
Document Update Notification

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DOCUMENT NO: **OP-1063.021**

TITLE: **EMERGENCY RESPONSE TRAINING
PROGRAM**

REVISION NO: **023-00-0**

CHANGE NO: **AP-23**

SUBJECT: **NEW REVISION**

*If this box is checked, please sign, date, and return transmittal
in envelope provided.*

ANO-1 Docket 50-313

ANO-2 Docket 50-368

Signature

Date

A045

**ENTERGY OPERATIONS INCORPORATED
ARKANSAS NUCLEAR ONE**

59 of 6.

TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES		PROC/WORK PLAN NO. 1903.004	CHANGE NO. 022-00-0
<input checked="" type="checkbox"/> PROCEDURE <input type="checkbox"/> WORK PLAN, EXP. DATE <u> N/A </u>		PAGE <u> 1 </u> OF <u> 1 </u>	
TYPE OF CHANGE: <input type="checkbox"/> NEW <input checked="" type="checkbox"/> REVISION <input type="checkbox"/> PC <input type="checkbox"/> TC <input type="checkbox"/> DELETION Procedure or Work Plan <input type="checkbox"/> EZ EXP. DATE: <u> N/A </u>			
AFFECTED SECTION: (Include step # if applicable)	DESCRIPTION OF CHANGE: (For each change made, include sufficient detail to describe reason for the change.)		
3.4	Commitments added		
5.5	Brackets and bold face added		
6.1 H	Brackets and bold face added		
7.1.1 A	Brackets and bold face added		
9.1.4	Brackets and bold face added		
11.0	Brackets and bold face added		
Attachment 1	Note added		
1903.004A	Brackets and bold face added		
FORM TITLE:	FORM NO.	CHANGE NO.	
DESCRIPTION OF CHANGE	1000.006C	047-04-0	

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1.0 PURPOSE

The purpose of this procedure is to describe the methods for administration and maintenance of the Emergency Plan and associated procedures.

2.0 SCOPE

2.1 This procedure describes the responsibilities of the ANO Emergency Planning Staff in regard to the administration and maintenance of the Emergency Plan and Implementing Procedures.

2.2 This procedure provides guidelines for management of the Emergency Plan and the Emergency Plan Implementing Procedures.

2.3 This procedure provides guidelines for maintenance of emergency facilities and equipment.

2.4 This procedure provides guidelines for the performance and documentation of the Quarterly Emergency Telephone Directory review.

2.5 This procedure outlines audit requirements of the Emergency Planning Program as outlined in 10CFR50.54(t).

3.0 REFERENCES

3.1 REFERENCES USED IN PROCEDURE PREPARATION

3.1.1 Emergency Plan

3.1.2 NUREG-0654, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"

3.1.3 1000.006, "Procedure Review, Approval, and Revision Control"

3.1.4 10CFR50.54(q)

3.1.5 10CFR50.54(t)

3.2 REFERENCES USED IN CONJUNCTION WITH THIS PROCEDURE:

3.2.1 1000.150, "Licensing Document Maintenance"

3.2.2 1000.131, "10CFR50.59 Review Program"

3.2.3 1903.010, "Emergency Action Level Classification"

3.3 RELATED ANO PROCEDURES INCLUDE:

3.3.1 1903 Series Procedures, "Emergency Plan Implementing Procedures"

3.3.2 1904 Series Procedures, "Offsite Dose Projections"

3.3.3 1905 Series Procedures, "Emergency Radiation Protection Procedures"

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3.4 REGULATORY CORRESPONDENCE CONTAINING NRC COMMITMENTS WHICH ARE IMPLEMENTED IN THIS PROCEDURE INCLUDE: **[BOLD]** DENOTES COMMITMENTS

