

ENERGY NORTHWEST

INTEROFFICE MEMORANDUM

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FROM: Procedure Control, Administrative Services, WNP-2 (927A)

SUBJECT: **PLANT PROCEDURES MANUAL - VOLUME SWP
PACKAGE NO. 2001-107**

REFERENCE:

The following Procedure(s) have been revised/approved and are to be inserted in your controlled copy of the Manual and the superseded revisions are to be removed and destroyed:

<u>Procedure</u>	<u>Rev.</u>	<u>Title/Comments</u>
SWP-EPP-01	6	Emergency Response Organization and Testing

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COLUMBIA GENERATING STATION
SITE-WIDE PROCEDURES

PROCEDURE NUMBER	APPROVED BY	DATE
*SWP-EPP-01	JVP - Revision 6	02/22/01
ORGANIZATION		
SITE-WIDE PROCEDURES		
ACTIVITY		
EMERGENCY PREPAREDNESS		
TITLE		
EMERGENCY RESPONSE ORGANIZATION AND TRAINING		

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1.0 PURPOSE

This procedure lists Energy Northwest's Emergency Response Organization (ERO) and identifies responsibilities for participation by, and training of, the ERO.

2.0 DISCUSSION

2.1 ERO positions, response categories and position requirements that comply with Emergency Plan requirements and Emergency Preparedness business practices are assigned by response category as indicated in the WNP-2 Emergency Plan.

2.2 Energy Northwest's ERO consists of positions that satisfy Emergency Preparedness Plan requirements for initial and augmenting staffing during declared emergency events as well as positions that may be summoned as needed. The positions are arranged in the following response categories:

2.2.1 On shift

Consists of plant positions staffed by shift personnel that satisfy FSAR, technical specification and security plan requirements for the normal conduct of plant operations. In a declared emergency, shift personnel provide initial staffing for emergency positions identified by the WNP-2 Emergency Plan. In certain cases, shift personnel may satisfy staffing requirements for more than one emergency position identified in the Plan such as Equipment Operators performing emergency maintenance tasks as well as serving as fire brigade members.

2.2.2 Essential

Consists of positions designated on a rotating on call list that can be summoned by electronic means to respond within a specified time. Essential ERO personnel will assist on shift personnel to provide assessment and mitigation of accident conditions, notifications to offsite agencies, or provide overall direction, control and logistical support for emergency operations.

2.2.3 Augmenting

Consists of positions designated on a rotating on call list that can be summoned by electronic means to respond within a specified time. Augmenting personnel provide additional emergency assessment, accident mitigation and logistics support to on shift and essential personnel.

2.2.4 Support

Consists of positions which may or may not be designated on a rotating on call list or ERO assignment list, but which may be summoned by electronic or manual means when needed to support emergency operations.

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3.0 RESPONSIBILITIES

{R-1582, R-1583, R1604}

- 3.1 The Plant General Manager (PGM) has overall responsibility for Energy Northwest emergency protective response to nuclear emergencies.
- 3.2 The Vice President for Operations Support and Public Information Officer has the responsibility and authority to implement Energy Northwest emergency preparedness program for the PGM.
- 3.3 Appropriate divisional vice presidents have the responsibility to approve assignment of emergency response organization (ERO) members to the ERO.
- 3.4 Appropriate management has the responsibility to support implementation of corrective actions relative to Columbia Generating Station Emergency Preparedness identified by critique and audit findings.
- 3.5 The Corporate Emergency Preparedness, Safety and Health Officer is responsible to identify and administer an ERO that fulfills the commitments and intents of the WNP-2 Emergency Plan. Additionally, the Corporate Emergency Preparedness, Safety and Health Officer:
 - Proposes assignment of personnel with appropriate skills to the ERO.
 - Has overall responsibility for implementation and maintenance of the Emergency Preparedness Training Program.
 - Assigns responsibility for development, implementation, and maintenance of emergency preparedness training materials.
 - Reviews and approves emergency preparedness training materials.
 - Ensures program meets required internal and external program and quality requirements, including offsite agency interface.
 - Ensures adverse findings by audit/inspection groups are addressed and resolved.
 - Ensures a review of emergency response personnel qualification status is conducted quarterly.
 - Maintains and implements a schedule of drills and exercises.

