

Nuclear Information and Records Management Transmittal

Procedure Number

EPIP-08

Revision #

003

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Document #	Critical Area	Control Custodian	Location	Paper	Quantity	Remarks	
EPIPS		00-000	C/SIM-A-PW-INV	PW	5	DD DELIVERY ONLY	
EPIPS		00-000	C/SIM-B-PW-INV	PW	5	DD DELIVERY ONLY	
EPIPS		00-000	NRC DOCUMENT CONTROL DESK	DOCUMENT CONTROL DESK, US NUCLEAR REGULATORY COMMISSION, MAIL STATION PI-37, WASHINGTON, DC 20555-0001	PW	1	SEND CERTIFIED MAIL ONLY!
EPIPS		00-000	NRC RIV ERC	USNRC REGION IV, ATTN.: E.W. MERSCHOFF, 611 RYAN PLAZA DRIVE, SUITE 400, ARLINGTON, TX 76011	PW	2	SEND CERTIFIED MAIL ONLY!
EPIPS		00-000	NRC RIV ERC	USNRC REGION IV, ATTN.: T.H. ANDREWS, 611 RYAN PLAZA DRIVE, SUITE 400, ARLINGTON, TX 76011	PW	2	SEND CERTIFIED MAIL ONLY!
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EPIPS		00-000	GOODWIN,A	Y/ARIZONA RADIATION REG AGENCY 4814 S 40TH ST PHX AZ 85040	PW	1	

Remarks

Quantity to be Reproduced	
PW 22	ST
54	

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For Questions Contact NIRM

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PROCEDURE INTENT

This procedure establishes guidelines for the following functions:

- Review, update, and approval of Emergency Plan Implementing Procedures, Joint Public Information Procedures, and the Emergency Plan, in accordance with 10 CFR 50.54(q)
- Development, conduct, evaluation, and documentation of emergency preparedness drills and exercises
- Instruction and testing of onsite and offsite Emergency Response Organization (ERO) personnel in the use of equipment, communications, plans, procedures, and management commitments
- Testing of equipment, communications, plans, procedures, and management commitments
- Response instructions for inadvertent siren system activation or other equipment malfunction
- Operational readiness and availability of equipment required for implementation of the PVNGS Emergency Plan
- Verify the adequacy of the PVNGS Emergency Plan, procedures, and effectiveness of both onsite and offsite emergency preparedness
- Document storage and retention requirements in accordance with ANSI N45.2.9-1974

Revision 3 incorporates the following changes:

- Revised section 10.3.2 to change training frequency from once per calendar year to every 12 months + 1 month, to be consistent with site training procedures.
- Revised section 10.5.1 to delete unnecessary detail related to annual retraining.
- Revised table in section 10.10 in 7 places to accurately describe current training program. Deleted two duplicate entries.
- Revised section 10.11.1 to delete the statement that periodic reviews may occur during weekly staff meetings.
- In Appendix A, put in the correct version of form EP-0541, deleted duplicate form EP-0701, added forms EP-0720, EP-0721, and EP-0752.

[Proprietary information on pages 40, 41, 43, 44, and 63]

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3**1.0 Introduction****1.1 Scope**

This procedure establishes guidelines for the following functions:

- Review, update, and approval of Emergency Plan Implementing Procedures, Joint Public Information Procedures, and the Emergency Plan, in accordance with 10 CFR 50.54(q)
- Development, conduct, evaluation, and documentation of emergency preparedness drills and exercises
- Instruction and testing of onsite and offsite Emergency Response Organization (ERO) personnel in the use of equipment, communications, plans, procedures, and management commitments
- Testing of equipment, communications, plans, procedures, and management commitments
- Response instructions for inadvertent siren system activation or other equipment malfunction
- Operational readiness and availability of reserves required for implementation of the PVNGS Emergency Plan through maintenance of equipment and supplies
- Verify the adequacy of the PVNGS Emergency Plan, procedures, and effectiveness of both onsite and offsite emergency preparedness
- Document storage and retention requirements in accordance with ANSI N45.2.9-1974

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3****1.2 Responsibilities**

Onshift Operations management is responsible for contacting Emergency Planning department when notified of a failure of the offsite siren system.

The Program Leader - Emergency Planning (or designee) shall be responsible for the coordination of the following activities:

- Review and approval of the PVNGS Emergency Plan, Emergency Plan Implementing Procedures, and Joint Public Information Procedures
- Assurance that 10 CFR 50.54(q) screening requirements have been completed prior to revision of the PVNGS Emergency Plan and/or the creation, revision, or cancellation of Emergency Plan Implementing Procedures or the Joint Public Information Procedures
- Appropriate development, review, approval, conduct, evaluation, and documentation of applicable emergency preparedness related tests, training drills, evaluated drills, and exercises
- Approval of objectives / extent-of-play regarding applicable drills and exercises in conjunction with offsite agencies, if applicable
- Submittal of evaluated exercise scenarios to the USNRC and FEMA when requested
- Verification that PVNGS Emergency Kits are maintained in a state of operational readiness and availability for emergency events
- As appropriate, participation of Emergency Planning staff members as Facility Advisors
- Fulfillment of emergency preparedness document and storage requirements in accordance with ANSI N45.2.9-1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants
- Fulfillment of emergency preparedness regulatory requirements

2.0 Procedure Review and Approval Limitations

2.1 The following elements identify the general limitations imposed by the procedure review and approval process:

- 2.1.1** 01DP-0AP01, Procedure Process, shall be used as a basis for the review and approval of Emergency Plan Implementing Procedures and Joint Public Information Procedures.

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- 2.1.2 Emergency Plan Implementing Procedures and Joint Public Information Procedures shall be reviewed and updated, if appropriate, biennially or more frequently if required by changing conditions.
- 2.1.3 The PVNGS Emergency Plan shall be reviewed annually and revised as necessary.
- 2.1.4 Written agreements listed in the PVNGS Emergency Plan shall be reviewed annually. This review shall normally be accomplished concurrently with the annual review of the PVNGS Emergency Plan.
- 2.1.5 Telephone numbers listed in the Telecommunications Technical Instruction shall be reviewed and updated, if appropriate, quarterly. Any changes required shall be initiated as soon as practicable following noted inconsistencies. Emergency Response Organization pager numbers, home phone numbers, work numbers, and station numbers should be reviewed and updated annually.

2.2 Screening Requirements

- 2.2.1 A 10 CFR 50.54(q) Screening per Section 3.0 of this procedure shall be completed for any of the following document actions prior to the document change:
 - 2.2.1.1 Revision to the PVNGS Emergency Plan
 - 2.2.1.2 Creation of Emergency Plan Implementing Procedures or Joint Public Information Procedures
 - 2.2.1.3 Revision to Emergency Plan Implementing Procedures or Joint Public Information Procedures
 - 2.2.1.4 Cancellation of Emergency Plan Implementing Procedures or Joint Public Information Procedures
- 2.2.2 Screening Basis
 - 2.2.2.1 Screenings are performed to determine if the respective Evaluations are required for the document change. Creation, revision, or cancellation made to Emergency Plan Implementing Procedures or Joint Public Information Procedures as a result of a PVNGS Emergency Plan revision do not require a second 10 CFR 50.54(q) Screening or Evaluation.

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3****2.2.3 Cross-Organization Reviews**

2.2.3.1 Emergency Planning shall address cross-organization review comments received from reviewing disciplines during procedure revisions. In addition, Joint Public Information Procedures shall be reviewed by the following personnel:

- Joint Emergency News Center Facility Coordinator
- Joint Emergency News Center State / County / PVNGS Spokespersons
- Rumor Control Group Supervisor
- PVNGS Strategic Communications

2.2.4 USNRC Document Submittals

2.2.4.1 Emergency Planning shall verify that one copy of a revised Emergency Plan or revised Emergency Plan Implementing Procedure has been submitted to the USNRC in accordance with 10 CFR 50 requirements.

2.2.5 Biennial Review Requirements

2.2.5.1 During biennial reviews (full basis check) or revisions, consider the following items:

- Deficiencies in training, procedures, personnel performance, and equipment identified during training sessions, drills, and exercises
- Changes to personnel assignments within onsite or offsite Emergency Response Organizations
- Changes to state or federal regulations or policies
- Recommendations from industry organizations or agencies
- Modifications to the plant or site area
- Changes to facilities
- Changes in operational status or construction impact
- Results of federal, state, industry, or internal audits
- Changes resulting from revisions to the PVNGS Emergency Plan or other procedures
- 10 CFR 50.59 Screening / Evaluation requirements

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3.0 10 CFR 50.54(q) Requirements**3.1 Abstract**

- 3.1.1** Per 10 CFR 50.54 (q): A licensee authorized to possess and operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards in 50.47(b) and the requirements in Appendix E of this part. A licensee authorized to possess and/or operate a research reactor or a fuel facility shall follow and maintain in effect emergency plans which meet the requirements in Appendix E to this part. The licensee shall retain the emergency plan and each change that decreases the effectiveness of the plan as a record until the Commission terminates the license for the nuclear power reactor. The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of 50.47(b) and the requirements of Appendix E to this part. The research reactor and/or the fuel facility licensee may make changes to these plans without Commission approval only if these changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the requirements of Appendix E to this part. This nuclear power reactor, research reactor, or fuel facility licensee shall retain a record of each change to the emergency plan made without prior Commission approval for a period of three years from the date of the change. Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission. The licensee shall submit, as specified in 50.4, a report of each proposed change for approval. If a change is made without approval, the licensee shall submit, as specified in 50.4, a report of each change within 30 days after the change is made. [21 FR 355, Jan. 19, 1956, as amended at 28 FR 3197, Apr. 3, 1963; 58 FR 45243, Aug. 27, 1993; 59 FR 5519, Feb. 7, 1994; 59 FR 10267, Mar. 4, 1994]

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3**3.2 Limitations**

3.2.1 A 10 CFR 50.54(q) Screening is performed to determine if a 10 CFR 50.54(q) Evaluation is required for the creation, revision, or cancellation. The Evaluation will be performed for all PVNGS Emergency Plan revisions and any document creation, revision, or cancellation requiring a revision to the PVNGS Emergency Plan. 10 CFR 50.54(q) Evaluations are conducted to verify that revisions to the PVNGS Emergency Plan maintain compliance with federal regulations and do not decrease its effectiveness. The following types of Plan and procedure revisions do not impact the effectiveness of the PVNGS Emergency Plan:

- Telephone number and/or staffing assignment changes
- Facility floor plan modifications
- Changes to equipment inventory requirements
- Format changes or typographical error corrections
- Modifications that do not alter the intent of the PVNGS Emergency Plan. Intent is altered if the accomplishment or its method changes in a significant manner relative to regulatory standards, requirements, guidance, or to commitments addressed in the existing revisions of the Plan or procedures. If the proposed revision or cancellation causes a decrease in the effectiveness of the PVNGS Emergency Plan, the revision or cancellation and associated justification must be submitted to the US Nuclear Regulatory Commission for approval prior to implementation.

3.3 Process

- 3.3.1** Obtain the following forms for use in the 10 CFR 50.54(q) Screening and Evaluation process:
- Form EP-0760, 10 CFR 50.54(Q) Screening (see Appendix A - Forms)
 - Form EP-0761, 10 CFR 50.54(Q) Evaluation (see Appendix A - Forms)
- 3.3.2** Complete Form EP-0760, 10 CFR 50.54(Q) Screening, and, if required, Form EP-0761, 10 CFR 50.54(Q) Evaluation (see Appendix A - Forms).
- 3.3.3** Submit completed form(s) to the Program Leader - Emergency Planning (or designee).

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4.0 Training Drills / Evaluated Drills / Exercises

4.1 Abstract

4.1.1 10 CFR 50.47 states, in part, "...Periodic exercises are conducted to evaluate major portions of emergency response capabilities, and periodic drills are conducted to develop and maintain key skills." Moreover, 10 CFR 50, Appendix E.IV.F, details the specific requirements for training of Emergency Response Organization personnel. To further elaborate on these requirements, the following three Emergency Planning event types shall be used accordingly as defined references:

4.1.1.1 A Training Drill is a supervised period of instruction. Controller / Participant interface, i.e., coaching, prompting, is allowed to enhance essential skills. No portion of this drill may be used to demonstrate compliance with periodic assessment requirements, i.e., objective related evaluation. Objectives are applied as performance measures and results are used as "lessons learned" in future training drills.

4.1.1.2 An Evaluated Drill is a measured assessment of a specified portion of emergency response capabilities. Controller / Participant interface, i.e., coaching, prompting, casual conversation, is not allowed. This drill may be used to demonstrate compliance with periodic assessment requirements, i.e., objective related evaluation.

4.1.1.3 An Exercise is a measured assessment of major portions of emergency response capabilities. Controller / Participant interface, i.e., coaching, prompting, casual conversation, is not allowed. This event type may be used to demonstrate compliance with periodic assessment requirements, i.e., objective related evaluation.

4.1.1.4 The performance of all three event types shall provide for critiqued feedback.

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3**4.1.2 Provisions of Implementation****4.1.2.1 The following provisions apply to all Emergency Planning drills and exercises:**

- All training drills, evaluated drills, and exercises should be scheduled and conducted to minimize conflicts with normal plant operations.
- If practicable, training drills, evaluated drills, and exercises should be scheduled in conjunction with applicable onsite / offsite response organizations and with the Licensed Operator Training Organization.
- Evaluated drills and exercise scenarios shall be developed in conjunction with participating response organizations. Scenario content should vary from exercise to exercise such that all major elements, i.e., Planning Standards, of the PVNGS Emergency Plan are tested within a six-year period.
- Objectives, the extent-of-play scheme, and the scenario for the biennial USNRC Evaluated Exercise shall be approved by the Program Leader - Emergency Planning (or designee) and submitted to the USNRC Regional Office and the Federal Emergency Management Agency within the time periods requested by those agencies prior to performance of the Evaluated Exercise.
- Communications capabilities shall be tested annually between PVNGS, federal and state emergency response organizations, and field assessment teams. These capabilities shall include notification aspects related to emergency response staffing. However, these tests may be performed in conjunction with an Evaluated Drill or Exercise and may be used to demonstrate compliance with periodic assessment requirements.

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3****4.1.3 Drill and Exercise Requirements****4.1.3.1 Evaluated drills and exercises shall incorporate the following aspects:**

- A Lead Controller will administer the Control Organization
- Players will be briefed on ground rules and safety considerations prior to commencement of the event
- Facility critiques will be conducted in accordance with 10 CFR 50 Appendix E.IV.F.2.g., i.e., "All training, including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction. Any weaknesses or deficiencies that are identified shall be corrected."
- Corrective actions shall be implemented to address negative findings (i.e., deficiencies and weaknesses) noted during performance of the drill or exercise

4.1.3.2 Evaluated drills and exercise scenario manuals include the following elements:

- The basic objective(s) and appropriate evaluation criteria
- Date(s), time period, place(s), and participating organizations
- Simulated events
- Time schedule of real and simulated initiating events
- A narrative summary describing the conduct of the exercise or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities

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4.1.4 Drill and Exercise Findings

4.1.4.1 Performance related issues resulting from the conduct of training drills shall be dispositioned in accordance with Emergency Response Organization training practices and requirements, e.g., remediation, critique, lessons learned, briefing. Findings identified during performance of evaluated drills and exercises shall be appropriately categorized comparable to USNRC methodology and shall conform to the following guidance:

- **Deficiencies will be identified in accordance with 10 CFR 50.54(s)(2)(ii) ["If after April 1, 1981, the NRC finds that the state of emergency preparedness does not provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency (including findings based on requirements of Appendix E, Section IV.D.3) and if the deficiencies (including deficiencies based on requirements of Appendix E, Section IV.D.3) are not corrected within four months of that finding, the Commission will determine whether the reactor shall be shut down until such deficiencies are remedied or whether other enforcement action is appropriate. In determining whether a shutdown or other enforcement action is appropriate, the Commission shall take into account, among other factors, whether the licensee can demonstrate to the Commission's satisfaction that the deficiencies in the plan are not significant for the plant in question, or that adequate interim compensating actions have been or will be taken promptly, or that there are other compelling reasons for continued operation."]. Deficiencies will generally correspond to findings in which the licensee's demonstrated state of emergency preparedness does not provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. Deficiencies can be identified due to one or more major emergency preparedness programmatic failures.**
- **Weaknesses will be identified as findings in which the licensee's demonstrated level of preparedness could have precluded effective implementation of the Emergency Plan in the event of an actual emergency. Weaknesses generally correspond to the inability to satisfy those objectives which relate to and are evaluated in accordance with regulatory criteria.**
- **Findings classified as strengths are exempt from categorization and need not be dispositioned.**

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3**4.1.5 Disposition of Findings**

4.1.5.1 The evaluation and tracking of all drill and exercise findings shall use the following process:

- 1.** Review all comments and objective evaluation forms (Controller Debrief).
- 2.** Screen all comments for validity.
- 3.** Identify the valid comments which satisfy CRDR thresholds and issue the appropriate CRDR(s) per 90DP-01P03, Condition Report Screening and Processing. Comments that individually satisfy a CRDR threshold should appropriately be entered into individual CRDRs. Those which do not may be grouped together on one Review CRDR.
- 4.** Provide feedback to the originator on the remaining comments, if requested.

4.2 Biennial Exercise Requirements

4.2.1 An exercise of the PVNGS Emergency Plan shall be conducted every two years and may be included in the biennial offsite plan exercise. Necessary actions shall be taken to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, at least one of which involves a combination of some of the principle functional areas of onsite emergency response capabilities. These functional areas include the following activities:

- Management and coordination of emergency response
- Accident assessment
- Protective action decision-making
- Plant system repair with corrective actions

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4.2.2 State and local government agencies located within the plume exposure pathway Emergency Planning Zone (EPZ) shall be offered the opportunity to participate in drills when requested by the agencies. Activation of all emergency response facilities is not necessary during these drills. The following aspects should be addressed:

- The opportunity for accident management strategies is afforded
- Supervised instruction is permitted
- The opportunity for operating staff to resolve problems (success paths) in lieu of Controller intervention is provided
- The focus of the drills is on training objectives

4.3 Biennial Exercise Criteria

4.3.1 The Biennial Evaluated Exercise must satisfy, as a minimum, all of the following seven criteria:

1. The exercise must be an exercise and not a drill. In an exercise, player performance is observed and noted by evaluators for critique purposes; there is no coaching by non-players.
2. The exercise involves major elements of the Emergency Plan. Most or all of the emergency response facilities (ERFs) are activated.
3. The exercise tests the integrated capability of the licensee to implement the Emergency Plan.
4. A unique scenario is developed for the exercise.
5. In addition to a Federal evaluation, the licensee performs a self-assessment of the exercise. A critique is conducted to identify strengths and weaknesses. Corrective actions are developed and implemented to address identified weaknesses.
6. State and local organizations are offered the opportunity to participate in the exercise.
7. Utility documentation of the exercise and how it met these criteria must be available for examination by USNRC inspectors.

