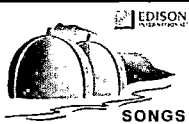


Attachment 1

Revised Emergency Plan Implementing Procedure



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

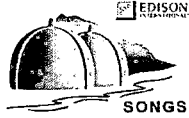
Page 1 of 88

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 ADM-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.	Section 6.0 Attachments 1 through 17

NOT QA PROGRAM AFFECTING

Procedure Type
Emergency Preparedness

Procedure Owner
Kelli Gallion-Sholler



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 2 of 88

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 PURPOSE AND SCOPE	3
2.0 RESPONSIBILITIES	5
4.0 PRECAUTIONS AND LIMITATIONS	16
5.0 PREREQUISITES	17
6.0 PROCEDURE	18
6.1 IOEP Maintenance	18
6.2 10 CFR 50.54(q) and 10 CFR 72.44(f) Screenings and Evaluations	25
6.3 Emergency Preparedness Training Program	28
6.4 Drill and Exercise Program	37
7.0 ACCEPTANCE CRITERIA	46
8.0 RETENTION OF RECORDS	46
9.0 REFERENCES / COMMITMENTS	47

ATTACHMENTS

1	Emergency Equipment	50
2	IOEP-1, IOEP-2, and MOEE Review	52
3	Security Plan and Emergency Plan Coordination	53
4	Annual EAL Review	54
5	Letters or Memoranda of Agreement Review	55
6	Emergency Response Directory Review	57
7	IOEP-1 and MOEE Distribution Review	58
8	Matrix of Periodic Drill and Exercise Objectives Review	59
9	Emergency Equipment and Supplies Inspection	60
10	Emergency Communications Quarterly Test	61
11	Emergency Equipment - Compensatory	64
12	Hospital Supplies Inspection	66
13	Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form	67
14	Completing EP QEV, 10 CFR 50.54(q) Evaluation Form	73
15	Planning Standard Functions List	80
16	Emergency Preparedness Program Review	83
17	Alert Media Test	84
18	Emergency Preparedness Training Program Curriculum	85
19	Ownership of ERO Training Elements	86
20	Summary of Changes	87

INFORMATION USE



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 3 of 88

1.0 **PURPOSE AND SCOPE**

1.1 IOEP Maintenance

- 1.1.1 To ensure the SONGS ISFSI-Only Emergency Plan (IOEP), consisting of the SONGS ISFSI-Only Emergency Plan (IOEP-1) and SONGS ISFSI-Only Emergency Plan Emergency Action Level Technical Bases Manual (IOEP-2), and the Emergency Plan Implementing Procedures (EPIPs) required by 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, 10 CFR 72.32(c), and other Emergency Preparedness related documents, equipment and facilities, are maintained current.
- 1.1.2 To provide guidance for maintenance and control of the following:
- IOEP-1
 - IOEP-2
 - EPIPs (Appendix B of IOEP-1)
 - Manual of Emergency Events (MOEE)
 - Letters and Memoranda of Agreement (Appendix C of IOEP-1)
 - Emergency Response Organization (ERO) Roster Review
 - IOEP and MOEE Distribution Lists
 - Matrix of Periodic Drill and Exercises Objectives
- 1.1.3 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.
- 1.1.4 To define the responsibilities for surveillance and maintenance of emergency equipment and the reporting of emergency equipment status.
- 1.1.5 To provide the process for identifying emergency equipment, communicating equipment issues, using appropriate compensatory measures, and applying an appropriate priority to the restoration of the equipment or facilities.
- 1.1.6 To test emergency communications with Federal, State, and local government agencies and to test communications equipment in the Emergency Response Facility (ERF) in accordance with 10 CFR 50, Appendix E, Section IV.E.9.a-d, as exempted.
- 1.1.7 To identify, report and track communications equipment malfunctions.
- 1.1.8 To ensure the requirements of 10 CFR 50.54(t) for independent review of the SONGS ISFSI emergency preparedness program are met.

INFORMATION USE



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 4 of 88

1.2 10 CFR 50.54(q) and 10 CFR 72.44(f) Screenings and Evaluations

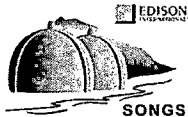
- 1.2.1 To perform 10 CFR 50.54(q) and 10 CFR 72.44(f) screenings and evaluations.
- 1.2.2 To ensure changes to the IOEP, consisting of IOEP-1 and IOEP-2, and EIPs (listed on Appendix B of IOEP-1) required by 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, 10 CFR 72.32(c), and the equipment and facilities described in those documents, are maintained in accordance with 10 CFR 50.54(q) and 10 CFR 72.44(f) to prevent a reduction in the effectiveness of the Emergency Plan.
- 1.2.3 This procedure section is developed in accordance with Regulatory Guide 1.219, Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors. Since no guidance exists for 10 CFR 72.44(f) and in accordance with 10 CFR 72.32(c), this procedure section shall be used to evaluate changes to the IOEP.

1.3 ERO Training

- 1.3.1 To describe the SONGS Emergency Preparedness Training Program, which implements the requirements contained in IOEP-1.
- 1.3.2 The Emergency Preparedness Training Program is designed to train Emergency Response Organization (ERO) personnel to perform emergency response duties as described in initial and continuing training. The initial training program ensures personnel have the required knowledge and skills to perform the duties as emergency responders. Continuing training ensures the incumbents maintain and improve job performance through development of job-related knowledge and skills.
- 1.3.3 ADM-30 and SDS-TN1-PGM-0001 identify the level and depth to which individuals are to be trained.

1.4 Drills and Exercises

- 1.4.1 To describe the SONGS Emergency Preparedness Drill and Exercise Program which implements the requirements contained in IOEP-1.
- 1.4.2 The Emergency Preparedness Drill and Exercise Program is designed to:
 - Provide guidelines for development, conduct, evaluation, and records maintenance of IOEP drills and exercises.
 - Establish a system for identifying deficiencies and weaknesses identified during a drill or exercise.
 - Provide guidelines for evaluation and records maintenance of actual declared emergencies.



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 5 of 88

2.0 **RESPONSIBILITIES**

NOTES

1. Some IOEP equipment program elements are administered by other personnel with Emergency Preparedness Manager (EPM) oversight.
2. SONGS Decommissioning Solutions (SDS), as the decommissioning general contractor for SONGS, is responsible for supporting the planning and implementation of emergency preparedness at SONGS.

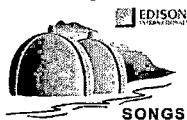
2.1 **SONGS Manager, ISFSI:**

- 2.1.1 Southern California Edison (SCE) is responsible for the maintenance of SONGS Emergency Preparedness Program. The issuance and control of the ISFSI-Only Emergency Plan and the activities associated with Emergency Preparedness at SONGS are the overall responsibility of the Manager, ISFSI.
- 2.1.2 Reviewing and approving changes other than editorial for the IOEP.

2.2 **Emergency Preparedness Manager:**

- 2.2.1 Maintaining and controlling the IOEP and related documents, and coordinating reviews and changes to those documents as specified in this procedure.
- 2.2.2 Designating cognizant technical reviewers for changes other than editorial for the IOEP or EPIPs.
- 2.2.3 Maintaining oversight of emergency equipment and facilities, as well as ensuring work and change-related processes include appropriate screening requirements to identify impacts to the IOEP.
- 2.2.4 Maintaining and inspecting emergency equipment and supplies not assigned to other divisions.
- 2.2.5 Ensuring an independent review of the emergency preparedness program is conducted to meet the requirements of 10 CFR 50.54(t).
- 2.2.6 Ensuring qualified individuals are available to perform 10 CFR 50.54(q) and 10 CFR 72.44(f) screenings and evaluations.
- 2.2.7 Ensuring continuing training on a calendar two-year frequency for personnel retaining 10 CFR 50.54(q) and 10 CFR 72.44(f) screening and evaluation qualifications.
- 2.2.8 Ensuring continuing training frequency and content are augmented in response to degrading performance in order to maintain the effectiveness of the 10 CFR 50.54(q) and 10 CFR 72.44(f) program as determined in assessment and inspection activities.

INFORMATION USE



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 6 of 88

- 2.2.9 Designating subject matter experts to support 10 CFR 50.54(q) and 10 CFR 72.44(f) screenings or evaluations when requested by the individuals performing the screening or evaluation.
- 2.2.10 Approving 10 CFR 50.54(q) and 10 CFR 72.44(f), screenings and evaluations.
- 2.2.11 Overseeing the Emergency Preparedness Training Program and ensuring that proper records are maintained to document training of the ERO.
- 2.2.12 Administration of Emergency Preparedness-related training.
- 2.2.13 Ensuring any person facilitating Emergency Preparedness-related training or evaluation has the certifications, experience, or skills necessary to effectively train or evaluate personnel.
- 2.2.14 Ensuring ERO training records are maintained in accordance with station procedures.
- 2.2.15 Ensuring the program maintains the proficiency of the ERO.
- 2.2.16 Ensuring the Drill and Exercise Six-Year Plan is maintained and up-to-date.
- 2.2.17 Ensuring drills and exercises required by the IOEP are scheduled, conducted and evaluated.
- 2.2.18 Coordinating resources for drill and exercise development to:
 - Lead the development, validation, and approval of scenarios.
 - Coordinate the assembly of the drill/exercise package and coordinate the distribution to the assigned controllers and evaluators.
 - Ensure scenario confidentiality for evaluated drills and exercises.
 - Ensure drill/exercise controllers, evaluators, and participants are identified and notified of the drill schedule.
 - Manage the overall conduct of the drill/exercise.
- 2.2.19 Ensuring actions are identified for objectives "not met" and for deficiencies, weaknesses or other issues.
- 2.2.20 Approving drill and exercise scenario manual and critique reports.
- 2.2.21 Briefing the SONGS Manager, ISFSI and the NRC inspection team of the exercise evaluation results.
- 2.2.22 Ensuring distribution or availability of drill and exercise critique reports.



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 7 of 88

- 2.2.23 Ensuring items identified in the critique:
- Are correctly dispositioned
 - Have appropriate assignment of responsibility made
 - Have corrective actions implemented in accordance with the Corrective Action Program (CAP)
- 2.2.24 Ensuring lessons-learned are disseminated or available to ERO personnel.
- 2.2.25 Ensuring remediation is provided for personnel demonstrating unsatisfactory performance during drills or exercises.

2.3 Cognizant Divisions:

- 2.3.1 Scheduling, inspecting, and maintaining emergency equipment contained under their area of responsibility in accordance with associated procedures and SONGS Preventive Maintenance Program.
- 2.3.2 Notifying the ISFSI Shift Supervisor (ISS) when maintenance and inspection activities reveal problems resulting in emergency equipment being out of service for other than planned maintenance.
- 2.3.3 Personnel Who Prepare and Review 10 CFR 50.54(q) and 10 CFR 72.44(f) Screens or Evaluations:
- Ensuring qualification IOEPQM to perform the task is current.
 - 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.
 - Requesting assistance by a subject matter expert via the EPM if the scope of 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation extends beyond his/her expertise.
- 2.3.4 Technical Reviewers:
- Performing technical review of 10 CFR 50.54(q) and 10 CFR 72.44(f) documentation associated with IOEP and EPIP revisions.
- 2.3.5 Monitoring ERO performance and conducting remediation to correct unsatisfactory performance.
- 2.3.6 Administration of Emergency Preparedness-related training, including identifying, developing, maintaining and revising training materials.
- 2.3.7 Ensuring ERO training requirements are met.
- 2.3.8 Ensuring required station support is identified and provided for the development and conduct of drills and exercises.

INFORMATION USE



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 8 of 88

2.4 ISFSI Shift Supervisor

- 2.4.1 Ensuring appropriate actions, including identification, tracking, and compensatory measures, are taken when emergency equipment or facilities are degraded or removed from service.
- 2.4.2 Maintaining the ERF in a state of readiness.
- 2.4.3 Ensuring pre-staged copies of EP-related documents in the ERF are current.

2.5 ISFSI Engineering Manager:

- 2.5.1 Determining emergency equipment and system availability when emergency equipment problems are identified.
- 2.5.2 Ensuring a design change process identifies any impacts to IOEP commitments and emergency response capabilities.

2.6 Regulatory Affairs:

- 2.6.1 Providing guidance on compliance with the station licensing basis and related reportability issues.
- 2.6.2 10 CFR 50.54(q) and 10 CFR 72.44(f) Screenings and Evaluations
- 2.6.3 Performing compliance reviews of 10 CFR 50.54(q) and 10 CFR 72.44(f) documentation associated with IOEP changes.

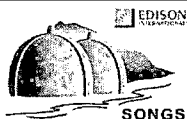
2.7 Maintenance:

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

2.8 SONGS Decommissioning Solutions (SDS)

- 2.8.1 SDS will perform Emergency Preparedness functions and support per SDS-EP1-PLN-0001, including but not limited to the following:
 - 2.8.1.1 Maintaining emergency communications services and/or equipment under their area of responsibility, in order to provide a means to ensure notification of protective actions for onsite personnel.
 - 2.8.1.2 Notifying the ISFSI Shift Supervisor (ISS) when emergency communications equipment is out of service for other than planned maintenance.
 - 2.8.1.3 Replenish RP equipment and supplies for the ISFSI Emergency Kit as requested.

INFORMATION USE



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1


Page 9 of 88

- 2.8.1.4 For an emergency involving radiological consequences (E-HU1), ensuring a minimum of one person, trained in radiological monitoring and assessment, reports to the SONGS ISFSI within four hours of the emergency declaration.
- 2.8.1.5 Providing RP Emergency Preparedness-related support for the ISFSI.
- 2.8.1.6 Reporting any condition to the ISS that might require entry into the ISFSI Only Emergency Plan.
- 2.8.1.7 Ensuring changes to the emergency communications services and/or equipment are assessed for impacts to IOEP commitments and emergency response capabilities.
- 2.8.1.8 Administrating RP Emergency Preparedness-related training, including identifying, developing, maintaining and revising training materials.
- 2.8.1.9 Entering Identified deficiencies into SDS CAP for correction.
- 2.8.1.10 Ensuring SDS General Employee Training and Visitor Information contain information on the actions to be taken if an emergency is declared at the SONGS ISFSI.
- 2.8.1.11 Ensuring SDS General Employee Training and Visitor Information contain information to ensure events such as fires, hazmat spills, injuries or medical emergencies are reported to the ISFSI Shift Supervisor.

2.9 SONGS Emergency Response Personnel:

- 2.9.1 SONGS Emergency Response Personnel shall meet the criteria set forth in the IOEP, EIPs and other applicable approved procedures and instructions.
- 2.9.2 Personnel with assigned Emergency Response Personnel (ERP) qualification codes shall:
 - 2.9.2.1 Receive documented training regarding their specific responsibilities and duties during a declared emergency at the SONGS ISFSI.
 - 2.9.2.2 Maintain SONGS ERO qualifications and Protected Area access.
 - 2.9.2.3 Review the posted drill / training schedule to ensure participation when assigned.
 - 2.9.2.4 Read all Emergency Preparedness Bulletins that are distributed.
 - 2.9.2.5 Maintain contact and call-out information up-to-date.
 - 2.9.2.6 Be available and prepared to provide relief support to the initial SONGS ERO responders in the event of an actual emergency or drill.
 - 2.9.2.7 Notify the EPM of planned employment termination.

