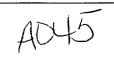
CLINTON POWER STATION NUCLEAR STATION ENGINEERING DEPT.

Controlled Document Transmittal

_	Transmitt	tal No	01P0077	_Transmittal Da	te <u>03/22/</u>	01Sh	eet <u>1 of</u>	
	Letter No)	Document	EMERGENO	CY PLAN IMI	PLEMENTING P	ROCEDUF	RE
	The attac	ched docu	ments are bei	ng transmitted fo	or your use.			
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	EPIP AP	-02, Rev.	13		Same, Rev. 1	4		
	EPIP AP	2-05, Rev.	8		Same, Rev. 9			

Please acknowledge receipt of the attached documents and return this signed transmittal to DOCUMENT CONTROL, V-150. NOTE: RETAIN A COPY OF THIS TRANSMITTAL FOR UPDATING INSTRUCTIONS, AS NEEDED.

Any questions regarding this transmittal should be forwarded to L. Hegger, extension 4087.



CLINTON POWER STATION NUCLEAR STATION ENGINEERING DEPT.

Controlled Document Transmittal

Transmittal	No	01P0077	_Transmittal D	ate	03/22/01	Sheet	2 of
Letter No	N/A	Document	EMERGEN	ICY PL	AN IMPLEME	NTING PROC	EDURE
The attached documents are being transmitted for your use.							
SPECIAL DISTRIBUTION: EC-01, EC-02, EC-07, EC-08, RA-02 & ATTACHMENTS							
273B. Training Requal/Classroom #7 V-922 273C. Training Requal/Classroom #7 V-922 273D. Training Requal/Classroom #7 V-922 273E. Training Requal/Classroom #7 V-922 273F. Training Requal/Classroom #7 V-922 273G. Training Requal/Classroom #7 V-922 273H. Training Requal/Classroom #7 V-922 273J. Training Requal/Classroom #7 V-922 273J. Training Requal/Classroom #7 V-922 273J. Training Requal/Classroom #7 T-31B SPECIAL DISTRIBUTION: EC-07 (attachments & index also), *EC-01f01 (20 unstamped copies)							
202D.	Simulate	or			V-922		
*69A.		orseshoe da Shull			T-31B		
REMOVE/DESTROY: EPIP Status Report Same, dtd. 03/19/01 EPIP AP-02, Rev. 13 Same, Rev. 14 EPIP AP-05, Rev. 8 Same, Rev. 9							

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Any questions regarding this transmittal should be forwarded to L. Hegger, extension 4087.

Signature/Date	

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NUMBER	EPIP TITLE	REVISION	DATE	ACN'S	ACN DATE
ADMINIST	RATIVE PROCEDURE (AP)				
AP-01	ORGANIZATION & PREPARATION OF CONTROLLED DOCUMENTS	6	12/13/99	n/a	
AP-02	REVISIONS AND ADVANCE CHANGE NOTICES	14	03/16/01	n/a	
AP-03	EMERGENCY RECORDS RETENTION	4	01/12/96	5/1	02/03/99
AP-04	PREPARATION & CONDUCT OF EMERGENCY DRILLS & EXERCISES	5	08/03/99	n/a	MAR 2,2 2001
AP-05	EMERGENCY PREPAREDNESS TRAINING PROGRAM	9	03/16/01	n/a	CONTROLLED COPY CLINTON POWER STATION
AP-06	REVIEW OF EMERGENCY PREPAREDNESS PROGRAM	5	12/20/99	6/1	04/14/00
AP-07	ALERT AND NOTIFICATION SYSTEM	7	06/19/00	n/a	
	F-01 ANS Test Report	1 .	09/30/94	2/1	06/19/00
	F-02 Siren Maintenance/Repairs Report	1	09/30/94	2/1	06/19/00
AP-09	EMERGENCY FACILITY AND EQUIPMENT CHECKS	6	05/18/00	n/a	
AP-10	EMERGENCY RESPONSE ORGANIZATION ASSIGNMENTS	8	01/24/00	n/a	

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NUMBER	EPIP	TITLE	REVISION	DATE	ACN'S	ACN DATE
EMERGENO	CY CON	TROL (EC)				
EC-01		EMERGENCY RESPONSE ANIZATION & STAFFING	6	07/12/99	7/1	12/13/99
	F-01	Interim Station Emergency Director	3	10/23/97	4/1	05/29/98
	F-02	Station Emergency Director (SED)	3	04/21/99	4/1	07/27/99
	F-03	SED Administrative Support	1	05/29/98	n/a	
	F-04	TSC Administrative Supervisor	2	10/23/97	n/a	
	F-05	Technical Assessment Supervisor	1	04/21/99	n/a	
	F-06	Emergency Operations Supervisor	1	04/21/99	n/a	
	F-07	TSC Radiological Supervisor	0	07/28/92	n/a	
	F-08	OSC Supervisor	1	08/26/99	n/a	
	F-09	Station Security Coordinator	0	07/28/92	n/a	
	F-10	TSC Communicator	` ' 3	02/24/00	n/a	
	F-11	TSC Records Management Coordinator	0	07/28/92	n/a	
	F-12	TSC Electrical Engineer	1	04/21/99	n/a	
	F-13	TSC Reactor Engineer	1	04/21/99	n/a	
	F-14	TSC Chemist-Nuclear	2	04/21/99	n/a	
	F-15	Operations Coordinator	1	04/21/99	n/a	
	F-16	TSC Computer Operator	5	02/28/00	n/a	