- 3.4.1 0CNA018203 (P-9495) Section 7.1.1A
- 3.4.2 0CAN068320 (P-10767) Section 6.1.1H
- 3.4.3 0CAN048205 (P-10843) Section 11.0
- 3.4.4 0CAN128211 (P-10861) Section 5.5, Form 1903.004A
- 3.4.5 0CAN128211 (P-10863) Section 9.1.4
- 3.4.6 10CFR50. APP E.V. (P-14145), Attachment 1

4.0 DEFINITIONS

- 4.1 Initial Response Staff (IRS) - The emergency organization primarily composed of plant personnel which must be able to augment the onsite plant personnel in accordance with Table B-1 of the Emergency Plan.
- 4.2 Emergency Response Organization (ERO) - The organization which is composed of the IRS, the EOF staff, the TSC staff, the OSC staff, and the Emergency Team members. It has the capability to provide manpower and other resources necessary for immediate and long-term response to an emergency situation.
- 4.3 EAL Bases Document - The document which provides the technical bases for initiating conditions used to classify plant related emergencies.

5.0 RESPONSIBILITY AND AUTHORITY

- 5.1 The Manager, Emergency Planning shall be responsible for the maintenance of ANO emergency preparedness.
- 5.2 The Emergency Planner(s) shall perform those tasks assigned by this procedure and shall coordinate activities to assure consistency between the Emergency Plan and Implementing Procedures.
- 5.3 The Emergency Planner(s) shall coordinate and issue changes to the Emergency Plan and the Emergency Plan Implementing Procedures.
- 5.4 Revisions to the Emergency Plan and Implementing Procedures shall be approved in accordance with Sections 6.2 and 6.3 of this procedure.
- 5.5 **[Suggestions for improvement of the Emergency Plan and Implementing Procedures may be made at any time by the plant staff using Form 1903.004A.]**

6.0 INSTRUCTIONS

- 6.1 REVIEW AND UPDATING OF THE EMERGENCY PLAN AND IMPLEMENTING PROCEDURES
 - 6.1.1 The review and updating of the Emergency Plan and Implementing Procedures shall include the following actions by the Emergency Planning Supervisor or his designee:

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- A. Provide for continuing review of the Emergency Plan and Implementing Procedures concerning ANO response.
- B. Notify affected site departments of Plan and Procedure changes.
- C. Notify affected sitebased ERO members of Plan and Procedures changes, as necessary.
- D. Process requests for improvements submitted on Form 1903.004A.
- E. Annually, review the Plan and Procedures in their entirety to verify that changes that have occurred which impact the Plan and/or procedures have been incorporated.
- F. At the conclusion of drills and/or exercises involving site ERO members, or at the conclusion of an incident which required implementation of the Plan, provide for a critique and evaluation by participants and revise the Plan and Procedures where appropriate.
- G. Evaluate feedback from Emergency Plan Training (including feedback from class critiques) and incorporate changes and improvements into the Emergency Plan and Procedures as necessary.
- H. **[Quarterly, ensure that the Emergency Telephone Directory is complete and current for emergency response personnel and that related sections of Procedures 1903.010 correspond to the Emergency Telephone Directory. Document the review on Form 1903.004C.]**
- I. Coordinate approval of the Emergency Plan changes in accordance with Section 6.2 of this procedure.
- J. Coordinate approval of the Emergency Plan Implementing Procedure changes in accordance with Section 6.3 of this procedure.
- K. Respond to QA/INPO audits and NRC inspections of emergency planning activities.
- L. Ensure that the Emergency Response Duty Roster and guidelines are updated and distributed annually.

6.2 APPROVAL OF EMERGENCY PLAN REVISIONS (AS SHOWN IN ATTACHMENT 1) SHALL BE PROVIDED AS FOLLOWS:

- 6.2.1 Revisions to the Emergency Plan shall be coordinated by the Emergency Planner(s).
- 6.2.2 The Emergency Planner(s) shall perform an independent review of the Emergency Plan revision.
- 6.2.3 The Emergency Planner(s) shall perform a 50.54(q) review for all Emergency Plan revisions (form 1903.004F).