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4.4 Training Drill / Evaluated Drill / Exercise Frequency Requirements

4.4.1 Training Drills

4.4.1.1 Facility: not required - scheduled per Simulator / classroom / personnel availability or as needs arise based on performance history or procedure and duty responsibility familiarization

4.4.1.2 Table-top: not required - scheduled per availability of personnel and resources based on performance history or procedure and duty responsibility familiarization

4.4.2 Evaluated Drills

4.4.2.1 Assembly: 6-year - performed in conjunction with Security personnel - involves Accountability activities

4.4.2.2 Radiological Monitoring: annual - environmental drill involving onsite soil / vegetation deposition sampling

4.4.2.3 Full-Scale: biennial - scheduled in years between Evaluated Exercises per Simulator / classroom / personnel availability or as needs arise based on performance history or procedure and duty responsibility familiarization

4.4.2.4 Health Physics: semi-annual - can be performed in conjunction with the Biennial Exercise or Full-Scale Drill - both of the following per calendar year, one in each half:

- PASS: satisfies liquid sampling requirements
- Radiological: satisfies airborne sampling requirements - performed with onsite / offsite survey teams

4.4.2.5 Medical: annual - conducted with offsite medical and transportation facilities - involves care of contaminated injured individuals

4.4.3 Exercises

4.4.3.1 Evaluated: biennial - scheduled per availability of the Simulator and plant personnel in conjunction with federal, state, and county authorities - evaluated by Federal agencies and self-assessment audit teams - must satisfy the seven criteria delineated in Section 4, Provisions of Implementation, of this document - documentation of actual events may be used in lieu of Exercise performance based on request to NRR with subsequent approval

4.4.3.2 IPZ: 6-year - ingestion pathway involving offsite agency response - full-scope 2-day event

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3**4.5 Scenario Development**

- 4.5.1** 84DP-0RM32, Handling of Proprietary, Confidential, and Company Confidential Information, controls confidentiality requirements for drill and exercise data and material. These requirements become void following performance of the applicable drill or exercise to which they pertain.
- 4.5.2** Scenario development data and/or material shall not be maintained on a shared server or workstation when that data or material is controlled by 84DP-0RM32, Handling of Proprietary, Confidential, and Company Confidential Information. The maintenance of scenario development data and/or material should occur on personal computers configured with CMOS boot password protection when equipped with fixed and/or removal storage media. It is the responsibility of the data developer to ensure no compromise or potential compromise of the data exists.
- 4.5.3** Scenario development personnel or individuals engaged in support of scenario development should read, sign, and date Form EP-0774, Scenario Development Data Confidentiality (see Appendix A - Forms), prior to initial exposure and/or access to confidential data and/or materials. As required, completed forms shall be stored and maintained in accordance with the Emergency Planning Document Storage and Retention requirements as specified in Emergency Planning administration guidance.
- 4.5.4** The list of objectives upon which to base scenario actions shall be extracted from the Master List of Emergency Planning Objectives. Objectives shall be demonstrated within the applicable time periods as specified.
- 4.5.5** The PVNGS Emergency Planning Controller Training and Information Manual should be reviewed by all Controllers prior to a major drill or exercise.
- 4.5.6** Collaboration with state and county personnel during the Full-Scale Drill and Evaluated Exercise development process should be employed when feasible.
- 4.5.7** Lead times may be required for certain aspects of scenario data development and should be taken into consideration during the development process.
- 4.5.8** The scenario development process routinely involves joint participation of many onsite and offsite departments and organizations. It is imperative that those departments and organizations identified as vital to the process be contacted as soon as possible. As required, individuals from these organizations should be employed as Scenario Task Force (STF) members.
- 4.5.9** Training sessions and briefings to organization participants should be conducted, as required, in accordance with Federal regulations and/or management needs.

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4.6 External Organizational Support

4.6.1 The amount and type of external organizational support required for the production of technically accurate and complete scenario support data varies with each drill and exercise. For this reason, it is essential that early formation of the Scenario Task Force occur to provide the adequate time and resources necessary for the amount and type of support needed. Each aspect of the scenario should be reviewed in detail by the STF as soon as possible to help determine which onsite and offsite organizational abilities will be required for the remainder of the development cycle. Additionally, the onsite and offsite support organizations required for drill and exercise development support should not be limited to those directly affected by postulated scenario actions. If data development is required to support other actions contained in the scenario, the organizational expertise should be solicited. This support data will be used to establish a basis for the scenario actions which require justification.

4.6.2 Typical organizational support required for scenario data development includes, but is not limited to, operational, radiochemistry, radiological (e.g., plume exposure pathway, ingestion exposure pathway, radiation, contamination, etc.) reactor physics, meteorological, hazardous chemical, fire related, medical, mechanical, electrical, communications, law enforcement, governmental, and training. These, and others, should always be reviewed for applicability early in the scenario development process.

4.6.3 The methodology used by the STF to employ external organizational support will vary with the requirements of the data. The following organizational support areas are routinely used for all major drill and exercise development projects and, as such, should always be represented on the STF membership:

- Operational
- Operations training
- Radiochemistry
- Radiological
- Meteorological
- Governmental

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4.6.4 The following organizations should provide concurrence of the scenario:

- PVNGS Operations
- PVNGS Licensed Operator Training
- PVNGS Radiation Protection
- Arizona Division of Emergency Management (ADEM)

4.7 The following PVNGS Emergency Planning forms (see Appendix A - Forms), or their equivalent, should be used as required during the drill or exercise development process:

- EP-0770, Full-Scale Drill / Exercise Checklist (see Appendix A - Forms)
- EP-0773, Training Drill Checklist (see Appendix A - Forms)
- EP-0774, Scenario Development Data Confidentiality (see Appendix A - Forms)

4.8 Form EP-0770, Full-Scale Drill / Exercise Checklist (see Appendix A - Forms), should be used for Full-Scale Drill and Evaluated Exercise development projects. Though the sequence of timeline activities associated with each drill and exercise may vary slightly, the form represents a sequenced timeline of events which should occur in the approximate order listed on the form.

4.9 Form EP-0773, Training Drill Checklist (see Appendix A - Forms), should be used for Emergency Response Organization (ERO) training sessions or mini-drills involving partial or full activation of onsite emergency response facilities. These sessions typically continue for 2 to 3 hours.

4.10 Form EP-0774, Scenario Development Data Confidentiality (see Appendix A - Forms), should be employed for scenario development personnel or individuals engaged in support of Full-Scale Drill and Evaluated Exercise scenario development. Its use is optional for training session and mini-drill scenario development.

4.11 For Full-Scale Drill and/or Evaluated Exercise development, complete Forms EP-0770, Full-Scale Drill / Exercise Checklist, and EP-0774, Scenario Development Data Confidentiality (see Appendix A - Forms), as required.

4.12 For Emergency Response Organization (ERO) training sessions or mini-drills involving partial or full activation of onsite emergency response facilities, complete Form EP-0773, Training Drill Checklist, as required. Completion of Form EP-0774, Scenario Development Data Confidentiality, is optional (see Appendix A - Forms).

4.13 Collect completed Forms EP-0774 (see Appendix A - Forms), Scenario Development Data Confidentiality, and maintain in accordance with the Emergency Planning Document Storage and Retention requirements specified in Emergency Planning administration guidance.

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5.0 Equipment Testing

5.1 Overview

5.1.1 Equipment testing should be scheduled and conducted to minimize conflicts with normal plant operations.

5.1.2 Communications Equipment Testing

5.1.2.1 ERDS: quarterly - scheduled for eleventh week of each calendar quarter - involves Control Room link verification to USNRC Operations Center from each PVNGS Unit

5.1.2.2 NAN: monthly - tested by Operations - failures reported to Emergency Planning

5.1.2.3 Department State / County: quarterly - communications links tested by Emergency Planning Department

5.1.2.4 USNRC: monthly - tested by Emergency Planning Department from Unit Control Rooms, TSC, and EOF - failures reported to USNRC Operations Center

5.1.3 Offsite Siren Warning System Testing

5.1.3.1 Activation: annual - conducted by Arizona Division of Emergency Management (ADEM) - APS Communications and Construction and Emergency Planning participate - malfunctions reported to APS Communications and Construction - Emergency Planning prepares / submits report to ADEM, who forwards to Federal Emergency Management Agency (FEMA)

5.1.3.2 Growl: quarterly - conducted by APS Communications and Construction - Emergency Planning notified of test scope and schedule - test results / failures reported to Emergency Planning

5.1.3.3 Silent: monthly - conducted by Maricopa County Department of Emergency Management (MCDEM), Maricopa County Sheriff's Office (MCSO), and Arizona Department of Public Safety (DPS) - test results / failures reported to Emergency Planning

5.1.4 Uninterruptible Power Supply Testing

5.1.4.1 Dose Assessment: quarterly - tested for UPS-equipped dose assessment computers - test conducted by Emergency Planning

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5.2 Notification Alert Network Testing

- 5.2.1** The Notification Alert Network (NAN) is comprised of a dedicated telephone and a radio network used to notify offsite agencies (state and county) of the declaration of any emergency classification by PVNGS personnel. Capabilities to notify offsite agencies of an emergency event at PVNGS within 15 minutes of declaring an emergency classification is required by 10 CFR 50 APP E.IV.D.3 ["A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. The licensee shall demonstrate that the State/local officials have the capability to make a public notification decision promptly on being informed by the licensee of an emergency condition. By February 1, 1982, each nuclear power reactor licensee shall demonstrate that administrative and physical means have been established for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ. The four-month period in 10 CFR 50.54(s)(2) for the correction of emergency plan deficiencies shall not apply to the initial installation of this public notification system that is required by February 1, 1982. The four-month period will apply to correction of deficiencies identified during the initial installation and testing of the prompt public notification systems as well as those deficiencies discovered thereafter. The design objective of the prompt public notification system shall be to have the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes. The use of this notification capability will range from immediate notification of the public (within 15 minutes of the time that State and local officials are notified that a situation exists requiring urgent action) to the more likely events where there is substantial time available for the State and local governmental officials to make a judgment whether or not to activate the public notification system. Where there is a decision to activate the notification system, the State and local officials will determine whether to activate the entire notification system simultaneously or in a graduated or staged manner. The responsibility for activating such a public notification system shall remain with the appropriate governmental authorities."].
- 5.2.2** Testing of the Notification Alert Network should be consistently performed on the same day each week to facilitate Test Performance Schedule compliance.
- 5.2.3** Each Unit shall perform the NAN Primary Circuit Test at least once per month. The NAN Primary Circuit Test shall rotate through a specified Unit each calendar week (different Unit each week) and this rotation is reserved for the first 3 weeks of each month. The NAN Radio Backup Test shall rotate through all 3 Units each calendar quarter and is reserved for week 4 of each month (different Unit each month). No testing will be conducted in week 5 of a calendar month.
- 5.2.4** Test performance should be alternated between Day Shift and Night Shift per the Test Performance Schedule. Day Shift testing should be avoided between the hours of 1100 and 1300.

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- 5.2.5 Meteorological information is obtained from ERFDADS by selecting "TOP MENU" located at the lower left corner of the display, then selecting "P&ID DISPLAYS", and then selecting "MET DATA." If ERFDADS is inoperable, meteorological information required on Form EP-0541, Palo Verde NAN Emergency Message (see Appendix A - Forms), should be estimated by Operations Supervision and entered on the form appropriately.
- 5.2.6 During performance of the NAN Primary Circuit Test or the NAN Radio Backup Test, complete the "Date / Time / Initials" columns for those agencies contacted. (Certain agencies may not respond on backshifts or weekends.)
- 5.2.7 If one or more of the responding agencies does not acknowledge following Sheriff's Office readback and acknowledgement roll call, contact agency via Alternate Link listed on Form EP-0541, Palo Verde NAN Emergency Message form (see Appendix A - Forms).
- 5.2.8 For test performance using the NAN Radio Backup, the radio located in the Unit Control Room or the Satellite Technical Support Center can be used.
- 5.2.9 White Authenticator Code envelopes shall be used for the tests. (Do not use the colored envelopes.) Each envelope is dated for the month designating its use and each Authenticator Code within an envelope shall be used for one calendar month. When a calendar month has elapsed and all testing has been completed for that specified month, the designated Authenticator Code may be discarded.
- 5.2.10 All NAN tests shall be documented on Form EP-0740, NAN Communications Test (see Appendix A - Forms). The form should be completed by the individual performing the test and forwarded to Emergency Planning, Mail Station 6050.
- 5.2.11 If one or more of the responding agencies does not acknowledge following Sheriff's Office readback and acknowledgement roll call during performance of the NAN Primary Circuit Test or the NAN Radio Backup Test, contact Emergency Planning on their next scheduled work day. Telecommunications equipment malfunctions shall be documented on a Work Request to MCC at Mail Station 6305.
- 5.2.12 **Completing the form**
- 5.2.12.1 Obtain the white Authenticator Code envelope for the current month from the wall key box in the Shift Supervisor's office and remove the code from the envelope. (Do not use an Authenticator Code in a colored envelope.)
- 5.2.12.2 Obtain Form EP-0541, Palo Verde NAN Emergency Message (see Appendix A - Forms).

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NOTE

Do not complete Step 2 of the form at this time.

5.2.12.3 Complete Steps 1, 4, and 6 of the form. (Use ERFDADS to obtain meteorological information required for Step 4 on the form. If ERFDADS is inoperable, Control Room Supervision should estimate the data and enter it on the form.)

5.2.12.4 Request Control Room Supervision to complete Steps 3 and 5 of the form using the following information:

- Step 3: Circle UNUSUAL EVENT, enter Unit, current time, and current date, and enter PVNGS Emergency Status Code 2-1.
- Step 5: Circle NO Radioactive Release, and check "There are no Protective Actions Required."

5.2.12.5 Request Control Room Supervision to review and sign the form.

5.2.13 Determining the system to test

5.2.13.1 Determine the appropriate "SYSTEM TO TEST" per the Test Performance Schedule in Section 5.2.16 of this document.

5.2.13.2 Proceed to the appropriate test block in this document per the following:

- For NAN Primary Circuit Test, go to Section 5.2.14 of this document.
- For NAN Radio Backup Test, go to Section 5.2.15 of this document.

5.2.14 Conducting the NAN Primary Circuit Test

5.2.14.1 Pick up the receiver on the NAN phone, push the red button for 5 seconds, and record the time in Step 2 of the form. Allow 30 seconds for all stations to access the phone.

5.2.14.2 Announce the following message:

"STAND BY FOR WARNING-POINT ROLL CALL. ALL STATIONS OBTAIN COPY OF PALO VERDE NAN EMERGENCY MESSAGE FORM."

Repeat message once.

5.2.14.3 Announce each NAN agency name and have each agency acknowledge prior to announcing the next agency name.

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5.2.14.4 When all agencies have acknowledged, read aloud Steps 1-6 on Form EP-0541, Palo Verde NAN Emergency Message (see Appendix A - Forms).

5.2.14.5 Announce the following message:

"STAND BY FOR ACKNOWLEDGMENT ROLL CALL. DID YOU COPY?"

Call out NAN agency name. Ensure each agency acknowledges their copy. Allow time for the Sheriff's Office to repeat back the entire message prior to other agencies' acknowledgment. If an agency indicates "DOES NOT COPY", clarify the message and resume the roll call when the agency does copy.

5.2.14.6 When all agencies acknowledge receipt of the message, announce the following message:

"END OF MESSAGE."

5.2.14.7 Hang up the NAN Primary Circuit Telephone.

5.2.14.8 If one or more of the responding agencies does not acknowledge following Sheriff's Office readback and acknowledgement roll call, note as "unsat" on Form EP-0740, NAN Communications Test form (see Appendix A - Forms), contact agency via Alternate Link listed on Form EP-0541, Palo Verde NAN Emergency Message form (see Appendix A - Forms), and document results under "COMMENTS."

5.2.14.9 Inform Control Room Supervision that the NAN Primary Circuit Test has been completed.

5.2.14.10 Complete Form EP-0740, NAN Communications Test (see Appendix A - Forms), and forward the form to Emergency Planning, Mail Station 6050.

5.2.15 Conducting the NAN Radio Backup Test

5.2.15.1 Using the NAN Radio Backup in the Satellite Technical Support Center (preferred) or in the Control Room, press the "Mode" button until the display indicates "NANB/U 18". (An alternate method to reach this status is to press the "Home" button until the unit audibly beeps. Then enter 18 on the key pad and press the "Sel" key.)

5.2.15.2 Press the "Page" button.

5.2.15.3 Press the "Mode" button until the display indicates "GOVT AGENCY". (The display will alternate between "GOVT AGENCY" and "ID - 755867".)

5.2.15.4 Press the "Sel" button. This action sends a page to all government agencies offsite.

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- 5.2.15.5 Wait for the 4-beep acknowledgment signal. This action indicates that offsite desk sets have acknowledged the page.
- 5.2.15.6 Press "Home" to return the display to "NANB/U 18".
- 5.2.15.7 Record the time in Step 2 of the form.
- 5.2.15.8 Key the radio microphone and announce the following message:

"ALL STATIONS THIS NET, ALL STATIONS THIS NET. THIS IS PALO VERDE TO ALL STATIONS. STAND BY FOR WARNING-POINT ROLL CALL. ALL STATIONS OBTAIN COPY OF PALO VERDE NAN EMERGENCY MESSAGE FORM."
- 5.2.15.9 After a 30-second waiting period, repeat the preceding message.
- 5.2.15.10 Announce each NAN agency name and have each agency acknowledge prior to announcing the next agency name.
- 5.2.15.11 When all agencies have acknowledged, read aloud Steps 1-6 on Form EP-0541, Palo Verde NAN Emergency Message (see Appendix A - Forms).
- 5.2.15.12 Announce the following message: "STAND BY FOR ACKNOWLEDGMENT ROLL CALL. DID YOU COPY?"

