
|--|---|-------------|-----------------------------------|
| AR 1017-57551 | Clarified the relationship between the cognizant divisions and the decommissioning organization, e.g., Operations is part of SCE. | See Below | Pages 5, 6, 11, 13, 15, 24 |
| Betterment | Updated Reference Section. | | Pages 17, 18 |

| | |
|----------------------------------|----------------|
| Reviewers By Title | Reviewer Name: |
| Emergency Planning | Sischo |
| Cyber Security | Chandler |
| NOD (Nuclear Oversight Division) | Kowal |
| Operations | Boerneke |
| Approvers: | |
| NOD Final Approval: | Kowal |
| CFDM Final Approval: | Gallion |

| | | |
|--|---|---|
| | 10CFR50.54(q) Screenings and Evaluations | SO123-VIII-ADMIN-4 REVISION: 1 Page 1 of 34 |
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| Procedure Usage Requirements | Sections |
|--|------------|
| Reference Use <ul style="list-style-type: none"> • Review and understand the procedure before performing any steps, including the prerequisite section. • Have a copy or applicable pages/sections open at the work site. • Use Placekeeping method according to SO123-XV-HU-3. • If any portion of the document is performed from memory, do so in the sequence specified. Perform each step as written, except when an approved process specifically allows deviation. • Refer to the procedure or instruction at least once to ensure completion of the task in accordance with the requirements. • Review the document at the completion of the task to verify that all appropriate steps are performed and documented. | ALL |

| Color Usage | Location |
|---|----------|
| This Document Does Not Contain Relevant Color | All |

QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / 50.54(q) APPLIES

| Procedure Type |
|----------------|
| General |

| Procedure Owner |
|----------------------|
| Kelli Gallion |

| | | |
|--|---|---|
| | 10CFR50.54(q) Screenings and Evaluations | SO123-VIII-ADMIN-4 REVISION: 1 |
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ATTACHMENT

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| | 10CFR50.54(q) Screenings and Evaluations | SO123-VIII-ADMIN-4 REVISION: 1 Page 3 of 34 |
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1.0 **PURPOSE AND SCOPE**

- 1.1 To perform 10CFR50.54(q) screenings and evaluations.
- 1.2 To ensure changes to the Permanently Defueled Emergency Plan (PDEP), consisting of San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan (PDEP-1) and San Onofre Nuclear Generating Station (SONGS) Permanently Defueled Emergency Plan Emergency Action Level Technical Bases Manual (PDEP-2), and its implementing procedures (listed on Appendix 2 of PDEP-1) required by 10CFR50.47(b) and 10CFR50 Appendix E, as exempted, and the equipment and facilities described in those documents, are maintained in accordance with 10CFR50.54(q) to prevent a reduction in the effectiveness of the Emergency Plan.

2.0 **RESPONSIBILITIES**

- 2.1 Onsite Review Committee (OSRC)
 - 2.1.1 Reviewing and approving changes other than editorial for PDEP-1 and PDEP-2.
- 2.2 Emergency Preparedness (EP) Manager
 - 2.2.1 Providing overall 10CFR50.54(q) program oversight by:
 - 2.2.1.1 Ensuring EP documents are developed, maintained, and revised per SONGS requirements and federal regulations.
 - 2.2.1.2 Ensuring the 10CFR50.54(q) program has qualified individuals to perform screenings and evaluations.
 - 2.2.1.3 Ensuring continuing training on a calendar two year frequency for personnel retaining 10CFR50.54(q) program qualifications.
 - 2.2.1.4 Ensuring continuing training frequency and content are augmented as needed to maintain good health of the 10CFR50.54(q) program as determined in assessment and inspection activities.
 - 2.2.1.5 Designating technical reviewers for changes other than editorial for PDEP-1 and PDEP-2, or for Implementing Procedures as needed.
 - 2.2.1.6 Designating subject matter experts to support 10CFR50.54(q) screenings or evaluations when requested by the individuals performing the screening or evaluation.
 - 2.2.1.7 Approving 10CFR50.54(q) screenings and evaluations.

REFERENCE USE

| | | |
|--|---|---|
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2.3 Personnel who Prepare and Review 10CFR50.54(q) Screens or Evaluations

- 2.3.1 Ensuring qualification EPSTQ5 to perform the task is current.
- 2.3.2 Ensuring all questions and conclusions are answered accurately and completely with sufficient detail for a technically competent individual to understand the rationale supporting the answer.
- 2.3.3 Requesting assistance by a subject matter expert via the Emergency Preparedness Manager if the scope of 10CFR50.54(q) screening or evaluation extends beyond his/her expertise.

2.4 Technical Reviewers

- 2.4.1 Ensuring independent technical reviews of 10CFR50.54(q) documentation associated with PDEP-1 and PDEP-2 that are not editorial.
- 2.4.2 Performing technical reviews of 10CFR50.54(q) documentation associated with PDEP Implementing Procedures revisions when requested.

2.5 Nuclear Regulatory Affairs Manager

- 2.5.1 Performing compliance reviews of 10CFR50.54(q) documentation associated with PDEP-1 and PDEP-2 changes.
- 2.5.2 Providing guidance on compliance with the station licensing basis.

3.0 **DEFINITIONS**

NOTE

PDEP-1 and PDEP-2 contain additional definitions and acronyms applicable to Emergency Preparedness Program.

3.1 **Activity:** A series of events or actions that may result in a change to the PDEP or affect the implementation of the PDEP. The following items are applicable in determining what an activity is as defined here:

- 3.1.1 An activity sets in motion the need to determine impact on certain licensing bases documents using regulatory review criteria such as 10CFR50.54(q).
- 3.1.2 Activities may range from something as simple as making an editorial change or an organizational change, to making complicated facility modifications.
- 3.1.3 For the purposes of 10CFR50.54(q), activities may also originate outside of the licensee's responsibility such as permanent hospital closings or changes to local agencies.