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NUMBER	EPIP TITLE		REVISION	DATE	ACN'S	ACN DATE
	F-17	Radiological Engineering Specialist	1	11/23/93	n/a	
	F-19	RP (TSC) Communicator	0	07/28/92	n/a	
	F-20	Status Board Keepers	0	07/28/92	n/a	
	F-21	Radiological Controls Supervisor	0 -	07/28/92	1/1	06/29/00
	F-22	In-station Emergency Teams	0 .	07/28/92	n/a	
	F-23	OSC Radiological Controls Coordinator	. 0	07/28/92	n/a	
	F-24	Assistant OSC Radiological Controls Coordinator	0	07/28/92	n/a	
	F-25	RP (OSC) Communicator	0	07/28/92	n/a	
	F-26	Emergency Team Coordinator	1	10/18/93	n/a	
	F-28	Emergency Manager	2	02/06/97	3/1	06/01/98
	F-30	EOF Director	3	03/05/97	n/a	
	F-31	Executive Administrative Support	1	06/01/98	n/a	
	F-32	Licensing Advisor	0	07/28/92	n/a	
	F-33	EOF Emergency Advisor	2	10/18/96	n/a	
	F-34	EOF Technical Advisor	0	07/28/92	n/a	
	F-36	Technical Information Liaison	1	01/22/97	n/a	
	F-37	Emergency Action Level/Protective Action Evaluator	0	07/28/ਉ2	n/a	
	F-38	Security Supervisor	0	07/28/92	n/a	
	F-39	Radiation Protection Supervisor	1	10/18/93	n/a	

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NUMBER	EPIP	TITLE	REVISION	DATE	ACN'S	ACN DATE
	F-40	EOF Administrative Supervisor	2	07/25/00	n/a	
	F-41	EOF Engineering Supervisor	0	07/28/92	1/1	07/28/99
	F-42	RP (EOF) Communicator	0	07/28/92	n/a	
	F-43	Dose Assessment Supervisor	1	12/01/93	n/a	
	F-44	Dose Assessor	0	07/28/92	n/a	
	F-45	Field Team Coordinator	2	01/10/00	n/a	
	F-46	Field Teams	0	07/28/92	n/a	
	F-47	Radiological Controls Coordinator	1	11/23/93	n/a	
	F-48	Environmental Lab Coordinator	1	11/23/93	2/1	03/25/99
	F-49	EOF Monitor	0	07/28/92	n/a	
	F-50	EOF Records Management Coordinator	0	07/28/92	n/a	
	F-51	EOF Communicator	3	02/24/00	n/a	
	F-52	Log Coordinator	0	07/28/92	n/a	
	F-53	Copy Clerk	0	07/28/92	n/a	
	F-54	TSC Emergency Advisor	0	07/28/92	n/a	
	F-55	Procurement Coordinator	0	07/28/92	n/a	
	F-56	Word Processor	0	07/28/92	n/a	į.
	F-57	EOF Computer Operator	4	09/02/99	n/a	
	F-58	Mechanical/Nuclear Engineer	0	07/28/92	n/a	
	F-59	EOF Electrical Engineer	0	07/28/92	n/a	
	F-60	Core Damage Assessor	0	07/28/92	n/a	

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NUMBER	EPIP	TITLE	REVISION	DATE	ACN'S	ACN DATE
	F-61	Technical Advisor to State/Local Organizations	0	07/28/92	n/a	
	F-62	EOF Administrative Support	0	07/28/92	n/a	
	F-63	Fire Brigade Coordinator	0	07/28/92	n/a	
	F-64	RAFT Liaison	0	07/28/92	n/a	
	F-65	Warehouseman	0	07/28/92	n/a	
	F-66	EOF Access Control Coordinator	1	10/26/93	n/a	
	F-67	PASS Team Leader	1	05/24/93	n/a	
	F-68	Fitness for Duty (FFD) Coordinator	0	07/28/92	n/a	
	F-69	HAZMAT Team Leader	0	07/28/92	n/a	
	F-70	Assistant Emergency Team Coordinator	0	07/28/92	n/a	
	F-71	OSC Communicator	0	07/28/92	n/a	
	F-72	OSC Support	0	10/05/93	n/a	
	F-73	Mechanical Engineer	0	07/27/99	n/a	
EC-02	EMER	RGENCY CLASSIFICATIONS	6	04/24/98	7/1, 7/2, 7/3	01/27/99, 12/13/99, 12/20/99
EC-03	NOTII EVEN	FICATION OF UNUSUAL T	5	01/02/97	6/1	01/24/00
EC-04	ALER	Т	4	01/02/97	5/1	01/24/00
EC-05	SITE A	AREA EMERGENCY	4	01/02/97	5/1, 5/2	10/23/97, 01/24/00
EC-06	GENE	RAL EMERGENCY	4	01/02/97	5/1, 5/2	10/23/97, 01/24/00