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- 3.6 The Operations Manager is responsible for ensuring that Shift Managers, Control Room Supervisors, Shift Technical Advisors, Reactor Operators, Shift Support Supervisors, and Equipment Operators are qualified for and aware of their emergency response responsibilities and assignments.
- 3.7 The Radiation Protection Manager is responsible for ensuring that Health Physics personnel are qualified for and aware of their emergency response responsibilities and assignments.
- 3.8 The Chemistry Manager is responsible for ensuring that Chemistry personnel are qualified for and aware of their emergency response responsibilities and assignments.
- 3.9 The Maintenance Manager is responsible for ensuring that Electrical, Mechanical, and I & C craft and supervision are qualified for and aware of their emergency response responsibilities and assignments.
- 3.10 The Nuclear Training Manager is responsible for ensuring that the appropriate training courses are listed in the personnel qualification directories. In addition, the Nuclear Training Manager is responsible for EP related training for the Fire Brigade, First Responders, Health Physics and Chemistry Technicians. The Nuclear Training Manager also:
- Provides for the development, implementation and maintenance of emergency preparedness training courses unique to control room emergency operations based on Vol. 5 of the PPMs, Emergency Operating Procedures.
 - Provides for instruction of accident identification and classification training for required emergency response personnel.
- 3.11 The Operations Training Superintendent is responsible for:
- Review and sign-off of lesson plans and exams applicable to licensed training.
 - Ensure emergency preparedness training schedules are coordinated with initial licensed training and requalification cycles.
 - Provide simulator and scenario support for the Emergency Preparedness Drill and Exercise program.
- 3.12 The Manager, Regulatory Affairs is responsible for providing programmatic approval of the Emergency Preparedness Training Program.

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- 3.13 The Supervisor, HP/CHEM and GET Training is responsible for providing Health Physics, Chemistry, General Employee, Respiratory Protection, Self-Contained Breathing Apparatus (SCBA), First Aid, Fire Brigade and Hazardous Material training to designated emergency response personnel.
- 3.14 The Manager, Security Programs is responsible for providing for emergency response training for security force personnel and for security personnel assigned to specific emergency centers.
- 3.15 Qualification Management Services is responsible for maintaining the training program documentation for tracking personnel qualification status.
- 3.16 The ERO consists of personnel that have the capability to provide manpower and other resources necessary for immediate and long-term response to an emergency situation. Personnel on shift are responsible for all emergency response measures within the first 60 minutes or until on call ERO members arrive. Essential personnel on ERO duty rotation are responsible for remaining within an hour of their emergency center when on duty, and for arriving at their assigned emergency center within 60 minutes of the declaration of an Alert or higher emergency classification.

4.0 PROCEDURE/GUIDELINES

NOTE: The ERO assignment list does not indicate the multiple functions that some individuals fill due to being cross trained or having received additional training, e.g., Equipment Operator who also serves as a Fire Brigade Member.

The selection and assignment of individuals to an ERO position should be based on their area of expertise as well as their normal job functions. The Qualification Directory target population description should be consulted when selecting individuals for ERO duty. Names of individuals selected for ERO duties will normally be provided by their line management, with the approval of the Team Sponsor.

Individuals selected for ERO participation must be qualified prior to ERO position assignment. Refresher training and participation in drills to ensure retention and familiarity with ERO duties will be administered on a calendar year basis (i.e., annually) to ERO personnel. Individuals not completing annual refresher training by December 31 of the current year will be disqualified to fill their ERO position until the training requirements are brought up-to-date.

- 4.1 An ERO assignment list is maintained by Emergency Preparedness that identifies personnel who have been assigned to staff emergency positions. This list is verified, published and distributed quarterly as a section of the Emergency Phone Directory.
- 4.2 The Operations Manager should ensure that ERO duties are periodically reiterated to On shift ERO Operations personnel. New hires should be informed of these duties as part of the hiring process.