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- 6.2.4 The Emergency Plan revision approval process will be conducted in accordance with Licensing Document Maintenance Procedure.
- 6.2.5 The approved plan revision shall be distributed in accordance with established document control procedures.
- 6.2.6 A record of each change to the Emergency Plan made without prior approval by the NRC, shall be retained for three years from the date of the change.
- 6.2.7 The Emergency Plan and records of any changes to the Emergency Plan that decrease the effectiveness of the Plan, shall be retained until the NRC terminates the license for both ANO units.
- 6.2.8 The Emergency Planning Program, as described and implemented by the ANO Emergency Plan and Implementing Procedures shall be audited once per 12 months by persons who have no direct responsibility for implementation of the Emergency Planning Program.

6.3 APPROVAL OF EMERGENCY PLAN IMPLEMENTING PROCEDURE REVISIONS SHALL BE PROVIDED AS FOLLOWS:

- 6.3.1 Revisions to the Emergency Plan Implementing Procedures shall be coordinated by the Emergency Planner(s).
- 6.3.2 The Emergency Planner(s) may perform an independent review of the Emergency Plan Implementing Procedure revision.

NOTE

Revisions to Procedure 1903.010, "Emergency Action Level Classification", shall be independently reviewed by the Unit One and/or Unit Two Operations Manager.

- 6.3.3 The Emergency Planner(s) shall perform a 50.54(q) review for any changes to the Emergency Action Levels (EALs) contained in Procedure 1903.010, "Emergency Action Level Classification".
 - 6.3.4 The Emergency Plan Implementing Procedures revision approval process will follow the requirements of Procedure 1000.006, "Procedure Control".
 - 6.3.5 The approved procedure revision shall be distributed in accordance with established document control procedures.
- 6.4 REVIEW AND REVISION OF THE EAL BASES DOCUMENT
- 6.4.1 The review and revision of the EAL Bases Document will be coordinated by Emergency Planning.
 - 6.4.2 The following directors/managers shall ensure that proposed changes to the document are reviewed for technical accuracy and/or applicability as emergency classification criteria.

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- A. Operations Managers
- B. Director, Design Engineering
- C. Manager, Rad Protection and Chemistry
- D. Director, Training and Emergency Planning

6.4.3 Reviews will be documented on Form 1903.004D. Procedure revisions resulting from changes to the EAL Bases Document will be reviewed and approved as described in Section 6.3.

6.5 REVIEW OF TRANSMITTALS TO NRC

6.5.1 All correspondence to the Nuclear Regulatory Commission that originates in the Emergency Planning Section shall be submitted to Licensing for review prior to transmittal to the Nuclear Regulatory Commission.

7.0 DRILLS AND EXERCISES

7.1 The Emergency Planner(s) shall coordinate to develop scenarios for emergency preparedness drills and the annual emergency preparedness exercise in accordance with the Emergency Plan.

7.1.1 The Emergency Planner(s) shall:

- A. **[Submit a listing of objectives associated with the annual emergency preparedness exercise to the NRC for review, at least 90 days prior to the scheduled exercise date, in accordance with NRC Inspection Procedure 82302, Exhibit 1.]**
- B. Submit the annual emergency preparedness exercise scenario and associated materials to the NRC for review, at least 60 days prior to the scheduled exercise date, in accordance with NRC Inspection Procedure 82302, Exhibit 1.
- C. Publish a schedule of emergency preparedness drills for the upcoming year during the last quarter of the current year.
- D. Schedule a critique at the conclusion of each exercise to evaluate the ability of the members of the ERO to respond as required by the Emergency Plan and Implementing Procedures.
- E. Submit documentation of each emergency preparedness practice drill/exercise to ANO Records Management System. This documentation as a minimum shall include the following:
 - 1. Scenario
 - 2. Drill/Exercise Evaluation Summary Sheets
 - 3. Documentation addressing action taken on each finding from the drill/exercise.