Call out NAN agency name. Ensure each agency acknowledges their copy. Allow time for the Sheriff's Office to repeat back the entire message prior to other agencies' acknowledgment. If an agency indicates "DOES NOT COPY", clarify the message and resume the roll call when the agency does copy.

NOTE

State the current time in the current time field using the 24-hour scheme.

- 5.2.15.13 When all agencies acknowledge receipt of the message, announce the following message:

"STATION CLEAR AT (current time). PALO VERDE OFF."
- 5.2.15.14 Inform Control Room Supervision that the NAN Radio Backup Test has been completed.
- 5.2.15.15 Complete Form EP-0740, NAN Communications Test (see Appendix A - Forms), and forward the form to Emergency Planning, Mail Station 6050.

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5.2.16 Test Performance Schedule

<u>MONTH</u>	<u>WEEK</u>	<u>SHIFT</u>	<u>UNIT</u>	<u>SYSTEM TO TEST</u>
JAN, JUL	1	Day	1	NAN Primary Circuit
	2	Night	2	NAN Primary Circuit
	3	Day	3	NAN Primary Circuit
	4	Night	1	NAN Radio Backup
FEB, AUG	1	Night	1	NAN Primary Circuit
	2	Day	2	NAN Primary Circuit
	3	Night	3	NAN Primary Circuit
	4	Day	2	NAN Radio Backup
MAR, SEP	1	Day	1	NAN Primary Circuit
	2	Night	2	NAN Primary Circuit
	3	Day	3	NAN Primary Circuit
	4	Night	3	NAN Radio Backup
APR, OCT	1	Night	1	NAN Primary Circuit
	2	Day	2	NAN Primary Circuit
	3	Night	3	NAN Primary Circuit
	4	Day	1	NAN Radio Backup
MAY, NOV	1	Day	1	NAN Primary Circuit
	2	Night	2	NAN Primary Circuit
	3	Day	3	NAN Primary Circuit
	4	Night	2	NAN Radio Backup
JUN, DEC	1	Night	1	NAN Primary Circuit
	2	Day	2	NAN Primary Circuit
	3	Night	3	NAN Primary Circuit
	4	Day	3	NAN Radio Backup

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3**6.0 Offsite Siren System Activation Testing**

- 6.1 This section provides direction for performing the following task(s):
- Conducting the Silent Test
 - Conducting the Growl Test
 - Conducting the Activation Test
- 6.2 The Silent and Growl Tests are performed on a routine basis by organizations other than PVNGS Emergency Planning. The annual Activation Test is administered and coordinated by PVNGS Emergency Planning.
- 6.3 Within the scope of this guidance, the Program Leader - Emergency Planning, maintains the following responsibilities:
- Approval of the siren testing schedule
 - Coordination, evaluation, and documentation of the siren tests
 - Coordination of planning / scheduling for the annual Activation Test
 - Ensuring appropriate corrective actions are designated to resolve deficiencies identified in the Silent and annual Activation Tests.
- 6.4 All siren tests are scheduled and conducted in a manner which satisfies the requirements of 10 CFR 50 - Appendix E and NUREG-0654. All tests shall be documented on pertinent forms and require no preliminary scenario outlines or Controller evaluation.
- 6.5 Conducting the Silent Test
- 6.5.1 This test is conducted by the Maricopa County Division of Emergency Management (MCDEM), the Maricopa County Sheriff's Office (MCSO), and the Arizona Division of Public Safety (DPS). The testing procedures are outlined in the INTRAC 2000 Controller Maintenance Procedure, which is updated and maintained by ADEM and MCDEM.
- 6.5.2 Ensure the test has occurred in accordance with scheduled activities.
- 6.5.3 Ensure test results are forwarded to PVNGS Emergency Planning.
- 6.5.4 If appropriate, report any test failures or anomalies to the Program Leader - Emergency Planning as soon as possible following the test.

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3****6.6 Conducting the Growl Test**

- 6.6.1 This test is conducted by APS Communications Systems personnel. The testing procedures are outlined in the Quarterly Maintenance Procedures maintained by APS Communications Systems.
- 6.6.2 Ensure PVNGS Emergency Planning has received notification by APS Communications Systems of the scope / time of the test.
- 6.6.3 Ensure the test has occurred in accordance with scheduled activities.
- 6.6.4 Ensure test results are forwarded to PVNGS Emergency Planning.
- 6.6.5 If appropriate, report any test failures or anomalies to the Program Leader - Emergency Planning as soon as possible following the test.
- 6.6.6 Ensure PVNGS Emergency Planning has received the completed Quarterly Growl Testing Form from APS Communications Systems for inclusion into the quarterly report forwarded to the Arizona Division of Emergency Management.

6.7 Conducting the Activation Test

- 6.7.1 This test is conducted by the Arizona Division of Emergency Management and is directed, supported, and coordinated by PVNGS Emergency Planning and APS Communications Systems. The Arizona Division of Emergency Management and the Maricopa County Division of Emergency Management may recruit volunteers to observe and independently verify siren operation during the activation test.
- 6.7.2 Ensure preliminary items on Form EP-0752, Offsite Siren Activation Planning (see Appendix A - Forms), have been completed.
- 6.7.3 Ensure that the Arizona Division of Emergency Management has dispatched the Communications Command Post to PVNGS and has established appropriate Radio Net Control operations at the site.
- 6.7.4 On the scheduled testing day, assemble all volunteers and provide them a briefing on siren testing activities planned by the organizations involved.
- 6.7.5 When volunteers have been briefed, assign siren testing locations to each and dispatch the teams to their assigned locations.
- 6.7.6 When on location, ensure each volunteer contacts Net Control to report their status and readiness for testing activities to initiate.
- 6.7.7 Ensure that Maricopa County Division of Emergency Management has initiated a countdown and that testing has commenced.
- 6.7.8 Ensure that all failures or anomalies are reported by the volunteers to Net Control after the initial test.

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- 6.7.9 Ensure that a second countdown and siren activation has been initiated by MCSO or DPS from a designated alternate location.
- 6.7.10 Ensure that all failures or anomalies are reported by the volunteers to Net Control after the second test.
- 6.7.11 Ensure that team leaders have directed all volunteers to return to the designated assembly area after completion of both tests.
- 6.7.12 Instruct all volunteers to complete Form EP-0753, Offsite Siren Activation Verification, and convey them to a team leader.
- 6.7.13 Ensure Net Control has notified all activation locations of test completion.
- 6.7.14 Report all siren malfunctions to APS Communications Systems.
- 6.7.15 If appropriate, report any test failures or anomalies to the Program Leader - Emergency Planning as soon as possible following the test.
- 6.7.16 Ensure APS Communications Systems initiates monitoring and tracking actions via the INTRAC 2000 print report for any malfunctions. This system interrogates the EPZ sirens twice daily at 0600 and 1800 for operational status.
- 6.7.17 Ensure all reported malfunctioning sirens have been retested within two working days following their repair.
- 6.7.18 If an extended siren outage occurs, notify the Maricopa County Sheriff's Office for alternate required actions.
- 6.7.19 Prepare and submit a Quarterly and an Annual Report to the Arizona Division of Emergency Management.
- 6.7.20 Ensure that the Arizona Division of Emergency Management submits a report to the Federal Emergency Management Agency describing the results of the Annual Siren Activation Test.

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3**7.0 Emergency Kit Maintenance****7.1 Inventory Requirements**

- 7.1.1** Emergency Kits shall be inventoried immediately following any event which breaches the integrity of the kit, i.e., designating equipment usage, or each calendar quarter, whichever is most limiting. NATM Procedures contained in the ERO Position Manuals are maintained current by Nuclear Information Records Management (NIRM) personnel, but shall be inventoried in conjunction with the Emergency Kit to ensure all NATM Procedures are of current issue. Equipment shall not be substituted unless specifically approved by the Program Leader - Emergency Planning (or designee).

7.2 Calibration and Instrument Checks

- 7.2.1** Emergency Plan Dose / Dose Rate equipment is calibrated on a 6-month cycle. Air sampling equipment is calibrated annually. Replacement of this equipment shall occur prior to the next calibration due date shown on each item. Equipment used in an emergency event must be returned to the calibration facility for calibration and required maintenance, if necessary. However, sufficient reserves of required instrumentation / equipment shall be available to replace those which are removed for calibration or repair. Operational checks of radiation survey and monitoring instrumentation shall be performed at quarterly inventory intervals. The operational checks shall include the radiological check source test and the internal battery test, if so equipped. Check source tests will also be performed on instrumentation during an emergency event.

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3**7.3 Kit Inventory Process**

7.3.1 The following Emergency Kits shall be inventoried immediately following use or each calendar quarter, whichever is most limiting:

- 2 - Ambulance (Fire Department / Medical Center)
- 1 - Backup Emergency Operations Facility
- 1 - Emergency Operations Facility
- 1 - Offsite Decontamination (Buckeye Airport)
- 2 - Offsite Hospitals (Good Samaritan / Maryvale)
- 3 - Operations Support Center (1 per Unit)
- 3 - Radiological Field Assessment Team Vehicles (maintained in Building E)
- 4 - Satellite Technical Support Center (1 per Unit and Simulator-A)
- 1 - Site Medical Center (Building F)
- 2 - Soil Sampling (maintained in Building E)
- 1 - Technical Support Center

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3**7.3.2 Noteworthy Items**

- 7.3.2.1** All Emergency Kits should have a seal affixed at the access point to the kit. For kits employing a locking device, e.g., padlock, at the access point, a kit seal should be installed in addition to the locking device to maintain positive access control for Emergency Kit inventory purposes.
- 7.3.2.2** Ensure that the Silver Zeolite (AgX) cartridges are maintained in an airtight wrap. Any cartridges found otherwise should be replaced.
- 7.3.2.3** Operational and battery checks should be performed on instrumentation employing that capability quarterly and prior to each use. Operational checks may be performed using the check sources in the kits. Ensure that all instrumentation is returned to the as-found condition after all checks have been performed and after each use. Spare batteries may be checked on a periodic basis using the battery tester included in some kits.
- 7.3.2.4** Out-of-calibration, expired, or missing required equipment or dosimetry should be replaced as soon as possible, preferably the same day of discovery. All other materials found deficient should be replaced within 5 days. ROS or other documentation used for solicitation should be attached to the inventory form if the deficient materials cannot be replaced within 5 days.
- 7.3.2.5** Perishable items maintained in the Buckeye Airport Emergency Kit should be replaced as the need arises, due to severe weather extremes placed upon them.
- 7.3.2.6** TLDs should not be stored in close proximity to the emergency kit check source.
- 7.3.2.7** Respirators do not possess expiration or due dates which require replacement by the individual performing the kit inventory. However, certain types of supplies stored in the Emergency Kit are classified as perishable and, as such, incorporate expiration dates affixed to them. When performing the inventory, the most limiting expiration date of all like supplies should be appropriately noted in the right column of the form.

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7.3.2.8 Not all Emergency Kits / facilities contain ERO Position Manuals. For those that do, the current NATM Station Manual Index and the current Position Manual Cross-Reference should be used as a guide when the ERO Position Manual procedures, instructional guides, and forms are verified for accuracy. To be verified as acceptable, a given ERO Position Manual must contain current NATM Station Manual Procedures as specified in the current NATM Station Manual Index and current forms as specified on the appropriate Position Manual Cross-Reference page located behind the "Document Index" Tab in each ERO Position Manual. Ensure that the minimum required number of each document is available in each ERO Position Manual.

7.3.2.9 A "Check Box" Column is available on all inventory forms to aid as a place-keeper for the individual performing the inventory and does not signify that an acceptable quantity for the applicable item exists. The performer's signature toward the bottom of the form is used as documentation for inventory requirements.

7.3.2.10 Prior to inventory, ensure the following items are available:

- A copy of this document
- The inventory form appropriate for the Emergency Kit
- Several Emergency Kit seals
- Replacement materials, if required
- Emergency Kit locker keys, if required
- Replacement radiological instrumentation, if appropriate
- A copy of the current Position Manual Cross-Reference

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7.3.3 Emergency Kits and Forms

7.3.3.1 Refer to the following list to determine which inventory form is appropriate as a record for each Emergency Kit (see Appendix A - Forms):

Emergency Kit	Form
• Ambulance (Fire Department)	EP-0701
• Ambulance (Medical)	EP-0702
• Backup EOF (APS Buckeye Office)	EP-0721
• Emergency Operations Facility	EP-0703
• Offsite Decontamination (Buckeye Airport)	EP-0704
• Offsite Hospital (Good Samaritan)	EP-0706
• Offsite Hospital (Maryvale)	EP-0707
• Operations Support Center (Unit 1)	EP-0708
• Operations Support Center (Unit 2)	EP-0709
• Operations Support Center (Unit 3)	EP-0710
• RFAT Vehicle #1 (maintained in Building E)	EP-0711
• RFAT Vehicle #2 (maintained in Building E)	EP-0712
• RFAT Vehicle #3 (maintained in Building E)	EP-0713
• Satellite Technical Support Center (Unit 1)	EP-0714
• Satellite Technical Support Center (Unit 2)	EP-0715
• Satellite Technical Support Center (Unit 3)	EP-0716
• Satellite Technical Support Center (Simulator-A)	EP-0717
• Site Medical Center (Building F)	EP-0718
• Soil Sampling (maintained in Building E)	EP-0719
• Technical Support Center	EP-0720

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3**7.3.4 Performing an Emergency Kit Inventory**

- 7.3.4.1 Upon arrival at the kit location, inspect the area surrounding the kit and correct any discrepancies associated with kit accessibility.
- 7.3.4.2 Complete the top line and the VERIFICATION Section of the form.
- 7.3.4.3 Inventory the appropriate ERO Position Manuals (if applicable), correcting any discrepancies found.
- 7.3.4.4 Remove the Emergency Kit seal and access the kit.
- 7.3.4.5 Compare the contents of the kit with the inventory requirements stated on the applicable Emergency Kit Form. Complete the applicable entries in the RECORD Section of the form.
- 7.3.4.6 Review the Noteworthy Items in Section 7.3.2 of this document to ensure that all problems encountered are dispositioned appropriately.
- 7.3.4.7 When the inventory is completed, sign and date the form at the bottom.
- 7.3.4.8 Ensure that the completed Emergency Kit Form is submitted to the Program Leader - Emergency Planning for review (signature).

8.0 Document Storage and Retention Requirements

- 8.1 The requirements of ANSI N45.2.9-1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants, apply to the work of any individual or organization that participates in collection, storage, or maintenance of quality assurance records associated with nuclear power plants. The requirements are intended to assure that records are available when needed for their intended purpose. Quality related records will be processed in accordance with 84DP-0RM30, Record Turnover Control.

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8.2 The following tables are used to determine Emergency Planning document storage and retention requirements. ERO Position Walkthrough status is also available via the Training Records Management System (TRMS).

QUALITY RELATED LIFETIME RETENTION		
Document Type	EP Fire-proof Files	NIRM (w/i 120 days)
EP-0300 (Exposure Authorization)		X
EP-0503 (KI Distribution)		X
ERO Position Walkthrough		X
Onsite Training		X

NON QUALITY RELATED 3-YEAR RETENTION		
Document Type	EP Fire-proof Files	NIRM (w/i 120 days)
Declared Event	X	
EP-0013 (Duty Contact Register)	X	
EP-0742 (Quarterly Communications Test)		X
Evaluated Drill Report		X
Exercise Report		X
EP-0701 - EP-0720 (E-Kit Inventory)		X

QUALITY RELATED 5-YEAR RETENTION		
Document Type	EP Fire-proof Files	NIRM (w/i 120 days)
EP-0772 (Exer Participant Briefing Checklist)	X	
Offsite Training (non-Palo Verde)	X	

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3**9.0 Emergency Planning Equipment Malfunction**

9.1 The Program Leader - Emergency Planning (or designee) shall be responsible for the following:

- Administration of coordinated activities, including immediate notification to Nuclear Regulatory Affairs (if appropriate), regarding problems associated with emergency preparedness equipment
- To ensure that an expeditious return to service of that equipment is completed
- To assure continued support from organizations relied upon for notification to PVNGS Emergency Planning for problems associated with this equipment

9.2 PVNGS onsite emergency preparedness equipment includes, but is not limited to, the following system(s) and/or component(s):

- TSC and EOF backup diesel generators
- TSC and EOF heating and ventilation systems
- TSC and EOF area radiation monitors
- TSC and EOF miscellaneous equipment PVNGS Site-Wide Paging System
- PVNGS ERO Group Pager System (primary notification)
- PVNGS Emergency Voice Response System Autodialer (backup notification)

9.3 When notified of component or system malfunction regarding the Technical Support Center or Emergency Operations Facility backup diesel generator, perform the following action(s):

- 9.3.1 Notify the appropriate PVNGS Maintenance Department discipline of the problem. Describe the nature of the problem accurately.
- 9.3.2 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.
- 9.3.3 Maintain subsequent follow-up actions to problem resolution.
- 9.3.4 Complete any required documentation associated with the problem and submit accordingly.

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- 9.4 When notified of component or system malfunction regarding the Technical Support Center or Emergency Operations Facility heating and ventilation system, perform the following action(s):
- 9.4.1 Notify PVNGS Facility Services of the problem. Describe the nature of the problem accurately.
 - 9.4.2 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.
 - 9.4.3 Maintain subsequent follow-up actions to problem resolution.
 - 9.4.4 Complete any required documentation associated with the problem and submit accordingly.
- 9.5 When notified of component or system malfunction regarding the Technical Support Center or Emergency Operations Facility area radiation monitor RU-13A or RU-13B, perform the following action(s):
- 9.5.1 Notify PVNGS RMS Maintenance of the problem. Describe the nature of the problem accurately.
 - 9.5.2 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.
 - 9.5.3 Maintain subsequent follow-up actions to problem resolution.
 - 9.5.4 Complete any required documentation associated with the problem and submit accordingly.
- 9.6 When notified of component or system malfunction regarding the Technical Support Center or Emergency Operations Facility miscellaneous equipment, perform the following action(s):
- 9.6.1 Notify the appropriate discipline of the problem. Describe the nature of the problem accurately.
 - 9.6.2 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.
 - 9.6.3 Maintain subsequent follow-up actions to problem resolution.
 - 9.6.4 Complete any required documentation associated with the problem and submit accordingly.