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- 4.3 The Radiation Protection Manager should ensure that ERO duties are periodically reiterated to On shift Health Physics ERO personnel. New hires should be informed of these duties as part of the hiring process.
- 4.4 The Chemistry Manager should ensure that ERO duties are periodically reiterated to On shift Chemistry ERO personnel. New hires should be informed of these duties as part of the hiring process.
- 4.5 The Maintenance Manager should ensure that ERO duties are periodically reiterated to On shift Electrical, Mechanical and I & C craft and supervision. New hires should be informed of these duties as part of the hiring process.
- 4.6 The Emergency Preparedness Training Program is a combination of classroom and performance-based training designed to provide the instruction necessary to develop and maintain ERO personnel skills and knowledge. Credit is taken for certain aspects of craft and fire brigade related skill training administered by the Nuclear Training Department for ERO skills and knowledge.

4.6.1 Objectives

a. Primary objective:

To prepare and maintain qualified personnel for all emergency response positions by providing training commensurate with the individual's emergency assignment.

b. Supporting objectives:

- (1) To comply with Federal regulations, Energy Northwest policies and procedures, and applicable INPO guidelines.
- (2) To continually enhance and assess the effectiveness of Emergency Preparedness training through tabletop and integrated drills.

4.6.2 Program Content Description {R5876}

The program consists of a combination of classroom, hands-on, and in-the-field training. The training program was originally developed from a job/task analysis. Current EP training has been updated from user feedback (ERO drill and exercise comments, and user reviews of procedures, etc.) and will continue to be updated from these methods. The format is designed for initial and refresher training to be presented using a team/center-based concept. This format is used to develop team spirit and cooperation and to allow for an exchange of ideas and expertise. Where appropriate, initial and/or refresher training can also be conducted using a seminar or workshop format when group discussion is an important benefit.

4.6.3 Initial Training {R-5875}

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- a. Initial training is designed to provide the position-specific skills and knowledge necessary for an individual to perform the functions of the emergency position.
- b. Individuals assigned to an emergency center are scheduled for the Emergency Preparedness/Emergency Center Overview Training specific to that center. Additional training required for an individual's position is provided on an as needed basis. The requirements of each emergency position, and specific EP courses are detailed in the Emergency Response section of the Qualification Directory.
- c. Individuals assigned to the on shift crews are scheduled for emergency response training during their normal training cycle. Some positions in the on shift emergency organization are filled by individuals who receive cross training or add on training so that they can fill multiple emergency response functions (refer to Attachment 6.1). The requirements for the on shift emergency positions are detailed in the Nuclear Training Department's Qualifications Directories. Some of the basic emergency response training is also provided in the General Employee Training program described in step 4.5.8.
- d. Upon completion of training, the students are normally required to pass a written exam, or to demonstrate performance-based actions, e.g., during a drill or exercise. {C-7972}

4.6.4 Refresher Training

- a. Refresher training is required on an annual basis for all ERO personnel and is conducted using training and drill participation.
- b. Classroom refresher training is developed to cultivate a team approach where primary center positions are retrained together. Personnel from different centers are trained as a team to promote better communication between individuals and centers and to provide for necessary problem resolution.
- c. Personnel attending team refresher training will normally first complete a review of applicable material from initial training, findings from the previous year's drills and exercises, results of audits and inspections, industry events, and changes to center operations/procedures. They then should participate in a tabletop or mini-drill to enhance and practice the training they have received.

4.6.5 EPIP Required Reading

- a. Personnel assigned to Plant emergency centers are made aware of EPIP revisions through the change management process. This process is

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designed to provide emergency response personnel with information regarding procedure revisions affecting their specific positions.

- b. If significant rather than cosmetic changes have been made, an electronic message detailing the significant changes are sent to the appropriate individuals. Documentation of the message is retained as appropriate.

4.6.6 Medical Services Support Training

- a. Medical Services Support Training provides training in the response to and handling of contaminated injured individuals to local hospital emergency room and ambulance/fire department personnel. The hospital training covers use of the hospital's radiological emergency kit contents, management and control of contamination in the emergency room and ambulance, and decontamination techniques. The ambulance/fire department training covers the use of provided radiation detection instruments and management and control of contamination at the scene and in the ambulance. Energy Northwest provides this training in support of Benton and Franklin Counties.
- b. Offsite Agency Training is provided upon request to augment state and county training. Offsite agencies select requested training from a list of topics which may be presented by Emergency Preparedness personnel. This training may also be offered to local law enforcement agencies, local fire and ambulance departments, local hospitals, Coast Guard and other groups or organizations who express interest.