REFERENCE USE

| | | |
|--|--|-----------------------------------|
| | 10CFR50.54(q) Screenings and Evaluations | SO123-VIII-ADMIN-4 REVISION: 1 |
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- 3.2 **Capability:** The capacity to implement the response actions or fulfill the administrative provisions identified in the PDEP. Capability is typically described by the following:
- 3.2.1 *Methods:* The procedural means or manner of implementing the response actions or fulfilling the administrative provisions identified in the PDEP.
 - 3.2.2 *Resources:* The personnel, procedures, equipment, communications, instrumentation, analytical equipment, transportation, supplies, and other items needed to implement the response actions or fulfill the administrative provisions identified in the PDEP.
 - 3.2.3 *State or Condition:* The material means of implementing the response actions or fulfilling the administrative provisions identified in the PDEP; such as operative, physical, or spatial.
- 3.3 **Change:** An action that results in modification of, addition to, or removal from, the licensee's PDEP. Types of changes include:
- 3.3.1 Editorial changes such as typographical, formatting, paragraph numbering, spelling, grammar, punctuation, title changes, or administrative changes that do not change the intent.
 - 3.3.2 Conforming changes are those changes that are made based on previous regulatory approved changes (for example, SAR/TS changes, EAL scheme changes, etc.).
 - 3.3.3 Interdependent changes involve two or more activities that collectively affect a function (these are typically where one change compensates for another change).
 - 3.3.4 Technical changes.
- 3.4 **Commitment:** A general term used to describe a regulatory commitment, management directive, or other obligation of the licensee.
- 3.4.1 A regulatory commitment is an explicit statement to take a specific action agreed to or volunteered by a licensee and submitted in writing on the docket to the NRC. A regulatory commitment is an intentional undertaking by a licensee to restore compliance with regulatory requirements, or complete a specific action to address an NRC issue or concern (e.g., generic letter, bulletin, order, RAI responses, etc.).
 - 3.4.2 A management commitment is a restriction or recurring action established by facility management that is neither required by regulation nor a regulatory commitment, but has importance or safety significance (e.g., independent technical review, courtesy notifications, maintenance of equipment no longer required per the PDEP).
 - 3.4.3 An obligation is any condition or action that is a legally binding requirement imposed on licensees through applicable rules, regulations, orders, and licenses (including technical specifications and license conditions).

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- 3.5 **Emergency Plan:** The document(s) prepared and maintained by the licensee that identify and describe the elements for maintaining emergency preparedness and responding to emergencies.
- 3.5.1 The Emergency Plan includes PDEP-1 and PDEP-2 that the NRC originally approved and all subsequent changes made by the licensee with, and without, prior NRC review and approval under 10CFR50.54(q).
- 3.5.2 The Emergency Plan includes any document that describes the programmatic methods that the licensee uses to maintain emergency preparedness and to respond to emergencies. Programmatic methods are equivalent to program elements.
- 3.6 **Planning Standard Function:** A capability or resource necessary to prepare for and respond to a radiological emergency, as set forth in 10CFR50 Appendix E Section IV and in 10CFR50.47(b), as exempted.
- 3.7 **Planning Standards:** The 16 standards identified in 10CFR50.47(b) that Emergency Plans are required to meet in order for the NRC to make their reasonable assurance determination for public health and safety.
- 3.8 **Program Element:** An item that comprises the implementation aspects of an emergency planning function. These items correspond to the evaluation criteria in NSIR/DPR-ISG-02 (or other alternative methods for which the licensee obtained approval) that identify specific acceptable methods for complying with an emergency planning function.
- 3.9 **Reduction in Effectiveness (RIE):** A change to the Emergency Plan that results in reducing the licensee's capability to perform an emergency planning function in the event of an emergency.
- 3.9.1 Reduction in effectiveness is an evaluation concept that is used with 10CFR50.54(q) to differentiate between changes that a licensee is allowed to make without prior NRC approval and those that require prior NRC approval.
- 3.9.2 Reduction in effectiveness is evaluated against capability and timeliness of affected planning standard functions, elements, and commitments.
- 3.10 **Regulatory Requirement:** Any emergency preparedness related requirement, including the planning standards in 10CFR50.47(b), 10CFR50 Appendix E, 10CFR50.54(q), 10CFR50.54(t), commitments made in the Emergency Plan, commission orders, and commitments made with regard to compensatory actions under 10CFR50.47(c) or 10CFR50.54(s)(2)(ii).
- 3.11 **Timeliness:** The capability to complete an activity within a specified timeframe.
- 3.11.1 Timeliness depends on several factors, including the availability of adequate qualified personnel to perform the activity; the number of multiple duties assigned to these personnel; augmentation time by off-shift personnel; and sufficient procedures, tools, instrumentation, equipment, and other material necessary to complete the activity.
- 3.11.2 Timeliness includes any change that modifies how the timeliness criterion is evaluated (e.g., "when the clock starts and stops").

REFERENCE USE

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4.0 **PRECAUTIONS AND LIMITATIONS**

4.1 **Precautions**

- 4.1.1 In order to properly evaluate a proposed change to the Emergency Plan, licensees need to understand the basis for the NRC's approval of the original plan and the basis for any subsequent change, whether it has been approved by the NRC or implemented by the licensee under 10CFR50.54(q).

4.2 **Limitations**

- 4.2.1 10CFR50.54(q) requires licensees to follow and maintain the effectiveness of an Emergency Plan that meets the planning standards of 10CFR50.47(b) and the requirements in Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10CFR50, "Domestic Licensing of Production and Utilization Facilities."

5.0 **PREREQUISITES**

- 5.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.
- 5.2 **VERIFY** Level of Use requirements on the first page of this procedure.

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NOTE

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

6.0 PROCEDURE

6.1 PDEP-1, PDEP-2, and Implementing Procedures Revisions

- 6.1.1 **REVISE** PDEP-1, PDEP-2, or PDEP Implementing Procedures in accordance with SO123-VIII-ADMIN-1 and station procedure revision requirements (reference SO123-XV-109.1).
- 6.1.2 **PERFORM** 10CFR50.54(q) screen/evaluation for all revisions to PDEP-1, PDEP-2, or PDEP Implementing Procedures (Appendix 2 of PDEP-1) per section 6.3.