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- 9.7 When notified of component or system malfunction regarding the PVNGS Site-Wide Paging System, perform the following action(s):**
- 9.7.1 Notify APS Communications Systems of the problem. Describe the nature of the problem accurately.**
 - 9.7.2 If appropriate, notify the Unit Shift Supervisors of the affected system and component and the nature of the problem.**
 - 9.7.3 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.**
 - 9.7.4 Maintain subsequent follow-up actions to problem resolution.**
 - 9.7.5 Complete any required documentation associated with the problem and submit accordingly.**
- 9.8 When notified of component or system malfunction regarding the PVNGS Emergency Response Organization Group Pocket Pager System (primary notification), perform the following action(s):**
- 9.8.1 Notify the appropriate PVNGS discipline of the problem. Describe the nature of the problem accurately.**
 - 9.8.2 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.**
 - 9.8.3 Maintain subsequent follow-up actions to problem resolution.**
 - 9.8.4 Complete any required documentation associated with the problem and submit accordingly.**
- 9.9 When notified of component or system malfunction regarding the PVNGS Emergency Voice Response System Autodialer (backup notification), perform the following action(s):**
- 9.9.1 Notify the appropriate PVNGS discipline of the problem. Describe the nature of the problem accurately.**
 - 9.9.2 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.**
 - 9.9.3 Maintain subsequent follow-up actions to problem resolution.**
 - 9.9.4 Complete any required documentation associated with the problem and submit accordingly.**

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9.10 When notified of component or system malfunction regarding the Offsite Siren Warning System, perform the following action(s):

NOTE

The following organizations have the ability to detect and notify PVNGS Emergency Planning of Offsite Siren Warning System malfunction: Maricopa County Department of Emergency Management (MCDEM), Maricopa County Sheriff's Office (MCSO), Arizona Department of Public Safety (DPS), APS Microwave Center, and APS Communications Systems.

Onshift Operations Management

9.10.1 Notify PVNGS Emergency Planning of the problem. Describe the nature of the problem accurately.

9.10.1.1 **IF 40% (16 or more) sirens are out of service for greater than 1 hour, THEN notify the USNRC within one hour.**

PVNGS Emergency Planning

9.10.2 Notify APS Communications Systems of the problem. Describe the nature of the problem accurately.

9.10.3 Notify the Program Leader - Emergency Planning (or designee) of the affected system and component and the nature of the problem.

9.10.4 Contact an organization other than the one reporting the problem to determine the scope of the problem, i.e., system-wide or isolated.

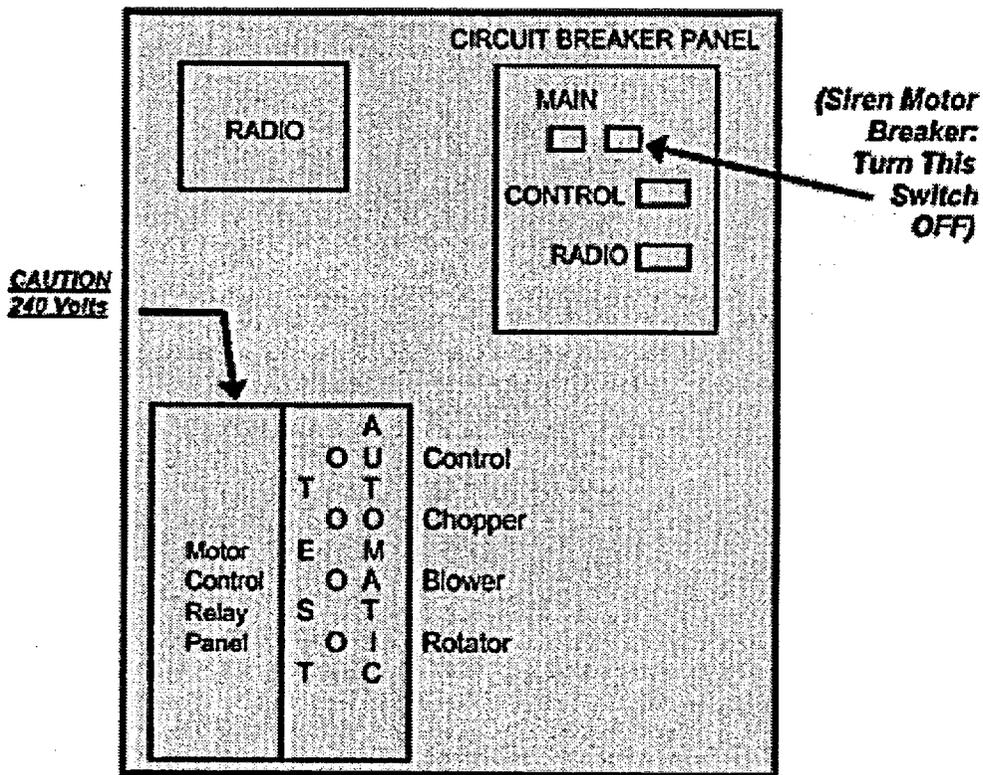
9.10.5 If the problem is determined to be isolated in nature, contact the Maricopa County Department of Emergency Management and request a possible change to System Master Control capabilities.

9.10.6 If the problem is determined to be system-wide (i.e., greater than 40% failure, or 16 or more sirens, out of service for greater than 1 hour), perform the following actions immediately:

9.10.6.1 Inform Nuclear Regulatory Affairs (during normal working hours) or the Unit 1 Shift Supervisor (off-hours) of the system failure and request a notification be initiated to the USNRC within 1 hour of siren system failure. Describe the nature of the problem accurately.

9.11.5 Siren deactivation for Mechanical Sirens only

- 9.11.5.1 Open the main cabinet door.
- 9.11.5.2 Open the circuit breaker panel door.
- 9.11.5.3 Turn off the motor breaker (top right-hand double switch).
- 9.11.5.4 Close the circuit breaker panel door.
- 9.11.5.5 Close and lock the main cabinet door.



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3**10.0 Emergency Planning Training Program Description****10.1 Scope**

This document outlines only the minimum training and qualification requirements necessary to qualify and maintain proficiency in duties associated with the PVNGS Emergency Preparedness Program.

10.2 Responsibilities

10.2.1 The Program Leader - Emergency Planning (or designee) shall be responsible for coordination of the following activities:

- Provision for technical review of the PVNGS Training Department's Emergency Preparedness lesson plan revisions when requested.
- Training for table-top, facility, radiological, medical, and major training scenarios, as required.
- Training briefings for offsite organizations who render assistance to PVNGS, as required.
- Provision for annual information dissemination regarding the onsite Unit Evacuation System, its various alerting sounds, actions to be taken when activated, and the telephone options for listening to recorded siren sounds.
- Assurance that PVNGS Program Leaders maintain their personnel qualified, where applicable, in Emergency Preparedness Training requirements on an annual basis.

10.2.2 Individual employees shall be responsible for the following activities:

- Maintaining an active Security ACAD by ERO personnel requiring access to the TSC or EOF to ensure participation in the Fitness-for-Duty Program.
- Attendance of Emergency Preparedness Training when scheduled.

10.3 Limitations

10.3.1 Emergency Response Personnel current in their ERO qualifications as of December 30, 1998 are considered to have completed initial ERO training. This consideration does not apply to specific discipline training. New personnel, or existing ERO members assigned to fill an ERO position in which they have not previously qualified, shall complete the Initial Training requirements for that position as specified in this procedure. All ERO personnel shall complete Continuing Training requirements as specified in this procedure.

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10.3.2 Emergency Preparedness Training is required on an annual basis, i.e., every 12 months + 1 month. To maintain qualifications, the training shall be completed by the end of the 13th month. Example of an annual training cycle: initial training date April 20, 2000, qualification expiration date May 31, 2001. An effort should be made to complete the training at approximately the same time each year to avoid inconsistencies associated with the interval.

10.3.3 Individuals who fail to complete their annual Emergency Preparedness Training requirements shall have their emergency response qualifications suspended until completion of required training.

10.3.4 Assignment to discipline specific ERO positions will be granted to personnel only after fully qualifying per the ERO position qualification card and per the appropriate discipline Training Program Description.

10.3.5 Individuals who fail to complete their discipline related (re)qualifications which serve as prerequisites for qualifications of Emergency Response Organization duties shall have their emergency response qualifications suspended until completion of required discipline specific training.

10.3.6 Onsite Emergency Preparedness Training should be developed using a process similar to that described within the Nuclear Training Department Administrative Procedures or other approved training program.

10.3.7 Lesson plans and examinations are not required for offsite support organization training. In this case, briefing forms and outlines may establish acceptable means of documentation. The PVNGS Emergency Planning Program Leader shall maintain records associated with offsite support organization training.

10.4 Basic training

10.4.1 Personnel requiring access to the Owner Controlled Area are provided annual information via newsletters, brochures, etc. regarding actions to take in the event of an emergency at the plant.

10.5 Emergency Response Organization Training

10.5.1 PVNGS personnel assigned duties in the Emergency Response Organization shall receive initial training and annual retraining. (See Training Requirements in Section 10.10 of this document for details.)

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10.5.2 The following criteria shall apply to training course failure by a student:

- Student qualification on tasks assigned to or associated with a course will be voided upon failure of the course examination.
- Remedial examinations shall be comparable to, but not the same as, the original examination failed by the student.
- A score of 80% or greater on the course examination is required for satisfactory completion of the course requirements.
- Failure of a course (i.e., examination score < 80%) will require the student to wait at least one working day prior to retaking the course (remediation).
- Failure of a remedial evaluation will require a review of the individual's performance history by the Section Leader of Technical Training and the individual's management for determination of corrective actions.

10.5.3 As necessary, additional (re)training of individuals should be conducted when significant changes to the PVNGS Emergency Plan and/or implementing procedures occur as determined by the Emergency Planning Program Leader and the Nuclear Training Department Leader.

10.5.4 To assist personnel in the development of skills required for an emergency, drills and exercises are conducted periodically in addition to annual retraining.

10.6 Onsite Medical Staff Training

10.6.1 The PVNGS onsite medical staff, excluding administrative support personnel, shall attend training similar in content to that which is provided to Maryvale Medical Center and Good Samaritan Medical Center staff on an annual basis.

10.7 Emergency Planning Staff Training

10.7.1 Training for PVNGS Emergency Planning staff is conducted via the completion of a required reading list and/or other training and includes participation in industry sponsored emergency planning symposia and workshops.

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3**10.8 Offsite Organization Training**

10.8.1 As appropriate, briefings for the members of the following offsite support organizations shall occur on an annual basis:

- APS Corporate Public Information personnel (PI)
- Arizona Division of Emergency Management (ADEM)
- Arizona Radiation Regulatory Agency (ARRA)
- Good Samaritan Medical Center
- Maricopa County Department of Emergency Management (MCDEM)
- Maryvale Medical Center
- Others as deemed necessary

10.8.2 Briefings should be specific to the agencies' response assignment(s) and, at a minimum, should include the following:

- Basic radiation protection (excluding ARRA)
- Emergency response procedures
- Interface with the PVNGS Emergency Response Organization

10.9 Media Training

10.9.1 In conjunction with state and county government personnel, briefings shall be offered to local and regional news media personnel on an annual basis. The familiarization briefings should be conducted by PVNGS Emergency Planning and PVNGS Communications personnel and should include the following items:

- PVNGS Emergency Plan
- Basic information regarding PVNGS operation / radiation
- Locations / mechanism for release of public information in an emergency
- Familiarization tour of the Joint Emergency News Center (JENC)

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10.10 Emergency Response Organization Training Requirements

- 10.10.1 The table below contains the minimum training requirements for each Emergency Response Organization (ERO) position. Department / Discipline training programs may require additional training for enhanced performance beyond that specified in the table. Unless specifically indicated, the Continuing / Retraining subject areas are required to be trained annually.
- 10.10.2 The EP Overview / Fundamentals Course should address the structure of the Emergency Response Organization, PVNGS emergency classification scheme, emergency facilities, major lines of communication, and a general overview of PVNGS emergency response. This training requirement may be met by attending discipline specific EP training, and/or satisfactorily completing the CMI (CBT) course NGE04 "Emergency Plan Overview".
- 10.10.3 The "Initial Training" column in the following table contains the numbers of "Job Qualification Cards" (JQC) for the specified position. Asterisked JQC numbers ("**") indicate JQCs existing within the discipline training programs. All other JQCs are available through the Emergency Preparedness Program.
- 10.10.4 In addition to other training requirements, any ERO position assigned to the TSC or EOF shall maintain a valid ACAD.

ERO POSITION	INITIAL TRAINING (JQC)	CONTINUING / RETRAINING
Administrative and Logistics Coordinator	NEP01-XX-017	EP Overview / Fundamentals
Administrative Support	NEP01-XX-019	EP Overview / Fundamentals
Assistant Emergency Operations Director	NEP01-XX-029	EP Emergency Coordinator or EOD specific training
Chemistry Coordinator	NEP01-XX-005	EP Overview / Fundamentals
Chemistry Technician	NCQ34-XX-001 **	EP Overview / Fundamentals
Dose Assessment Health Physicist	NRE00-XX-004 **	EP Overview / Fundamentals
Electrical Engineering	NEP01-XX-006	EP Overview / Fundamentals
Electrical Maintenance Technician	NEA99-XX-009 **	Site Access (Re)training
Emergency Coordinator Technical Assistant	NEP01-XX-007	EP Emergency Coordinator
Emergency Maintenance Coordinator	NEP01-XX-008	EP Overview / Fundamentals
Emergency Operations Director	NEP01-XX-028	NGE22

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ERO POSITION	INITIAL TRAINING (JQC)	CONTINUING / RETRAINING
Fire Protection / Emergency Medical Technician	NPF68 **	EP (NPL09 or equivalent)
Government Liaison	NEP01-XX-018	EP Overview / Fundamentals
Information Coordinator	NEP01-XX-021	EP Overview / Fundamentals
Instrumentation and Control Technician	NIJ01-XX-305 **	Site Access (Re)training
Mechanical Engineering	NEP01-XX-009	EP Overview / Fundamentals
Mechanical Maintenance Technician	NMO01-XX-101/102 **	Site Access (Re)training
Onshift Emergency Coordinator	SRO + EC LOCT	LOCT
Onsite Emergency Coordinator	NEP01-XX-027	EP Emergency Coordinator
Onshift RFAT Driver	EP Overview / Fundamentals	EP Overview / Fundamentals
Operations Advisor	NEP01-XX-001	EP Emergency Coordinator
Operations Coordinator	NEP01-XX-010	EP Emergency Coordinator
Operations Support Center Coordinator	NEP01-XX-002	EP Overview / Fundamentals
Plant Status Technician	NEP01-XX-011	EP Overview / Fundamentals
Probabilistic Risk Assessment	NEP01-XX-012	EP Overview / Fundamentals
Rad Waste Operator	NLN10-05 **	<ul style="list-style-type: none"> • NLO Continuing Training (NLOCT) • STSC Communicator
Radiation Protection Monitor	NRE00-XX-004 ** NRE00-XX-005 **	<ul style="list-style-type: none"> • EP Overview / Fundamentals • RPM / RPC / RAC
Radiation Protection Support Technician	NRE00-XX-002 **	EP Overview / Fundamentals
Radiation Protection Technician	NRE00-XX-003 **	<ul style="list-style-type: none"> • EP Overview / Fundamentals • RP Emergency Teams
Radiological Assessment Communicator	NRE00-XX-002 **	EP Overview / Fundamentals
Radiological Assessment Coordinator	NRE00-XX-004 ** NRE00-XX-005 **	<ul style="list-style-type: none"> • EP Overview / Fundamentals • RPM / RPC / RAC

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ERO POSITION	INITIAL TRAINING (JQC)	CONTINUING / RETRAINING
Radiological Monitoring Technician	NCQ48-XX-001 ** NRE00-XX-006 **	EP Overview / Fundamentals
Radiological Protection Coordinator	NRE00-XX-004 ** NRE00-XX-005 **	<ul style="list-style-type: none"> • EP Overview / Fundamentals • RPM / RPC / RAC
Reactor Analyst	NEP01-XX-013	<ul style="list-style-type: none"> • EP Overview / Fundamentals • Core Damage Assessment (Biennial)
Licensed Operator (Shift Manager, CR Supervisor, CR Operator)	Licensed Operator Initial Training (LOIT)	Licensed Operator Continuing Training (LOCT)
Repairs Coordinator	NEP01-XX-004	EP Overview / Fundamentals
Safety Analysis Engineer	NEP01-XX-014	EP Overview / Fundamentals
Satellite Technical Support Center Communicator (NLO)	NLN10-05 **	NLO Continuing Training (NLOCT)
Satellite Technical Support Center Communicator (Non-NLO)	NEP01-XX-026	NLO Continuing Training (NLOCT)
Security Coordinator	NEP01-XX-022	EP Overview / Fundamentals
Security Director	NEP01-XX-003	EP Overview / Fundamentals
<i>(Security Force Member)</i>	3-MSF-001-02 **	<i>EP Security</i>
Shift Technical Advisor	NOD01-XX-001 **	EP Emergency Coordinator
Systems Engineering	NEP01-XX-023	EP Overview / Fundamentals
Technical Analysis Manager	NEP01-XX-024	EP Overview / Fundamentals
Technical Engineering Manager	NEP01-XX-015	EP Overview / Fundamentals
USNRC Liaison Health Physics	NEP01-XX-025	EP Overview / Fundamentals
USNRC Liaison Operations	NEP01-XX-016	EP Overview / Fundamentals

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10.11 Emergency Planning Staff Training Requirements

10.11.1 All Emergency Planning Coordinators and the Program Leader are required to read and/or discuss the documents specified in the table below as part of the job qualification and training process. Training attendance sheets are an acceptable means to document the required reading performance.