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4.6.7 Emergency Drill Program

The emergency drill program utilizes non-evaluated drills as on-the-job training. Participants are evaluated during the performance of their job and on-the-spot corrections/training is conducted. Evaluated drills (i.e., exercises) are not conducted as training sessions. Problems identified from drills may be incorporated into annual refresher training, covered during tabletop, discussed via email or other appropriate methods.

4.6.8 There are additional areas where training required for emergency response is incorporated into programs maintained and presented by other training groups. These training requirements are documented by Qualification Management Services and compliance is reviewed regularly by the Emergency Preparedness Program Leader.

a. HP/Chem, General Employee Training (GET)

- (1) General Employee Training encompasses a section titled "Emergency Response" and the content is evaluated and revised as needed by the Emergency Preparedness Group.
- (2) Protected Area Access training is presented to all personnel who respond to emergency positions at the EOF, or require unescorted access to the Protected Area. In addition the Environmental Field Team members will receive Radiation Worker Training.
- (3) These programs are under the direction of the HP/CHEM and GET Department of Nuclear Training.

b. Cross Training for Certain ERO Members

- (1) The members of the Columbia Generating Station Fire Brigade receive training provided by the Nuclear Training Department. This training meets the requirements identified in NRC regulations and the Washington Administrative Code. In addition, all Fire Brigade members must meet annual medical qualifications as administered by the Occupational Health Group.
- (2) A minimum of two members of the Fire Brigade are First Responder qualified. Remaining members of the Fire Brigade receive First Aid training. These programs are administered by Nuclear Training and meet the requirements set forth in NRC regulations and the Washington Administrative Code.

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- (3) There are three HP Technicians on shift. Two must be available to perform Health Physics (HP) technician duties during the initial stages of an event prior to OSC activation. These duties include actions for radiation protection access control, radiation monitoring coverage for response teams (i.e., repair, corrective action, search and rescue, first aid, and fire fighting teams), personnel monitoring, and dosimetry support. The third HP Technician performs in plant surveys.
- (4) Maintenance responsibilities may also be covered by certain members of the On-shift Crew during the initial stages of an event. These duties may involve minor mechanical, electrical, or instrumentation and control (I&C) actions, such as tightening the packing on a valve, racking in a breaker, venting a gauge, and reading blueprints or piping and instrumentation drawings. Training to support these Maintenance duties is provided by the Nuclear Training Department as part of the Operator Training program. Equipment Operators who fill this role receive basic Maintenance training in accordance with the Equipment Operator Qualification Directory.
- c. Respiratory Protection/Self-Contained Breathing Apparatus (SCBA) Training is provided to essential emergency response personnel as identified in the Qualification Directory. The training is under the direction of the HP/CHEM and GET section of Nuclear Training.
- d. Security Emergency Response Training is administered by Energy Northwest Security and a description can be found in the individual Security lesson plans. The Emergency Preparedness group provides updated overview materials applicable to the Security program.

5.0 REFERENCES

- 5.1 10CFR50.47, Emergency Plans {R-1582, R-1583, R-1604}
- 5.2 10CFR50.54, Conditions of Licenses
- 5.3 10CFR50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities {R-5706, R-5875, R-5876}
- 5.4 44CFR350, Review and Approval of State and Local Radiological Emergency Plans and Preparedness
- 5.5 NUREG-0654, FEMA REP-1, Revision 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 5.6 FSAR Chapter 13.3, WNP-2 Emergency Plan

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5.7 SWP-FFD-01, Fitness for Duty Program Requirements

5.8 IOM, JV Parrish to All Supply System Employees, 10/14/96

5.9 IR 83-43 (PTL H105631)

{C7972}

5.10 Qualification Directory

6.0 ATTACHMENTS

6.1 ERO Response Category - On shift

6.2 ERO Response Category - Essential

6.3 ERO Response Category - Augmenting

6.4 ERO Response Category - Support

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ERO RESPONSE CATEGORY - ON SHIFT

<u>Title</u>	<u>Staffing Level</u>
1) Shift Manager	1
2) Control Room Supervisor	1 ¹
3) Control Room Operators	2
4) Equipment Operators	2
5) Shift Technical Advisor	1 ¹
6) ENS Communicator	1 ²
7) Fire Brigade Team	5 ^{2,3}
8) Health Physics	3
9) Chemistry	1
10) I & C/Electrical	1 ²
11) Mechanical	1 ²
12) SCC Duty Officer	1 ⁴
13) Security	Per Security Plan

Attachment 6.1

¹ Modes 1,2,3; Modes 4,5 as required by the Operations Manager (GI2-94-096)

² May be provided by shift personnel who may be assigned other functions.