6.2 Lower-tiered Document Revisions

- 6.2.1 **REVISE** lower-tiered documents not listed in Appendix 2 of PDEP-1 in accordance with SO123-VIII-ADMIN-1 and station procedure revision requirements (reference SO123-XV-109.1).
- 6.2.2 A change to lower-tiered documents does not normally require a 10CFR50.54(q) screen/evaluation.
 - IF an Emergency Plan requirement is removed from the Emergency Plan **AND** relocated to a lower tiered document, THEN the lower tiered document must be reviewed in accordance with 10CFR50.54(q). In this case, the lower tiered document now contains the Emergency Plan license requirement **AND** should be listed in Appendix 2 of PDEP-1.

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6.3 10CFR50.54(q) Screening and Evaluation

NOTE

The purpose of the 10CFR50.54(q) screening is to determine whether a 10CFR50.54(q) evaluation is required, not to determine if an activity reduces the effectiveness of the Emergency Preparedness Program.

- 6.3.1 **PERFORM** a 10CFR50.54(q) screening for any activity that may impact the emergency preparedness program to determine and document whether 10CFR50.54(q) Evaluation is needed.
 - 6.3.1.1 Follow the guidelines in Attachment 1 to **COMPLETE** 10CFR50.54(q) screening on Form EP(123) QSC, *10CFR50.54(q) Screening Form*.
 - 6.3.1.1.1 A 10CFR50.54(q) screening may be skipped for activities that will be taken directly to a 10CFR50.54(q) evaluation.
 - 6.3.1.1.2 Multiple activities may be considered on a single screening so long as all proposed activities are identified and screened.
 - 6.3.1.2 Screen each activity separately unless it involves any of the following:
 - 6.3.1.2.1 Editorial changes such as typographical, formatting, paragraph numbering, spelling, grammar, punctuation, title changes, or administrative changes that do not change the intent.
 - 6.3.1.2.2 Conforming changes (e.g., activities that implement a change associated with regulation, order or NRC approved license amendments that specifically address the impact on the SONGS emergency preparedness program).
 - 6.3.1.2.3 Repetitive identical changes such as a single activity that changes several sections of the Emergency Plan or procedures.
 - 6.3.1.2.4 Two or more changes that are interdependent (e.g., an activity where one change compensates for another change, such as changes to the ERO staffing, changing equipment used for multiple functions, major program changes in a particular area, etc.).
 - 6.3.1.3 If the activity is subject to one or more change processes outside of 10CFR50.54(q) (such as 10CFR50.59, 10CFR50.90, 10CFR50.54(a), or 10CFR50.54(p)), then comply with the other applicable change processes.

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NOTES

1. The NRC expects 10CFR50.54(q) evaluations to be of a level of rigor and thoroughness consistent with the scope of the proposed changes with particular emphasis placed on the risk-significant planning standards [10CFR50.47(b)(4), (5), (9), and (10)].
2. The NRC would consider enforcement action for any 10CFR50.54(q) evaluation that is of inadequate scope and extent to reasonably assess the impact of the proposed change on the effectiveness of the Emergency Plan.

6.3.2 **PERFORM** a 10CFR50.54(q) evaluation for any activity that affects an area of the emergency preparedness program as determined in the 10CFR50.54(q) screening or by self-evidence (i.e., the proposed activity was taken directly to an evaluation without a screening).

6.3.2.1 Follow the guidelines in Attachment 2 to **COMPLETE** 10CFR50.54(q) evaluation on Form EP(123) QEV, *10CFR50.54(q) Evaluation Form*.

6.3.2.2 If the activity is subject to one or more change processes outside of 10CFR50.54(q) (such as 10CFR50.59, 10CFR50.90, 10CFR50.54(a), and 10CFR50.54(p)), then comply with the other applicable change processes.

6.4 Approval for Changes that Reduce Effectiveness

NOTE

The regulation 10CFR50.54(q)(4) requires the licensee to submit a license amendment application per 10CFR50.90 for prior NRC approval of a change that it believes will reduce the effectiveness of its Emergency Plan.

6.4.1 In addition to the filing requirements in 10CFR50.90, the application shall include:

6.4.1.1 All Emergency Plan pages affected by the change.

6.4.1.2 A forwarding letter identifying the change(s), the reason for the change(s), and the licensee's basis for concluding that its Emergency Plan, as modified, continues to meet the planning standards in 10CFR50.47(b) and the requirements in Appendix E to 10CFR50.

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6.5 **Determining Acceptability of a Previously Performed 10CFR50.54(q)**

- 6.5.1 If the acceptability of a previously performed 10CFR50.54(q) screening or evaluation is in question, then compare it to the guidance that was applicable at the time the 10CFR50.54(q) screening or evaluation was prepared.
- 6.5.2 If a previously performed 10CFR50.54(q) screening or evaluation is determined to be unacceptable, then report the determination in an Action Request.
- 6.5.3 A subsequent 10CFR50.54(q) screening or evaluation may also be required to correct an error or omission in an approved screening or evaluation.
 - 6.5.3.1 The subsequent 10CFR50.54(q) screening or evaluation should clearly consider and describe how the previously approved 10CFR50.54(q) screening or evaluation is affected, and shall be completely re-performed as a stand-alone document.
 - 6.5.3.2 The subsequent 10CFR50.54(q) screening or evaluation shall reference the previously performed 10CFR50.54(q) screening or evaluation and state whether it supersedes or supplements it.

7.0 **RETENTION OF RECORDS**

- 7.1 PDEP revisions, including 10CFR50.54(q) screening and evaluation documentation, are quality-assurance records and shall be retained.
- 7.2 Revisions to PDEP-1, PDEP-2, or PDEP Implementing Procedures (listed on Appendix 2 of PDEP-1) made without NRC prior approval shall be retained in SAP SCASE for three years after the date of each change.
- 7.3 10CFR50.54(q) screening and evaluation documentation shall be scanned into eDMRM in accordance with RPA 92-0010E.
- 7.4 The Emergency Plan and each change for which NRC prior approval was obtained shall be retained in SAP SCASE until the Commission terminates the license.

