

**Pacific Gas and Electric Company**

Diablo Canyon Power Plant  
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805/545-6000

January 16, 2001

PG&E Letter DCL-01-007



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

**Docket No. 50-275, OL-DPR-80**  
**Docket No. 50-323, OL-DPR-82**  
**Diablo Canyon Units 1 and 2**  
**Emergency Plan Implementing Procedure Update**

Dear Commissioners and Staff:

In accordance with Section V, "Implementing Procedures," of 10 CFR 50, Appendix E, enclosed is an update to the emergency plan implementing procedures for Diablo Canyon Power Plant, Units 1 and 2.

As provided under 10 CFR 50.54(q), the changes in this update do not decrease the effectiveness of the emergency plan and, therefore have been made without prior NRC approval. The plan, as changed, continues to meet the standards of 10 CFR 50.47(b) and 10 CFR 50, Appendix E.

This update does not contain any privacy/proprietary information in accordance with NRC Generic Letter 81-27.

If there are any questions regarding this update, please contact Mr. Mark Lemke of my staff at (805) 545-4787.

Sincerely,

A handwritten signature in black ink, appearing to read 'J.R. Becker'. The signature is written in a cursive style with a large, looping 'B'.

**James R. Becker**  
**Director - Operations Services**

Enclosures

A045

cc: Ellis W. Merschoff - w/a (2)  
David L. Proulx  
Girija S. Shukla

DDM/1345

**LOCATION OF PRIVACY/PROPRIETARY INFORMATION IN  
EMERGENCY PLAN IMPLEMENTING PROCEDURES  
FOR DIABLO CANYON POWER PLANT, UNITS 1 AND 2**

<u>Procedure Number</u>	<u>Privacy/ Proprietary Information</u>	<u>Title/Location of Privacy/Proprietary Information</u>
OM10.DC1 Revision 2	No	Emergency Preparedness Drills and Exercises

## DIABLO CANYON POWER PLANT EMERGENCY PLAN IMPLEMENTING PROCEDURES

Table of Contents - Emergency Plan Implementing Procedures  
Volume 1A (OM10.ID3 only), Volume 1B (OM10.DC1 only), and Volume 3B

Proc. No.	Rev.	Title
OM10.ID3	6	Emergency Plan Training
<b>OM10.DC1*</b>	<b>2</b>	<b>Emergency Preparedness Drills and Exercises</b>
EP G-1	29	Emergency Classification and Emergency Plan Activation
EP G-2	21	Activation and Operation of the Interim Site Emergency Organization (Control Room)
EP G-3	33	Notification of Off-Site Agencies and Emergency Response Organization Personnel
EP G-4	17	Personnel Assembly, Accountability and Site Access Control During Emergencies
EP G-5	8	Evacuation of Nonessential Site Personnel
EP R-2	19C	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	8B	Release of Radioactive Liquids
EP R-7	13	Off-Site Transportation Accidents
EP OR-3	6	Emergency Recovery
EP RB-1	5B	Personnel Dosimetry
EP RB-2	4B	Emergency Exposure Guides
EP RB-3	4	Stable Iodine Thyroid Blocking
EP RB-4	4A	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	4C	Personnel Decontamination
EP RB-8	13	Instructions for Field Monitoring Teams
EP RB-9	11	Calculation of Release Rate
EP RB-10	7	Protective Action Recommendations
EP RB-11	11C	Emergency Offsite Dose Calculations
EP RB-12	6	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	5B	Core Damage Assessment Procedure
EP RB-15	9	Post Accident Sampling System
EP EF-1	25A	Activation and Operation of the Technical Support Center
EP EF-2	24	Activation and Operation of the Operational Support Center
EP EF-3	17	Activation and Operation of the Emergency Operations Facility
EP EF-4	13A	Activation of the Mobile Environmental Monitoring Laboratory
EP EF-9	7	Backup Emergency Response Facilities
EP EF-10	4	Joint Media Center Activation and Operation

**\* Procedure included in this submittal**



**Emergency Preparedness Drills and Exercises**

12/15/00  
 Effective Date

Sponsoring Organization: Emergency Planning  
 Procedure Classification: Quality  
 Review Level: "A"

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**1. SCOPE**

This procedure provides administrative controls for the DCPD Emergency Plan drill and exercise program.