³ In addition to the Fire Brigade team leader, at least one of these individuals is an EO, and two should be First Aid qualified per the FSAR.

⁴ Not a NUREG-0654, Table B-1 position

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ERO RESPONSE CATEGORY - ESSENTIAL

<u>Title</u>	<u>Staffing Level</u>
1) Operations Support Center Manager	1 ⁶
2) OSC HP Lead	1
3) OSC Chemistry Technician	1
4) OSC Mechanic	3
5) OSC Electrician	2 ⁵
6) OSC I&C Technician	2 ⁵
7) OSC Health Physics Technician	5
4) TSC Manager	1
5) TSC Operations Manager	1
6) TSC Radiation Protection Manager	1
7) TSC Core Thermal Engineer	1
8) TSC Technical Manager	1
9) TSC Mechanical Engineer	1
10) TSC Electrical Engineer	1
11) TSC Plant/NRC Liaison	1
12) EOF Manager	1
13) EOF Radiological Emergency Manager	1
14) EOF Field Team Members	6
15) EOF Field Team Coordinator	1 ⁶
16) EOF Telecommunications Manager	1
17) JIC Manager	1

Attachment 6.2

⁵ Electrician and I&C Technicians must total two for OSC activation.

⁶ Not a NUREG-0654, table B-1 position

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ERO RESPONSE CATEGORY - AUGMENTING

<u>Title</u>	<u>Staffing Level</u>
1) Control Room Information Coordinator	1
2) OSC Information Coordinator	1
3) OSC Repair Team Coordinator	1
4) OSC Electrical Lead	1
5) OSC I&C Lead	1
6) OSC Mechanical Lead	1
7) OSC Team Tracker	1
8) TSC Maintenance Manager	1
9) TSC Plant Admin Manager	1
10) TSC Chemistry/Effluent Manager	1
11) TSC Information Coordinator	1
12) Assistant EOF Manager	1
13) EOF Manager's Secretary	1
14) EOF Site Support Manager	1
15) EOF Engineering Manager	1
16) EOF Security Manager	1
17) EOF Radiation Detection Systems Engineer	1
18) EOF Dose Projection Health Physicist	1
19) EOF Information Coordinator	1
20) Energy Northwest Representatives to the County EOCs	2
21) Assistant JIC Manager	2
22) JIC Media Manager	1
23) EOF PIO	1

Attachment 6.3

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ERO RESPONSE CATEGORY - SUPPORT

NOTE: Positions listed are called in, unless noted.

<u>Title</u>	<u>Staffing Level</u>
1) TSC Administrative Support	2
2) TSC Manager's Secretary	1
3) TSC/OSC Communicator	1
4) TSC Computer Engineer	1
5) TSC Trending Forecaster	1
6) EOF Plant Systems Assessment	1
7) EOF Electrical/I&C Engineer	1
8) EOF Fuels Assessment Engineer	1
9) EOF Technical Support	1
10) EOF PDIS Analyst	1
11) EOF Manpower Scheduler	1
12) EOF State/County Technical Liaison	1
13) Energy Northwest Representative to the State	1
14) EOF Administrative Support	3
15) EOF Offsite Agency Coordinator	1
16) EOF INPO Network Coordinator	1
17) EOF Licensing Manager	1
18) HPC Staff Member	1
19) EOF Field Team Dispatcher	1
20) JIC Information Manager	1
21) JIC Support Manager	1
22) JIC Spokesperson	1
23) JIC Technical Spokesperson	1
24) JIC HP Spokesperson	1
25) JIC News Release Editor	1
26) JIC Distribution Team Supervisor	1
27) JIC Distribution Team Members	3
28) JIC Phone Team Supervisor	2
29) JIC Media Phone Team Members	4
30) JIC Public Phone Team Members	4
31) JIC Audio/Visual	1
32) JIC Receptionist	1
33) JIC Secretary	1

Attachment 6.4

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