INFORMATION USE

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 10 of 88

- 2.9.3 When on duty for an ERO position:
- 2.9.3.1 Ensure no concurrent assignment to another on-duty SONGS ERO position or on-shift SONGS ERO position.
 - 2.9.3.2 Be prepared to establish contact, ready to perform SONGS ERO responsibilities within 2 hours of emergency declaration.
 - 2.9.3.3 Be prepared with Southern California Edison (SCE) identification (i.e., security photo ID badge), second identification, proper work attire, and PPE.
 - 2.9.3.4 Remain fit for duty during the entire period of time on-duty.
(Reference SCE-HR-EECONDUCT-PL-303).
 - 2.9.3.5 Ensure home arrangements (e.g., childcare, transportation availability, etc.) are made in advance in preparation for being called-in in response to an emergency or drill.
 - 2.9.3.6 Ensure access to a well-maintained vehicle with sufficient fuel.
 - 2.9.3.7 IF unable to fulfill on-duty responsibilities, THEN arrange for duty coverage by another fully qualified individual in the same SONGS ERO position and inform the ISS to update required documents (e.g., ISS Turnover).
 - 2.9.3.8 Maintain Duty Week coverage from 0700 hours on the first Monday of the Duty Week to 0700 hours the following Monday.



3.0 DEFINITIONS

Activity

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

- An activity sets in motion the need to determine impact on certain licensing bases documents using regulatory review criteria such as 10 CFR 50.54(q) and 10 CFR 72.44(f).
- Activities may range from something as simple as making an editorial change or an organizational change, to making complicated facility modifications.
- For the purposes of 10 CFR 50.54(q) and 10 CFR 72.44(f), activities may also originate outside of the licensee's responsibility such as permanent hospital closings or changes to local agencies.

Capability

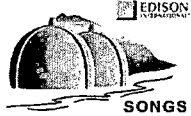
The capacity to implement the response actions or fulfill the administrative provisions identified in the IOEP. Capability is typically described by the following:

- Methods: The procedural means or manner of implementing the response actions or fulfilling the administrative provisions identified in the IOEP.
- 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 IOEP.
- State or Condition: The material means of implementing the response actions or fulfilling the administrative provisions identified in the IOEP; such as operative, physical, or spatial.

Change

An action that results in modification of, addition to, or removal from, the licensee's IOEP. Types of changes include:

- Editorial and typographical changes such as formatting, paragraph numbering, spelling, or punctuation that does not change intent.
- Conforming changes are those changes that are made based on previous regulatory approved changes (for example, DSAR or Tech. Spec. equipment changes, EAL scheme changes, etc.).
- Interdependent changes involve two or more activities that collectively affect a function (these are typically where one change compensates for another change).
- Technical changes.



3.0 DEFINITIONS

Commitment

A general term used to describe a regulatory commitment, management directive, or other obligation of the licensee.

- 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.).
- 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 IOEP).
- 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).

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 emergency equipment is restored to a fully functional condition.

Controller

An individual assigned to present information or data within the conduct of the drill.

Deficiencies

Items that identify the EP program or procedures do not conform to the provisions of applicable federal regulations.

Demonstration Criteria

A list of attributes that, if performed correctly, define completion of a performance objective. Failure to satisfactorily demonstrate a demonstration criterion does not necessarily mean failure of a performance objective, unless specifically noted.

Drill

A controlled scenario event conducted to provide training and practice for the participants. Drills may also include evaluated objectives and demonstration criteria as part of meeting periodic performance objective requirements as pre-designated by the scenario.

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.

- The Emergency Plan includes the IOEP (IOEP-1 and IOEP-2) that the NRC originally approved and all subsequent changes made by the licensee with, and without, prior NRC review and approval under 10 CFR 50.54(q) and 10 CFR 72.44(f).
- 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.



3.0 DEFINITIONS

Emergency Response Equipment

Systems, structures, and components, as well as essential tools and equipment, necessary to implement the IOEP.

Emergency Response Facility (ERF)

The security center of the station from which the ISFSI can be monitored. The facility containing the communication equipment necessary for both normal and emergency conditions. It is operated under the direction of the ISS/ED and serves as the primary location for event classification, emergency declaration and notifications to offsite agencies, assessment activities, and corrective action direction.

Emergency Response Organization (ERO)

Organization of personnel who may be called upon during an emergency to perform duties to mitigate accident conditions at SONGS.

Emergency Response Personnel (ERP)

Personnel who may be called upon during an emergency to perform duties to mitigate accident conditions at SONGS.

Evaluation (Drill/Exercise)

An individual who judges the performance of the participants, as well as the adequacy of the Radiological Emergency Plan, procedures, facilities, and equipment, against designated objectives and demonstration criteria.

Evaluator (Training)

An Individual who observes and assesses the trainee's performance during the qualification process. An Evaluator is someone qualified in the ERO position or a Subject Matter Expert in the specific task(s) being evaluated.

Exercise

An event that evaluates the integrated capability and a major portion of the basic elements against designated objectives and demonstration criteria. An exercise may involve participation of personnel from Federal, State, and local government agencies.

Frequency

The following frequencies are used:

- Quarterly (Q) – Frequency of occurrence is met if performed within 1.25 times a 92-day interval as measured from the previous performance.
- Semi-Annual (S) – Twice per calendar year (1st: Jan 1 – Jun 30; and 2nd: Jul 1 – Dec 31).
- Annual (1Y) – Frequency of occurrence is met if performed within 1.25 times a 12-month interval as measured from the previous performance. This definition does not apply to the term "annual" when it relates to the conduct of the Emergency Preparedness drills which are performed within the calendar year.
- Biennial (2Y) – Occurring every two calendar years.
- Cyclic (6Y) – Occurring every six calendar years.

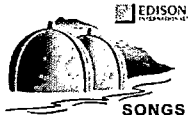
Integrated Drill

A drill that incorporates multiple demonstration requirements to be conducted in connection with one another.

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 14 of 88

3.0 **DEFINITIONS**

<u>Local Government Agencies</u>	Orange County and San Diego County.
<u>Other Issues</u>	Items not quality affecting or of regulatory concern. These are items noted for trending purposes and actions intended to improve the emergency preparedness program.
<u>Planning Standard Function</u>	A capability or resource necessary to prepare for and respond to a radiological emergency, as set forth in 10 CFR 50.47(b) and 10 CFR 50 Appendix E Section IV, as exempted, which meets the requirements of 10 CFR 72.32(c).
<u>Planning Standards (PS)</u>	The 16 standards identified in 10 CFR 50.47(b), as exempted, that Emergency Plans are required to meet in order for the NRC to make their reasonable assurance determination for public health and safety.
<u>Program Element</u>	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, and approved exemptions, for which the licensee obtained approval) that identify specific acceptable methods for complying with an emergency planning function.
<u>Protected Area (PA)</u>	That onsite area within the ISFSI security boundary as defined in SONGS' Security Plan.
<u>Reduction in Effectiveness (RIE)</u>	<p>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.</p> <ul style="list-style-type: none"> • RIE is an evaluation concept that is used with 10 CFR 50.54(q) and 10 CFR 72.44(f) to differentiate between changes that a licensee is allowed to make without prior NRC approval and those that require prior NRC approval. • RIE is evaluated against capability and timeliness of affected planning standard functions, program elements, and commitments.
<u>Regulatory Requirement</u>	Any emergency preparedness related requirement, including the planning standards in 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, 10 CFR 72.32(c), 10 CFR 50.54(q), 10 CFR 50.54(t), and 10 CFR 72.44(f) commitments made in the Emergency Plan, commission orders, and commitments made with regard to compensatory actions under 10 CFR 50.47(c) or 10 CFR 50.54(s)(2)(ii).



3.0 DEFINITIONS

Risk-Significant
Planning Standards
(RSPS)

A subset of the PS, identified by the NRC to provide Reactor Oversight Process (ROP) focus on planning standards that have the greatest impact on the ability to protect the health and safety of the public and the workers which includes the following four PS: 10 CFR 50.47(b)(4) — emergency classification system, (b)(5) — emergency notifications, (b)(9) — emergency assessment capability, or (b)(10) — emergency protective actions, as exempted, and supported by the corresponding Sections of Appendix E to 10 CFR Part 50, as exempted. Note that parts of 10 CFR 50.47(b)(10) are treated as not risk significant. Also note that ROP metrics described in NEI 99-02 and significance determination described in IMC0609 App. B, for the purpose of NRC inspection do not apply to ISFSI Only facilities.

Scenario Manual

A manual that provides generic information that relates to the scenario and specific information relating to control and evaluation of scenario activities.

SONGS ERO

A subset of the broader ERO described in IOEP-1 Part-II, Section 2.0. Those ERO positions that are on-shift or augmented, filled by SONGS personnel, i.e., ISS/ED and Resource Manager (RM).

Subject Matter
Expert

A person who has attained a level of expertise by education, experience, or plant/vendor task qualification.

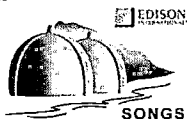
Timeliness

The capability to complete an activity within a specified timeframe.

- 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.
- Timeliness includes any change that modifies how the timeliness criterion is evaluated (e.g., "when the clock starts and stops").
- SONGS ISFSI Management expects SONGS will resolve a weakness identified during an exercise, drill or training in a timely manner consistent with its risk significance. An RSPS-related weakness is typically corrected within 90 days of identification. A PS-related weakness is typically corrected within 180 days of identification.
- SONGS ISFSI Management expects equipment that is used for RSPS and that does not have a compensatory measure is returned to service within seven days.

Weaknesses

Items of documented performance during an exercise, drill or training that could have precluded effective implementation of the Emergency Plan in the event of an actual emergency.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 16 of 88

4.0 PRECAUTIONS AND LIMITATIONS

4.1 Precautions

4.1.1 IOEP Maintenance

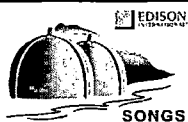
- The IOEP is designed as a last line of defense to address emergencies at an ISFSI including the capability of protecting public health and safety during and following the event. Therefore, regulations that govern emergency equipment may require more timely restoration than technical specifications or other administrative controls.
- Emergency equipment must be capable of functioning at all times. IF there is a loss of function, THEN compensatory measures must be evaluated and used to restore the function until the emergency equipment is repaired.
- A loss of function of the IOEP requires a determination regarding reportability in accordance with SEC-15 (10 CFR 50.72).

4.1.2 Drills and Exercises

- Security, Radiological Protection and Safety procedures shall remain in effect during drills and exercises.
- Drill or exercise activities shall be suspended in the event of an actual emergency.
- Electronic communications of information related to the drill or exercise with offsite agencies should be identified as drill or exercise information by beginning and ending them with the statement, "This is a drill." This statement should also be repeated periodically on communication lines (telephone, radio) that are kept open for extended periods or could be monitored or overheard by nonparticipants.

4.1.3 10 CFR 50.54(q) and 10 CFR 72.44(f) Screenings and Evaluations

- In order to properly evaluate a proposed change to the IOEP, 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 10 CFR 50.54(q) and 10 CFR 72.44(f).



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 17 of 88

4.2 Limitations

4.2.1 IOEP Maintenance

- None

4.2.2 ERO Training

- None

4.2.3 Drills and Exercises

- None

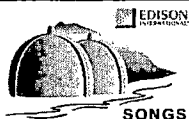
4.2.4 10 CFR 50.54(q) and 10 CFR 72.44(f) Screenings and Evaluations

- 10 CFR 50.54(q) and 10 CFR 72.44(f) requires licensees that are authorized to possess and operate an ISFSI under a 10 CFR Part 50 general license to follow and maintain the effectiveness of an Emergency Plan that meets the standards in 10 CFR 50.47(b) and the requirements in Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities," to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities, as exempted."

5.0 PREREQUISITES

5.1 **VERIFY** this document is current by using one of the methods described in ADM-3.

5.2 **VERIFY** Level of Use requirements on the first page of this procedure.



REFERENCE USE

NOTE

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

6.0 PROCEDURE

6.1 IOEP Maintenance

6.1.1 IOEP and EPIP Revisions

6.1.1.1 **REVISE** IOEP-1, IOEP-2, or EPIPs (Appendix B of IOEP-1) in accordance with station procedure revision requirements (refer to ADM-10).

6.1.1.2 Prior to issuing IOEP-1, IOEP-2, or EPIPs, **ENSURE**:

- 10 CFR 50.54(q) and 10 CFR 72.44(f) screen/evaluation has been performed, and the results indicate that the changes can be made without prior NRC approval,

OR

- Prior approval from the NRC to make the changes has been received.

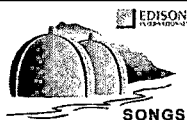
6.1.1.3 IF changes other than editorial will be made to IOEP-1 and IOEP-2, THEN **OBTAIN** the required additional review and approval:

- Technical review
- ISFSI-Only Security Plan Review
- Third party review of 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening/Evaluation
- Nuclear Regulatory Affairs (NRA) compliance review
- SONGS Manager, ISFSI review and approval

6.1.1.4 Validate changes to IOEP-2 EALs to **ENSURE** the EALs can be implemented in a timely manner.

6.1.1.5 **DISTRIBUTE** IOEP-1, IOEP-2, and EPIPs to locations responsible for IOEP implementation on a controlled basis in accordance with the distribution list.

6.1.1.6 **COMMUNICATE** changes to IOEP-1, IOEP-2, and EPIPs to ERO personnel.

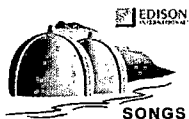


Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 19 of 88

- 6.1.1.7 WHEN IOEP-1 OR IOEP-2 are issued, OR EPIPs are issued for changes requiring a full 10 CFR 50.54(q)/10 CFR 72.44(f) evaluation, THEN within 15 days of issuance, **INITIATE** an Action Request Assignment to NRA for the 30-day and six-month NRC reporting requirements. [Reference 10 CFR 50.54(q)(5) and 10 CFR 72.44(f)].
- **COMPLETE** EP SOA, for changes requiring a report to the NRC and forward to NRA.
- 6.1.1.8 **NOTIFY** offsite response organizations of updates to the IOEP.
- 6.1.2 Lower-tiered Document Revisions
- 6.1.2.1 **REVISE** lower-tiered documents **NOT** listed in Appendix B of IOEP-1 in accordance with station procedure revision requirements (refer to ADM-10).
- 6.1.2.2 **REVIEW** technical changes to EP SNF with Cal OES, Orange County, San Diego County and Marine Corps Base Camp Pendleton (MCBCP).
- Document review and concurrence in conjunction with the changes using CAP (refer to ADM-5).
- 6.1.2.3 IF an Emergency Plan requirement is removed from the IOEP AND relocated to a lower tiered document, THEN the lower tiered document must be reviewed in accordance with 10 CFR 50.54(q) and 10 CFR 72.44(f). In this case, the lower tiered document now contains the Emergency Plan license requirement AND should be listed in Appendix B of IOEP-1.
- 6.1.2.4 Communicate changes to Emergency Preparedness documents to affected ERO personnel.
- 6.1.2.5 **ENSURE** the ISS updates the ERO Notebooks with changes to Emergency Preparedness documents that are pre-staged for an emergency, to satisfy the requirements of ADM-3 for verifying documents are current.
- 6.1.3 Review of Emergency Preparedness Documents
- 6.1.3.1 The EPM or designee shall **REVIEW** IOEP-1 annually to identify changes to be incorporated in the next revision.
- Document the review on Attachment 2.
- 6.1.3.2 The EPM or designee shall **REVIEW** IOEP-2, and the MOEE annually to identify changes to be incorporated in the next revision.
- Document the review on Attachment 2.