This procedure was rewritten; therefore, revision bars are not included.

**2. DISCUSSION**

In the context of scheduling and development, drill and exercise may be used interchangeably within this procedure.

This procedure implements 10 CFR 50.47 (b) (14).

- Periodic exercises are conducted to evaluate emergency response capabilities.
- Periodic drills are conducted to develop and maintain key skills.
- Deficiencies identified as a result of exercises or drills are corrected.

More criteria is provided by 10 CFR 50, Appendix E, Section IV (F). Exercises shall:

- Test the adequacy of timing and content of implementing procedures and methods.
- Test emergency equipment and communications networks.
- Test the public notification system.
- Ensure that emergency organization personnel are familiar with their duties.

Federal regulations also specify biennial exercises with state and local government participation within the Plume Exposure Pathway Emergency Planning Zone (EPZ).

Scheduling of exercises involving state and local participation must be coordinated with the affected governmental agencies, the Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA).

### 3. DEFINITIONS

#### **Annual**

A calendar year beginning January 1 and ending December 31.

#### **Controller**

An individual that ensures the scenario proceeds in accordance with the timeline, disseminates information and pre-planned messages, observes and documents player performance and makes corrective action recommendations. Controllers should be technically qualified in the areas they are controlling and it is preferable to have controllers assigned to the Emergency Response Organization (ERO) position they are controlling.

#### **Drill**

A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. Drills may involve on-the-spot correction and may require demonstration of correct performance by the controller. Drills may be used to correct findings from an exercise.

#### **Exercise**

An event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. An exercise is evaluated and requires documentation of problem areas.

#### **Emergency Response Organization (ERO)**

The organization specifically designed to supplement the DCPD normal plant organization during emergencies. This organization is established upon activation of the DCPD Emergency Plan and provides coordinated, comprehensive emergency response capabilities.

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#### 4. RESPONSIBILITIES

##### **DCPP Plant Manager**

Assuring emergency drills and exercises are scheduled as an integral part of plant operations.

##### **Director, Operations Services**

Ensuring implementation of the DCPD Emergency Plan drill and exercise program.

##### **Emergency Planning Supervisor**

- Developing an annual drill and exercise schedule.
- Developing and conducting all required DCPD Emergency Plan drills and exercises.
- Implementing corrective actions identified during drills and exercises for the Onsite Emergency Preparedness program.
- Coordinating drill and exercise schedules and corrective actions with governmental agencies, offsite organizations and Corporate groups.

##### **Drill and Exercise Coordinator**

Preparation and conduct of the drill program, under the direction of Emergency Planning Supervision.

##### **Safety and Fire Protection Group**

- Scheduling, developing and conducting fire drills to meet FSAR 9.5H requirements.
- Coordinating participation by California Department of Forestry (CDF) in at least two drills annually.

#### 5. INSTRUCTIONS

##### 5.1 EMERGENCY RESPONSE DRILLS AND EXERCISES

##### 5.1.1 Onsite Emergency Response Exercises

- 1) Onsite emergency response exercises shall be conducted every 2 years.

**Note:** The exercise may be included in the full participation biennial exercise.

- 2) Other drills shall be conducted during the interval between biennial exercises, including at least one drill that involves a combination of some of the principal functional areas of the onsite emergency response capabilities.