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8.0 **REFERENCES / COMMITMENTS**

8.1 **Implementing Reference**

8.1.1 **Procedures**

8.1.1.1 SO123-VIII-ADMIN-1, Emergency Preparedness Program Maintenance

8.1.1.2 SO123-XV-HU-3, Written Instruction Use and Adherence

8.1.2 **Forms**

8.1.2.1 EP(123) QSC, 10CFR50.54(q) Screening Form

8.1.2.2 EP(123) QEV, 10CFR50.54(q) Evaluation Form

8.2 **Developmental References**

8.2.1 **Commitments**

8.2.1.1 PDEP-1, SONGS Permanently Defueled Emergency Plan, Volume 1

8.2.1.2 PDEP-2, SONGS Permanently Defueled Emergency Plan, Volume 2, EAL
Technical Bases Manual

8.2.2 **Others**

8.2.2.1 NEI 10-05, "Assessment of On Shift Emergency Response Organization Staffing and Capabilities"

8.2.2.2 NEI 11-03, "Guidelines for Evaluating Emergency Plan Changes Under 10CFR50.54(q)"

8.2.2.3 NSIR/DPR-ISG-02, Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants

8.2.2.4 Regulatory Guide 1.219, "Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors"

8.2.2.5 Regulatory Guide 1.33, Quality Assurance Program Requirements

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| Completing EP(123) QSC, 10CFR50.54(q) Screening Form | | Attachment 1 |

1.0 **Section 1, Activity Description and References**

- 1.1 Multiple activities may be considered on a single screening so long as all proposed activities are identified and screened.
- 1.2 **RECORD** the tracking number on the form (Action Request assignment number).
- 1.3 **RECORD** a description of the activity.
 - 1.3.1 The description does not need to include the reason for the activity. Typically the reason for the activity is associated with the screening of the change and should be documented in the applicable section.
 - 1.3.2 A reference to an attached procedure, table or other form of description may be used in addition to the activity description.
 - 1.3.3 For an activity that results in changes to multiple documents or sections in a document, developing a comparison table of the current content to the changed content may be used to support the description.
- 1.4 **RECORD** the references related to the activity (e.g., additional Action Request, engineering change package, calculation number, prior approval ADAMS accession number, license amendment number, etc.).

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2.0 **Section 2, 1st Tier Screening**

2.1 **CHECK** the appropriate box or boxes that define the type of change associated with the activity.

2.1.1 **CHECK** the "physical change" box for an activity that involves a change such as organizational structure or staffing, site layout or boundaries, material changes of supplies or equipment, etc.

NOTE

An activity may involve both a physical change and a process change, although it may not be known if a physical change will also result in a process change at this time.

2.1.2 **CHECK** the "process change" box for an activity that involves a change such as altering the method or steps to do a task, performing with more or fewer individuals, overlapping with other activities, etc.

2.1.3 **CHECK** the "value change" box for an activity that involves a change such as set-points, thresholds, time durations, indicators, standards, etc.

2.1.4 **CHECK** the "editorial change" box for an activity that only involves a change such as typographical, formatting, paragraph numbering, spelling, grammar, punctuation, title changes, or administrative changes that do not alter intent, value, capability or timeliness.

2.1.4.1 An activity that is an editorial only change should not be any other type of change; physical change, process change, value change, or conforming change.

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NOTE

1. Activities that have been ordered by the regulator or have been previously submitted to and approved by the NRC are considered conforming changes that do not require a 10CFR50.54(q) effectiveness evaluation provided the related change to the emergency preparedness program is specifically and fully addressed in that order or docketed approval transmittal (such as plant design, equipment, EALs, etc.).
2. Approved LARs, such as for plant modifications, SAR, or security changes, that do not include specific consideration and approval of the activity's change to the emergency preparedness program are not considered conforming changes.
3. Changes to regulations or new regulations issued to the industry at large are not typically considered conforming changes.

- 2.1.5 **CHECK** the "conforming change" box if applicable.
- 2.2 If the activities are strictly an editorial or conforming change, then **GO TO** Step 5.0, Section 5 Screening Results.

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3.0 **Section 3, 2nd Tier Screening**

3.1 **DOCUMENT** the association of the activity with the emergency preparedness program as follows:

3.1.1 **CHECK** the applicable planning standard or 10CFR50 Appendix E requirement box or boxes that are associated with the activity.

NOTE

Most EP Program commitments are associated with a planning standard and are identified above. However, site specific commitments associated with other regulations, orders, Atomic Safety and Licensing Board, NRC correspondence, etc., that do not fall under one of the sixteen planning standards may exist as an EP Program commitment.

3.1.2 If the activity is not associated with any of the planning standards or 10CFR50 Appendix E requirements, then **PERFORM** the following:

3.1.2.1 **PERFORM** a search to identify any SONGS site specific emergency preparedness program commitments made since the NRC originally approved PDEP not related to a planning standard that are associated with the activity using the following as applicable:

- Current Licensing Basis search tool
- Commitment Database search tool
- Management Commitments

3.1.2.2 **DOCUMENT** the scope of the search (such as key words).

3.1.2.3 **LIST** the wording and the source of any applicable SONGS site specific Emergency Preparedness program commitment associated with the activity.

3.2 If the activity is associated with any of the planning standards or is associated with a SONGS site specific emergency preparedness commitment, then **GO TO** Step 4.0, Section 4, 3rd Tier Screening.

3.3 If the activity is not associated with a planning standard and is not associated with a SONGS site specific emergency preparedness commitment, then **GO TO** step 5.0, Section 5, Screening Results.

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4.0 **Section 4, 3rd Tier Screening**

- 4.1 For each planning standard or 10CFR50 Appendix E requirement checked in Section 3, **IDENTIFY** the applicable function(s), element(s) and site specific commitment(s) associated with the activity.

NOTE

1. Regulatory Guide 1.219 Section 4 and NEI 10-05 Appendix C provide lists of EP Program and ERO Performance functions which are the basis for Attachment 3.
2. Refer to the above documents for additional guidance when performing Screenings.