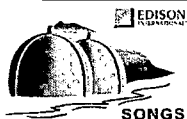


Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 20 of 88

- 6.1.3.3 The EPM or designee shall **REVIEW** IOEP requirements relative to the ISFSI-Only Security Plan requirements annually.
- Document the review on Attachment 3.
- 6.1.3.4 The EPM or designee shall **REVIEW** the EALs with the State and local government agencies and MCBCP annually.
- Document the review on Attachment 4.
- 6.1.3.5 The EPM or designee shall be responsible for agreements involving firefighting, rescue, transport of injured person, medical treatment, and law enforcement (per the SONGS Security Plan), including **REVIEW** of documents annually to **ENSURE** documents are current.
- **REVIEW** Action Requests in order to identify any that directly affect the content of the Agreements.
 - Action Requests that directly affect the content of the Agreements should be shared with the affected agency during the annual review of the Agreement and documented on Attachment 5.
 - Document the review on Attachment 5.
- 6.1.3.6 The EPM or designee shall **REVIEW** Emergency Response Directory quarterly to **ENSURE** information for ERO (names and numbers), support personnel and applicable offsite organizations is maintained current.
- Document the review on Attachment 6.
- 6.1.3.7 The EPM or designee shall **REVIEW** distribution lists for IOEP-1 and the MOEE annually to **VERIFY** distribution information is maintained current.
- Document the review on Attachment 7.
- 6.1.3.8 The EPM or designee shall **REVIEW** EP 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).
- Document the review on Attachment 8.
- 6.1.3.9 The EPM or designee shall **COMPLETE** EP PDE during the fourth quarter.
- Document the completion on Attachment 8.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 21 of 88

6.1.4 Emergency Equipment Inspections

6.1.4.1 The ISS or designee shall **PERFORM** inventory of the items in EP EKIL quarterly, or within 7 days after each use, and forward a copy of the inventory to Emergency Preparedness.

- A system of sealed containers may be utilized versus actual performance of item-by-item inventory.
- Document the inventory on Attachment 9.

6.1.4.2 The EPM or designee shall **PERFORM** an inventory of supplies maintained at hospitals annually, or within 7 days after each use.

- Document the inventory on EP HIL.
- Document the completion of the inventory on Attachment 12.

6.1.5 Emergency Communication Tests

6.1.5.1 The ISS or designee shall **PERFORM** communications test of Emergency Response Facility Emergency Kit portable radios, cellular phones and satellite phones quarterly.

- Document the test on Attachment 10.

6.1.6 Alert Media

6.1.6.1 The ISS or designee shall **PERFORM** a test of Alert Media quarterly.

- Document the test on Attachment 17.

6.1.7 Identifying Emergency Equipment

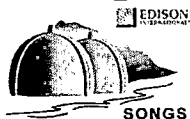
6.1.7.1 Emergency equipment may be identified by checking the list contained in Attachment 1.

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

6.1.8 Discovery of Degraded or Nonfunctional Emergency Equipment

6.1.8.1 Personnel discovering problems with emergency equipment should:

- **INITIATE** appropriate deficiency tracking documents (e.g., Trouble Ticket, IT request, Action Request, Condition Report).
- **NOTIFY** the ISS.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 22 of 88

- 6.1.8.2 WHEN notified of nonfunctional or degraded emergency equipment, THEN the ISS shall **IDENTIFY** compensatory measures by referring to Attachment 1.
- 6.1.8.3 **VERIFY** compensatory measures are available:
- **IMPLEMENT** compensatory measures (if action is required) immediately following emergency equipment loss or facility functional failure.
- 6.1.8.4 IF compensatory measures are **NOT** available, OR Attachment 1 only states repair or replacement, THEN:
- The ISS shall **COMPLETE** Attachment 11 to identify and evaluate the appropriate use of interim compensatory measures.
 - The ISS may **COORDINATE** with the EPM or other subject matter experts when developing and approving interim compensatory measures in Attachment 11.
 - IF an appropriate reviewer is **NOT** available, THEN the ISS may sign Attachment 11 as the reviewer.
- 6.1.8.5 The ISS shall **NOTIFY** the EPM of the nonfunctional or degraded emergency equipment and compensatory measures used.
- 6.1.8.6 The ISS shall **PRIORITIZE** emergency equipment restoration in a timely manner.
- 6.1.8.7 The ISS shall **ADD** nonfunctional or degraded emergency equipment that require compensatory actions to the ISS shift turnover process, along with compensatory measures being used.
- 6.1.9 Planned Maintenance Affecting Emergency Equipment

NOTE

Personnel identifying emergency equipment that will be degraded or rendered nonfunctional as the result of planned maintenance should coordinate with the ISS to identify compensatory measures.

- 6.1.9.1 IF notified by personnel of emergency equipment that will be degraded OR rendered nonfunctional as the result of planned maintenance, THEN the ISS shall:
- **VERIFY** compensatory measures listed in Attachment 1 are available.
 - **ENSURE** compensatory measures are established prior to starting work.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 23 of 88

- 6.1.9.2 IF compensatory measures are **NOT** available, OR Attachment 1 only states repair or replacement, THEN:
- The ISS may permit emergency equipment to be removed from service for maintenance or surveillance testing IF:
 - Personnel removing the emergency equipment from service remain in the immediate area
- AND**
- The emergency equipment can be restored to service immediately when notified by the ISS or designee.
- 6.1.9.3 IF the conditions of Step 6.1.9.2 **CANNOT** be met, THEN the ISS may implement interim compensatory measures according to Attachment 11.
- **COMPLETE** Attachment 11.
 - **ENSURE** interim compensatory measures from Attachment 11 are established prior to starting work.
- 6.1.9.4 The ISS shall **NOTIFY** the EPM of the nonfunctional or degraded IOEP equipment and associated compensatory measures being implemented.
- 6.1.9.5 The ISS shall **ADD** nonfunctional or degraded emergency equipment that require compensatory actions to the ISS shift turnover process along with compensatory measures being implemented.
- 6.1.10 Restoration of Emergency Equipment
- 6.1.10.1 Emergency equipment and facilities should be returned to service with a priority commensurate with the significance of the associated emergency response function.
- 6.1.10.2 Personnel should **NOTIFY** the ISS of any work on emergency equipment that is over-schedule or at risk.
- The ISS shall **NOTIFY** the EPM.
- 6.1.10.3 The individual(s) completing the work should **NOTIFY** the ISS when work is complete **AND** the emergency equipment is returned to service.
- The ISS shall **NOTIFY** the EPM.
 - The ISS shall **REMOVE** the emergency equipment and compensatory measures from the ISS shift turnover documentation.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 24 of 88

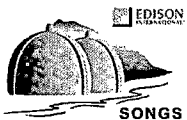
6.1.11 Emergency Preparedness Program Review

6.1.11.1 To meet the requirements of 10 CFR 50.54(t), SONGS coordinates an independent review of the emergency preparedness program to examine conformance with applicable portions of 10 CFR 50.47, 10 CFR 50.54, 10 CFR 72.32, 10 CFR 72.44, and 10 CFR 50 Appendix E. Included in the review are the following:

- The IOEP and associated Implementing Procedures.
- The emergency preparedness training including drills and exercises as well as any activation of the IOEP since the last program review.
- The readiness of the station Emergency Response Organization to perform its function.
- The readiness of the Emergency Response Facility and equipment to perform as outlined in the IOEP and Implementing Procedures.
- The interfaces between SONGS and local agencies pertaining to the overall emergency preparedness program.

6.1.11.2 The EPM or designee shall **ENSURE** a review is conducted within 12 months of the prior review, and with the proper scope to meet the requirements of 10 CFR 50.54(t)

- Document the completion of the review on Attachment 16.



6.2 10 CFR 50.54(q) and 10 CFR 72.44(f) Screenings and Evaluations

6.2.1 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening

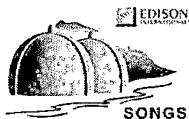
NOTE

The purpose of the 10 CFR 50.54(q) and 10 CFR 72.44(f) screening is to determine whether a 10 CFR 50.54(q) and 10 CFR 72.44(f) evaluation is required, not to determine if an activity reduces the effectiveness of the emergency preparedness program.

6.2.1.1 **PERFORM** a 10 CFR 50.54(q) and 10 CFR 72.44(f) screening for any activity that may impact the emergency preparedness program to determine and document whether 10 CFR 50.54(q) and 10 CFR 72.44(f) Evaluation is needed.

6.2.1.1.1 **COMPLETE** 10 CFR 50.54(q) and 10 CFR 72.44(f) screening on EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form, using the guidelines in Attachment 13.

- A 10 CFR 50.54(q) and 10 CFR 72.44(f) screening may be skipped for activities that will be taken directly to a 10 CFR 50.54(q) and 10 CFR 72.44(f) evaluation.
- Multiple activities may be considered on a single screening so long as all proposed activities are identified and screened.
- An activity may involve a specific change that results in an impact to a single item or it may involve a much broader change to an area of the emergency preparedness program.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 26 of 88

- 6.2.1.1.2 Screen each activity separately unless it involves any of the following:
- Editorial or typographical changes such as formatting, paragraph numbering, spelling, grammar, punctuation, or title changes that do **NOT** change the intent.
 - 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).
 - Repetitive identical changes such as a single activity that changes several sections of the IOEP or EIPs.
 - 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.).

- 6.2.1.1.3 IF the activity is subject to one or more change processes outside of 10 CFR 50.54(q) and 10 CFR 72.44(f) [such as 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a) or 10 CFR 50.54(p)], THEN comply with the other applicable change processes.

6.2.2 10 CFR 50.54(q) and 10 CFR 72.44(f) Evaluation

NOTES

1. The NRC expects 10 CFR 50.54(q) and 10 CFR 72.44(f) 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 [10 CFR 50.47(b)(4), (5), (9), and (10)], as exempted.
2. The NRC would consider enforcement action for any 10 CFR 50.54(q) and 10 CFR 72.44(f) evaluation that is of inadequate scope and extent to reasonably assess the impact of the proposed change on the effectiveness of the Emergency Plan.

- 6.2.2.1 **PERFORM** a 10 CFR 50.54(q) and 10 CFR 72.44(f) evaluation for any activity that affects an area of the emergency preparedness program as determined in the 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or by self-evidence (i.e., the proposed activity was taken directly to an evaluation without a screening).

- 6.2.2.1.1 **COMPLETE** EP QEV, 10 CFR 50.54(q) and 10 CFR 72.44(f) Evaluation Form, using the guidelines in Attachment 14.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 27 of 88

- 6.2.2.1.2 IF the activity is subject to one or more change processes outside of 10 CFR 50.54(q) and 10 CFR 72.44(f) [such as 10 CFR 50.59, 10 CFR 50.90, 10 CFR 50.54(a) or 10 CFR 50.54(p)], THEN comply with the other applicable change processes as well.

6.2.3 Approval for Changes that Reduce Effectiveness

NOTE

The regulation 10 CFR 50.54(q)(4) requires the licensee to submit a license amendment application per 10 CFR 50.90 for prior NRC approval of a change that it believes will reduce the effectiveness of its Emergency Plan.

- 6.2.3.1 In addition to the filing requirements in 10 CFR 50.90, the application shall include:
- 6.2.3.1.1 All Emergency Plan pages affected by the change.
- 6.2.3.1.2 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 10 CFR 50.47(b) and the requirements in Appendix E to 10 CFR 50, as exempted.
- 6.2.4 Determining Acceptability of a Previously Performed 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening or Evaluation
- 6.2.4.1 IF the acceptability of a previously performed 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation is in question, THEN compare it to the regulation that was applicable at the time the 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation was prepared.
- 6.2.4.2 IF a previously performed 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation is determined to be unacceptable, THEN document the determination in CAP.
- 6.2.4.3 A subsequent 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation may also be required to correct an error or omission in an approved screening or evaluation.
- 6.2.4.3.1 The subsequent 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation should clearly consider and describe how the previously approved 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation is affected, and shall be completely re-performed as a stand-alone document.
- 6.2.4.3.2 The subsequent 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation shall reference the previously performed 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation and state whether it supersedes or supplements it.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 28 of 88

6.3 Emergency Preparedness Training Program

6.3.1 SONGS ERO Training Program Structure

NOTE

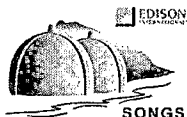
SONGS ERO Personnel Training consists of Initial Training and Continuing Training.

6.3.1.1 SONGS ERO Training Program Objectives

- To instruct each SONGS ERO member in the topics relevant to the function of the ERO positions.
- To instruct each SONGS ERO member in the duties and responsibilities specific to their ERO position according to EPP-1.
- To provide a means of evaluating ISS/ED and Resource Manager qualification by use of a PQS.

6.3.1.2 SONGS ERO Training Program Overview

- The training for SONGS ERO personnel is developed from the position-specific responsibilities as defined in the IOEP. Members of the SONGS ERO receive initial training and annual retraining. They also receive recurring Emergency Plan-related training annually through ISFSI Plant Access Training and position specific training based upon their specific ERO position.
- IF training requirements are revised, **THEN ENSURE** the Learning Management System qualification program matches the new requirements.
- Attachment 18 describes the Emergency Preparedness Training Program Curriculum for SONGS ERO positions.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 29 of 88

6.3.1.3 Personnel Selection

6.3.1.3.1 SONGS ERO personnel are selected based on input from SONGS ISFSI management.

6.3.1.3.2 WHEN a candidate is selected for a SONGS ERO position, THEN **INITIATE** an Action Request to assign the ERO position to the candidate.

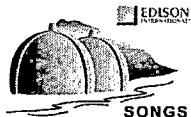
6.3.1.3.3 In the Action Request Description field, **INCLUDE** "ERO Position Qualification".

6.3.1.3.4 **CREATE** an Action Request Assignment for the candidate that contains sufficient information to support the qualification completion, such as:

- SONGS ERO position name.
- Required training to be completed for the SONGS ERO position per Attachment 18.
- Date training is due to be completed.
- Initiation of EP ERPA.
- Completion of applicable sections of EP ERPA and forwarding of form to the EPM.

6.3.1.3.5 WHEN a SONGS ERO candidate has completed the required ERO position training, THEN the EPM or designee shall **COMPLETE** the applicable section of EP ERPA.