- a) The principal functional areas of emergency response include activities such as:

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

- b) Activation of the Emergency Response Facilities is not required. Tabletop and training exercises may be conducted.
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### 5.1.2 Offsite Emergency Response Exercises

- 1) Offsite emergency response exercises **shall** be conducted biennially with full participation by each offsite agency having a role under the plan.
  - a) Emergency Planning **shall** coordinate with San Luis Obispo County Office of Emergency Services to verify County personnel and resources are adequate to respond to an emergency.
- 2) Ingestion pathway exercises **should** be conducted at least once every twelve years.
  - a) The California Governor's Office of Emergency Services and the Department of Health Services **should** have full participation in these exercises.
  - b) Emergency Planning **shall** assist with enabling any State or local Government agency located within the plume exposure pathway EPZ to participate drills when requested.
- 3) Scenarios **should** ensure sufficient opportunity to evaluate the Control Room (Simulator) Operators as stated in the exercise objectives.

### 5.1.3 Communications Drills

- 1) Communications with San Luis Obispo County Sheriff and California Office of Emergency Services response centers **shall** be tested monthly.
- 2) In accordance with STP I-29, telecommunications checks from the Control Room **shall** be conducted with the San Luis Obispo Sheriff's office and State OES on a weekly basis in addition to the communications drill.
- 3) Communications between the DCP, EOF, State EOC, SLO County EOC and field assessment teams **shall** be tested annually during full-scale drills, to verify understanding of the content of messages.

### 5.1.4 Medical Emergency Drills

- 1) Medical emergency drills **shall** be conducted according to letters of agreement with each medical facility listed in the DCP Emergency plan .
- 2) Drills involving a simulated contaminated individual who is transported from the plant to a medical facility **shall** be conducted annually.

### 5.1.5 Radiological Monitoring Drills

- 1) Radiological monitoring drills **shall** be conducted annually.
  - 2) Radiological monitoring drills **shall** include collection and analysis of environmental samples and provisions for communication and record keeping.
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### 5.1.6 Health Physics Drills

- 1) Health Physics Drills **shall** be conducted semi-annually involving response to and analysis of:
  - Simulated elevated airborne contamination.
  - Simulated contaminated liquid samples.
  - Direct radiation measurements in the environment.
- 2) Health Physics Drills may be conducted separately or as part of full scale drills or exercises.

## 5.2 SCENARIO DEVELOPMENT

### 5.2.1 Scenario Development Team

- 1) A Scenario Development Team **should** assist Emergency Planning, as necessary, to develop biennial exercise, dress rehearsals and training drill scenarios.
- 2) The following expertise should be included on the Scenario Development Team:

**Drill and Exercise Coordinator**

Responsible for the preparation and conduct of the drill program.

**Plant Operations Specialist**

Knowledgeable of plant systems, plant operations and simulator scenario development.

**Radiological Systems Specialist**

Knowledgeable of the plant radiological monitoring systems, plant chemistry, atmospheric dispersion modeling, and development of onsite and offsite field data.

**Emergency Planning Training Coordinator**

Responsible for training lesson plans and documentation.

### 5.2.2 Scenario Review Group

- 1) A Scenario Review Group **should** assist Emergency Planning, as necessary, to provide technical review of scenarios for biennial exercises, dress rehearsals and training drills.
- 2) The Scenario Review Group may consist of personnel with the following expertise:

**Operations Reviewer**

An independent reviewer to the Scenario Development Team Operations representative.

**Radiation Protection Reviewer**

An independent reviewer of scenario radiological data.

**Chemistry Reviewer**

Ensures that data is adequate and accurate if PASS or other sampling is to be conducted.

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**Security Reviewer**

Ensure the conduct of the exercise will not result in Security problems.

**Plant Emergency Planning Reviewer**

Ensures the scenario meets onsite and offsite objectives.

**Maintenance Reviewer**

Determines where additional data may be needed to support maintenance functions.

**Safety and Fire Protection Group Reviewer**

Reviews the scenario for fire, emergency medical, and safety issues.

**Offsite Agency Representative**

State, Federal and local agencies may be asked to review scenarios to ensure scenario design is adequate to support their drill objectives.