REQUIRED READING DOCUMENTS	
10 CFR, Part 50.47 and Appendix E	FEMA-REP-14 Exercise Manual
EPIP-01 Satellite Technical Support Center Actions	FEMA-REP-15 Exercise Evaluation Methodology
EPIP-02 Operations Support Center Actions	Fixed Nuclear Facility Offsite Emergency Response Plan
EPIP-03 Technical Support Center Actions	INPO Document 85-014 EP Program Review
EPIP-04 Emergency Operations Facility Actions	INPO Document 86-032 Emergency Resources Manual
EPIP-05 Backup Emergency Operations Facility Actions	INPO Document 96-009 Maintaining Emer. Preparedness
EPIP-06 Reassembly Area Operations	INPO Document 88-019 Drill and Exercise Manual
EPIP-07 Telecommunications	Joint Public Information s (<i>JPIPs</i>)
EPIP-08 Emergency Planning Administration	NUREG-0654 / FEMA-REP-1 and Supplements
Dose Projection Technical Bases	NUREG-0737 Supplement 1
Emergency Action Level (<i>EAL</i>) Technical Bases	PVNGS Emergency Plan
EPA400-R-92-001 Protective Action Guides	USNRC EP Inspection Reports (<i>routed as necessary</i>)
	USNRC Response Technical Manual (<i>current version</i>)

Emergency Planning Coordinator Date

EP Program Leader Date

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3**11.0 Emergency Preparedness Respiratory Guidelines****11.1 Regulatory Guidance****11.1.1 UFSAR**

- The PVNGS UFSAR requires SCBAs for six personnel in the Control Room, and indicates that personnel should be capable of donning that equipment in 2 minutes or less.

11.1.2 NUREGS

- NUREG-0654 mandates that respiratory protective equipment be available in the various ERO response facilities. The inference is clear that the ERO Staff will be qualified to utilize this equipment, although specific guidance is not given as to which disciplines of the ERO Staff and the specific numbers of each are to be respiratory qualified.

11.1.3 NRC

- NRC Inspection modules include review of the respiratory equipment stocked for emergency use in emergency kits. NRC expectations when auditing biennial emergency Exercises are that repair teams will don respiratory equipment when (simulated) conditions require.

11.1.4 10CFR

- 10CFR20.1702, Use of Other Controls, lists ways of limiting intakes of radioactive material.
- 10CFR20.1703, Use of Individual Respiratory Protection Equipment, requires the licensee to (a)(4) issue a written policy statement on respirator usage covering (ii) the routine, nonroutine and emergency use of respirators.
- 10CFR50.47(b)(11), Emergency Plans, establishes means for controlling radiological exposures in an emergency for emergency workers. The means for controlling radiological exposures include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides. The inference is that the licensee uses respiratory equipment to control internal radiological exposure.
- 29CFR1910.134, Respiratory Protection, is the Occupational Safety and Health Administration (OSHA) requirement for employers to control airborne contamination. When airborne contamination cannot be controlled, this section requires employers to provide respirators and to establish a respiratory protection program.

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11.1.5 The above represents the current regulatory guidance. That guidance does not provide specific direction on which ERO Onshift and Onsite Staff members are to maintain respiratory equipment qualifications. Current PVNGS guidance for ERO Staff also does not provide specific numbers of personnel per discipline to maintain respiratory qualifications. This document is intended to establish the basis for such specific numbers.

11.2 Overview

11.2.1 The following are basic situations the Onshift ERO Staff may encounter that would require respiratory protective equipment.

11.2.1.1 Exposure to a non-radioactive hazardous materials atmosphere [SCBA required]

- This applies to a minimum number of Onshift personnel - primarily a core Control Room staff and the Fire Protection staff. All other Onshift personnel would withdraw from the affected areas rather than don protective equipment.

11.2.1.2 Exposure to tear gas from armed intruders [Gas Mask required]

- This applies to Security personnel only; protective equipment is available Onshift. All other Onshift personnel would withdraw from the affected areas rather than don protective equipment.

11.2.1.3 Exposure to a radioactive atmosphere [SCBA or Full Face required]

- This applies to all members of the Onshift staff. It is expected that the prudent normal response would allow the majority of the Onshift personnel to withdraw from the affected area. A selected number of personnel in the various disciplines need to maintain respiratory qualifications to respond for lifesaving or equipment saving vital to plant operation. Guidance is provided in the position by position review section as to the minimum qualified personnel per shift.

11.3 Positions Requiring Respiratory Qualifications

11.3.1 The number of ERO Staff members to maintain respiratory qualifications for response to Hazardous Materials and to Tear Gas is currently addressed in PVNGS guidance, with those numbers included here for clarity. The number of ERO Staff members required to respond in a radioactive atmosphere is not defined. The following analyses were done to develop numbers. The numbers were developed based on expected actions during the first two hours of an event. The numbers also are based on work in high dose/airborne area entries being minimized to the absolutely necessary (life saving or equipment saving) during that time.

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11.3.2 Operations support conducted analyses of the Abnormal and Emergency Operation Procedures to identify the maintenance tasks required by the procedures during the first two hours of a plant transient or upset condition. The following is a list of those tasks and the responsible work group(s) to perform them:

- Mechanical Maintenance-Install portable air compressor for Instrument Air backup.
- Mechanical Maintenance-Repair Emergency Diesel Generator lube oil leaks.
- Mechanical Maintenance-Fill Emergency Diesel Generator crankcase with oil.
- Electrical Maintenance-Inspect and trouble shoot medium voltage circuit breaker if breaker trips or fails to close.
- Instrumentation & Control-Use troubleshooting job-aid to diagnose failure of annunciator section.
- Instrumentation & Control-Install temporary recorder for plant monitoring.
- Instrumentation & Control-Collect thermocouple data in event of RVLMS failure.

11.3.3 Radiation Protection Group conducted an analysis of their actions during the first two hours of a plant transient or upset condition with the following assumptions:

- All unnecessary personnel would exit transient high dose/airborne areas and new control boundaries would be set as necessary to confine those areas.
- A minimal number of entries into transient high dose/airborne areas to mitigate the situation will need to be done in the first two hours of the event - example, entries for lifesaving or for equipment repair vital to plant operations. Further entries into transient high dose/airborne areas would be done only as necessary and/or support allows.
- Supporting ERO Staff would not remain functioning within transient high dose/airborne area but would withdraw to backup facilities/areas.

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11.3.4 **Summation and Basis:** the task force reviewing the above included all involved disciplines and the associated training departments. The review provides the following ERO position by position numbers with additional supporting information relating to position specifics. These numbers represent the minimum number of personnel to be available. "SCBA" means qualification to wear a Self Contained Breathing Apparatus; "FF" means qualification to wear a Full Face respirator; "SCBA/FF" means qualification to wear both. It is expected that in actual practice the numbers of qualified personnel will be higher.

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11.4 Position Qualifications and Basis

GROUP	SCBA / FF QUALIFIED	BASIS
Control Room, STSC	All licensed personnel and STAs, and three Auxiliary Operators (one per Unit crew) maintain SCBA/FF. *	This staff might have to function in a radiological airborne or hazardous materials environment to bring the unit to a safe shutdown condition.
Chemistry	One Chemistry Technician maintains SCBA/FF. **	This staff might have to function in an extreme radiological environment to obtain reactor coolant analysis.
Radiation Monitoring	One Radiation Monitoring Technician maintains FF. **	This staff might have to function in a radiological environment to obtain correlation release point samples. This staff would not function in an extreme radiological environment or in a hazardous materials environment.
Electrical I&C Mechanical	One qualified member of each discipline maintains FF. **	This staff might have to function in a radiological environment to repair vital equipment. This staff would not function in an extreme radiological environment or in a hazardous materials environment.
Radiation Protection	Two Radiation Protection Technicians maintain SCBA/FF. **	Some of the available staff might have to function in an extreme radiological environment to support firefighting, lifesaving, equipment saving, etc. The rest of the staff would fall back with the RCA boundaries and would not require respiratory protection.
Fire Protection	All Onshift Fire Protection staff maintain SCBA. *	The available staff may have to respond in entirety to a hazardous or extreme radiological environment for life-saving purposes. In addition, SCBAs are required for firefighting.
Security	All Onshift Security personnel designated as Armed Responders. *	For situations where a radioactive release or hazardous material release is ongoing, the Security Force would go into a "Fallback" mode. Posts would not be left unattended but personnel would retreat to the nearest safe location where the area can be monitored. Respiratory protection would not be required. Manning of the CAS and SAS would be maintained in the "fallback" mode as above. It is expected that one or both would be able to stay operational during a release situation without respiratory protection being required.

* **Required to be "clean shaven" while on duty. A "clean shaven" condition exists when no facial hair can interfere with the respirator's facial seal.**

** **Required to be capable of being "clean shaven" while on duty.**

Personnel who require corrective lenses while wearing a respirator or SCBA shall always have their corrective lenses readily available while on duty.

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3**11.5 Justification by Position**

- 11.5.1** Control Room Staff may have to remain in the affected unit to perform safe shutdown.
- 11.5.2** AOs may be sent out during the initial two hours of activity for search and rescue or to repair vital equipment. In addition, airborne activity in the affected unit might require respiratory protection to assist in performing the EOPs. Two qualified AOs available as a minimum are adequate to support these activities. Respiratory equipment is available in the STSC and OSC.
- 11.5.3** Chemistry activities would include primary sampling to verify activity levels. PASS sampling preparation might begin during the initial two hours, although the PASS procedure "Cautions" the Chemistry Leader to recommend at least a 2-hour delay after reactor trip prior to sampling under accident conditions. Airborne activity in the affected unit might mandate respiratory protection. One qualified Chemistry Tech is deemed adequate to meet these initial two-hour needs. Respiratory equipment is available in the OSC.
- 11.5.4** Effluent related activities would include sampling stack release points, RMS monitoring and release point calculations. Airborne activity in the affected unit might mandate respiratory protection for sampling. One qualified RM Tech is deemed adequate to meet these initial two-hour needs. Respiratory equipment is available in the OSC.
- 11.5.5** Radiation Protection will perform dose assessment; onsite, offsite and inplant surveys; coverage for repair, corrective action, search and rescue and fire teams; access control; personnel monitoring and dosimetry issue. Respiratory equipment is available in the OSC.
 - 11.5.5.1** Dose assessment can be done in a low dose area under any conditions by use of backup equipment and facilities.
 - 11.5.5.2** Onsite, offsite and inplant surveys in the first two hours are performed to define and contain areas. Teams are sent out to determine plume edges, dose boundaries, etc. Respiratory protection is not required for these surveys.
 - 11.5.5.3** Coverage for repair, corrective action, search and rescue and fire teams may be required for a minimal amount of entries during the first two hours. Two qualified RP Techs should be available as a minimum.
 - 11.5.5.4** Access Control, Personnel Monitoring and Dosimetry issue will all be performed in a low dose area with respiratory protection not required.

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11.5.6 Some of the available Onshift Security personnel are considered to need gas masks. Security Dept. maintains that equipment immediately available to the personnel. That equipment is outside of the Emergency Planning maintained equipment specified elsewhere in this document.

11.5.7 **ONSITE STAFF (after 2 hours):** Respiratory equipment is required in the TSC/EOF by NUREG 0654. The expected use would be primarily by the RP Support Tech monitoring habitability. Air sampling and surveying may be done outside the facility envelope. One qualified RP SupportTech is deemed adequate for minimum operation in each facility. It is not expected that any other TSC/EOF position will require respiratory protection. Facility relocation would be utilized in the event of a facility airborne problem.

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1.0 Precautions and limitations

- 1.1 Forms in this appendix are to be considered "samples." In accordance with 01DP-0AP01, Procedure Process," the user may copy a sample form from the procedure if the copy is legible enough to use.
- 1.2 Forms in this appendix are available on the PVNGS Local Area Network (LAN), on drive V:, in directory \Eplan\Forms.

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2.2 Form EP-0701, E-Kit Inventory - Ambulance (Fire Department) (sample)

FORM EP-0701 A

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Ambulance (Fire Department)		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: <input type="checkbox"/> QTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):				
RECORD				
✓	Quantity	Item	Serial Number	Cal Due-Exp Date
	(per kit)	ERO Position Manuals		
	4	200-mrem Dosimeter		
	2	Battery (AA)		
	4	Clothing Pack		
	1	Dosimeter Charger		
	4	Thermoluminescent Dosimeter (Whole Body TLD)		
Inventoried by: _____		Reviewed by: _____		
(Performer Signature)		(Date)		
		(Department Leader-EP Signature)		
		(Date)		

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2.3 Form EP-0702, E-Kit Inventory - Ambulance (Medical) (sample)

FORM EP-0702 A

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Ambulance (Medical)		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: OTRLY POST-EVENT AUDIT OTHER (explain):				
RECORD				
✓	Quantity	Item	Serial Number	Cal Due-Exp Date
	(per list)	ERO Position Manuals	//////////	//////////
	4	200-mmam Dosimeter	//////////	
	2	Battery (AA)	//////////	//////////
	4	Clothing Pack	//////////	//////////
	1	Dosimeter Charger	//////////	//////////
	4	Thermoluminescent Dosimeter (Whole Body TLD)	//////////	
Inventoried by: _____		Reviewed by: _____		
(Partner Signature)		(Date)		
		(Department Leader/EP Signature)		
		(Date)		

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2.4 Form EP-0703, E-Kit Inventory - EOF (sample)

FORM EP-0703 c

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Plant Name:		Location:	EOF
VERIFICATION			
As-found ICE Basf Number:		New ICE Basf Number:	
Reason for Kit Inventory:		OTHERLY	POST-EVENT
		AUDIT	OTHER (specify):
RECORD			
Quantity	Item	Serial Number	Cal Due-Exp Date
40	ERC Position Manuals		
1	T-REM 1.5-REM Dosimeter (any combination)		
40	XO-nram Dosimeter		
1	AC Air Sampler		
6	ApX Cartridges		
1	Air Sample Head		
3	Battery (6-Volt)		
24	Battery (D)		
2	Battery (AA)		
1	Battery Tester		
3	Bottles (plastic - pint)		
1	Calculator		
1	Cellular Telephone		
6	Coveralls (paper)		
1	Cy Check Source		
1	Dosimeter Checker		
1	EC-A Area Monitor		
1	EC-B Direct Source		
1	EAG Survey Meter		
1	Fluoridins (4 hand held, 4 portable instruments)		
3	Gloves (cloth - pair)		
3	Gloves (plastic - pair)		
2	Marshall Beaker		
6	Particulate Filter		
1	PX-6 Survey Meter		
10	Potassium Iodide (tablets)		
4	Radiation Alarm Sign with Inserts		
1	Radiocative Material Labels (rolls)		
1	Radiocative Tags (rolls)		
10	Respirator / In-line Converter (each) (Maska 1 LOG MED 1 SM)		
1	RAM-20 Filter		
1	Screwdriver (straight-blade)		
1	Screwdriver (phoenix)		
1	Span-Off Part		
40	Thermoluminescent Dosimeter (TLD)		
6	Whitpack / Envelope (each)		
Inventoried by: _____ (Date) _____ (Date)		Reviewed by: _____ (Date) _____ (Date)	
_____ (Signature)		_____ (Signature)	

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2.5 Form EP-0704, E-Kit Inventory - Offsite Decon (Buckeye Airport) (sample)

FORM EP-0704.

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name: _____ Location: **Offsite Decon (Buckeye Airport)**

VERIFICATION RECORD

At-Found Kit Base Number: _____ New Kit Base Number: _____

Reason for Kit Inventory: **QTRLY** **POST-EVENT** **AUDIT** **OTHER (specify):** _____

Quantity	Item	Serial Number	Cal Due-Exp Date
✓ 1	low level	ERD Position Burners	
50	200-416161 Decontaminant		
25	Bag plastic - (airp)		
8	Barney (O)		
1	Barney Towel		
50	Boots (plastic - pair)		
2	Bucket		
1	Bulbrom		
50	Coveralls (paper)		
1	CW Check Source		
4	Decontamination Spray (60:50:1)		
2	Decontamination Spray bottles		
1	Dosimeter Change		
1	E-140N / S30 Filter #1		
1	E-140N / S30 Filter #2		
1	E-140N / S30 Filter #3		
1	E-140N / S30 Filter #4		
5	Extraction Cord (125-400) with 2 1/2-sec. Thermostats		
1	First Aid Kit		
2	Flashlight		
2	Flashlight (for alarm)		
25	Gloves (plastic - pair)		
1	Hand Lotion (antisept)		
2	Measuring Tape (feet)		
1	Mechan Cloth (gasket)		
8	Pen		
8	Radiation Area Sign with Insects		
50	Radioactive Waste (flask)		
1	Radioactive Waste (flask)		
4	Razor		
1	Shavers		
2	Brush Bristle		
2	Scrubber (overcoat-alto scrubbers)		
2	Spending System (toilet)		
1	Shower (toilet)		
6	Soap (bar)		
8	Showerbar		
2	Spec-GM PMD		
1	Shoe (leather - quarter)		
2	Towel (cloth)		
10	Traffic Cone		

Inventory by: _____ (Signature) _____ (Name)

Reviewed by: _____ (Signature) _____ (Name)

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2.8 Form EP-0708, E-Kit Inventory - OSC (Unit 1) (sample)