- 4.1.1 Using Attachment 3 as a reference, **LIST** the applicable function(s) associated with the activity.
- 4.1.2 Using 10CFR50 Appendix E and NSIR/DPR-ISG-02 Attachment 1 as references, **LIST** the applicable element(s) that are associated with the activity.
- 4.1.3 **LIST** each SONGS site specific emergency preparedness program commitment associated with the activity.
- 4.2 **LIST** the current Emergency Plan content that describes how the function(s), element(s) and commitment(s) are met.
- 4.3 **DOCUMENT** whether the activity does or does not affect how the current Emergency Plan meets the listed function(s), element(s) and commitment(s).
- 4.4 **GO TO** step 5.0, Section 5, Screening Results.

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5.0 **Section 5, Screening Results**

5.1 **CHECK** the box that indicates the activity may be implemented without performing a 10CFR50.54(q) evaluation provided any of the following conditions are met:

- 5.1.1 The change was identified as only editorial.
- 5.1.2 The change was identified as only conforming (i.e., an activity that has been given prior approval by the NRC).
- 5.1.3 The activity does not affect how the current Emergency Plan meets all of the following:
 - A planning standard function
 - A program element
 - A SONGS site specific emergency preparedness program commitment

5.2 **CHECK** the box that indicates the activity should not be implemented without performing a 10CFR50.54(q) evaluation provided any of the following conditions are met:

- 5.2.1 The activity does affect how the current Emergency Plan meets a planning standard function.
- 5.2.2 The activity does affect how the current Emergency Plan meets a program element.
- 5.2.3 The activity does affect how the current Emergency Plan meets a site specific EP program commitment.

6.0 **Sign Off Sections**

- 6.1 Prior to signing, the preparer and reviewer shall **ENSURE** all included information is finalized and correct.
- 6.2 **RECORD** name, signature, and date for the preparer.
- 6.3 **RECORD** name, signature, and date for the reviewer.
- 6.4 **RECORD** name, signature, and date for the approver

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| Completing EP(123) QEV, 10CFR50.54(q) Evaluation Form | | Attachment 2 |

1.0 **Section 1, Activity Description and References**

- 1.1 Multiple activities may be considered on a single evaluation so long as all proposed activities are identified and evaluated.
- 1.2 **RECORD** the tracking number on the form (Action Request assignment number).
- 1.2.1 If a screening evaluation was previously performed, then **USE** the same tracking number.
- 1.3 **RECORD** a description of the activity.
- 1.3.1 Activities determined as strictly editorial or conforming during the 10CFR50.54(q) screen do not need to be recorded for the evaluation.
- 1.3.2 The description does not need to include the reason for the activity. Typically the reason for the activity is associated with the evaluation of the change and should be documented in the applicable section.
- 1.3.3 A reference to an attached Procedure, table, or other form of description may be used in addition to the activity description.
- 1.3.4 For an activity that results in changes to multiple documents or sections in a document, developing a comparison table of the current content to the changed content may be used to support the description.
- 1.4 **RECORD** the references related to the activity (e.g., additional Action Request, engineering change package, calculation number, prior approval ADAMS accession number, license amendment number, etc.).

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2.0 **Section 2, Impact and Licensing Basis Determination**

2.1 The below steps are performed successively for each individual planning standard or applicable regulation when more than one planning standard or regulation is associated with the activity.

2.2 **DETERMINE** and **LIST** the specific 10CFR50.47(b) planning standard and other applicable regulation associated with the activity.

NOTE

1. Regulatory Guide 1.219 Section 4 and NEI 10-05 Appendix C provide lists of EP Program and ERO Performance functions which are the basis for Attachment 3.
2. Refer to the above documents for additional guidance when performing Evaluations.

2.2.1 Using Attachment 3 as a reference, **LIST** the applicable function(s) associated with the activity by planning standard.

2.2.2 Using 10CFR50 Appendix E and NSIR/DPR-ISG-02 Attachment 1 as references, **LIST** the applicable element(s) associated with the activity by planning standard.

2.2.3 **IDENTIFY** any SONGS site specific emergency preparedness program commitments associated with the activity using the following as applicable:

- Current Licensing Basis Search Tool
- Commitment Database Search Tool
- Management Commitments

2.2.4 **DOCUMENT** the scope of the search (such as key words).

2.2.5 **LIST** the wording and the source of any applicable SONGS site specific Emergency Preparedness program commitment associated with the activity.

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NOTES

1. The approved means to meet a particular planning standard function, program element or site specific commitment is documented in the approved version of the PDEP.
2. The approved versions of PDEP-1 and PDEP-2 may be the licensing basis for how a particular planning standard function, program element, or site specific commitment is met, or the licensing basis may be provided in other documents that led to the approval of PDEP-1 and PDEP-2 content (and subsequent revisions), such as in SERs, Supplemental SERs, licensing hearing transcripts, or docketed inspection finding commitments, etc.
3. The licensing basis is used to evaluate whether an activity will result in a regulatory non-compliance or a reduction in effectiveness.

- 2.3 Using Regulatory Guide 1.219 for reference, **DETERMINE** and **DOCUMENT** the Emergency Plan content that describes how the listed functions, elements, and commitments are met, and any additional licensing basis information not part of the Emergency Plan content itself.
- 2.3.1 If the approved licensing basis is different from the basis contained in the current Emergency Plan, then **DOCUMENT** the reason for the difference.
- 2.3.2 **LIST** the source of licensing basis information if it is not the current Emergency Plan content (for example; SER, E-Plan, EPIP, etc.).

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3.0 **Section 3, Compliance Evaluation and Conclusion**

- 3.1 The below steps are performed successively for each individual planning standard or applicable regulation when more than one planning standard or regulation is associated with the activity.
- 3.2 **REVIEW** the regulatory requirements (i.e., licensing basis) to ensure the basis of the existing program elements and why the elements were incorporated in the PDEP is understood.
- 3.2.1 In consideration of each function, element, and commitment listed in the impact determination above (Section 2.0, Impact and Licensing Basis Determination), document:
- 3.2.1.1 How the activity does or does not alter the Emergency Plan content.
- 3.2.1.2 How the activity does or does not alter the licensing basis with regards to meeting the regulatory requirements.
- 3.2.1.3 **ENSURE** the specific 10CFR50.47(b) and 10CFR50 Appendix E requirements associated with the activity are included in the evaluation.
- 3.3 **CHECK** the appropriate box for whether the activity continues to provide compliance with the requirements of 10CFR50.47(b) and 10CFR50 Appendix E in the conclusion.
- 3.4 If the activity does not continue to provide compliance with the regulatory requirements of 10CFR50.47(b) and 10CFR50 Appendix E, then it shall be either:
- 3.4.1 Rejected
- 3.4.2 Revised to achieve compliance
- 3.4.3 Formally submitted to the NRC for an exemption to the regulatory requirement per 10CFR50.12
- 3.5 If the evaluation concludes the activity does not continue to provide compliance with the regulatory requirements, then **GO TO** step 5.0, Section 5, Evaluation Results.