- **DOCUMENT** completion of EP ERPA in a separate assignment under the AR created in Step 6.3.1.3.2.



NOTE

1. EPM or designee may delegate Subject Matter Experts (SMEs) to perform ERO training and evaluation activities.
2. SMEs are selected based on the following criteria:
 - Documented technical expertise on the specific tasks for which trainees will be trained and evaluated. Documented technical expertise can be validated using the applicable training program database e.g., ShareKnowledge, SDS Training Matrix, etc.
 - Overall job knowledge.
 - High standards of performance and commitment to quality.
 - Professionalism and judgment.
 - Conservative approach to nuclear safety and industrial safety.

6.3.2 SONGS ERO Position Initial Training

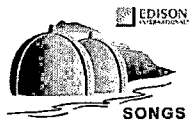
6.3.2.1 Knowledge-Based Training

6.3.2.1.1 Personnel assigned to SONGS ERO positions receive an initial overview course that familiarizes them with the basic IOEP information in the following areas:

- Planning Basis.
- Emergency Classification.
- ERO and Responsibilities.
- Augmentation of SONGS ERO.
- Emergency Response Facility.
- Position-specific Duties.

6.3.2.1.2 Planning Basis:

- An introduction to emergency preparedness and regulatory requirements.
- A summary of the role of off-site radiological emergency support groups with emphasis on related emergency plans.
- A summary of the role of the ERO during an emergency.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 31 of 88

- 6.3.2.1.3 Emergency Classification:
- Review of SONGS ISFSI emergency classification scheme based on NEI 99-01 Rev. 6, provided in IOEP-2.
 - Use of EAL Matrix Table in IOEP-2.
 - Assessment of conditions following an off-normal, natural phenomenon, or accident event.
 - Classification of an event and declaration of an emergency.
- 6.3.2.1.4 ERO and Responsibilities:
- Review of EPP-1, Section for Responsibilities.
 - Review of the ERO structure and chain of command.
 - ISS/ED delegable and non delegable responsibilities.
- 6.3.2.1.5 Augmentation of SONGS ERO:
- Emergency Response Directory.
 - Personnel required to be contacted and associated time limits.
 - Courtesy Notification process.
 - Communication Equipment.
- 6.3.2.1.6 Emergency Response Facility:
- ERF location and layout.
 - ERF access control.
 - Location and use of assessment equipment.
 - Location and use of ERO notebook and communications equipment.
 - Location and contents of Emergency Kit.
- 6.3.2.1.7 Position-specific Duties:
- ISS/ED.
 - Security.
 - RM.



6.3.2.2 Performance-Based Training

NOTE

It is preferred that performance based training is completed in a drill/exercise setting, such that a trainee can perform their SONGS ERO position tasks under the control of a qualified SONGS ERO position holder.

- 6.3.2.2.1 Personnel assigned to SONGS ERO positions receive performance-based training using observations, instructional walkthrough, **AND/OR** drill participation upon completion of the knowledge based training requirements.
- 6.3.2.2.2 Performance requirements are designed to provide a practical element to the SONGS ERO Training Program **AND** a familiarization with the conduct of operations associated with the assigned SONGS ERO position.
- Observations are designed to provide the trainee with an opportunity to observe their prospective SONGS ERO position “in action” during a drill or exercise.
 - Instructional walkthroughs are designed to provide one-on-one or small group training sessions in an interactive lecture-type environment by the EPM or a qualified SONGS ERO position holder. The walkthrough usually takes place where the position is assigned and covers the equipment, communications, procedures and activities necessary to fulfill the responsibilities and actions of that position.
 - Drills are designed to provide training sessions through interactive scenarios. Drills are conducted as part of the overall training program for the broader ERO and may sometimes be used to demonstrate periodically required objectives. Participation in a drill for purposes of training will not include an evaluation of an EP objective specific to that position, as this is designed to be a guided instructional period for the trainee, in which they may receive coaching and mentoring.
- 6.3.2.2.3 The SONGS ERO function may permit a training exemption based on previous experience in a similar position. **COMPLETE** AD 412 to approve an Exemption or a Waiver.
- 6.3.2.2.4 **IF** an individual is re-qualifying for the same SONGS ERO position, **THEN** the EPM or designee **EVALUATES** the differences between the initial and continuing training qualifications and how long the individual has been out of the position, **AND** the individual **COMPLETES** the differences.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 33 of 88

6.3.3 SONGS ERO Position Evaluation

6.3.3.1 AFTER completion of Knowledge-Based (Section 6.3.2.1) **AND** Performance-Based (Section 6.3.2.2) training, the SONGS ERO position trainee completes evaluation requirements of the PQS during discussions, observations, instructional walkthrough, and/or drill participation.

6.3.3.2 Evaluation elements are **OBSERVED AND ASSESSED** by evaluators who are qualified in the SONGS ERO position.

6.3.3.3 Performance-Based evaluation involves practical demonstrations of the ability to perform the assigned duties and responsibilities for the SONGS ERO position.

6.3.3.3.1 The evaluation process includes generic tasks **AND** position-specific tasks for the SONGS ERO position.

6.3.3.3.2 Trainee proficiency may be demonstrated by successfully performing or simulating the task.

6.3.3.3.3 The criteria for satisfactory demonstration of the SONGS ERO trainee's capability to perform their SONGS ERO position duties and responsibilities are determined by the evaluator(s) in accordance with the PQS and applicable instructions and tasks.

6.3.3.3.4 The evaluator's initials and signature on the PQS verifies the trainee has demonstrated the knowledge and skills to independently perform the SONGS ERO position tasks.

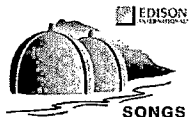
6.3.3.3.5 The SONGS ERO position candidate provides the completed PQS to the EPM or designee for approval.

6.3.4 Remediation

NOTE

Unsatisfactory exercise or drill performance or failure to satisfactorily complete a portion of a training program may require some form of remediation.

6.3.4.1 IF remediation is required, THEN the EPM or designee **PREPARES** a remedial action plan on a case by case basis.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 34 of 88

6.3.5 Annual Retraining

6.3.5.1 The annual retraining provides an overview of SONGS IOEP **AND** position specific responsibilities.

6.3.5.2 This training is accomplished via completion of required training or demonstrating proficiency of the position during drills.

6.3.5.3 An individual who does **NOT** complete annual retraining is **REMOVED** from their ERO position in LMS.

6.3.6 SONGS Supplemental Personnel (With Unescorted PA Access) Training

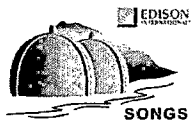
6.3.6.1 SONGS personnel with unescorted PA access receive ISFSI Plant Access Training in accordance with ADM-30, Attachment for Initial and Requal Training, which includes general IOEP overview. Personnel requiring badges for unescorted PA access receive initial and annual refresher training on general station procedures and policy. This training includes required actions to be taken if an actual emergency is declared at the SONGS ISFSI.

6.3.6.1.1 Transport of Contaminated Injured Persons is performed in accordance with SDS-RP1-PCD-1004, Survey and Release of Personnel, **AND** demonstrated during the annual medical emergency drill with EP support.

6.3.7 Other Supplemental Personnel (Without Unescorted PA Access) Training

6.3.7.1 Personnel assigned to work at the station who do **NOT** require unescorted ISFSI PA access, including visitors, receive information on the actions to be taken if an emergency is declared at the SONGS ISFSI.

6.3.7.2 Outside contracted personnel or SCE personnel who are brought in to assist with response, mitigating or recovery actions who have **NOT** received emergency planning overview training will receive Just-In-Time training prior to performing response actions. This includes training on radiological hazards and Visitor/Escort responsibilities.



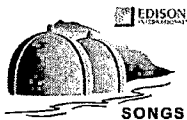
Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 35 of 88

6.3.8 EPM Training

- 6.3.8.1 The individual assigned as the EPM should **MAINTAIN** an adequate knowledge of regulations, planning techniques, and the latest applications of emergency equipment and supplies. Training may include:
- 6.3.8.1.1 Courses specific or related to emergency preparedness.
 - 6.3.8.1.2 Observation of, or participation in, drills and/or exercises at other stations.
 - 6.3.8.1.3 Participation in industry review and evaluation programs.
 - 6.3.8.1.4 Participation in regional or national emergency preparedness seminars, committees, workshops, or forums.
 - 6.3.8.1.5 10 CFR 50.54(q) and 10 CFR 72.44(f) Evaluation Qualification.
- 6.3.8.2 EPM or designee shall **USE** IOEPQM, ISFSI Only Emergency Planning Qualification Manual, to complete qualifications for EP Program administrative support activities.
- 6.3.8.2.1 Personnel performing 10 CFR 50.54(q) and 10 CFR 72.44(f) screenings and evaluations shall have completed training per qualification IOEPQM. In addition,
- Personnel performing 10 CFR 50.54(q) and 10 CFR 72.44(f) screenings and evaluations should have adequate expertise in technical or administrative matters related to the activity being addressed.
 - IF the scope of 10 CFR 50.54(q) and 10 CFR 72.44(f) screening or evaluation extends beyond expertise of preparer or reviewer, THEN assistance by a subject matter expert should be requested via the EPM.
 - Continuing training on a calendar two-year frequency for personnel retaining 10 CFR 50.54(q) and 10 CFR 72.44(f) program qualifications is required (Encode 5054SE). Training frequency and content should be augmented in response to degrading performance in order to maintain an effective 10 CFR 50.54(q) and 10 CFR 72.44(f) program.
- 6.3.8.2.2 Waivers / exemptions may be granted to contractors or SONGS staff that possess the necessary experience to complete the 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening and Evaluations. **COMPLETE** AD 412 to approve an Exemption or a Waiver.
- 6.3.8.2.3 Continuing training course work selection and professional development for emergency preparedness should be **REVIEWED AND UPDATED** by the EPM (or designee).



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 36 of 88

6.3.9 Support Organizations Training

6.3.9.1 Training is made available to support organizations that may be called upon to provide assistance in the event of an emergency. The following outlines the training provided to these organizations:

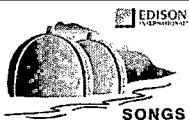
6.3.9.1.1 Non-SONGS organizations that may provide specialized services during an emergency (i.e., law enforcement, firefighting, rescue, medical services and transport of injured personnel) are provided or offered site-specific emergency response training, annually.

6.3.9.1.2 The training made available is designed to acquaint the participants with the special problems potentially encountered during an ISFSI emergency (including basic radiation protection and the effects of radiation exposures and radiological contamination), notification procedures and their expected roles. Organizations that must enter the site are instructed as to the identity (by position and title) of those persons in the onsite organization who will control their support activities.

6.3.9.1.3 Records for training offered and/or provided for the offsite responders are to be **DOCUMENTED AND MAINTAINED**.

6.3.9.2 Support for training of Offsite Emergency Response Organizations may be provided by SONGS when requested.

6.3.9.3 Support Organization personnel who are brought in to assist with mitigating or recovery actions who have **NOT** received emergency planning overview training will receive Just-in-Time training prior to performing response actions. This includes training on radiological hazards and Visitor/Escort responsibilities.



6.4 Drill and Exercise Program

NOTES

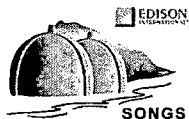
1. Equipment and proficiency drills may be performed as part of the Biennial Exercise, alternate year Integrated Drill, or as an independent drill. A drill may be a component of an exercise. Drills are supervised and evaluated by qualified personnel.
2. SONGS will invite Federal, State, and local government agencies to participate or observe scheduled exercises.

6.4.1 Drill/Exercise Schedule

6.4.1.1 **DEVELOP** and **MAINTAIN** a Drill and Exercise Schedule that allows demonstration of all major portions of the IOEP over a six-year period, and supports achievement of the minimum drill frequencies and types listed as specified below:

6.4.1.1.1 Biennial (2Y)

- Exercise - tests the adequacy of timing and content of implementing procedures and methods; tests emergency equipment and communication networks; ensures emergency personnel are familiar with their duties. May be evaluated by Federal evaluators.
- Alternate year Integrated Drill - Conducted for the purpose of testing, developing, and maintaining the proficiency of emergency responders.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 38 of 88

6.4.1.1.2

Annual (1Y)

- Communications drill with State and local government agencies, and NRC Headquarters is conducted annually. Communication drills include the aspect of understanding the content of messages.
- Medical Emergency Drill, involving a simulated contaminated individual, which contains provisions for participation by local support services organizations (i.e., ambulance and support hospital) is conducted annually. The offsite portions of the medical drill may be performed as part of the required Biennial Exercise or alternate year Integrated Drill.
- Radiation Protection drill is conducted annually.
- Unannounced augmentation drill is conducted annually. This drill involves implementation of the ERO call-out procedure and documentation of the estimated response time for each responder. This drill demonstrates the capability to augment the ED after an emergency is declared.

6.4.1.1.3

Other

- Fire drill is conducted in accordance with SONGS Fire Protection Program.

6.4.1.2

Demonstrate the following principal functional areas in Biennial Exercises and alternate year Integrated Drills during the six year calendar cycle in accordance with the frequency specified in EP PDE:

- Management and coordination of emergency response.
- Accident assessment.
- Event classification.
- Notification of offsite agencies
- Assessment of onsite impact of radiological releases.
- Mitigative action development and implementation.
- Emergency Termination and Recovery.

6.4.1.3

The EPM or designee shall **DEVELOP** an Annual Drill and Exercise Schedule for the coming year before the end of the current year.

- **COORDINATE** drill dates with affected offsite agencies when establishing the drill schedule.
- **CONFIRM** any changes to the Drill and Exercise Schedule with all affected internal and external organizations, and **ENSURE** changes are approved by the EPM.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 39 of 88

6.4.2 Selection of Drill/Exercise Objectives

6.4.2.1 The EPM or designee shall **IDENTIFY** which drill objectives will be evaluated prior to the drill.

6.4.2.2 The selection of objectives shall be based upon:

- Corrective Actions/Inspection Reports/Drill Critiques/Industry Lessons Learned.
- Revisions to the IOEP.
- Six-year schedule and objective demonstration tracking based on EP PDE.
- Verification of the effectiveness of corrective actions initiated from previous drills.

6.4.3 Scenario Development

NOTES

1. EP DCL may be used to develop the Biennial Exercise and alternate year Integrated Drill.
2. Exercise and drill scenarios, as appropriate, emphasize coordination among Onsite and Offsite Response Organizations.

6.4.3.1 **ASSEMBLE** appropriate resources based on the type and scope of the scenario.

6.4.3.2 **COORDINATE** any required resources with the SONGS Manager, ISFSI.

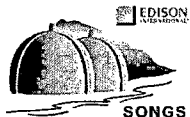
6.4.3.3 **DEVELOP** the scenario to provide reasonable assurance that anticipatory responses will **NOT** result from pre-conditioning of participants.

6.4.3.4 **VARY** the scenario from year to year such that all major elements of the plans **AND** preparedness organizations are tested.