FORM EP-0708

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location:		OSC Unit #	
As-found Kit Shelf Number:		VERIFICATION		New Kit Shelf Number:	
Reason for Kit Inventory:		QTRLY	POST-EVENT	ADDT	OTHER (Specify):
		RECORD			
Quantity	Description	Item	Serial Number	Cal. Dur.	Exp. Date
✓ 1	ERO Position Manual		XXXXXXXXXX		
1	AC Air Sampler		XXXXXXXXXX		
4	Air Canisters		XXXXXXXXXX		
1	Air Sampler Head		XXXXXXXXXX		
2	Battery (6-Vol)		XXXXXXXXXX		
10	Battery (9V)		XXXXXXXXXX		
1	Battery Tester		XXXXXXXXXX		
6	Books (instric - post)		XXXXXXXXXX		
1	Calculator		XXXXXXXXXX		
4	Compass (compass)		XXXXXXXXXX		
1	OS Object Source		XXXXXXXXXX		
1	DC Air Sampler		XXXXXXXXXX		
1	Emergency Dose Authorization Package		XXXXXXXXXX		
1	Exposition Card		XXXXXXXXXX		
1	FMS Slaver Mailer		XXXXXXXXXX		
5	Flashlight		XXXXXXXXXX		
6	Gloves (instric - post)		XXXXXXXXXX		
4	Gloves (instric - post)		XXXXXXXXXX		
2	Marshall Sampler		XXXXXXXXXX		
1	Mixing Tape (instric)		XXXXXXXXXX		
1	Mozath Can (instric)		XXXXXXXXXX		
1	Ovens Men		XXXXXXXXXX		
4	Particulate Filter		XXXXXXXXXX		
1	PC-21 Sampler Meter		XXXXXXXXXX		
10	Polonium Iodide (instric)		XXXXXXXXXX		
8	Portable Airs (instric with meters)		XXXXXXXXXX		
1	Radioactive Material Labels (instric)		XXXXXXXXXX		
25	Radioactive Signs (instric)		XXXXXXXXXX		
1	Radioactive Tape (instric)		XXXXXXXXXX		
4	Respirator / Injns Carrier (instric (size medium))		XXXXXXXXXX		
2	Receiver Unit (instric/1 LG 1 SMI)		XXXXXXXXXX		
1	RIL-20 Filter #1		XXXXXXXXXX		
1	RIL-20 Filter #2		XXXXXXXXXX		
1	RMS Handing Tool (instric / instric)		XXXXXXXXXX		
1	RMS Hi-Rising Seat Sample Wed		XXXXXXXXXX		
1	Screwdriver (instric/Instric)		XXXXXXXXXX		
4	Self-Contained Breathing Apparatus		XXXXXXXXXX		
2	Self-Contained Breathing Apparatus (spare masks) (LG 1 SMI)		XXXXXXXXXX		
1	Shovels (Instric)		XXXXXXXXXX		
2	Spec-Oil Pad		XXXXXXXXXX		
4	Whipstick / Emvopak (instric)		XXXXXXXXXX		

Inventoried by: _____
(Partner Signature) _____ (Date)

Reviewed by: _____
(Department Leader/EP Supervisor) _____ (Date)

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2.9 Form EP-0709, E-Kit Inventory - OSC (Unit 2) (sample)

FORM EP-0709

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: OSC (Unit 2)		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: <input type="checkbox"/> QTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):				
RECORD				
Quantity	Item	Serial Number	Cal	Dis-Exp Date
(per kit)	ERO Position Manuals	XXXXXXXXXX		XXXXXXXXXX
1	AC Air Sampler	XXXXXXXXXX		XXXXXXXXXX
6	AirX Cartridge	XXXXXXXXXX		XXXXXXXXXX
1	Air Sampler Head	XXXXXXXXXX		XXXXXXXXXX
2	Battery (9-Volt)	XXXXXXXXXX		XXXXXXXXXX
10	Battery (D)	XXXXXXXXXX		XXXXXXXXXX
1	Battery Tester	XXXXXXXXXX		XXXXXXXXXX
6	Boots (plastic - pair)	XXXXXXXXXX		XXXXXXXXXX
1	Calculator	XXXXXXXXXX		XXXXXXXXXX
6	Coveralls (paper)	XXXXXXXXXX		XXXXXXXXXX
1	Cs-137 Check Source	XXXXXXXXXX		XXXXXXXXXX
1	DC Air Sampler	XXXXXXXXXX		XXXXXXXXXX
1	Emergency Dose Authorization Package	XXXXXXXXXX		XXXXXXXXXX
1	Extension Cord	XXXXXXXXXX		XXXXXXXXXX
1	FAQ Survey Meter	XXXXXXXXXX		XXXXXXXXXX
5	Flashlight	XXXXXXXXXX		XXXXXXXXXX
6	Gloves (cloth - pair)	XXXXXXXXXX		XXXXXXXXXX
6	Gloves (plastic - pair)	XXXXXXXXXX		XXXXXXXXXX
2	Mariell Beaker	XXXXXXXXXX		XXXXXXXXXX
1	Masking Tape (rolls)	XXXXXXXXXX		XXXXXXXXXX
1	Masking Cloth (packs)	XXXXXXXXXX		XXXXXXXXXX
1	Onsite Map	XXXXXXXXXX		XXXXXXXXXX
6	Portable Filter	XXXXXXXXXX		XXXXXXXXXX
1	PC-8 Survey Meter	XXXXXXXXXX		XXXXXXXXXX
10	Potassium Iodide (bottles)	XXXXXXXXXX		XXXXXXXXXX
5	Radiation Area Sign with Inserts	XXXXXXXXXX		XXXXXXXXXX
1	Radiactive Material Labels (rolls)	XXXXXXXXXX		XXXXXXXXXX
25	Radiactive Rope (feet)	XXXXXXXXXX		XXXXXXXXXX
1	Radiactive Tape (rolls)	XXXXXXXXXX		XXXXXXXXXX
4	Respirator / Iodine Canister (each) (size medium)	XXXXXXXXXX		XXXXXXXXXX
2	Respirator Mask (square) (1 LG 1 SM)	XXXXXXXXXX		XXXXXXXXXX
1	RM-20 Filter #1	XXXXXXXXXX		XXXXXXXXXX
1	RM-20 Filter #2	XXXXXXXXXX		XXXXXXXXXX
1	RMS Handling Tool (tweez / gripper)	XXXXXXXXXX		XXXXXXXXXX
1	RMS Hi-Range Skid Sample Head	XXXXXXXXXX		XXXXXXXXXX
1	Screwdriver (trash) (blades)	XXXXXXXXXX		XXXXXXXXXX
4	Self-Contained Breathing Apparatus	XXXXXXXXXX		XXXXXXXXXX
2	Self-Contained Breathing Apparatus (spare masks) (1 LG 1 SM)	XXXXXXXXXX		XXXXXXXXXX
1	Sneers (boxes)	XXXXXXXXXX		XXXXXXXXXX
2	Stop-Off Pad	XXXXXXXXXX		XXXXXXXXXX
6	Wetpack / Envelope (each)	XXXXXXXXXX		XXXXXXXXXX
Inventoried by: _____ (Performer Signature) _____ (Date)		Reviewed by: _____ (Department Leader-EP Signature) _____ (Date)		

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2.10 Form EP-0710, E-Kit Inventory - OSC (Unit 3) (sample)

FORM EP-0710

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location:		OSC (Unit 3)	
VERIFICATION					
As-Found ICE Seal Number:		New ICE Seal Number:			
RECORD					
Reason for ICE Inventory:	OTDRY	POST-EVENT	AUDIT	OTHER (specify):	
Quantity	Item	Serial Number	Cal Due-Exp Date		
1	ERO Position Markers				
1	AC Air Sampler				
5	Air Canisters				
1	Air Sampler Head				
2	Battery (6-Vol)				
10	Battery (D)				
1	Battery Tester				
6	Books (gasitic - pass)				
1	Calculator				
6	Counters (passer)				
1	DC Check Source				
1	DC Air Sampler				
1	Emergency Dose Authorization Package				
1	Explosion Cord				
1	FAD Survey Meter				
5	Flashlight				
4	Gloves (gasitic - pass)				
4	Gloves (gasitic - pass)				
2	Marshall Beaker				
1	Measuring Tape (feet)				
1	Measuring Craft (feet)				
1	Oxygen Mask				
4	Perforated Film				
1	PG-8 Survey Meter				
10	Polystyrene Rods (feet)				
6	Radometer Alpha Beta with Insects				
1	Radioactive Material Labels (feet)				
25	Radioactive Paper (feet)				
1	Radioactive Tape (feet)				
4	Resistor / Lighting Cables (feet) (wire mesh)				
2	Resistor Blank (feet) (1 LG 1 SM)				
1	RAI-20 Printer #1				
1	RAI-20 Printer #2				
1	RAIS Handling Tool (feet) (nylon)				
1	RAIS Hi-Radiation Sand Sample Head				
1	Schwabner (tetraethyl stude)				
4	Seal-Contained Breathing Apparatus				
2	Self-Contained Breathing Apparatus (feet) (mask) (LG 1 SM)				
1	Sensors (feet)				
2	Succ-Diff Prod				
6	Whisper / Eneqops (feet)				

Inventoried by: _____ (Signature) _____ (Date)

Reviewed by: _____ (Signature) _____ (Date)

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2.11 Form EP-0711, E-Kit Inventory - RFAT Vehicle #1 (sample)

FORM EP-0711:

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: RFAT Vehicle #1	
VERIFICATION			
As-found KR Seal Number:		New KR Seal Number:	
Reason for KR Inventory: <input type="checkbox"/> CTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):			
RECORD			
Quantity	Item	Serial Number	Cal Dur-Exp Date
(per list)	ERO Position Manuals		
1	110-Volt AC Generator (start and run)		
2	200-mm Dosimeter		
2	5-REM Dosimeter		
1	AC Air Sampler		
6	Air Cartridges		
1	Air Sample Filter		
1	Air Sample Head		
3	Bag (plastic - large)		
4	Battery (9-Volt)		
2	Battery (AA)		
4	Battery (D)		
1	Battery Tester		
1	Calculator		
1	Clipboard		
1	Ca ²⁺ Check Source		
1	DC Air Sampler		
1	Dosimeter Charger		
6	Drinking Cup		
1	Drinking Water Container		
1	EAG Survey Meter		
1	E-140N / 630 Frisker (either)		
1	First Aid Kit		
1	Flashlight		
3	Gloves (plastic - pair)		
3	Marselli Beaker		
3	Marker / Pen (each)		
1	Masking Tape (rolls)		
1	Offsite Map		
1	Onsite Map		
6	Portable Filter		
1	Potassium Iodide (bottles)		
1	Radioactive Material Labels (rolls)		
1	Reassembly Area Key (on key-ring)		
1	Radioactive Tape (rolls)		
1	RD-2 Survey Meter		
1	Smears (boxes)		
1	Stopwatch		
6	Whipack / Envelope (each)		
Inventoried by: _____ (Performer Signature) _____ (Date)		Reviewed by: _____ (Department Leader-EP Signature) _____ (Date)	

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2.12 Form EP-0712, E-Kit Inventory - RFAT Vehicle #2 (sample)

FORM EP-0712

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: RFAT Vehicle #2		
VERIFICATION				
As-found Kit Serial Number:		New Kit Serial Number:		
Reason for Kit Inventory: <input type="checkbox"/> QTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):				
RECORD				
✓	Quantity (per list)	Item	Serial Number	Cal Due-Exp Date
		ERO Position Manuals	//////////	//////////
	1	110-Volt AC Generator (start and run)	//////////	//////////
	2	200-mm Dosimeter	//////////	//////////
	2	5-REM Dosimeter	//////////	//////////
	1	AC Air Sampler	//////////	//////////
	6	AsX Cartridge	//////////	//////////
	1	Air Sample Fuse	//////////	//////////
	1	Air Sample Head	//////////	//////////
	3	Bag (plastic - large)	//////////	//////////
	4	Battery (9-Volt)	//////////	//////////
	2	Battery (AA)	//////////	//////////
	4	Battery (D)	//////////	//////////
	1	Battery Tester	//////////	//////////
	1	Calculator	//////////	//////////
	1	Clipboard	//////////	//////////
	1	Ca ²⁺ Check Source	//////////	//////////
	1	DC Air Sampler	//////////	//////////
	1	Dosimeter Charger	//////////	//////////
	6	Drinking Cup	//////////	//////////
	1	Drinking Water Container	//////////	//////////
	1	EAG Survey Meter	//////////	//////////
	1	E-182N / 83D Frisker (either)	//////////	//////////
	1	First Aid Kit	//////////	//////////
	1	Flashlight	//////////	//////////
	3	Gloves (plastic - pair)	//////////	//////////
	3	Marnell Beaker	//////////	//////////
	3	Marker / Pen (each)	//////////	//////////
	1	Masking Tape (rolls)	//////////	//////////
	1	Offsite Map	//////////	//////////
	1	Onsite Map	//////////	//////////
	6	Portable Filter	//////////	//////////
	1	Post-it Notes (stickers)	//////////	//////////
	1	Radioactive Material Labels (rolls)	//////////	//////////
	1	Reasonably Area Key (on key-ring)	//////////	//////////
	1	Radioactive Tape (rolls)	//////////	//////////
	1	RD-2 Survey Meter	//////////	//////////
	1	Shoers (boots)	//////////	//////////
	1	Stopwatch	//////////	//////////
	6	Whisper / Envelope (each)	//////////	//////////
Inventoried by: _____		Reviewed by: _____		
(Performer Signature) (Date)		(Department Leader-EP Signature) (Date)		

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2.13 Form EP-0713, E-Kit Inventory - RFAT Vehicle #3 (sample)

FORM EP-0713

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name: _____ Location: RFAT Vehicle #3

VERIFICATION RECORD

As-found Kit Serial Number: _____ New Kit Serial Number: _____

Reason for Kit Inventory: OTRLY POST-EVENT AIDIT OTHER (explain):

Quantity	Item	Serial Number	Cal Due-Exp Date
1	ERC Position Manuals		
1	110-volt AC Generator (start and run)		
2	300-watt Dieselifier		
2	S-REM Dieselifier		
1	AC Air Sampler		
4	Air Canisters		
1	Air Sample Pump		
1	Air Sample Head		
3	Gas Detector - (amps)		
4	Battery (2-Volt)		
2	Battery (6A)		
4	Battery (7)		
1	Battery Tester		
1	Calculator		
1	Clipboard		
1	GM Check Source		
1	DC Air Sampler		
1	Dosimeter Counter		
4	Protective Cap		
1	Duplicate Water Counter		
1	FA2 Survey Meter		
1	E-1430N / ESD Fisher (battery)		
1	Fire Aid Kit		
1	Flashlight		
3	Gloves (plastic - pair)		
3	Marshall Baggie		
3	Marker / Pen (each)		
1	Masking Tape (roll)		
1	Orange Alert		
1	Orange Alert		
4	Portable Filter		
1	Protective bootie (each)		
1	Protective Material (each)		
1	Reassembly Area Key (on key-chain)		
1	Rescueive Tape (roll)		
1	RFAT Bunker Alert		
1	Shower (roll)		
1	Shower		
1	Wetpack / Envelopes (each)		

Inventoried by: _____ (Date) _____ (Date)

Reviewed by: _____ (Department Leader/EP Signature) _____ (Date)

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2.14 Form EP-0714, E-Kit Inventory - Satellite TSC (Unit 1) (sample)

FORM EP-0714 c

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Satellite TSC (Unit 1)		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: <input type="checkbox"/> QTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):				
RECORD				
✓	Quantity	Item	Serial Number	Cal Due-Exp Date
	(per kit)	ERG Position Manuals	XXXXXXXXXX	XXXXXXXXXX
	1	10-Mile EPZ Map	XXXXXXXXXX	XXXXXXXXXX
	1	AC Air Sampler		
	2	AsX Canister	XXXXXXXXXX	
	1	Air Sample Hood	XXXXXXXXXX	XXXXXXXXXX
	2	Battery (9-Volt)	XXXXXXXXXX	XXXXXXXXXX
	1	Battery Tester	XXXXXXXXXX	XXXXXXXXXX
	1	Calculator	XXXXXXXXXX	XXXXXXXXXX
	1	Ca ¹³⁷ Check Source		XXXXXXXXXX
	1	FAG Survey Meter		
	2	Marnell Beaker	XXXXXXXXXX	XXXXXXXXXX
	1	Onsite Map	XXXXXXXXXX	XXXXXXXXXX
	2	Particulate Filter	XXXXXXXXXX	XXXXXXXXXX
	1	PIC-6 Survey Meter		
	10	Potassium Iodide (bottles)	XXXXXXXXXX	
	10	Respirator / Iodine Canister (each) (8 MED 1LG 1SM)	XXXXXXXXXX	
	1	RM-20 Fritzer #1		
	1	RM-20 Fritzer #2		
	8	Self-Contained Breathing Apparatus (8 MED 0 1 G 6 SM)	XXXXXXXXXX	XXXXXXXXXX
	34	Self-Contained Breathing Apparatus (bottles - spare)	XXXXXXXXXX	XXXXXXXXXX
	1	Smears (boxes)	XXXXXXXXXX	XXXXXXXXXX
	2	Whisper / Envelope (each)	XXXXXXXXXX	XXXXXXXXXX
Inventoried by:		Reviewed by:		
(Performer Signature) _____ (Date) _____		(Department Leader-EP Signature) _____ (Date) _____		

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2.15 Form EP-0715, E-Kit Inventory - Satellite TSC (Unit 2) (sample)

FORM EP-0715c

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Satellite TSC (Unit 2)		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: <input type="checkbox"/> QTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):				
RECORD				
✓	Quantity (per kit)	Name	Serial Number	Cal Due-Exp Date
	1	ERO Position Manuals	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	10-Mile EPZ Map	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	AC Air Sampler		
	2	AcX Cartridge	XXXXXXXXXXXX	
	1	Air Sampler Head	XXXXXXXXXXXX	XXXXXXXXXXXX
	2	Battery (9-Volt)	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	Battery Tester	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	Calculator	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	Cs ¹³⁷ Check Source		XXXXXXXXXXXX
	1	FAB Survey Meter		
	2	MarineII Beaker	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	One-In Map	XXXXXXXXXXXX	XXXXXXXXXXXX
	2	Particulate Filter	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	PK-4 Survey Meter		
	10	Potassium Iodide (bottles)	XXXXXXXXXXXX	
	10	Respirator / Iodine Canister (each) (8 MED 1 LG 1 SM)	XXXXXXXXXXXX	
	1	RM-20 Frisbee #1		
	1	RM-20 Frisbee #2		
	8	Self-Contained Breathing Apparatus (8 MED 6 LG 6 SM)	XXXXXXXXXXXX	XXXXXXXXXXXX
	34	Self-Contained Breathing Apparatus (bottles - spare)	XXXXXXXXXXXX	XXXXXXXXXXXX
	1	Sponges (boxes)	XXXXXXXXXXXX	XXXXXXXXXXXX
	2	Whitpack / Envelope (each)	XXXXXXXXXXXX	XXXXXXXXXXXX
Inventoried by: _____		Reviewed by: _____		
(Performer Signature) (Date)		(Department Leader-EP Signature) (Date)		