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4.0 Section 4, Reduction in Effectiveness Evaluation and Conclusion

4.1 A reduction in effectiveness is usually based on a change to a planning standard function.

4.1.1 A change to one or more program elements may not always reduce the effectiveness of the associated planning standard function.

4.2 A reduction in effectiveness typically occurs if there is a reduction in the capability or timeliness for performing or fulfilling a function, element, or commitment without activities to compensate for the reduction in capability or timeliness.

4.2.1 In some cases, licensees may have committed to particular program elements in response to site-specific considerations. For example, a licensee may have increased its commitment for the numbers of on shift ERO personnel to compensate for long staff augmentation times because of the remoteness of a site from residential areas.

4.3 An activity may impact more than one function, element, or commitment under different planning standards.

4.4 **REVIEW** Regulatory Guide 1.219 Section 4 for examples of changes that may or may not require prior NRC approval.

4.5 The below steps are performed successively for each individual planning standard or applicable regulation when more than one planning standard or regulation is associated with the activity.

4.5.1 Unless an activity results in repetitive identical changes or multiple activities result in interdependent changes, document the evaluation for reduction in effectiveness for each activity/change separately.

4.6 In consideration of each function, element, and commitment listed in the impact determination above (step 2.0) document how:

4.6.1 The activity does or does not alter the Emergency Plan content.

4.6.2 The activity does or does not alter the licensing basis with regards to a reduction in effectiveness, with specific evaluation of the following attributes:

4.6.2.1 Continued capability to meet or perform the function, element, or commitment.

4.6.2.2 Continued timeliness of the function, element, or commitment.

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- 4.6.3 If there are any differences in how the Emergency Plan will meet one of the listed functions, elements, or commitments, then **PERFORM** the following:
- 4.6.3.1 Document a clear explanation for the difference (e.g., special circumstances that require the difference in order to effectively perform the function, as a matter of convenience, or as an operating philosophy).
- 4.6.3.2 Qualify the difference as improving, sustaining, or reducing the effectiveness of the planning standard function, element, or commitment.
- 4.7 If multiple activities create interdependent changes, then **EVALUATE** and document the overall impact on the effectiveness of the Emergency Plan or its implementation in a summary at the end of the section.
- 4.8 **CHECK** the appropriate box for whether the activity constitutes a reduction in effectiveness in the conclusion.
- 5.0 **Section 5, Evaluation Results**

NOTE

In the case where it is uncertain whether the activity constitutes a reduction in effectiveness, the NRC suggests a pre-application conference call be arranged with the NRC Headquarters staff to discuss the proposed change and to ask the staff to clarify the regulatory positions in Regulatory Guide 1.219.

- 5.1 **RECORD** the evaluation results.
- 5.1.1 **CHECK** the appropriate box that indicates the activity may be implemented without prior NRC approval provided both of the following conditions are met:
- 5.1.1.1 The activity does continue to comply with the requirements of 10CFR50.47(b) and 10CFR50 Appendix E.
- 5.1.1.2 The activity does not constitute a reduction in effectiveness.
- 5.1.2 **CHECK** the appropriate box that indicates the activity shall not be implemented without prior NRC approval provided either of the following conditions is met:
- 5.1.2.1 The activity does not continue to comply with the requirements of 10CFR50.47(b) and 10CFR50 Appendix E.
- 5.1.2.2 The activity constitutes a reduction in effectiveness.

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5.1.3 Take one of the following actions for any activity that reduces the effectiveness of the Emergency Plan.

5.1.3.1 Reject the activity.

5.1.3.2 Revise the activity so that it maintains the effectiveness of the Emergency Plan.

5.1.3.3 Formally submit the activity to the NRC for prior approval per 10CFR50.90.

6.0 Sign Off Sections

6.1 Prior to signing, the preparer and reviewer shall **ENSURE** all included information is finalized and correct.

6.2 **RECORD** name, signature, and date for the preparer.

6.3 **RECORD** name, signature, and date for the reviewer.

6.4 **RECORD** name, signature, and date for the approver.

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| Planning Standards Program and Performance Functions List | | Attachment 3 |

1.0 Assignment of Responsibility (Organization Control): 10CFR50.47(b)(1)

1.1 Program Functions

- 1.1.1 Responsibility for emergency response is assigned.
- 1.1.2 The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) per the Emergency Plan.

1.2 Performance Functions

- 1.2.1 Coordination with offsite response agencies (Emergency Management, Incident Command Post, Field Monitoring, etc.).
- 1.2.2 Continuous staffing and shift relief.

2.0 Onsite Emergency Organization: 10CFR50.47(b)(2)

2.1 Program Functions

- 2.1.1 The process ensures on shift emergency response responsibilities are staffed and assigned.
- 2.1.2 The process for timely augmentation of on shift staff is established and maintained.