6.4.3.5 The scenario shall provide the necessary information and guidance to achieve the identified objectives.

6.4.3.6 **DEVELOP** the scope of the drill or exercise to indicate:

- Participants.
- Extent of responses by the ERO including extent of notifications and degree of simulation.
- Offsite participation.



6.4.4 Scenario Manual

- 6.4.4.1 The scenarios for use in exercises and drills include, at a minimum, the following:
- The basic objective(s) of each drill/exercise and appropriate evaluation criteria.
 - The date(s), time period, place(s), and participating organizations.
 - The simulated events.
 - A time schedule of real and simulated initiating events.
 - A narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing.
 - A description of the arrangements for and advance materials to be provided to official observers.

6.4.5 Scenario Confidentiality

- 6.4.5.1 Scenario confidentiality shall be maintained for drill/exercise evaluated objectives and unannounced drills.
- 6.4.5.2 Each individual, except Federal, State, and local governmental agency representatives, knowledgeable of the scenario shall sign a confidentiality agreement.

6.4.6 Conduct of Drill and Exercises

NOTE

EP DCL may be used to conduct drill/exercise readiness checks.

- 6.4.6.1 Before the drill/exercise starts:
- 6.4.6.1.1 **NOTIFY** participants and drill/exercise controllers and evaluators of their participation and **CONDUCT** briefs.
- 6.4.6.1.2 **ENSURE** controllers establish drill control communications at predetermined time.
- 6.4.6.1.3 **NOTIFY** offsite agencies and/or offsite controllers of the start of the drill/exercise.
- 6.4.6.1.4 **NOTIFY** the Emergency Response Facility of the drill/exercise and start time and any extent of play that may or may not involve the actual staff.
- 6.4.6.1.5 **ANNOUNCE** the drill/exercise start and instructions for nonparticipants.

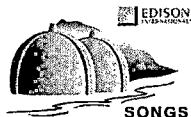


Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 41 of 88

- 6.4.6.2 During the drill/exercise:
- 6.4.6.2.1 **START** the drill/exercise at the scheduled time.
- 6.4.6.2.2 **ALLOW** free play for decision making.
- 6.4.6.2.3 Controllers **ENSURE** the events are running according to the scenario timeline.
- 6.4.6.2.4 The Lead Controller may **DETERMINE** the need for modification of scenario information, **OR** the suspension **OR** termination of the drill/exercise based upon changing site conditions or ERP response.
- 6.4.6.2.5 Controllers may **RESOLVE** discrepancies in data or field information with concurrence of the Lead Controller.
- 6.4.6.2.6 Controllers shall **DISTRIBUTE** messages and cues as scheduled in the scenario with concurrence of the Lead Controller.
- 6.4.6.2.7 Controllers shall **INFORM** the Lead Controller of problems encountered that impact the timeline and completion of major events.
- 6.4.6.2.8 Evaluators and controllers shall **MAINTAIN** a chronological record of sequence of events and participant responses in sufficient detail in their assigned area to provide an accurate record of activities.
- 6.4.6.3 Termination of the drill/exercise:
- 6.4.6.3.1 The Lead Controller shall **OBTAIN** concurrence from the other controllers that all applicable objectives were demonstrated and evaluated.
- 6.4.6.3.2 The Lead Controller shall **NOTIFY** the Emergency Response Facility that the exercise or drill is terminated.
- 6.4.6.3.3 **ANNOUNCE** the drill/exercise termination.
- 6.4.6.3.4 The Lead Controller shall **ENSURE** participating Federal, State or local agencies, and any Federal or State agency controllers/evaluators are notified that the drill/exercise is terminated.
- 6.4.6.3.5 The Lead Controller shall **COORDINATE** the following activities:
- **VERIFY** all participants, controllers, and evaluators have signed an attendance sheet and **COLLECT** all the sheets.
 - **ENSURE** all drill/exercise paperwork is collected from each participant.
 - **ENSURE** participants restore or restock emergency supplies and equipment, including forms and procedures.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 42 of 88

6.4.7 Drill and Exercise Evaluation

6.4.7.1 Post-Drill/Exercise Participant Critique

6.4.7.1.1 A Participant Critique shall be conducted with the ERO at the conclusion of the drill/exercise.

6.4.7.1.2 Participants unable to attend the post-drill critique shall be provided an opportunity to provide feedback using the drill/exercise critique or feedback sheets.

6.4.7.1.3 Immediately after the drill or exercise, the controllers shall **DISTRIBUTE** drill/exercise critique or feedback sheets to participants.

6.4.7.1.4 Participants shall **COMPLETE** the critique which will provide the opportunity to self-identify errors and performance-based issues.

6.4.7.1.5 Participants should document facility, equipment, process, or procedure issues identified during the drill/exercise in CAP.

6.4.7.1.6 The controllers should **PROVIDE** additional observations and evaluations.

6.4.7.1.7 At the conclusion of the Participant Critique, the Lead Controller shall **COLLECT** completed Participant Critique documentation.

6.4.7.2 Post-Drill/Exercise Controller/Evaluator Debrief

6.4.7.2.1 **COORDINATE** a Controller Debrief to discuss the preliminary findings.

6.4.7.2.2 **EVALUATE** drills and exercises against criteria identified by the specific objectives using EP ODC.

6.4.7.2.3 **ENSURE** the Controller Debrief remains focused on evaluation of objectives, **NOT** the development of corrective action plans.

6.4.7.2.4 **DETERMINE** whether the items in the preliminary findings are deficiencies, weaknesses, or other issues.

6.4.7.2.5 **ASSEMBLE** Objective Evidence to support evaluation of RSPS objectives.

6.4.7.2.6 **DIRECT** the cognizant controllers to document evaluated objectives **NOT** met, and any facility, equipment, process, or procedure issues identified during the drill/exercise, if not already documented by participants, in CAP.

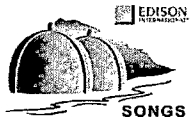


Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 43 of 88

- 6.4.7.2.7 The Lead Controller shall **ASSEMBLE** the information from the evaluation forms, response records, drill data, drill/exercise critique, feedback sheets, participant comments, and other drill records.
- 6.4.7.2.8 The EPM or designee should **PERFORM** an update to the active EP PDE following each drill/exercise.
- 6.4.7.3 Draft Critique Report
- 6.4.7.3.1 A draft critique report shall be completed for an exercise or drill involving the evaluation of designated objectives, including reference to CAP documents and recommendations.
- 6.4.7.3.2 IF the NRC was onsite to conduct an evaluation, THEN the draft critique report for the Biennial Exercise should be completed prior to the agreed upon NRC exit meeting.
- 6.4.7.3.3 IF the NRC was onsite to conduct an evaluation, THEN REVIEW findings with Nuclear Oversight to **ENSURE** all significant Licensee critique comments are incorporated prior to NRC exit meeting for a Biennial Exercise.



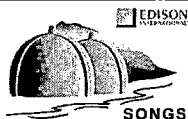
Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 44 of 88

- 6.4.7.3.4 The draft critique report shall address each of the following elements that were included for the drill/exercise scenario:
- Executive Summary
 - Drill/Exercise Description
 - Introduction
 - Participation Summary
 - Sequence of Events / Drill Summary
 - Drill/Exercise Evaluation Results
 - Drill/Exercise Objectives Evaluation
 - Strengths, deficiencies, weaknesses and other issues
 - Corrective Action Summary
 - ERF Evaluation
 - Facility and Equipment Issues
 - Procedure Quality Issues
 - Demonstration Criteria (DC) results
 - Participant, Controller and Evaluator Lists
 - Drill Control Issues
 - Scenario Design Issues
- 6.4.7.4 SONGS ISFSI Management Critique Meeting
- 6.4.7.4.1 A SONGS ISFSI Management Critique Meeting shall be completed for the Biennial Exercise and the alternate year Integrated Drill.
- 6.4.7.4.2 The EPM or designee shall **CONDUCT** the SONGS ISFSI Management Critique Meeting.
- 6.4.7.4.3 The purpose of the Critique Meeting is to give organizational visibility to the drill and exercise program and provide an independent check on the preliminary significance evaluation of ERO performance and drill objectives. Focus should be on drill performance issues associated with weaknesses or items that require corrective action, not minor drill critique items.
- 6.4.7.4.4 The Managers are expected to challenge the EPM/evaluator's conclusion related to potential drill performance weaknesses.
- 6.4.7.4.5 The critique process is considered complete when all draft conclusions related to the identified weaknesses have been presented by the EPM to senior management, and any management questions or comments have been documented in the draft exercise/drill critique report.

REFERENCE USE



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 45 of 88

6.4.7.5 Final Critique Report

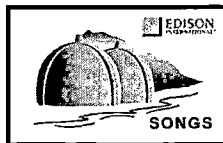
- 6.4.7.5.1 A final critique report incorporating comments from the SONGS ISFSI Management Critique Meeting shall be completed for the Biennial Exercise and the alternate year Integrated Drill.
- 6.4.7.5.2 The formal evaluation in the form of a final written critique report shall be approved by the cognizant supervisor and made available to the ERO and the SONGS ISFSI Management.

6.4.8 Corrective Actions

NOTE

Risk Significant Planning Standards (RSPS) are 10 CFR 50.47(b)(4), 10 CFR 50.47(b)(5), 10 CFR 50.47(b)(9), and 10 CFR 50.47(b)(10), as exempted. All other 10 CFR 50.47(b) planning standards are not risk significant.

- 6.4.8.1 Document evaluated objectives **NOT** met, facility, equipment, process, or procedure issues identified during the drill and exercise in CAP.
- 6.4.8.1.1 Document each problem separately. For each problem:
 - **IDENTIFY** if the problem is related to an applicable RSPS, by stating "Risk Significant Planning Standard" in the Action Request description.
 - **IDENTIFY** if it is a deficiency, weakness, or other issue.
 - **IDENTIFY** the person responsible for resolution.
- 6.4.8.2 **EVALUATE** observations made during drills and exercises in relation to applicable federal regulations and the SONGS IOEP.
- 6.4.8.3 **ENSURE** Corrective Actions for issues related to 10 CFR 50.47(b) planning standards, as exempted, are documented in CAP.
- 6.4.9 Actual Emergency Events
- 6.4.9.1 **EVALUATE** Actual Emergency Events incorporating applicable elements of Section 6.4.7.
- 6.4.9.2 **EVALUATE AND CORRECT** problems identified during actual Emergency Events incorporating applicable elements of Section 6.4.8.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 46 of 88

INFORMATION USE

7.0 ACCEPTANCE CRITERIA

7.1 None

8.0 RETENTION OF RECORDS

8.1 IOEP Maintenance

8.1.1 A history file for revised IOEP-1, IOEP-2, EIPs (Appendix B of IOEP-1), and the MOEE shall be retained in eDMRM for three years after the date of each change (Reference AR 0217-13273).

8.1.2 A record of each change to the SONGS Emergency Plan (Unit 1, Units 2&3, and ISFSI - Operating, Permanently Defueled and ISFSI-Only), made without prior NRC approval in accordance with 10 CFR 50.54(q) shall be retained in eDMRM for three years from the date of each change. A report of each such change, including a summary of its analysis, shall be submitted within 30 days after the change is put in effect [Reference 10 CFR 50.54(q)(5) and AR 0217-13273].

8.1.3 The original SONGS Emergency Plan (Unit 1 – Operating) and records of each change to the plan, (Unit 1, Units 2&3, and ISFSI - Operating, Permanently Defueled and ISFSI-Only) including IOEP-1, IOEP-2, or EIPs (Appendix B of IOEP-1), for which prior NRC approval was obtained pursuant to 10 CFR 50.54(q)(4) shall be retained in eDMRM until the Commission terminates the license for the nuclear power reactor (References 10 CFR 50.54(q)(6) and AR 0217-13273).

8.1.4 **SCAN** Completed Attachments for quarterly reviews and inspections into eDMRM quarterly, prior to the end of the following quarter in accordance with RPA 99-0119E.

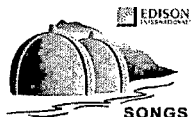
8.1.5 **SCAN** Completed Attachments for annual reviews and inspections into eDMRM annually, prior to the end of the first quarter of the following calendar year in accordance with RPA 99-0119E.

8.1.6 Completed copies of Attachments used in this procedure may be retained in EP files for at least two years to facilitate reviews and inspections.

8.2 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening and Evaluation

8.2.1 **SCAN** 10 CFR 50.54(q) and 10 CFR 72.44(f) screening and evaluation documentation into eDMRM in accordance with RPA 92-0010E.

INFORMATION USE



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 47 of 88

8.3 Training

- 8.3.1 The Personnel Qualification Standards (PQSs) of individuals participating in the Emergency Preparedness Training Program shall be maintained in the training records database and scanned into eDMRM in accordance with RPA 92-0011E.
- 8.3.2 IOEPQM, ISFSI Only Emergency Planning Qualification Manual, shall be maintained in the training records database.
- 8.3.3 **SCAN** IOEPQM, ISFSI Only Emergency Planning Qualification Manual, into eDMRM in accordance with RPA 92-0011E.

8.4 Drills and Exercises

- 8.4.1 Drill and Exercise records shall be maintained in EP files for a period of six years in accordance with the exercise cycle.
- 8.4.2 Scenarios used to conduct EP drills and exercises in accordance with Periodic Drill and Exercise Requirements shall be maintained in EP files for a period of six years.
- 8.4.3 **SCAN** the final critique report into eDMRM within three months of the date it is signed in accordance with RPA 20-0002E.
- 8.4.4 A copy of the critique report may be kept in EP files for a period of two years to facilitate reviews and inspections.

8.5 Emergency Preparedness Program Review

- 8.5.1 **SCAN** the independent review of the Emergency Preparedness Program performed in accordance with 10 CFR 50.54(t) per Section 6.1.11 into eDMRM in accordance with RPA 20-0002E.