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2.16 Form EP-0716, E-Kit Inventory - Satellite TSC (Unit 3) (sample)

FORM EP-0716c

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Satellite TSC (Unit 3)		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: <input type="checkbox"/> OTRLY <input type="checkbox"/> POST-EVENT <input type="checkbox"/> AUDIT <input type="checkbox"/> OTHER (explain):				
RECORD				
✓	Quantity	Item	Serial Number	Cal Due-Exp Date
	(per lot)	ERO Position Manuals	//////////	//////////
	1	10-Min EPZ Map	//////////	//////////
	1	AC Air Sampler		
	2	AsX Cartridges	//////////	
	1	Air Sampler Head	//////////	//////////
	2	Battery (9-Volt)	//////////	//////////
	1	Battery Tester	//////////	//////////
	1	Calculator	//////////	//////////
	1	Cs ¹³⁷ Check Source		//////////
	1	FAG Survey Meter		
	2	Marinelli Beaker	//////////	//////////
	1	Onsite Map	//////////	//////////
	2	Particulate Filter	//////////	//////////
	1	PC-6 Survey Meter		
	10	Potassium Iodide (bottles)	//////////	
	10	Respirator / Iodine Canister (each) (8 MED 1 LG 1 SM)	//////////	
	1	RM-20 Friskee #1		
	1	RM-20 Friskee #2		
	8	Self-Contained Breathing Apparatus (8 MED 6 LG 6 SM)	//////////	//////////
	34	Self-Contained Breathing Apparatus (bottles - spare)	//////////	//////////
	1	Gloves (boxes)	//////////	//////////
	2	Whitpack / Envelope (each)	//////////	//////////
Inventoried by:		Reviewed by:		
_____ (Performer Signature) (Date)		_____ (Department Leader-EP Signature) (Date)		

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2.17 Form EP-0717, E-Kit Inventory - Satellite TSC (Simulator-A) (sample)

FORM EP-0717

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Satellite TSC (Simulator-A)			
VERIFICATION					
As-found Kit Seal Number:		New Kit Seal Number:			
Reason for Kit Inventory:		QTRLY	POST-EVENT	AUDIT	OTHER (expir):
RECORD					
✓	Quantity	Item	Serial Number	Cal Due-Exp Date	
	(per list)	ERO Position Manuals	//////////	//////////	
	1	10-Mile EPZ Map	//////////	//////////	
	1	AC Air Sampler	//////////	//////////	
	2	AirX Cartridge	//////////	//////////	
	1	Air Sampler Head	//////////	//////////	
	1	Calibrator	//////////	//////////	
	1	Cs ¹³⁷ Check Source	//////////	//////////	
	1	FAG Survey Meter	//////////	//////////	
	2	Marinelli Beaker	//////////	//////////	
	1	Onsite Map	//////////	//////////	
	2	Particulate Filter	//////////	//////////	
	1	PIC-B Survey Meter	//////////	//////////	
	1	RM-20 Frisbee #1	//////////	//////////	
	1	RM-20 Frisbee #2	//////////	//////////	
	1	Smears (boxes)	//////////	//////////	
	2	Whitpack / Envelope (each)	//////////	//////////	
Inventoried by: _____		Reviewed by: _____			
(Performer Signature)		(Department Leader-EP Signature)			
(Date)		(Date)			

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2.18 Form EP-0718, E-Kit Inventory - Site Medical Center (sample)

FORM EP-0718 A

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location:		Site Medical Center	
As-found Kit Bag Number:		VERIFICATION		New Kit Bag Number:	
Reason for Kit Inventory:		OTHER	POST-EVENT	AUDIT	OTHER (Specify):
RECORD					
Quantity	Item	Serial Number	Cal Due-Exp Date		
✓ 10	ERO Position Markers				
1	200-gram Dosimeter				
1	AC Air Squeezer				
1	Air Sampling Head				
2	Bag (polyethy)				
1	Battery (6-Volt)				
2	Battery (AA)				
1	Battery Tester				
1	Bottle (polyethylene)				
10	Cherry Puffs				
1	Clay Check Source				
1	Decontamination Tissue/tp				
1	Dosimeter Charger				
1	FAG Survey Meter				
1	Handker (pre-cut pad)				
2	Masking Tape (poly)				
1	Megalin Cloth (poly)				
6	Particulate Filter				
3	Radiation Area Sign with markers				
25	Radioactive Pledge (sheet)				
1	Radioactive Tapes (poly)				
1	Shower (foamed)				
2	Stop-Off Pad				
13	Thermoluminescent Dosimeter (TLD - Extremity)				
16	Thermoluminescent Dosimeter (TLD - Whole Body)				
1	Tube (poly)				
4	Wetsock / Kneesock (poly)				

Inventoried by: (Name) (Date)

Reviewed by: (Department Leader/EP Specialist) (Date)

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2.19 Form EP-0719, E-Kit Inventory - Soil Sampling (sample)

FORM EP-0719A

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name:		Location: Soil Sampling		
VERIFICATION				
As-found Kit Seal Number:		New Kit Seal Number:		
Reason for Kit Inventory: QTRLY POST-EVENT AUDIT OTHER (explain):				
RECORD				
✓	Quantity	Item	Serial Number	Cal Due-Exp Date
	(per list)	ERO Position Manuals		
	2	Bag (plastic ZipLock - 9" x 12")		
	2	Bag (plastic ZipLock - 12" x 18")		
	2	Boots (plastic - pair)		
	2	Coveralls (paper)		
	1	Environmental Sampling Guidance with Forms (self)		
	2	Gloves (cotton - pair)		
	2	Gloves (rubber - pair)		
	1	Hammer		
	1	Marker		
	1	Mess Kit Cloth (packs)		
	1	Pruning Shears		
	6	Radiological Sample Labels		
	1	Sampling Spoon		
	2	Shoecovers (plastic - pair)		
	2	Sonyi Sticks		
	1	Vinyl Tape (rolls)		
Inventoried by: _____		Reviewed by: _____		
(Performer Signature) (Date)		(Department Leader/EP Signature) (Date)		

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2.20 Form EP-0720, E-Kit Inventory - TSC (sample)

FORM EP-0720

PVNGS EMERGENCY PLANNING

EMERGENCY KIT INVENTORY

Print Name: _____ Location: TSC

VERIFICATION RECORD

As-found Kit Serial Number: _____ New Kit Serial Number: _____

Reason for Kit Inventory: OTDRLY POST-EVENT ALSOIT OTHER (specify): _____

Quantity	Item	Serial Number	Cal Due-Exp Date
✓ 1 (see list)	ERO Protection Burners		
20	4-REM / 1-EMEM Detector (any combination)		
20	300-mrem Dosimeter		
1	AC Air Sampler		
1	ACX Cartridge		
1	Air Sample Head		
3	Battery (6-Volt)		
2	Battery (9V)		
1	Battery Tester		
3	Booster (generic - pass)		
1	Calculator		
1	Cellular Telephone		
1	Overnight Assembly		
1	OTDR Check Source		
1	Dot-matrix Printer		
1	EC-4 Area Monitor		
1	EC-4 Check Source		
1	FAO Safety Marker		
3	Gloves (latex - pass)		
3	Gloves (nitrile - pass)		
2	Martini Cooler		
1	Personal Filter		
1	PC-8 Survey Meter		
10	Positron locks (generic)		
4	Radiation Area Sign with Insects		
1	Respirator (generic) (check)		
1	Radiactive Tape (pass)		
10	Resistor / Voltage Divider (pass) (1 EQ 2 MED 1 SM)		
1	RL-20 Filter		
1	Screwdriver (generic) (check)		
1	Shower (generic)		
1	Sho-Gel Pad		
1	Wipesack / Emulsion (pass)		

Inventoryed by: Pauline Spivack (Name) Reviewed by: Deborah Leader-EP Spivack (Name)

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2.22 Form EP-0740, NAN Communications Test (sample)

FORM EP-0740

PVNGS EMERGENCY PLANNING

NAN COMMUNICATIONS TEST

DATE: _____		TIME: _____		UNIT: _____	
Location	NAN Primary Circuit Test SAT / UNSAT	NAN Radio Backup Test SAT / UNSAT	Comments		
Unit STSC					
MCSO					
DPS					
ARRA					
ADEM					
MCDEM					
<p>NOTE: Report telecommunications equipment malfunctions to Communications Systems at 83-6000 and contact Emergency Planning on their next scheduled work day</p>					
GENERAL COMMENTS					
<p>NOTE: Forward this completed form to Emergency Planning - Mail Station 6050</p>					
Performed by: _____		(Signature)		Date: _____	
Print Name: _____					
Approved by: _____		(Department Leader - Emergency Planning Signature)		Date: _____	

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2.23 Form EP-0750, Inadvertent Siren Activation Notice (sample)

FORM EP-0750c

PVNGS EMERGENCY PLANNING

INADVERTENT SIREN ACTIVATION NOTICE

DATE Notification Received:		TIME Notification Received:	
GENERAL INFORMATION			
Name of Individual Calling:			
Telephone Number of Individual:			
Siren Location and/or Siren Pole Number:			
Time Siren Was First Heard:			
Is Siren Currently Sounding? <input type="checkbox"/> YES <input type="checkbox"/> NO			
PVNGS EMERGENCY PLANNING DEPARTMENT CONTACT INFORMATION			
Time Reported to PVNGS Emergency Planning Department:			
Name of Individual Contacted:			
Telephone Number of Individual Contacted:			
APS CUSTOMER SOLUTIONS CENTER INFORMATION			
Customer Service Associate Name:	_____ (please print)		
Customer Service Associate Signature:	_____ (date)		
COMMENTS			
NOTE: Forward this completed form to PVNGS Emergency Planning, Mail Station 6050			

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2.24 Form EP-0752, Offsite Siren Activation Planning (sample)

FORM EP-0752:

PVNGS EMERGENCY PLANNING

OFFSITE SIREN ACTIVATION PLANNING

Scheduled Test Date:		
TIME	ACTION	COMPLETE
- 2 Months	Contact Federal Emergency Management Agency (FEMA)	
	Update poster and transmit to Graphics	
- 1 Month	Notify Arizona Division of Emergency Management (ADEM)	
	Notify Maricopa County Division of Emergency Management (MCDEM)	
	Notify Arizona Department of Public Safety (DPS)	
	Notify Maricopa County Sheriff's Office (MCSO)	
	Notify PVNGS Strategic Communications	
	Notify APS Media Relations	
	Notify APS Public Affairs	
	Notify APS Telecommunications	
	Notify APS Communications Systems	
	Notify School Principals	
	Schedule the assembly location	
- 3 Weeks	Draft resident mailing letter	
	Transmit mailing letter to Reproduction and mail to EPZ residents per List #103	
- 2 Weeks	Schedule lunches / drinks	
- 1 Week	Prepare packages of maps, forms, and ear plugs	
	Reserve vehicles for Team Leaders	
	Provide guidance to MCSO for calls from the public	
	Provide guidance to PVNGS Strategic Communications for calls from the public	
	Provide guidance to APS Switchboard Operator for calls from the public	
	Draft letter to PVNGS employees	
	Ensure transmission of letters to local Mayors	
	Ensure transmission of letters to School Principals	
	Ensure transmission of letters to PVNGS employees	
	Ensure transmission of letters to EPZ residents	
	Situate posters within 10-mile EPZ	
	Situate onsite notices	
	Test Day	Transmit packages to assembly location
Situate signs to direct visitors to location		
Collect Forms EP-0753, Offsite Siren Activation Verification		
Post-Test	Prepare letter of appreciation	
	Remove posters within 10-mile EPZ	
	Prepare Siren Report for Arizona Division of Emergency Management	

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2.25 Form EP-0753, Offsite Siren Activation Verification (sample)

FORM EP-0753 a

PVNGS EMERGENCY PLANNING

OFFSITE SIREN ACTIVATION VERIFICATION

Name:	Date:	Siren Pole Number:	
Address:	City:	State:	ZIP:

CONDUCTING THE SIREN TEST

Upon arrival at the desired location:

- 1) Walk over to the siren pole and locate the Siren Pole Number.
- 2) Write the Siren Pole Number in the blank toward the top of this form.
- 3) Position yourself 100-200 feet from the siren pole.
- 4) Transmit the following message over the radio to the Communications Van:
"This is Siren Number _____ posted, over." (Net Control will confirm receipt of your message.)
- 5) Wait for siren to sound. (Complete the information below as required.)
- 6) Immediately following the test, Net Control will ask if there were any malfunctions. Report only if your siren did not sound or did not function correctly.
- 7) Wait for the second test.
- 8) When the second test is complete, wait for your Team Leader to arrive.
- 9) When your Team Leader has arrived, proceed to the assembly location.

SIREN TEST INFORMATION

Siren Test #	Time Siren Started	Time Siren Stopped	Wavering Tone?	Steady Tone?
1			YES NO	YES NO
2			YES NO	YES NO

Did the horn rotate? YES NO Did the siren turn OFF? YES NO

A siren should start up gradually to full tone and coast down to the end of the test.

Was there anything unusual about the siren's operation? YES NO

If YES, describe: _____

VERIFICATION

Observer: _____ (signature) _____ (date)

Leader / Coordinator: _____ (signature) _____ (date)

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2.26 Form EP-0760, 10 CFR 50.54 (Q) Screening (sample)

FORM EP-0760

PVNGS EMERGENCY PLANNING

10 CFR 50.54(Q) SCREENING

Procedure / Document Number:	Procedure / Document Revision:	
DOCUMENT INFORMATION		
Document Title:		
Description of Proposed Revision: _____		

ASSESSMENT OF ACCEPTABILITY		
Is the proposed revision a revision to the PVNGS Emergency Plan? <input type="checkbox"/> YES <input type="checkbox"/> NO		
Does the proposed revision require a revision to the PVNGS Emergency Plan? <input type="checkbox"/> YES <input type="checkbox"/> NO		
• • If the answer to either question is YES, a 10 CFR 50.54(Q) Evaluation must be performed • •		
TRAINING REQUIREMENT REVIEW		
<input type="checkbox"/> A copy of this revision has been conveyed to Training Change System (TCS) personnel		
COMMENTS		
AFFIRMATION		
Performed by: _____	_____	_____
(print)	(signature)	(date)
Reviewed by: _____	_____	_____
(print)	★ (signature)	(date)
★ indicates review of this document only		

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2.27 Form EP-0761, 10 CFR 50.54 (Q) Evaluation (sample)

FORM EP-0761 A

PVNGS EMERGENCY PLANNING

10 CFR 50.54(Q) EVALUATION

Procedure / Document Number: _____	Procedure / Document Revision: _____
DOCUMENT INFORMATION	
Document Title: _____	
Document Section(s) affected by proposed change(s): _____	
EFFECT OF PROPOSED CHANGE(S)	
10 CFR 50.47(b) Planning Standard(s) affected: _____	
Commitment(s) affected: _____	
EFFECTIVENESS REVIEW	
<i>Written justification is required for each NO answer. All documentation supporting rationale or justification for each NO answer must be attached to this document.</i>	
<p>1) Does this change delete or contradict any regulatory requirement? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>2) Does this change decrease the effectiveness of the PVNGS Emergency Plan resulting in the loss of reasonable assurance that adequate protection can and will be taken in the event of a radiological emergency as required by 10 CFR 50.47(a)? <input type="checkbox"/> YES <input type="checkbox"/> NO</p> <p>3) Does this change result in the loss of ability to meet any of the standards or applicable requirements described in 10 CFR 50.47(b) and (d) or any USNRC approved alternatives to those standards and requirements? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>	
<i>If the answer to any question is YES or rationale does not support justification for any question answered NO, then approval is required from the USNRC Regional Office prior to implementation of the proposed change(s).</i>	
AFFIRMATION	
Performed by: _____	_____
(print)	(signature)
Approved by: _____	_____
(print)	★ (signature)
★ Department Leader - PVNGS Emergency Planning (signature indicates review of this document and all applicable attachments)	

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2.28 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 1 of 10 (sample)

FORM EP-0770

PVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 1 of 10)

(COPY TYPE)		NOT VALID UNLESS STAMPED			This form contains the major actions necessary to adequately plan and implement an annual full-scale drill and exercise development cycle. If possible, the form should be completed in the approximate sequence as listed. The values listed in the DAYS Column are based on the day of the evaluated exercise. The full-scale drill is announced as - 35 days, which correlates to one training cycle ahead of the evaluated exercise. The two DATE Columns should be completed by entering the date in each column for the specified action achieved. Critical actions are bulletted and appear bolded. Department management should be notified if any deviations from the expected timeline for these critical actions arise.		
FSD Number / Date:							
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION			
1	- 210			Establish date of Full-Scale Drill / Exercise (record on table headers)			
2	- 210			Reserve Simulator-A for Full-scale Drill / Exercise date & time period			
3	- 208			Verify FEMA Protective Action Guideline (PAG) values			
4	- 208			Schedule Simulator-A for scenario development			
5	- 205			Order binders, inserts, & index tabs for manuals, as required			
6	- 198			Review recent UNESC / FEMA exercise reports			
7	- 196			Select the objectives to be demonstrated			
8	- 182			Develop extent-of-play criteria with State of NE / Maricopa County			
9	- 181			Establish Scenario Test Force (STF) / Scenario Review Board (SRB) staffing			
10	- 180			Generate scenario foundation (STF duty)			
11	- 167			Develop scenario timeline			
12	- 165			Obtain Scenario Review Board (SRB) approval of core events & timeline			
13	- 161			Identify ERO participant team(s): FSD: _____ EXR: _____			
14	- 160			Obtain EP Department approval of objectives & extent-of-play			
15	- 159			Ensure Full-Scale Drill / Exercise dates entered into Nice Work Schedule			

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2.29 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 2 of 10 (sample)

FORM EP-0770

PVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 2 of 10)