**5.3 DRILL AND EXERCISE SCHEDULE**

- 1) An annual drill and exercise schedule **should** be developed prior to January 1 of the schedule year.
- 2) The annual drill and exercise schedule **should** be coordinated and approved by:
  - Plant management.
  - San Luis Obispo County Office of Emergency Services.
  - Governor's Office of Emergency Services.
- 3) Scheduling of the biennial exercise **should** be coordinated with:
  - Region IV utilities.
  - Nuclear Regulatory Commission.
  - Federal Emergency Management Agency.

**5.4 EXERCISE SUBMITTAL**

- 1) Biennial exercise objectives **shall** be submitted to FEMA 90 days prior to the exercise.
  - 2) The complete scenario package **shall** be submitted to FEMA at least 60 days prior to the exercise for review.
  - 3) The table below lists milestones that **should** be achieved prior to a biennial exercise.
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## Biennial Exercise Development Milestones

Days prior to Exercise	Activity
180	Organizations determine extent of play to support commitments.
180	Extent of play for all organizations is defined and agreed to by all parties.
180-150	Development of objectives and potential scenarios.
150	Exercise objectives are approved by all organizations. Scenario is selected.
150-135	Exercise timeline is developed.
135	Exercise timeline is approved.
135	Players and controllers are selected for the exercise.
135-90	Exercise package is developed and reviewed by the Scenario Review Group.
100	Letters of transmittal (NRC, FEMA) are prepared.
90	Initial draft of scenario is submitted to regulatory agencies.
90-60	Organizations review the exercise scenario.
60	Final draft of the exercise scenario is submitted to regulatory agencies.
60	Logistical support for the exercise is initiated.
45	Regulatory agencies provide summary exercise review comments.
<10	Conduct controller briefing
<10	Inspect facilities and emergency equipment.
<10	Verify player lists.

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### 5.5 DRILL AND EXERCISE CRITIQUES

Formal critiques **shall** be conducted following all drills and exercises in order to identify weak or deficient areas that need correction.

- 1) Critiques **should** be performed at each facility at the conclusion of the drill or exercise.
- 2) Any weaknesses or deficiencies that are identified **should** be corrected.

### 5.6 REMEDIAL EXERCISES

- 1) Remedial exercises may be required if the NRC, in consultation with FEMA, determines that a biennial exercise has not demonstrated that adequate protective measures can be taken in the event of a radiological emergency.
  - 2) The extent of State and local participation in remedial exercises **should** be sufficient to demonstrate that appropriate corrective actions have been taken regarding the elements of the plan not properly tested in the previous exercises.
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## 5.7 REPORTS

Drill reports **shall** be prepared and include:

- Drill attendance.
- Objectives.
- Required remedial actions.

## 5.8 CORRECTIVE ACTION TRACKING

Corrective Actions identified during drills or exercises shall be tracked using:

- Action Requests, if the issue meets the problem criteria of OM7.ID1.
- EPIC, at the discretion of Emergency Planning.

## 5.9 EMERGENCY RESPONSE ORGANIZATION DRILL AND EXERCISE PARTICIPATION

- 1) Drill participants **should** be selected and notified at the beginning of the drill cycle.
- 2) Key ERO members (as defined in AWP EP-001) **shall** participate in a drill or exercise at least once every eight quarters.
- 3) All ERO members **should** participate in drills annually or as often as necessary to maintain proficiency.
- 4) Emergency Planning **should** track and notify personnel who have not participated in an exercise or drill within the year.
- 5) Personnel not fully ERO qualified may participate in drills for training purposes, but will not be considered qualified for that position until all training requirements are met.

## 6. RECORDS

- 1) The following non-quality drill and exercise records **should** be retained within department files for a minimum of 3 years.
  - Scenario and supporting data.
  - Completed forms and documents generated during the drill or exercise.
  - Lists of participants, controllers and evaluators.
  - Copy of the Drill/Exercise report.

## 7. REFERENCES

None

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