9.0 REFERENCES / COMMITMENTS

9.1 Implementing References

- 9.1.1 Procedures
 - 9.1.1.1 ADM-3, Human Performance Program
 - 9.1.1.2 ADM-5, Corrective Action Program
 - 9.1.1.3 ADM-8, Decommissioning Agent (DA) Records Management
 - 9.1.1.4 ADM-10, Processing Procedures, Instructions, and Forms
 - 9.1.1.5 ADM-30, ISFSI Training Program Description

INFORMATION USE



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 48 of 88

- 9.1.1.6 ENG-15, Operability Determinations and Functionality Assessments
- 9.1.1.7 EPP-1, Emergency Response
- 9.1.1.8 SDS-EP1-PLN-0001, Emergency Preparedness and Response Support Plan
- 9.1.1.9 SDS-PM1-PLN-0008, SDS Site Communication and Reportability Plan
- 9.1.1.10 SDS-RP1-PCD-1004, Survey and Release of Personnel
- 9.1.1.11 SDS-TN1-PCD-0007, General Employee Training
- 9.1.1.12 SDS-TN1-PGM-0001, SDS Conduct of Training
- 9.1.1.13 SEC-15, Notification, Reporting and Loggable Events
- 9.1.2 Other
- 9.1.2.1 IOEPQM, ISFSI Only Emergency Planning Qualification Manual
- 9.1.2.2 SCE-HR-EECONDUCT-PL-303, SCE Corporate Fitness for Duty Policy
- 9.1.2.3 7IO1PQS, ISFSI Shift Supervisor / Emergency Director or Resource Manager
- 9.1.3 Forms
- 9.1.3.1 AD 412, Exemption or Waiver
- 9.1.3.2 EP 54T, SONGS Emergency Preparedness Program Review
- 9.1.3.3 EP DCL, Drill Checklist
- 9.1.3.4 EP EKIL, Emergency Kit Inventory List
- 9.1.3.5 EP ERPA, Emergency Response Personnel Assignment
- 9.1.3.6 EP HIL, Hospital Inventory List
- 9.1.3.7 EP ODC, Objectives Demonstration Criteria
- 9.1.3.8 EP PDE, Matrix of Periodic Drill and Exercises Objectives
- 9.1.3.9 EP QEV, 10 CFR 50.54(q) and 10 CFR 72.44(f) Evaluation Form
- 9.1.3.10 EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form
- 9.1.3.11 EP SNF, SONGS Notification Form
- 9.1.3.12 EP SOA, SONGS IOEP/EPIP Change Report and Analysis Summary

INFORMATION USE



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 49 of 88

9.2 Developmental References

9.2.1 Commitments

- 9.2.1.1 IOEP-1, SONGS ISFSI-Only Emergency Plan
- 9.2.1.2 IOEP-2, SONGS ISFSI-Only Emergency Plan EAL Technical Bases Manual
- 9.2.1.3 SONGS Technical Specifications
- 9.2.1.4 10 CFR 50.47(b) (as exempted)
- 9.2.1.5 10 CFR 50.54(q)
- 9.2.1.6 10 CFR 50 Appendix E (as exempted)
- 9.2.1.7 10 CFR 72.44(f)
- 9.2.1.8 SO123-ODCM, SONGS Offsite Dose Calculation Manual (ODCM)
- 9.2.1.9 San Onofre 2 & 3 UFSAR (DSAR) Section 2.1.2, Exclusion Area Authority and Control
- 9.2.1.10 San Onofre 2 & 3 UFSAR (DSAR) Figure 2.1-5

9.2.2 Procedures

- 9.2.2.1 SDS-RP4-PCD-1006, Calibration of Common Portable Dose Rate Meters

9.2.3 Other

- 9.2.3.1 AR 0217-13273, Emergency Plan Record Retention Requirements
- 9.2.3.2 NEI 10-05, Assessment of On Shift Emergency Response Organization Staffing and Capabilities
- 9.2.3.3 NEI 11-03, Guidelines for Evaluating Emergency Plan Changes Under 10 CFR 50.54(q)
- 9.2.3.4 NSIR/DPR-ISG-02, Interim Staff Guidance Emergency Planning Exemption Requests For Decommissioning Nuclear Power Plants
- 9.2.3.5 NUREG 0654/FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 9.2.3.6 Regulatory Guide 1.219, Guidance on Making Changes to Emergency Plans for Nuclear Power Reactors



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 50 of 88

Emergency Equipment

Attachment 1

Emergency Equipment	Description / Function	Compensatory Measures (See Procedure Sections 6.1.8, 6.1.9, and 6.1.10)	Reference
Protected Area Access Control and Personnel Accountability System	System that provides accountability of site personnel, visitors, and contract personnel inside the Protected Area.	Timely (90 days) repair of equipment. Use manual tracking of personnel inside Protected Area.	IOEP-1: 10.0
Emergency Response Facility (ERF)	Location from which the ERO can assess conditions, evaluate potential consequences, initiate action, and perform notifications.	TBD at time of event.	IOEP-1: 8.1
Cellular Phones	Communications between ERF and Federal, State, and local government agencies; MCBCP, ERO; Hospitals; Field Teams, and others. Voice, text, messaging, email capabilities.	Timely (90 days) repair of emergency equipment. Use commercial landline telephone system, satellite phones and/or portable radios.	IOEP-1: 6.0, 8.2, App. A
Satellite Phones	Backup communications between ERF and Federal, State, and local government agencies; MCBCP, ERO; Hospitals; Field Teams, and others. Voice capabilities.	Timely (90 days) repair of emergency equipment. Use commercial landline telephone system, cellular phones and/or portable radios.	IOEP-1: 5.0, 5.0, 8.2, App. A
Commercial Landline Telephone System	Communications between ERF and Federal, State, and local government agencies; MCBCP; ERO; Hospitals; Field Teams and others. Voice capabilities.	Timely (90 days) repair of emergency equipment. Use cellular phones, satellite phones, and/or portable radios.	IOEP-1: 5.0, 6.0, 8.2
Radio System	Communications between ERF and ERO; Field Teams; site personnel. Voice capabilities.	Timely (180 days) repair of emergency equipment. Use cellular phones and/or satellite phones.	IOEP-1: 5.0, 6.0, 8.2, 10.0, App. A
Alert Media	Communications between ERF and site personnel.	Timely (180 day) repair of emergency equipment. Use compensatory measures listed in SDS-PM1-PLN-0008.	IOEP-1: 10.0
Emergency Kit Procedures / Reference Material	IOEP-1, IOEP-2 Emergency Response Directory (ERD) EPIPs.	Timely (90 days) replacement of material. Use alternate materials available onsite.	IOEP-1: 8.2, App. A



Emergency Preparedness Program Maintenance

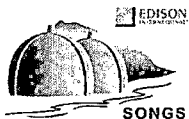
EPP-2
REVISION 1

Page 51 of 88

Emergency Equipment

Attachment 1

Emergency Equipment	Description / Function	Compensatory Measures (See Procedure Sections 6.1.8, 6.1.9, and 6.1.10)	Reference
Emergency Kit Equipment / Supplies	Communications equipment (portable radios, cellular phone, satellite phone), portable radiation monitoring equipment to measure gamma, beta, and neutron radioactivity in mR/hr, portable emergency lighting, medical emergency response bag, dosimeters capable of measuring dose and dose rate, Contamination control supplies, decontamination control supplies, protective clothing.	Timely (90 days) repair or replacement of emergency equipment / supplies. Use similar equipment available onsite.	IOEP-1: 8.2, App. A
Computers with network access	Emergency notifications, meteorological information.	Timely (180 days) repair or replacement of emergency equipment. Use commercial landline telephone system, cellular phones, and/or satellite phones.	N/A
Holtec Multi-Purpose Canister	Confinement boundary for the contained radioactive materials	IF performing evolutions that require VVM lid removal, <u>THEN</u> : 1. PERFORM dose rate survey prior to removing the lid and after reinstalling it. 2. PERFORM an initial dose rate survey after removing the lid to establish a baseline. 3. MAINTAIN continuous RP coverage while the lid is removed. 4. IF area radiation monitor reading OR survey indicates an UNPLANNED rise of 25 mR/hr over baseline level, <u>THEN</u> the intent of E-HU1.2 has been met. Based on judgement a declaration of Unusual Event PD-HU3.1 should be made.	IOEP-2: E-HU1.2



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 52 of 88

IOEP-1, IOEP-2, and MOEE Review

Attachment 2

1.0 **REVIEW** IOEP-1 annually to **ENSURE** document is current (refer to Step 6.1.3.1).

Comments: _____

2.0 **REVIEW** IOEP-2 and the MOEE to **ENSURE** documents are current (refer to Step 6.1.3.2).

Comments: _____

PERFORMED BY: _____

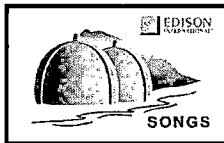
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____

SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 53 of 88

Security Plan and Emergency Plan Coordination

Attachment 3

- 1.0 **REVIEW** IOEP-1 requirements relative to the ISFSI-Only Security Plan (refer to Step 6.1.3.3).
- 2.0 **IDENTIFY** changes to IOEP-1 and ISFSI-Only Security Plan since the last review.
- 3.0 **CONFIRM** review of changes to IOEP-1 by Security Management.
- 4.0 **CONFIRM** review of changes to ISFSI-Only Security Plan by EPM or designee.
- 5.0 IF any changes have **NOT** been reviewed by appropriate management,
THEN INITIATE review for impact and document results in CAP.
- 5.1 **RECORD** Action Request number **OR ENTER** N/A: _____

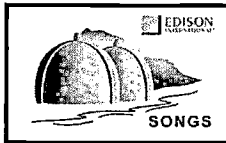
Comments: _____

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 54 of 88

Annual EAL Review

Attachment 4

- 1.0 **REVIEW** EALs with State and local government agencies and MCBCP annually (refer to Step 6.1.3.4).

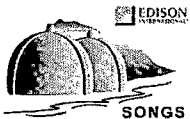
Comments (include how review/task was performed):

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 55 of 88

Letters or Memoranda of Agreement Review

Attachment 5

1.0 **REVIEW** the following letters or memoranda of agreement annually (refer to Step 6.1.3.5).

1.1 MCBCP Agreements for fire response, rescue operations, prompt ambulance transport of personnel on a 24 hour per day basis.

Comments (include how review/task was performed):

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

1.2 Mission Hospital Regional Medical Center Agreement for hospital and medical services, including receiving and treating contaminated and/or injured persons requiring immediate hospital care.

Comments (include how review/task was performed):

PERFORMED BY: _____
Emergency Preparedness Manager or designee

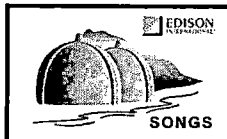
Date: _____

1.3 Tri-City Medical Center Agreement for hospital and medical services, including receiving and treating contaminated and/or injured persons requiring immediate hospital care.

Comments (include how review/task was performed):

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 56 of 88

Letters or Memoranda of Agreement Review

Attachment 5

1.4 FBI and local public entities Agreement(s) for law enforcement support per the Security Plan.

Comments (include how review/task was performed):

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

2.0 All Letters or Memoranda of Agreement have been reviewed. Problems identified have been corrected or documented in CAP.

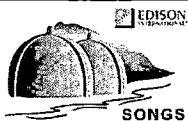
Comments:

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 57 of 88

Emergency Response Directory Review

Attachment 6

- 1.0 **REVIEW** Emergency Response Directory quarterly to **ENSURE** ERO recall information (names and numbers), support personnel, and applicable offsite organizations is maintained current (refer to Step 6.1.3.6).
- 2.0 **REPLACE** outdated Emergency Response Directories per the distribution list (last page of EP ERD).

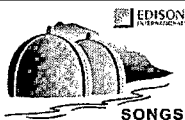
Comments:

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 58 of 88

IOEP-1 and MOEE Distribution Review

Attachment 7

- 1.0 **REVIEW** distribution lists for IOEP-1 and MOEE annually to **VERIFY** distribution information is current (refer to Step 6.1.3.7).

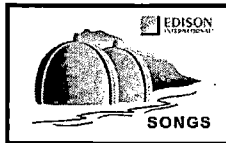
Comments (include how review/task was performed):

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 59 of 88

Matrix of Periodic Drill and Exercise Objectives Review

Attachment 8

- 1.0 **REVIEW** EP 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) (refer to Step 6.1.3.8).

Comments:

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

- 2.0 **COMPLETE** EP PDE during the fourth quarter to **ENSURE** all required objectives for the year have been accomplished. **ATTACH** EP PDE to this review.

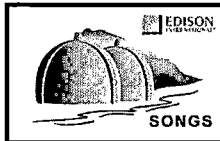
Comments

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 60 of 88

Emergency Equipment and Supplies Inspection

Attachment 9

- 1.0 ISS or designee has inventoried Emergency Kit procedures, materials, equipment, and supplies per EP EKIL (refer to Step 6.1.4.1).

INVENTORY ITEM	TRACKING NUMBER	DATE COMPLETED	SEALED CONTAINER (YES / NO)	PERFORMED BY
ERF KIT 1				

- 2.0 The emergency equipment and supplies quarterly inspections have been completed. Problems identified have been corrected or documented in CAP.

Comments:

REVIEWED BY: _____
ISFSI Shift Supervisor or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 61 of 88

Emergency Communications Quarterly Test

Attachment 10

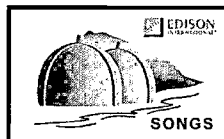
NOTE

Performance of drill requirements specified in IOEP-1 Part II, Section 14 satisfies the testing frequency for equipment that is documented as used during the drill.

- 1.0 Emergency Kit Portable Radios Test (refer to Step 6.1.5.1).
- 1.1 **TURN ON** two Emergency Kit portable radios **AND SELECT** a specific channel for the test.
- 1.2 **OPERATE** Emergency Kit portable radios **AND VERIFY** clear and audible communications for both transmission and reception.
- 1.3 **TURN OFF** Emergency Kit portable radios.
- 1.4 **RECORD** test results on the table below.
- 1.5 **REPEAT** Steps 1.1 through 1.4 until all Emergency Kit portable radios are tested.
- 1.6 **IF** equipment or communication problems were encountered, **THEN NOTIFY** the ISS to arrange for repairs. **DOCUMENT** problems in CAP. **RECORD** Action Request number(s) on table below; otherwise N/A.

Emergency Kit Portable Radio Serial Number	Test SAT	Action Request Number	PERFORMED BY	Date
	Y N			
	Y N			
	Y N			
	Y N			

- 2.0 Emergency Kit Cellular Phones Test (refer to Step 6.1.5.1).
- 2.1 **TURN ON** Emergency Kit cellular phone.
- 2.2 **CALL** a nearby phone **AND VERIFY** clear and audible communications for both transmission and reception.
- 2.3 **REQUEST** a return phone call.
- 2.4 **VERIFY** return call clear and audible communications for both transmission and reception.
- 2.5 **TURN OFF** Emergency Kit cellular phone.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 62 of 88

Emergency Communications Quarterly Test

Attachment 10

- 2.6 **RECORD** test results on the table below.
- 2.7 **REPEAT** Steps 2.1 through 2.6 until all Emergency Kit cellular phones are tested.
- 2.8 IF equipment or communication problems were encountered, **THEN NOTIFY** the ISS to arrange for repairs. **DOCUMENT** problems in CAP. **RECORD** Action Request number(s) on table below; otherwise N/A.

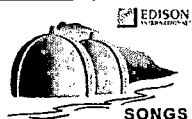
Emergency Kit Cellular Phone Number (ERD)	Test SAT	Action Request Number	PERFORMED BY	Date
	Y N			
	Y N			
	Y N			
	Y N			

NOTE

Emergency Response Directory contains Emergency Kit satellite phone dialing instructions.

- 3.0 Emergency Kit Satellite Phones Test (refer to Step 6.1.5.1).
- 3.1 **TURN ON** both Emergency Kit satellite phones.
- 3.2 **CALL** one Emergency Kit satellite phone with the other Emergency Kit satellite phone **AND VERIFY** clear and audible communications for both transmission and reception.
- 3.3 **REQUEST** a return phone call.
- 3.4 **VERIFY** return call clear and audible communications for both transmission and reception.
- 3.5 **RECORD** test results on the table below.
- 3.6 **TURN OFF** both Emergency Kit satellite phones.
- 3.7 IF equipment or communication problems were encountered, **THEN NOTIFY** the ISS to arrange for repairs. **DOCUMENT** problems in CAP. **RECORD** Action Request number(s) on table below; otherwise N/A.