FSD Number / Date:		EXR Number / Date:			
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION	
16	- 155			Schedule Operations personnel for scenario development support	
17	- 154	XXXXXX		Develop Exercise meteorological data summary	
18	- 152	XXXXXX		Submit Exercise meteorological data request to NWS (NOAA)	
19	- 136	XXXXXX		Develop Exercise scenario on Simulator-A	
20	- 123	XXXXXX		Develop Exercise scenario Computer Aided Exercises (CAE)	
21	- 113		XXXXXX	Develop Full-Scale Drill scenario on Simulator-A	
22	- 104		XXXXXX	Develop Full-Scale Drill scenario Computer Aided Exercises (CAE)	
23	- 101			Determine need for & extent of scenario mockup support materials	
24	- 97	XXXXXX		Generate 90-day submittal of objectives & extent-of-play criteria	
25	- 97	XXXXXX		• Transmit 90-day submittal to State of AS for FROA submittal	
26	- 92	XXXXXX		• Generate cover letter & transmit 90-day submittal to DSNIC	
27	- 85	XXXXXX		Complete Exercise Simulator scenario development w/ Ops personnel	
28	- 82		XXXXXX	Complete Full-Scale Drill Simulator scenario development w/ Ops personnel	
29	- 81		XXXXXX	Develop Full-Scale Drill meteorological data summary	
30	- 80		XXXXXX	Submit Full-Scale Drill meteorological data request to NWS (NOAA)	
31	- 79	XXXXXX		Generate Exercise Manual Section-1 Introduction	
32	- 79	XXXXXX		Generate Exercise Manual Section-2 Objectives	
33	- 79	XXXXXX		Generate Exercise Manual Section-3 PV Guide	
34	- 79	XXXXXX		Generate Exercise Manual Section-4 PV Messages	
35	- 79	XXXXXX		Generate Exercise Manual Section-5 Offsite Guide	

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2.30 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 3 of 10 (sample)

FORM EP-0770

PVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 3 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION
36	- 77	XXXXXXXX		Generate Exercise Manual Section-6 Offsite Messages
37	- 77	XXXXXXXX		Generate Exercise Manual Section-9 Equipment
38	- 77	XXXXXXXX		Obtain Exercise meteorological data from NWS (MOAA)
39	- 76	XXXXXXXX		Generate Exercise Manual Section-8 Meteorological
40	- 74	XXXXXXXX		Generate Exercise Manual Section-7 Chem / Rad
41	- 73	XXXXXXXX		Develop Exercise IPZ data, if required
42	- 73	XXXXXXXX		Generate Exercise Manual Section-5 Control Data
43	- 73	XXXXXXXX		Determine / establish Exercise Control Call requirements
44	- 73	XXXXXXXX		• Obtain verbal approval of objectives / extent-of-play from FEMA
45	- 72	XXXXXXXX		• Obtain verbal approval of objectives / extent-of-play from USMPC
46	- 70	XXXXXXXX		Ensure scenario & data satisfy USMPC / FEMA minimum requirements
47	- 70	XXXXXXXX		Produce master prototype Exercise Manual
48	- 69	XXXXXXXX		Produce master prototype Exercise IPZ Manual, if required
49	- 68	XXXXXXXX		Finalize 60-day submittal materials with Scenario Review Board (SRB)
50	- 67	XXXXXXXX		Finalize 60-day submittal materials with Scenario Task Force (STF)
51	- 66	XXXXXXXX		Generate 60-day submittal of Exercise / IPZ Manuals & materials
52	- 65	XXXXXXXX		• Transmit 60-day submittal to State of AS for FEMA submittal
53	- 65	XXXXXXXX		• Generate cover letter & transmit 60-day submittal to USMPC
54	- 64			Reserve EIC Auditorium for Full-Scale Drill / Exercise Player Briefings
55	- 58			Verify Simulator-A availability for Full-Scale Drill / Exercise

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2.31 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 4 of 10 (sample)

FORM EP-0770

FVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 4 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION
56	- 58			Generate Full-Scale Drill / Exercise Control Organization position list
57	- 58		XXXXXX	Generate Full-Scale Drill Manual Section-1 Introduction
58	- 58		XXXXXX	Generate Full-Scale Drill Manual Section-2 Objectives
59	- 58		XXXXXX	Generate Full-Scale Drill Manual Section-3 9V Guide
60	- 56		XXXXXX	Generate Full-Scale Drill Manual Section-4 PV Messages
61	- 56		XXXXXX	Generate Full-Scale Drill Manual Section-5 Offsite Guide
62	- 56		XXXXXX	Generate Full-Scale Drill Manual Section-6 Offsite Messages
63	- 55		XXXXXX	Generate Full-Scale Drill Manual Section-9 Equipment
64	- 53		XXXXXX	Obtain Full-Scale Drill meteorological data from WWS (NOAA)
65	- 52		XXXXXX	Generate Full-Scale Drill Manual Section-8 Meteorological
66	- 52		XXXXXX	Generate Full-Scale Drill Manual Section-7 Chem / Rad
67	- 52		XXXXXX	Develop Full-Scale Drill IPZ GCSA, if required
68	- 50		XXXXXX	Generate Full-Scale Drill Manual Section-6 Control Data
69	- 49		XXXXXX	Ensure "dry runs" of scenario have been validated with use of all CAs
70	- 49		XXXXXX	Obtain additional WTS7000 radios from Security for Full-Scale Drill use
71	- 49		XXXXXX	Produce master prototype Full-Scale Drill Manual
72	- 49		XXXXXX	Produce master prototype Full-Scale Drill IPZ Manual, if required
73	- 49		XXXXXX	Finalize Full-Scale Drill materials with Scenario Review Board (SRB)
74	- 47		XXXXXX	Finalize Full-Scale Drill materials with Scenario Task Force (STF)
75	- 47		XXXXXX	Request reproduction of Full-Scale Drill Manual

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2.32 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 5 of 10 (sample)

FORM EP-0770

PVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 5 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION
76	- 47		XXXXXX	Request reproduction of Full-Scale Drill IPZ Manuals, if required
77	- 45		XXXXXX	Secure reproduction of Full-Scale Drill Manuals
78	- 43		XXXXXX	Secure reproduction of Full-Scale Drill IPZ Manuals as required
79	- 43		XXXXXX	Determine / establish Full-Scale Drill Control Cell requirements
80	- 43		XXXXXX	Conduct offsite Initial Controller Training, if required
81	- 43		XXXXXX	Conduct onsite Initial Controller Training, if required
82	- 42		XXXXXX	Identify Full-Scale Drill Operations personnel participants
83	- 42		XXXXXX	Verify readiness of applicable scenario mockup materials
84	- 42		XXXXXX	Notify ABBN of Full-Scale Drill
85	- 42		XXXXXX	Notify Air-Exec of Full-Scale Drill
86	- 42		XXXXXX	Notify APS Communications of Full-Scale Drill
87	- 42		XXXXXX	Notify APS Energy Control Center of Full-Scale Drill
88	- 42		XXXXXX	Notify APS Media Relations of Full-Scale Drill
89	- 42		XXXXXX	Notify APS Security of Full-Scale Drill
90	- 42		XXXXXX	Notify APS Telephone Operator of Full-Scale Drill
91	- 42		XXXXXX	Notify APS Vice President - Nuclear of Full-Scale Drill
92	- 42		XXXXXX	Notify Area Municipal Mayors of Full-Scale Drill
93	- 42		XXXXXX	Notify AREA of Full-Scale Drill
94	- 42		XXXXXX	Notify AE DPS of Full-Scale Drill
95	- 42		XXXXXX	Notify DOE of Full-Scale Drill

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2.33 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 6 of 10 (sample)

FORM EP-0770

PVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 6 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION
96	- 42		XXXXXX	Notify FEMA of Full-Scale Drill
97	- 42		XXXXXX	Notify Good Samaritan Medical Center of Full-Scale Drill
98	- 42		XXXXXX	Notify Maryvale Samaritan Hospital of Full-Scale Drill
99	- 42		XXXXXX	Notify MCHHS of Full-Scale Drill
100	- 42		XXXXXX	Notify MCSO of Full-Scale Drill
101	- 42		XXXXXX	Notify National Weather Service (NWS) of Full-Scale Drill
102	- 42		XXXXXX	Notify BRP Power Dispatch Operator of Full-Scale Drill
103	- 42		XXXXXX	Notify USERC of Full-Scale Drill
104	- 42		XXXXXX	Submit Simulator-A Full-Scale Drill telecommunications request
105	- 41		XXXXXX	Submit catering request for Full-Scale Drill
106	- 41		XXXXXX	Disseminate Full-Scale Drill email memo to all EPO personnel
107	- 41		XXXXXX	Conduct offsite Full-Scale Drill Controller Briefing (disseminate manuals)
108	- 41		XXXXXX	Conduct onsite Full-Scale Drill Controller Briefing (disseminate manuals)
109	- 41		XXXXXX	Review applicable E-Plan Kit inventories
110	- 41		XXXXXX	Ensure adequate supplies of colored armbands / level badges exist
111	- 41		XXXXXX	Identify / produce Full-Scale Drill Player handouts (rules, briefing)
112	- 40		XXXXXX	Disseminate Full-Scale Drill site-wide communication
113	- 40		XXXXXX	• Complete Full-Scale Drill Control Organization staff list
114	- 40		XXXXXX	• Conduct offsite Full-Scale Drill Player Briefing
115	- 40		XXXXXX	• Conduct onsite Full-Scale Drill Player Briefing

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2.34 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 7 of 10 (sample)

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PVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 7 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ.	DAYS	DATE (FSD)	DATE (EXR)	ACTION
116	- 36		XXXXXX	Obtain restricted list of Full-Scale Drill observers & evaluators
117	- 36		XXXXXX	Verify Full-Scale Drill Control Cell telecommunications configuration
118	- 36		XXXXXX	Ensure Simulator-A procedures are current
119	- 36		XXXXXX	Verify Simulator-A Computer Room RMS / WISCOM functionality
120	- 36		XXXXXX	Verify Simulator Support personnel (hardware, software) availability
121	- 35		XXXXXX	Verify Simulator-A Full-Scale Drill telecommunications configuration
122	- 35		XXXXXX	Perform logistics material checks
123	- 35		XXXXXX	• Conduct Full-Scale Drill
124	- 35		XXXXXX	• Conduct Full-Scale Drill facility critiques
125	- 34		XXXXXX	Continue Full-Scale Drill 172 segment as required
126	- 31		XXXXXX	Conduct Full-Scale Drill management briefing / critique
127	- 30	XXXXXX		Incorporate "lessons learned" from Full-Scale Drill into Exercise
128	- 14	XXXXXX		Execute "dry runs" of scenario have been validated with use of all CAPs
129	- 14	XXXXXX		Obtain additional WRS2000 radios from Security for Exercise use
130	- 14	XXXXXX		Finalize Exercise materials with Scenario Review Board (SRB)
131	- 12	XXXXXX		Finalize Exercise materials with Scenario Task Force (STF)
132	- 12	XXXXXX		Request reproduction of _____ Exercise Manuals
133	- 12	XXXXXX		Request reproduction of _____ Exercise IPE Manuals, if required
134	- 10	XXXXXX		Secure reproduction of Exercise Manuals
135	- 8	XXXXXX		Secure reproduction of Exercise IPE Manuals as required

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2.35 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 8 of 10 (sample)

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FVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 8 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION
136	- 8	XXXXXX		Conduct offsite Initial Controller Training as required
137	- 8	XXXXXX		Conduct onsite Initial Controller Training as required
138	- 7	XXXXXX		Identify Exercise Operations personnel participants
139	- 7	XXXXXX		Verify readiness of applicable scenario setup materials
140	- 7	XXXXXX		Notify ASEM of Exercise
141	- 7	XXXXXX		Notify Ais-Evac of Exercise
142	- 7	XXXXXX		Notify APS Communications of Exercise
143	- 7	XXXXXX		Notify APS Energy Control Center of Exercise
144	- 7	XXXXXX		Notify APS Media Relations of Exercise
145	- 7	XXXXXX		Notify APS Security of Exercise
146	- 7	XXXXXX		Notify APS Telephone Operator of Exercise
147	- 7	XXXXXX		Notify APS Vice President - Nuclear of Exercise
148	- 7	XXXXXX		Notify Area Municipal Mayors of Exercise
149	- 7	XXXXXX		Notify AREA of Exercise
150	- 7	XXXXXX		Notify AE DRS of Exercise
151	- 7	XXXXXX		Notify DOE of Exercise
152	- 7	XXXXXX		Notify FEMA of Exercise
153	- 7	XXXXXX		Notify Good Samaritan Medical Center of Exercise
154	- 7	XXXXXX		Notify Maryvale Samaritan Hospital of Exercise
155	- 7	XXXXXX		Notify NCDM of Exercise

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2.36 Form EP-0770, Full-Scale Drill / Exercise Checklist, page 9 of 10 (sample)

FORM EP-0770

FVNGS EMERGENCY PLANNING

FULL-SCALE DRILL / EXERCISE CHECKLIST (Part 9 of 10)

FSD Number / Date:		EXR Number / Date:		
SEQ	DAYS	DATE (FSD)	DATE (EXR)	ACTION
156	- 7	XXXXXX		Notify NCSO of Exercise
157	- 7	XXXXXX		Notify National Weather Service (NWSA) of Exercise
158	- 7	XXXXXX		Notify SRP Power Dispatch Operator of Exercise
159	- 7	XXXXXX		Notify USMNC of Exercise
160	- 7	XXXXXX		Finalize Exercise Control Call requirements
161	- 7	XXXXXX		Submit Simulator-A Exercise telecommunications request
162	- 6	XXXXXX		Submit catering request for Exercise
163	- 6	XXXXXX		Disseminate Exercise email memo to all ERO personnel
164	- 6	XXXXXX		Conduct offsite Exercise Controller Briefing (disseminate manuals)
165	- 6	XXXXXX		Conduct onsite Exercise Controller Briefing (disseminate manuals)
166	- 6	XXXXXX		Review applicable E-Plan Kit inventories
167	- 6	XXXXXX		Ensure adequate supplies of colored armbands / lapel badges exist
168	- 6	XXXXXX		Identify / produce Exercise Player handouts (rules, briefing)
169	- 5	XXXXXX		Disseminate Exercise site-wide communication
170	- 5	XXXXXX		• Complete Exercise Control Organization staff list
171	- 5	XXXXXX		• Conduct offsite Exercise Player Briefing
172	- 5	XXXXXX		• Conduct onsite Exercise Player Briefing
173	- 1	XXXXXX		Obtain restricted list of Exercise observers & evaluators
174	- 1	XXXXXX		Verify Exercise Control Call telecommunications configuration
175	- 1	XXXXXX		Ensure Simulator-A procedures are current

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2.38 Form EP-0773, Training Drill Checklist (sample)

FORM EP-0773.

PVNGS EMERGENCY PLANNING

TRAINING DRILL CHECKLIST

Type:		Number:	Action:
SEQ	DAYS	DATE	INITIALS
1	- 014		
2	- 014		
3	- 014		
4	- 010		
5	- 010		
6	- 007		
7	- 007		
8	- 007		
9	- 006		
10	- 006		
11	- 005		
12	- 005		
13	- 002		
14	- 002		
15	- 001		
16	- 001		
17	- 001		
18	- 001		
19	- 000		
20	- 000		
21	- 000		
22	- 000		

Comments:

- Verify date and time
- Identify response team
- Identify and establish Player requests
- Select objectives
- Identify extent of play criteria
- Identify offsite organization participation criteria
- Establish Simulator-A telecommunication request
- Review / validate scenario and timeline
- Identify / develop required support data
- Identify / assign Controllers
- Determine / establish Control Cell requirements
- Disseminate email memo to all ERO personnel
- Produce site-wide announcement w/ Strat. Comm.
- Identify / produce Player handouts (sit. rules, briefing)
- Verify Player assignments
- Verify Simulator-A Computer Room RIMS DCU and dose projection software functionality
- Organize / conduct Controller pre-briefing
- Distribute scenario package to Controllers:
 - Attendance sheets
 - Control Cell telephone numbers
 - EP Comment forms
 - Session briefing outline (purpose, objectives, extent-of-play, facilities activated, telecommunications, observations)
 - Scenario (as necessary)
 - Controller badge / arm-band
 - Critique guidelines
 - E-Kit seats
 - Scenario support data
- Verify Simulator-A telecommunications configuration
- Conduct training drill
- Conduct facility critiques
- Verify Simulator A telecommunications to Simulator mode

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2.39 Form EP-0774, Scenario Development Data Confidentiality (sample)

FORM EP-0774 A

PVNGS EMERGENCY PLANNING

SCENARIO DEVELOPMENT DATA CONFIDENTIALITY

SUMMARY

An emphasis on scenario confidentiality and suspicion of Exercise participant preparation perceived by the United States Nuclear Regulatory Commission (USNRC) makes the control of scenario data essential. If any suspicion of scenario compromise exists, the NRC may invalidate the Exercise scenario and request a full remedial performance.

You are required to maintain full control of Drill / Exercise material and data in accordance with 84DP-0RM32, Handling of Proprietary, Confidential, and Company Confidential Information, when in support of scenario development personnel. Any reproduction, distribution, or communication of material and/or data, or content of same, to unauthorized personnel is strictly prohibited. Elimination of scenario data or related material shall be accomplished only via a full-page paper shredder. Transfer of material shall take place within the confines of packaging clearly marked as "CONFIDENTIAL." Delegation of typing and/or reproduction of related material shall take place under the auspices of scenario development personnel.

The practice of reasonable caution with respect to scenario data will prevent any inference of participant preparation. The potential minimal gains offered by "leaking" data to participants is tremendously offset by the consequences of suspicion of compromise. A remedial Exercise would generate substantial expenses in personnel time, has provisions for operational impacts, and would have the potential of possible civil penalties levied against Arizona Public Service Company by the USNRC. In addition, evaluators may lose confidence in PVNGS and, as a result, exercise increased diligence in their reappraisal of plant and personnel performance.

Confidentiality of any specific scenario data shall no longer be required upon conclusion of the scenario pertaining to the specific data for which it applies. This Confidentiality Agreement shall terminate upon conclusion of all scenarios applicable to data development undertaken for purposes relating to said Drills and/or Exercises and shall not require written individual relinquishment of statement bounds.

As a contributor to or member of the scenario development group, I have read the provisions stated above and understand their importance concerning data confidentiality.

NAME: _____
(print)

SIGNATURE: _____

DATE: _____