2.2 Performance Functions

- 2.2.1 Plant Operations (status monitoring and Emergency Operating Procedures actions)
- 2.2.2 Command and Control
- 2.2.3 Facility/Group Management and Supervision
- 2.2.4 ERO Mobilization and Response (persons receiving the notification)
- 2.2.5 Use of Medical, Fire, and Law Enforcement Support

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| Planning Standards Program and Performance Functions List | | Attachment 3 |

3.0 Emergency Response Support and Resources: 10CFR50.47(b)(3)

3.1 Program Functions

3.1.1 Arrangements for requesting and using offsite assistance have been made.

3.2 Performance Functions

3.2.1 Request, Integration, and Use of Offsite Personnel within the Emergency Response Facilities

3.2.2 Contact and Use of External Support Services (technical, material, etc.)

4.0 Emergency Classification System: 10CFR50.47(b)(4)

4.1 Program Functions

4.1.1 A standard scheme of emergency classification and action levels is in use.

4.2 Performance Functions

4.2.1 Event Classification

5.0 Notification Methods and Procedures: 10CFR50.47(b)(5)

5.1 Program Functions

5.1.1 Procedures for notification of State and local governmental agencies are capable of alerting them of the declared emergency within 60 minutes after declaration of an emergency and providing follow up notifications.

5.2 Performance Functions

5.2.1 ERO Notification

5.2.2 Local/State Event Notification (Emergency Classification Level)

5.2.3 NRC Event Notification

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| Planning Standards Program and Performance Functions List | | Attachment 3 |

6.0 Emergency Communications: 10CFR50.47(b)(6)

6.1 Program Functions

6.1.1 Systems are established for prompt communication among principal emergency response organizations.

6.1.2 Systems are established for prompt communication to emergency response personnel.

6.2 Performance Functions

6.2.1 NRC Emergency Telecommunications System

6.2.2 Interagency/Organization Communications

6.2.3 Industry Event Communications (ANI, etc.)

7.0 Public Education and Information: 10CFR50.47(b)(7)

7.1 Program Functions

7.1.1 Coordinated dissemination of public information during emergencies is established.

7.2 Performance Functions

7.2.1 Media Statements

7.2.2 Media Briefings

7.2.3 Accommodation of News Media Personnel

7.2.4 Media Monitoring

7.2.5 Rumor Control

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| Planning Standards Program and Performance Functions List | Attachment 3 |
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8.0 Emergency Facility and Equipment: 10CFR50.47(b)(8)

8.1 Program Functions

8.1.1 Adequate facilities are maintained to support emergency response.

8.1.2 Adequate equipment is maintained to support emergency response.

8.2 Performance Functions

8.2.1 Facility/Work Area Setup

8.2.2 Facility Activation

8.2.3 Facility Operation

8.2.4 Facility Relocation

8.2.5 Facility Information Display Systems

9.0 Accident Assessment: 10CFR50.47(b)(9)

9.1 Program Functions

9.1.1 Methods, systems, and equipment for assessment of radioactive releases are in use.

9.2 Performance Functions

9.2.1 Accident Detection and Assessment

9.2.1.1 Engineering analysis

9.2.1.2 Plant system prognosis

9.2.1.3 Priorities of mitigating actions

9.2.2 Dose Assessment

9.2.2.1 Meteorological assessment

9.2.2.2 Release determination/projection

9.2.3 Radiological Monitoring (in plant, onsite, and offsite)

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9.2.4 Response Team Activities (damage assessment, repair, firefighting)

9.2.4.1 Task development and prioritization

9.2.4.2 Team briefing, dispatch, and control

9.2.5 Extreme Measures [50.54(x), Mitigation Strategies]

10.0 **Protective Response: 10CFR50.47(b)(10)**

10.1 Program Functions

10.1.1 A range of protective actions is available for emergency workers during emergencies, including hostile action events.

10.2 Performance Functions

10.2.1 Assembly (onsite)

10.2.2 Protected Area Accountability (includes search and rescue)

10.2.3 Evacuation (local area, protected area and Owner Controlled Area)

10.2.3.1 Precautionary dismissal

10.2.3.2 Site access controls

10.2.4 Personnel protective equipment

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| Planning Standards Program and Performance Functions List | | Attachment 3 |

11.0 Radiological Exposure Control: 10CFR50.47(b)(11)

11.1 Program Functions

- 11.1.1 The resources for controlling radiological exposures for emergency workers are established.

11.2 Performance Functions

- 11.2.1 Authorization and use of Emergency Exposure Limits
- 11.2.2 Monitoring and decontamination (personnel, material, etc.)
- 11.2.3 Contamination and habitability controls (site and personnel)

12.0 Medical and Public Health Support: 10CFR50.47(b)(12)

12.1 Program Functions

- 12.1.1 Arrangements are made for medical services for contaminated, injured individuals.

12.2 Performance Functions

- 12.2.1 First Aid
- 12.2.2 Transportation of contaminated injured personnel
- 12.2.3 Medical treatment assistance

13.0 Recovery Planning and Post accident Operations: 10CFR50.47(b)(13)

13.1 Program Functions

- 13.1.1 Plans for recovery and reentry are developed.

13.2 Performance Functions

- 13.2.1 Event termination
- 13.2.2 Initiation and operation of the recovery organization
- 13.2.3 Environmental sampling (ingestion pathway activities)

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| Planning Standards Program and Performance Functions List | | Attachment 3 |

14.0 Drills and Exercises: 10CFR50.47(b)(14)

14.1 Program Functions

14.1.1 A drill and exercise program (including, for example, radiological, medical, health physics) is established.

14.1.2 All exercises, drills, and training that provide performance opportunities to develop, maintain, and demonstrate key skills are assessed via a formal critique process to identify weaknesses.

14.1.3 Identified weaknesses are corrected.

14.2 Performance Functions

14.2.1 None

15.0 Emergency Responder Training: 10CFR50.47(b)(15)

15.1 Program Functions

15.1.1 Training is provided to ERO personnel.

15.2 Performance Functions

15.2.1 None

16.0 Emergency Plan Maintenance: 10CFR50.47(b)(16)

16.1 Program Functions

16.1.1 Responsibility for Emergency Plan development and review is established.

16.1.2 Planners responsible for Emergency Plan development and maintenance are properly trained.

16.2 Performance Functions

16.2.1 None.

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| Summary of Changes | Attachment 4 |
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Notification tracking 10CFR50.54(q): 0717-89718