Emergency Kit Satellite Phone Number (ERD)	Test SAT	Action Request Number	PERFORMED BY	Date
	Y N			
	Y N			



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 63 of 88

Emergency Communications Quarterly Test

Attachment 10

4.0 Quarterly communications test has been completed. Problems identified have been corrected or documented in CAP.

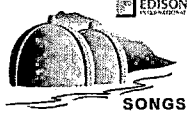
Comments:

REVIEWED BY: _____
ISFSI Shift Supervisor or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 64 of 88

Emergency Equipment - Compensatory

Attachment 11

Equipment Description / Function	
ERF / Location	
Action Request Number	

1.0 **IDENTIFY** the Emergency Plan Function / Reference:

1.1 Category: **CHECK** the appropriate box

- ☐ Equipment used to assess an Emergency Action Level Threshold.
- ☐ Means of fulfilling an emergency response function other than above.

NOTE

Temporary compensatory measures that are put in place while the affected emergency equipment is being restored to full functionality are not considered changes to the IOEP. However, an evaluation should address the capability of function and the timeliness of compensatory measures compared to the intended function of the degraded emergency equipment.

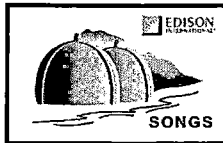
1.2 **IDENTIFY** compensatory measures used:

1.3 **IDENTIFY** the time period approved for compensatory measures (e.g., 90 days for RSPS-related equipment and 180 days for PS-related equipment).

2.0 Do compensatory measures fully maintain the emergency response function?

YES ☐ NO ☐

Basis:



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 65 of 88

Emergency Equipment - Compensatory

Attachment 11

3.0 Documentation

3.1 For planned or unplanned maintenance activities expected to result in the emergency equipment being unavailable for more than 30 days, **CREATE** an Assignment to the EPM for evaluation of compensatory measures under 10 CFR 50.54(q) and 10 CFR 72.44(f).

3.1.1 Planned maintenance **SHALL NOT** proceed until the Assignment is approved.

3.1.2 Unplanned maintenance activity compensatory measures should be used immediately in the case of unplanned maintenance without waiting for the Assignment to be created.

3.2 **NOTIFY** the ERO as soon as practical.

3.3 Document compensatory measures in CAP for EP tracking.

3.4 **REVIEW** SEC-15 for reportability requirements and actions

4.0 Review / Approval

4.1 Compensatory Measures Acceptance Criteria

4.1.1 The Reviewer completes the following evaluation:

SAT	COMPENSATORY MEASURE EVALUATION CRITERIA
	Compensatory measures provide specific, clear, and actionable guidance.
	Alternate indications / components include specifics such as the person or position assigned responsibility for actions associated with compensatory measures, actions required by compensatory measures, and periodicity for compensatory actions, as well as review and approval authority.
	Compensatory measures are the best available means to maintain the emergency preparedness function.

PREPARED BY:

Print Name / Signature
(ISFSI Shift Supervisor/designee)

Date: _____

REVIEWED BY:

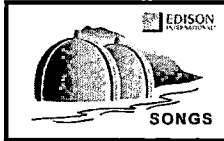
Print Name / Signature
(ISFSI Shift Supervisor/designee)

Date: _____

APPROVED BY:

Print Name / Signature
(EPM/designee or SONGS Manager, ISFSI/designee)

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 66 of 88

Hospital Supplies Inspection

Attachment 12

1.0 EPM or designee has inventoried supplies maintained at the hospitals (refer to Step 6.1.4.2):

1.1 Mission Hospital Regional Medical Center

	DATE COMPLETED	PERFORMED BY
Radiological Emergency Supplies		

1.2 Tri-City Medical Center

	DATE COMPLETED	PERFORMED BY
Radiological Emergency Supplies		

2.0 The hospital supplies inspections have been completed. Problems identified have been documented in CAP.

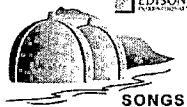
Comments:

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 67 of 88

Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form	Attachment 13
-----------------------------------------------------------------------	----------------------

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 corrective action, engineering change package, procedure change request, calculation number, prior approval ADAMS accession number, license amendment number, etc.).

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 68 of 88

Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form	Attachment 13
-----------------------------------------------------------------------	----------------------

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 perform 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 or title changes that do **NOT** alter intent, value, capability or timeliness.

2.1.5 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.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 69 of 88

Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form

Attachment 13

NOTES

1. Activities that have been ordered by the regulator or have been previously submitted to and approved by the NRC or FEMA through other formal change processes are considered conforming changes that do not require a 10 CFR 50.54(q) and 10 CFR 72.44(f) 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 ISFSI design, equipment, EALs, etc.).
2. Approved LARs, such as for ISFSI modifications, DSAR, FSAR, 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.

2.1.6 IF the change is a conforming change, THEN CHECK the "conforming change" box.

2.2 IF the activities are strictly an editorial or conforming change,
THEN GO TO Step 5.0, Section 5, Screening Results.

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 70 of 88

Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form	Attachment 13
-----------------------------------------------------------------------	----------------------

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 10 CFR 50 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, ASLB, NRC/FEMA 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 10 CFR 50 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 the IOEP, not related to a planning standard, that are associated with the activity, using the following resources:

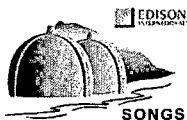
- Certrec
- NRC Correspondence

- 3.1.2.2 Document the scope of the search (such as key words).

- 3.1.2.3 Transcribe the wording and **IDENTIFY** 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.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 71 of 88

Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form

Attachment 13

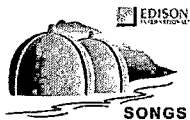
4.0 Section 4, 3rd Tier Screening

- 4.1 For each planning standard or 10 CFR 50 Appendix E requirement checked in Section 3, 2nd Tier Screening, **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 functions which are the basis for Attachment 15.
2. Refer to the above documents for additional guidance when performing Screenings.

- 4.1.1 Using Attachment 15 as a reference, **IDENTIFY** the applicable function(s) associated with the activity.
- 4.1.2 Using 10 CFR 50 Appendix E and NSIR/DPR-ISG-02 Attachment 1, as exempted, as references, **IDENTIFY** the applicable element(s) that are associated with the activity.
- 4.1.3 **IDENTIFY** each SONGS site-specific emergency preparedness program commitment associated with the activity.
- 4.2 **IDENTIFY** the current IOEP 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 IOEP meets the listed function(s), element(s) and commitment(s).
- 4.4 **GO TO** Step 5.0, Section 5, Screening Results.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 72 of 88

Completing EP QSC, 10 CFR 50.54(q) and 10 CFR 72.44(f) Screening Form

Attachment 13

5.0 Section 5, Screening Results

5.1 **CHECK** the box that indicates the activity may be implemented without performing a 10 CFR 50.54(q) and 10 CFR 72.44(f) 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 given prior approval by the NRC or FEMA).

5.1.3 The activity does **NOT** affect how the current IOEP 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 10 CFR 50.54(q) and 10 CFR 72.44(f) evaluation provided any of the following conditions are met:

5.2.1 The activity does affect how the current IOEP meets a planning standard function.

5.2.2 The activity does affect how the current IOEP meets a program element.

5.2.3 The activity does affect how the current IOEP meets a site-specific EP program commitment.

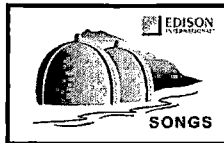
6.0 Sign Off Sections

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.



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 73 of 88

Completing EP QEV, 10 CFR 50.54(q) Evaluation Form

Attachment 14

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 number).

1.2.1 IF a screening evaluation was previously performed,
THEN USE the same Action Request number.

1.3 **RECORD** a description of the activity.

1.3.1 Activities determined as strictly editorial or conforming during the 10 CFR 50.54(q) and 10 CFR 72.44(f) 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.

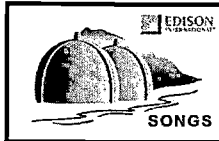
1.3.4 For an activity that results in changes to multiple documents or sections in a document, developing a comparison table of the current content to the changed content may be used to support the description.

1.4 **RECORD** the references related to the activity (e.g., additional correction actions, engineering change package, procedure change request, calculation number, prior approval ADAMS accession number, license amendment number, etc.).

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 **IDENTIFY** the specific 10 CFR 50.47(b) planning standard(s), as exempted, and other applicable regulation associated with the activity.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 74 of 88

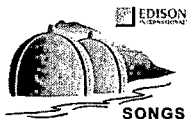
Completing EP QEV, 10 CFR 50.54(q) Evaluation Form

Attachment 14

NOTES

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 15.
2. The above documents are available for additional guidance when performing evaluations.

- 2.2.1 Using Attachment 15 as a reference, **IDENTIFY** the applicable function(s) associated with the activity by planning standard.
- 2.2.2 Using 10 CFR 50 Appendix E and NSIR/DPR-ISG-02 Attachment 1, as exempted, as references, **IDENTIFY** 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 resources:
 - Certrec.
 - NRC Emergency Plan related SERs.
- 2.2.4 Document the scope of the search (such as key words).
- 2.2.5 **IDENTIFY** the wording and the source of any applicable SONGS site-specific Emergency Preparedness program commitment associated with the activity.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 75 of 88

Completing EP QEV, 10 CFR 50.54(q) Evaluation Form

Attachment 14

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 IOEP.
2. The approved version of the IOEP may itself 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 the IOEP 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 RIE.

2.3 **DETERMINE** and document the IOEP content that describes how the listed functions, elements, and commitments are met, and any additional licensing basis information not part of the IOEP content itself.

2.3.1 IF the approved licensing basis is different from the basis contained in the current IOEP, THEN document the reason for the difference.

2.3.2 **IDENTIFY** the source of licensing basis information if it is not the current IOEP content (for example; Safety Evaluation Report, IOEP, EPIP, etc.).

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 IOEP is understood.

3.2.1 In consideration of each function, element, and commitment listed in the impact determination above (Section 2, Impact and Licensing Basis Determination), document:

3.2.1.1 How the activity does or does not alter the IOEP content.

3.2.1.2 How the activity does or does not alter the licensing basis with regards to meeting the regulatory requirements.

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 76 of 88

Completing EP QEV, 10 CFR 50.54(q) Evaluation Form	Attachment 14
----------------------------------------------------	----------------------

- 3.2.1.3 **ENSURE** the specific 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, and 10 CFR 72.32(c) 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 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, and 10 CFR 72.32(c) in the conclusion.
- 3.4 IF the activity does **NOT** continue to provide compliance with the regulatory requirements of 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, and 10 CFR 72.32(c), 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 10 CFR 50.12.
- 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.
- 4.0 Section 4, Reduction in Effectiveness Evaluation and Conclusion
- 4.1 An RIE 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 An RIE 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, SONGS employs the EAB to satisfy the 10 CFR 72.106 requirement for a 100-meter minimum distance from the spent fuel in the ISFSI to the Site Boundary.
- 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.



Emergency Preparedness Program Maintenance

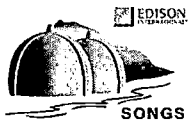
EPP-2
REVISION 1

Page 77 of 88

Completing EP QEV, 10 CFR 50.54(q) Evaluation Form

Attachment 14

- 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 RIE 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 IOEP content.
- 4.6.2 The activity does or does not alter the licensing basis with regards to an RIE, with specific evaluation of the following attributes:
- 4.6.2.1 Continued capability to meet or perform the planning standard function, program element, or commitment.
- 4.6.2.2 Continued timeliness of the planning standard function, program element, or commitment.
- 4.6.3 IF there are any differences in how the IOEP 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 IOEP or its implementation in a summary at the end of the section.
- 4.8 **CHECK** the appropriate box for whether the activity constitutes an RIE in the conclusion.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 78 of 88

Completing EP QEV, 10 CFR 50.54(q) Evaluation Form

Attachment 14

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 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, and 10 CFR 72.32(c).

5.1.1.2 The activity does **NOT** constitute an RIE.

5.1.2 **CHECK** the appropriate box that indicates that 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 10 CFR 50.47(b) and 10 CFR 50 Appendix E, as exempted, and 10 CFR 72.32(c).


5.1.2.2 The activity constitutes an RIE.

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

5.1.3.1 Reject the activity.

5.1.3.2 Revise the activity so that it maintains the effectiveness of the IOEP.

5.1.3.3 Formally submit the activity to the NRC for prior approval per 10 CFR 50.90.

	Emergency Preparedness Program Maintenance	EPP-2 REVISION 1
		Page 79 of 88

Completing EP QEV, 10 CFR 50.54(q) Evaluation Form	Attachment 14
----------------------------------------------------	----------------------

- 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.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 80 of 88

Planning Standard Functions List

Attachment 15

NOTE

In accordance with 10 CFR 72.32(c), the following satisfies the requirements of 10 CFR 72.32.

- 1.0 Assignment of Responsibility (Organization Control): 10 CFR 50.47(b)(1)
- 1.1 Planning Standard 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 IOEP.
- 2.0 Onsite Emergency Organization: 10 CFR 50.47(b)(2)
- 2.1 Planning Standard 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.
- 3.0 Emergency Response Support and Resources: 10 CFR 50.47(b)(3)
- 3.1 Planning Standard Functions
 - 3.1.1 Arrangements for requesting and using offsite assistance have been made.
- 4.0 Emergency Classification System: 10 CFR 50.47(b)(4)
- 4.1 Planning Standard Functions
 - 4.1.1 A standard scheme of emergency classification and action levels is in use.
- 5.0 Notification Methods and Procedures: 10 CFR 50.47(b)(5)
- 5.1 Planning Standard Functions
 - 5.1.1 Procedures for notification of State and local governmental agencies and MCBP are capable of alerting them of the declared emergency within 60 minutes after declaration of an emergency and providing follow up notifications.
 - 5.1.2 Administrative and physical means have been established for alerting and providing prompt instructions to the public within the EAB.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 81 of 88

Planning Standard Functions List

Attachment 15

6.0 Emergency Communications: 10 CFR 50.47(b)(6)

6.1 Planning Standard 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.

7.0 Public Education and Information: 10 CFR 50.47(b)(7)

7.1 Planning Standard Functions

7.1.1 Coordinated dissemination of public information during emergencies is established.

8.0 Emergency Facility and Equipment: 10 CFR 50.47(b)(8)

8.1 Planning Standard Functions

8.1.1 Adequate facilities are maintained to support emergency response.

8.1.2 Adequate equipment is maintained to support emergency response.

9.0 Accident Assessment: 10 CFR 50.47(b)(9)

9.1 Planning Standard Functions

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

10.0 Protective Response: 10 CFR 50.47(b)(10)

10.1 Planning Standard Functions

10.1.1 A range of Protective Actions is available for implementation during emergencies.

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

11.0 Radiological Exposure Control: 10 CFR 50.47(b)(11)

11.1 Planning Standard Functions

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



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 82 of 88

Planning Standard Functions List

Attachment 15

- 12.0 Medical and Public Health Support: 10 CFR 50.47(b)(12)
 - 12.1 Planning Standard Functions
 - 12.1.1 Arrangements are made for medical services for contaminated, injured individuals.
- 13.0 Recovery Planning and Post-accident Operations: 10 CFR 50.47(b)(13)
 - 13.1 Planning Standard Functions
 - 13.1.1 Plans for recovery are developed.
- 14.0 Drills and Exercises: 10 CFR 50.47(b)(14)
 - 14.1 Planning Standard 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.
- 15.0 Emergency Responder Training: 10 CFR 50.47(b)(15)
 - 15.1 Planning Standard Functions
 - 15.1.1 Training is provided to ERO personnel.
- 16.0 IOEP Maintenance: 10 CFR 50.47(b)(16)
 - 16.1 Planning Standard Functions
 - 16.1.1 Responsibility for IOEP development and review is established.
 - 16.1.2 Individual(s) responsible for IOEP development and maintenance are properly trained.