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F. Provide the Vice President, Operations - ANO with a report of findings and recommended corrective actions, resulting from the exercise critiques.

8.0 COMMUNICATIONS

8.1 THE EMERGENCY PLANNER(S) SHALL:

- 8.1.1 Perform the designated quarterly communications test and phone number verification per Procedure 1903.061, "Communications Equipment Tests".
- 8.1.2 Perform the designated monthly test and quarterly phone number verification per Procedure 1903.061, "Communications Equipment Tests".
- 8.1.3 Perform annual communications tests between ANO and the county EOC's.

9.0 EMERGENCY RESPONSE PERSONNEL

9.1 THE ANO EMERGENCY PLANNER(S) SHALL:

- 9.1.1 Issue and update letters of assignment, suspension, reinstatement and termination for ERO personnel as required by Procedures 1903.002 and 1903.003.
- 9.1.2 Determine staffing adequacy when a letter of termination/suspension is issued.
- 9.1.3 Review the most recent ANO Organizational Chart monthly to ensure that staffing changes in the normal plant organization are reflected in the Emergency Response Organization. Document this review on Form 1903.004E.
- 9.1.4 **[Ensure that the Emergency Telephone Directory and the Computerized Notification System (CNS) data base are updated on a quarterly basis.]**
- 9.1.5 Perform a critique process to identify strengths, weaknesses and improvement items on all emergency classifications and medical emergencies where the Emergency Medical Team has been activated. The results of the critique should then be published and distributed as a training aid for the other team members. The critique process will be similar to the critique process used for Drills and Exercises. This process is described in the ANO Emergency Planning Drill/Exercise Manual.

10.0 FACILITIES AND EQUIPMENT

10.1 THE EMERGENCY PLANNER(S) SHALL:

- 10.1.1 Ensure that periodic inventories of the emergency kits located at ANO, the EOF and St. Mary's Hospital are completed per Procedure 1903.060, "Emergency Supplies and Equipment" and that inventories are maintained.

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11.0 [DEDICATED EMERGENCY RESPONSE VEHICLE

- 11.1 A vehicle has been dedicated for use as an ANO emergency response vehicle. This vehicle, a four-wheel-drive Chevrolet Blazer, is normally parked at the EOF near the lower west entrance.
- 11.2 The offsite monitoring section of the Emergency Radiation Team has priority use of this vehicle to conduct field surveys in the event of a radiological release at ANO.
- 11.3 Keys for this vehicle are located in the red key box outside of Room 110 of the EOF and in the emergency kit in the OSC.
- 11.4 In the event that the four-wheel drive vehicle becomes unavailable, the Manager of Emergency Planning will designate another ANO vehicle for emergency response use.]

12.0 OFFSITE SUPPORT ORGANIZATIONS

- 12.1 The Manager, Emergency Planning shall provide the Nuclear Planning and Response Program with appropriate information involving Emergency Plan and Implementing Procedures revisions.
- 12.2 The Manager, Emergency Planning shall maintain liaison between ANO and the Arkansas Department of Health and other appropriate support organizations.
- 12.3 The Manager, Emergency Planning shall coordinate to ensure that letters of agreement with offsite support organizations are reviewed every two years and updated if necessary.