Author: Lucia Sischo

| Reason | Description of Change | Reviewer(s) | Step, Section, Attachment or Page |
|------------|---|--------------------|--|
| 0617-57673 | <p>Specify when referring to PDEP-1 or PDEP-2 versus the general term PDEP.</p> <p>Change examples to those relevant to a PDEP.</p> <p>Remove "onsite and offsite".</p> <p>Change NUREG-0654 to NSIR/DPR-ISG-02.</p> <p>Align with 10CFR50.54(q)(2).</p> <p>Remove reference to Nuclear Notification methodology.</p> <p>Update for SAP SCASE or RPA.</p> <p>Remove reference to FEMA and ANS.</p> <p>Remove items for which SONGS has been exempted.</p> | EP NOD Cyber | <p>Throughout</p> <p>Step 3.1.3</p> <p>Step 3.7</p> <p>Steps 3.8, 8.2.2.3; Att 1 Step 4.1.2 and Att 2 Step 2.2.2</p> <p>Step 4.2.1</p> <p>Steps 6.3.1.1 and 6.3.2.1; Att 1 Steps 1.2 and 1.4, Att 2 Steps 1.2 and 1.4</p> <p>Section 7.0</p> <p>Att 1 Note 1 @ Step 2.1.5</p> <p>Att 3</p> |
| 0717-89718 | Provide consistent verbiage regarding editorial change. | | Steps 3.3.1 and 6.3.1.2.1; Att 1 Step 2.1.4 |
| 0317-43330 | Update for RPA. | | Section 7.0 |
| Comment | Update Nuclear Notification to Action Request. | Chandler | Step 6.5.2 |
| Comment | Remove exempted reference. | Gallion | Section 6.3.3 |
| | Update licensing acronyms and spell out acronym. | | Step 3.3.2 and Attachment 1 |

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| Reviewer Title | Reviewer Name |
|----------------------------|---------------|
| Owner | Sischo |
| Emergency Planning | Sheek |
| Cyber Security (Required) | Chandler |
| NOD (Required) | Churchill |
| Approvers: | |
| NOD Final Approval: | Churchill |
| CFDM / Designee: | Gallion |

Attachment 4

Report and Analysis Summary of Permanently Defueled Emergency Plan Implementing Procedures Changes

San Onofre Nuclear Generating Station
Report and Analysis Summary
10 CFR 50.54(q)(5)

| Document Number: SO123-VIII-ADMIN-1, Revision 5 Title: Emergency Preparedness Program Maintenance SONGS Action Request: 1017-57551-14 | |
|---|--|
| Change Description | Analysis Summary |
| <p>The 10CFR50.54(q) evaluation for SO123-VIII-ADMIN-1 Revision 5 was performed under AR 1017-57551 assignment 14. This revision:</p> <ul style="list-style-type: none">• Updates responsibility owners due to the transition of programs to SONGS Decommissioning Solutions (SDS).• Incorporates editorial changes. | <p>After incorporation of the changes in SO123-VIII-ADMIN-1 Revision 5, the Permanently Defueled Emergency Plan continues to maintain:</p> <ul style="list-style-type: none">• adequate equipment to support emergency response• established responsibilities for emergency plan development and review• trained planners responsible for emergency plan development and maintenance <p>The Permanently Defueled Emergency Plan continues to meet the regulatory requirements of 10CFR50.47(b) and 10CFR50 Appendix E, Section IV, as exempted.</p> <p>The changes do not modify the licensing basis with regards to a reduction in effectiveness. The capability and timeliness to perform the planning function is not altered by the changes. The capability and timeliness to perform the associated elements are also maintained.</p> <p>The changes can be implemented without prior NRC approval.</p> |
| PREPARED BY: Lucia Sischo DATE: 12-18-2017 | REVIEWED BY: Kevin Sheek DATE: 1-8-2018 |

San Onofre Nuclear Generating Station
Report and Analysis Summary
10 CFR 50.54(q)(5)

| Document Number: SO123-VIII-ADMIN-4, Revision 1 Title: 10CFR50.54(q) Screenings and Evaluations SONGS Action Request: 0717-89718 | |
|---|--|
| Change Description | Analysis Summary |
| <p>The 10CFR50.54(q) evaluation for SO123-VIII-ADMIN-4 Revision 1 was performed under AR 0717-89718 assignment 8. This revision:</p> <ul style="list-style-type: none"> Revises wording to either provide applicable information or remove non applicable information. Due to the decommissioning status at the station, the NRC has granted exemptions from certain Emergency Planning requirements. This procedure contained information that was no longer applicable based on the exemptions granted. In addition, the procedure referenced documents that apply to operating plants; these referenced documents were removed or replaced by more pertinent documents that have been developed for decommissioning. Revises wording to align the definition of editorial correction, including grammar, titles and administrative changes that do not change intent of the original text, as editorial. Removes a step that does not provide instruction and is already covered under definitions. Corrects the retention time for Emergency Plan documents changes made without NRC prior approval, in order to align with NRC retention requirement in 10CFR50.54(q)(5). Incorporates editorial changes. | <p>After incorporation of the changes in SO123-VIII-ADMIN-4 Revision 1, the Permanently Defueled Emergency Plan continues to maintain:</p> <ul style="list-style-type: none"> The necessary direction for the performance of 10CFR50.54(q) screenings or evaluations by trained planners. Established responsibilities for emergency plan development and review Trained planners responsible for emergency plan development and maintenance <p>The changes do not conflict with the Emergency Plan content or the exemptions granted. The changes do not alter the licensing basis with regards to meeting the regulatory requirements The Permanently Defueled Emergency Plan continues to meet the regulatory requirements of 10CFR50.47(b) and 10CFR50 Appendix E, Section IV, as exempted.</p> <p>The changes do not modify the licensing basis with regards to a reduction in effectiveness. The changes to procedure SO123-VIII-ADMIN-4 ensure that planners have a proper tool for the performance of 10CFR50.54(q) screenings or evaluations, backing up their training. The capability and timeliness for emergency plan development and maintenance is retained. The capability and timeliness to perform the planning function is not altered by the changes. The capability and timeliness to perform the associated element is also maintained.</p> <p>The changes can be implemented without prior NRC approval.</p> |
| PREPARED BY: Lucia Sischo DATE: 12-21-2017 | REVIEWED BY: Kevin Sheek DATE: 1-8-2018 |