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 83 of 88

Emergency Preparedness Program Review

Attachment 16

- 1.0 **REVIEW** all program elements of the SONGS ISFSI Emergency Preparedness Program in accordance with 10 CFR 50.54(t) (refer to Step 6.1.11).
- 1.1 **PERFORM** the review using EP 54T.
- 2.0 **ATTACH** the completed Form EP 54T.

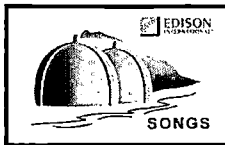
Comments:

PERFORMED BY: _____
Emergency Preparedness Manager or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 84 of 88

Alert Media Test

Attachment 17

- 1.0 **LOG INTO** Alert Media.
- 2.0 **SEND** at test notification message to the SCE test group via text, phone call, **AND** email, requesting a return acknowledgement text.
- 3.0 **VERIFY** notification was sent and return texts were received.
- 4.0 **LOG OUT** of Alert Media.
- 5.0 **ATTACH** test report documentation to this attachment.
- 6.0 **IF** problems are encountered, **THEN NOTIFY** SDS to arrange for repairs.
- 6.1 **DOCUMENT** problems in CAP, **AND RECORD** Action Request number(s) in Comments section

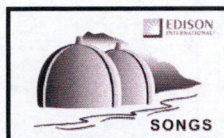
Comments:

PERFORMED BY: _____
ISFSI Shift Supervisor or designee

Date: _____

APPROVED BY: _____
SONGS Manager, ISFSI

Date: _____



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 85 of 88

Emergency Preparedness Training Program Curriculum

Attachment 18

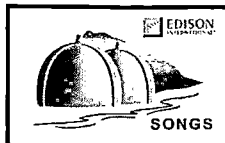
	TYPE	ERP CODE	POSITION	PQS	QUALIFICATION MANUAL	ISFSI PLANT ACCESS TRAINING [1]	SDS RADIATION WORKER TRAINING	SDS SITE ACCESS TRAINING	IEPERO	MT8216 [2]	ISFRAD	JITT [3]	5054SE
1	Onshift ERO	IO1	ISFSI Shift Supervisor/Emergency Director [4]	7IO1PQS		X	X	X	X		X		
2	Onshift ERO	IO2	On-Shift Security Personnel			X	X	X		X			
3	Augmented ERO	IO3	Resource Manager	7IO1PQS		X	X	X	X		X		
4	Supplemental		SONGS Supplemental Personnel			X		X					
5	Supplemental		Other Supplemental Personnel									X	
6	Support		Support Organization Personnel									X	
7	Staff		Emergency Preparedness		IOEPQM	X		X					X

LEGEND

	Lifetime		Calendar Two-Year		24 Months		12 Months
--	----------	--	-------------------	--	-----------	--	-----------

Notes:

- [1] Personnel with unescorted access to SONGS ISFSI PA receive Plant Access Training in accordance with ADM-30, Attachment for Initial and Requal Training, which includes general IOEP overview.
- [2] Selected station personnel receive basic training in first aid (encode MT8216).
- [3] Personnel brought in to assist who have **NOT** received Emergency Plan Training will receive Just-In-Time Training, including training on radiological hazards, and Visitor/Escort responsibilities for personnel who are not badged for unescorted ISFSI PA access.
- [4] Personnel qualified for ERP IO1 must meet ISFSI Shift Supervisor qualifications in accordance with ADM-30.



Emergency Preparedness Program Maintenance

**EPP-2
REVISION 1**

Page 86 of 88

Ownership of ERO Training Elements

Attachment 19

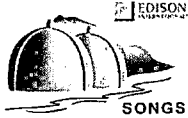
PROGRAM OWNER: SDS [1]	
ENCODE / QUALIFICATION	DESCRIPTION
SDS-TN1-RWT-0001 (SDS LMS) CBTRW1 (SCE LMS)	SDS Radiation Worker Training [3]
ISFRAD	Radiation Meter Operation
SDS-TN1-PAT-0001 (SDS LMS) CBTPA1 (SCE LMS)	SDS Site Access Training [3]

PROGRAM OWNER: EMERGENCY PREPAREDNESS (SCE)	
ENCODE	DESCRIPTION
7IO1PQS	ISFSI Shift Supervisor/Emergency Director/Resource Manager
IEPERO	ERO Responder
N/A [4]	General IOEP Overview (module of ISFSI Plant Access Training)
IOEPQM	ISFSI Only Emergency Planning Qualification Manual
5054SE	Performing Effective 50.54(q) / 72.44(f) Evaluations

PROGRAM OWNER: SECURITY (SCE)	
ENCODE	DESCRIPTION
ISFSI Plant Access Training Encodes [2]	ISFSI Plant Access Training
MT8216	Adult/Infant/Child CPR/AED/First Aid

Note:

- [1] Refer to SDS-TN1-PGM-0001, SDS Conduct of Training.
- [2] Refer to ADM-30, Attachment for Initial and Requal Training, for ISFSI Plant Access Training encodes.
- [3] Refer to SDS-TN1-PCD-0007, General Employee Training
- [4] General IOEP Overview is included in ISFSI Plant Access Training



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 87 of 88

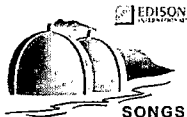
Summary of Changes

Attachment 20

Author: Lucia Sischo

AR Tracking 50.54(q): 1020-93717

Reason	Description of Change	Reviewer(s) (by title or division)	Step, Section, Attachment or Page
1020-93717	Updated Compensatory Actions for Holtec VVM.	ALL	51
0121-86481	Moved Emergency Preparedness Training from ADM-30 to this procedure. This change does not change the intent of the procedure nor the required reviews including 50.59/72.48 applicability.		Section 6.3, Attachments 18 and 19
0820-32483 0920-17272 0121-74552	Revised Section 6.3: <ul style="list-style-type: none"> Clarified ERO (members) Changed GET reference to ISFSI Plant Access Training Added or designee as alternate for EPM Clarified that Plant Access Training applies to ISFSI. Added reference to 5054SE. 		Section 6.3
	New Attachment 18: <ul style="list-style-type: none"> Changed frequency of completing Qual manual to Lifetime and split out 5054SE portion as separate item with a frequency of calendar two-year for Emergency Preparedness Staff (per AR 0121-74552 below) Changed Plant Access Training to ISFSI Plant Access Training, and added Emergency Preparedness Staff Changed GETRWT to Radiation Worker Training, and changed frequency to 24 months Added SDS Site Access Training every 24 months, for ISFSI Shift Supervisor/Emergency Director, On Shift Security Personnel, Resource Manager, SONGS Supplemental Personnel, and Emergency Preparedness Staff 		Attachment 18
	New Attachment 19: <ul style="list-style-type: none"> Deleted "Radiation Protection" from program owner title Added SDS Site Access Training Added 5054SE, 50.54(q) / 72.44(f) Evaluations Added "ISFSI" to Plant Access Training Added Note to refer to SDS-TN1-PCD-0007 for Radiation Worker and SDS Site Access Training 		Attachment 19
1220-90589	Updated the definition of Annual Frequency to state that EP drills are performed per calendar year.		13
0121-50317	Clarified that SONGS will invite the NRC and other agencies to observe scheduled exercises without requiring a request for an invitation.		37
0121-55305	Clarified responsibilities for the EP Training Program.		6
0121-47658	Clarified that the Manager, ISFSI has the overall responsibilities of the SONGS EP Program		5



Emergency Preparedness Program Maintenance

EPP-2
REVISION 1

Page 88 of 88

Summary of Changes

Attachment 20

Reason	Description of Change	Reviewer(s) (by title or division)	Step, Section, Attachment or Page
0121-74552	Changed frequency of completing Qual manual to Lifetime and split out 5054SE portion as separate item with a frequency of calendar two-year for Emergency Preparedness Staff	ALL	Attachment 18
0120-16540	Added that personnel qualified for ERP IO1 must meet ISFSI Shift Supervisor qualifications in accordance with ADM-30.		85
Betterment	Changed SDS Mass Notification System to Alert Media.		21, 50, 84
	Added rows to allow for documenting all Emergency Kit Portable Radio checks.		61
	Updated called out references.		Throughout Procedure
	Removed encode IEPBAS.		Throughout Procedure

Required Reviewers	Name
Emergency Plan 50.54(q) APPLIES	Lucia Sischo
Physical Security Plan 50.54(p)	DNA
Fire Protection 50.48(f)	DNA
50.59	DNA
72.48	DNA
Cyber Security APPLIES	Mike Chandler
Nuclear Oversight	DNA
Procedure Owner or designee	Lucia Sischo
Other Reviewers	
Third Party 50.54(q) Reviewer	Complete per L. Sischo
Security	John O'Dowd
Shift Manager (AR 1020-93717 only)	Jim Vrla
Security	Dave Piper
Approvers:	
Cognizant Supervisor	N/A for Revision
CFDM / Designee Final	Kelli Gallion-Sholler

Attachment 2

Report and Analysis Summary

**SAN ONOFRE NUCLEAR GENERATING STATION
REPORT AND ANALYSIS SUMMARY
10 CFR 50.54(q)(5) / 10 CFR 72.44(f)**

Document Number: EPP-2, Revision 1

Title: Emergency Preparedness Program Maintenance

Action Request #: 1020-93717

Change Description	Analysis Summary
<p>The 10CFR50.54(q) evaluation for EPP-2 Revision 1 is covered under AR 1020-93717 assignment 3. This revision includes:</p> <ul style="list-style-type: none"> • Revision of Holtec Multi-Purpose Canisters compensatory measure when performing evolutions that required the Vertical Ventilated Module lid removal. • Movement of Emergency Preparedness Training instructions from procedure ADM-30 to EPP-2. • Clarification of Emergency Response positions that required a Personnel Qualification Standard (PQS). • Correction of title from General Employee Training to ISFSI Plant Access Training. • Addition of designee for the Emergency Preparedness Manager. • Addition of 5054SE encode for the calendar two-year 10 CFR 50.54(q) and 10 CFR 72.44(f) training. • Correction of Qualification Manual IOEPQM frequency to Lifetime for Emergency Preparedness Staff. • Correction of the frequency for SDS Radiation Worker Training. • Addition of SDS Site Access Training to the Emergency Preparedness Training Program Curriculum. • Clarification that personnel qualified for ERP IO1 must meet ISFSI Shift Supervisor qualifications in accordance with ADM-30. • Addition of responsibility for the SONGS Manager, ISFSI. • Addition of responsibility for the Emergency Preparedness Manager. • Clarification of the term annual for Emergency Preparedness drills means within the calendar year. • Clarification to communicate changes to the Emergency Plan and Implementing Procedures to the Emergency Response Organization. • Removal of the need for Federal, State, and local government agencies to request an invitation to participate or observe schedule exercises. • Other editorial changes. 	<p>The changes do not contradict the licensing basis or the emergency plan content. The changes do not modify the licensing basis with regards to a reduction in effectiveness.</p> <p>When evolutions are performed with VVM lid removal, the compensatory measures in place will continue to meet the applicable regulatory requirements of 10 CFR 50.47(b)(4), 10CFR50 Appendix E Sections IV.B.1 and IV.B.2. The MPC activities will render one EAL E-HU1.2 component unavailable for a period of time for that specific MPC, but the compensatory measures taken will ensure that the intent of the EAL basis is sustained during the time and that the licensing basis with regards to meeting the regulatory requirements is maintained.</p> <p>Moving instructions from procedure ADM-30 to EPP-2 is an editorial change.</p> <p>Clarifying that only the ISFSI Shift Supervisor/Emergency Director and the Resource Manager positions require a PQS to complete qualification corrects a misleading statement by specifically listing which positions use a PQS.</p> <p>Correcting the title from General Employee Training to ISFSI Plant Access Training points to the specific training topic that contains the recurring Emergency Plan-related annual training. The Emergency Plan-related training content has not been changed.</p> <p>Adding a designee for the Emergency Preparedness Manager is consistent with other sections of the procedure.</p> <p>Adding 5054SE encode for the calendar two-year 10 CFR 50.54(q) and 10 CFR 72.44(f) staff training requirement, and correcting Qualification Manual IOEPQM frequency to Lifetime for Emergency Preparedness Staff, clarifies that 10 CFR 50.54(q) and 10 CFR 72.44(f) training is the training element that requires calendar two-year training.</p> <p>Correcting the frequency for SDS Radiation Worker Training incorporates a change that was inadvertently omitted during revision 0 of EPP-2.</p> <p>Adding SDS Site Access Training ensures individuals can access the site.</p> <p>Clarifying that personnel qualified for ERP IO1 must meet ISFSI Shift Supervisor qualifications ensures that Emergency Directors are ISFSI Shift Supervisor qualified, as indicated in the Emergency Plan.</p>

Adding responsibilities for the SONGS Manager, ISFSI, and the Emergency Preparedness Manager ensures alignment with the Emergency Plan.

Clarifying the term annual for Emergency Preparedness drills aligns them with the periodicity for Biennial Exercise and the Integrated Drill.

Clarifying the direction to communicate changes to the Emergency Plan and Implementing Procedures to the Emergency Response Organization ensures alignment with the Emergency Plan.

Proactively inviting Federal, State, and local government agencies to participate or observe scheduled exercises ensures consistency in the exercise preparation process.

The Emergency Plan maintains a standard emergency classification and action level scheme. The Emergency Plan ensures periodic exercises are conducted to evaluate major portions of emergency response capabilities and periodic drills are conducted to develop and maintain key skills. The Emergency Plan continues to provide radiological emergency response training for those who may be called on to assist in an emergency. The Emergency Plan establishes the responsibilities for plan development and review and for distribution of emergency plans, and ensures that planners are properly trained.

The Emergency Plan continues to meet the regulatory requirements of 10CFR50.47(b) and 10CFR50 Appendix E, as exempted. The capability and timeliness to perform the planning functions and elements related to the planning functions are maintained.

The changes can be implemented without prior NRC approval.

PREPARED BY: Lucia Sischo

DATE: 2-22-2021

REVIEWED BY: Kelli Sholler

DATE: 2-25-2021