13.0 ATTACHMENTS AND FORMS

13.1 ATTACHMENTS

- 13.1.1 Attachment 1 - "Emergency Plan and Implementing Procedures Review"

13.2 FORMS

- 13.2.1 Form 1903.004A - "Emergency Planning Evaluation/Action Request"
- 13.2.2 Form 1903.004C - "Quarterly Emergency Telephone Directory Review"
- 13.2.3 Form 1903.004D - "EAL Bases Document Review"
- 13.2.4 Form 1903.004E - "ANO Organizational Chart Review"
- 13.2.5 Form 1903.004F - "50.54(q) Screening and Evaluation"

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ATTACHMENT 1

EMERGENCY PLAN AND
IMPLEMENTING PROCEDURES REVIEW

Emergency Plan and/or
Procedure Revision
Originated



Independent and
Supervisory Review



10CFR50.59
Review



10CFR50.54(q) Review
Emergency Plan/EAL
Changes



Plant Safety
Committee Review



General Manager,
Operations Approval



Vice President
Operations - ANO
Approval



**Approved Emergency
Plan Revision**

Note: Procedures are approved and implemented at this point. Procedure revisions may subsequently be reviewed by the Vice President, Operations - ANO.

Note: Emergency Plan changes are not approved until all steps are completed.

Note: **[Emergency Plan Changes will be submitted to NRC within 30 days as per 10CFR50.4]**

- | | <u>Initials</u> |
|--|-----------------|
| 1. ERO Positions | |
| A. Assigned individuals are listed correctly | _____ |
| B. Assigned telephone, pager and radio numbers correct | _____ |
| 2. ERO Personnel | |
| A. Assigned personnel are listed correctly | _____ |
| B. Assigned telephone and pager numbers correct | _____ |
| 3. Emergency Response Centers | |
| A. Assigned telephone numbers are correct | _____ |
| 4. Emergency Teams/Groups | |
| A. Assigned members are listed correctly | _____ |
| B. Telephone numbers are correct | _____ |
| 5. Technical Assistants/Communicators/EAL Reviewers | |
| A. Assigned members are listed correctly | _____ |
| B. Telephone numbers are correct | _____ |
| 6. Federal Contacts | |
| A. Federal Contact listing is complete | _____ |
| B. Telephone numbers are correct | _____ |
| 7. Industry Contacts | |
| A. Industrial Contact listing is complete | _____ |
| B. Telephone numbers are correct | _____ |
| 8. State and Local contacts | |
| A. Applicable agencies are listed | _____ |
| B. Telephone numbers are correct | _____ |
| 9. TOCC Phone Directory | |
| A. TOCC-Telephone numbers are listed correctly | _____ |

FORM TITLE: QUARTERLY EMERGENCY TELEPHONE DIRECTORY REVIEW	FORM NO. 1903.004C	CHANGE 022-00-0
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- | | <u>Initials</u> |
|--|-----------------|
| 10. Pager Assignments | |
| A. Assigned individuals are listed correctly | _____ |
| B. Pager number assignments are correct | _____ |
| 11. Entergy Corporation Contacts | |
| A. Assigned individual listing is correct | _____ |
| B. Telephone numbers are correct | _____ |
| 12. Procedure Verification | |
| A. Related sections of Procedures 1903.011 correspond to the
Emergency Telephone Directory Listing. | _____ |
| 13. The entries in the Computerized Notification System (CNS) database
have been compared to those in the Emergency Telephone Directory
and changes made as necessary. | _____ |

Comments: _____

Performed by _____ Date _____

Reviewed by _____ Date _____

FORM TITLE: QUARTERLY EMERGENCY TELEPHONE DIRECTORY REVIEW	FORM NO. 1903.004C	CHANGE 022-00-0
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This document provides technical bases which explain the ANO Emergency Action Level criteria found in Procedure 1903.010, "Emergency Action Level Classification". This document is intended for use as a writers guide for procedure 1903.010, a resource for training program development, as a self-study guide, and as a reference for use in audits and inspections.

The following individuals (or their designee's) have reviewed proposed changes to revision _____ of this document for technical accuracy and applicability as emergency classification criteria.

Manager, Operations Unit One _____ / _____
 Signature Date

Manager, Operations Unit Two _____ / _____
 Signature Date

Director, Design Engineering _____ / _____
 Signature Date

Manager, Rad Protection & Chemistry _____ / _____
 Signature Date

Director, Training and Emergency Planning _____ / _____
 Signature Date

FORM TITLE: <p style="text-align: center;">EAL BASES DOCUMENT REVIEW</p>	FORM NO. <p style="text-align: center;">1903.004D</p>	CHANGE <p style="text-align: center;">022-00-0</p>
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1. Review the most recent ANO Organizational Chart to assess how personnel changes have impacted the ERO staffing.
2. List below any personnel changes in the normal organization which will/may have an impact on the ERO staffing.

NAME	ERO POSITION

Comments: _____

Performed by: _____

Reviewed by: _____

1. DOCUMENT INFORMATION

Procedure/Document Number:	Proc./Doc. Revision:
Document Title:	
Was LRS search used? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Brief Description of Proposed Revision:	

2. SCREENING

A.) Does the proposed revision require a revision to the Emergency Plan? <input type="checkbox"/> Yes <input type="checkbox"/> No
B.) Does the proposed revision change ANO Emergency Action Levels (EALs)? <input type="checkbox"/> Yes <input type="checkbox"/> No
If the answer to either question is YES, then a 50.54(q) evaluation must be performed. If A.) is checked yes, proceed to section 3. If B.) is checked yes, proceed to section 4.

3. EMERGENCY PLAN CHANGE INFORMATION

Document change information below (attach additional pages if necessary):		
<u>Section</u>	<u>Sub-Section</u>	<u>Page Number(s)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
Comments: _____		

4. 10CFR50.47(b) and 10CFR50, APPENDIX E CHECKLIST

Review the planning standards contained in 10CFR50.47(b) and 10CFR50, Appendix E to determine if any of the standards are affected by the change. Check the applicable abbreviated standard below if it is affected.

1.0 10CFR50.47(b) STANDARDS

- (1) ___ Assignment of ERO Responsibilities by licensee, state & county.
- (2) ___ Adequate staffing and response, both Onsite and Offsite.
- (3) ___ Arrangements for assistance, and state and local staff provided for at the EOF.
- (4) ___ Emergency Classification/Action Levels and minimum initial offsite response.
- (5) ___ Notification to state/local/ERO, and Notification to the public provided for.
- (6) ___ Communications-State/local/ERO and the public.
- (7) ___ Information to the public/media on a periodic basis.
- (8) ___ Emergency facilities and equipment are provided and maintained.
- (9) ___ Methods/systems/equipment for monitoring for offsite consequences.
- (10) ___ Protective actions for the plume exposure pathway/EPZ for workers and public.
- (11) ___ Emergency worker exposure controls.
- (12) ___ Medical services for contaminated injured personnel.
- (13) ___ General plans for reentry and recovery.
- (14) ___ Periodic exercises and drills. Deficiencies are identified and corrected.
- (15) ___ Radiological emergency response training provided.
- (16) ___ Responsibilities for Emergency Plan development/review/distribution.

2.0 10CFR50, APPENDIX E STANDARDS

- ___ (I), (II), (III) Emergency Plan as described in the FSAR.
- ___ (IV)A Emergency organization for coping with radiological emergencies.
- ___ (IV)B Assessing the release of radiological material and associated EALs.
- ___ (IV)C Emergency classification and EALs and notification/activation of the ERO.
- ___ (IV)D Notification of NRC, State, locals and public. Dissemination of information.
- ___ (IV)E Emergency facilities/equipment with communications systems and medical arrangements.
- ___ (IV)F Training on and exercising the Emergency Plan.
- ___ (IV)G Plan/Procedure maintenance, and surveillance of equipment and supplies.
- ___ (IV)H Reentry and recovery following an accident.
- ___ (V) Changes to the Emergency Plan and procedures are sent to the NRC.
- ___ (VI) Maintain the Emergency Response Data System (ERDS).

FORM TITLE: 50.54(Q) SCREENING AND EVALUATION	FORM NO. 1903.004F	CHANGE 022-00-0
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