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NUMBER	EPIP TITLE	REVISION	DATE	ACN'S	ACN DATE
EC-07	EMERGENCY PLAN NOTIFICATION	11	01/31/00	12/1	01/19/01
	F-01 State and NRC Notifications Checklist	1	01/19/01	n/a	
EC-08	NON-ESSENTIAL PERSONNEL EVACUATION	. 8	07/23/00	n/a	
EC-09	SECURITY DURING EMERGENCIES	5	03/22/96	6/1, 6/2	09/21/98, 07/30/99
EC-10	PERSONNEL ACCOUNTABILITY	6	10/23/97	n/a	
EC-11	REENTRY	4	08/03/99	n/a	
EC-12	EMERGENCY TEAMS	8	10/03/00	n/a	
EC-13	REACTOR CORE DAMAGE ESTIMATION	4	09/19/97	5/1, 5/2	12/01/97, 09/28/99
EC-14	RECOVERY	3	10/21/94	4/1, 4/2, 4/3	02/08/96, 02/03/99, 12/13/99
	F-01 Recovery Checklist	0	10/21/94	n/a	

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NUMBER	EPIP	TITLE	REVISION	DATE	ACN'S	ACN DATE
FACILITIES	AND E	QUIPMENT (FE)				
FE-01	TSC C	OPERATIONS	7	02/12/01	n/a	
FE-02	OSC (OPERATIONS	6	06/09/97	7/1	07/23/99
FE-03	EOF (OPERATIONS	5	06/09/97	6/1	04/21/99
FE-04	BEOF	OPERATIONS	5	06/09/97	6/1	07/23/99
FE-05	EMER SUPP	RGENCY EQUIPMENT & LIES	11	05/26/97	n/a	
	F-02	OSC Emergency Equipment	3	03/25/99	n/a	
	F-03	EOF Emergency Equipment	3	07/22/97	n/a	
	F-04	BEOF Emergency Equipment	0	04/28/92	n/a	
	F-05	EOF Environmental Lab Equipment	0	04/28/92	n/a	
	F-06	Emergency Vehicle Kit	0	04/28/92	n/a	
	F-07	Field Monitoring Kit	1	07/22/97	n/a	
	F-08	Hospital Kit	1	10/07/97	n/a	
	F-09	Decontamination Kit	2	10/16/94	n/a	
	F-10	TSC Administrative Supplies	3	02/26/97	n/a	
	F-11	OSC Administrative Supplies	0	04/28/92	n/a	
	F-12	OSC Maintenance Tool Box	2	05/29/98	n/a	
	F-13	First Aid Kit (Trauma Kit)	. 1	05/29/98	n/a	
	F-14	EOF Administrative Supplies	1	10/16/94	n/a	
		BEOF Administrative Supplies	0	04/28/92	n/a	
	F-16	JPIC Administrative Supplies	1	02/06/97	n/a	

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NUMBER	EPIP TITLE	REVISION	DATE	ACN'S	ACN DATE
	F-17 EOP Supply Kit	4	09/30/99	n/a	
	F-18 EOP MCR Tool Bag	0	10/16/94	n/a	
FE-06	EMERGENCY COMMUNICATIONS EQUIPMENT	5	11/07/00	n/a	
MISCELLA	NEOUS (MS)				
MS-01	TRANSPORTATION ACCIDENTS	4	10/13/97	5/1	02/01/00
MS-03	NOTIFICATION OF NEXT OF KIN	4	01/12/96	5/1, 5/2	02/03/99, 12/13/99
MS-04	PROCESSING NRC & IDNS PERSONNEL DURING AN EMERGENCY	4	06/06/00	n/a	

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NUMBER	EPI	P TITLE	REVISION	DATE	ACN'S	ACN DATE
PUBLIC REI	LATIO	NS (PR)				
PR-01	JOINT PUBLIC INFORMATION CENTER ORGANIZATION & STAFFING		6	02/06/97	7/1	12/13/99
	F-01	JPIC Administration Coordinator Checklist	1	02/06/97	n/a	
	F-02	JPIC Audiovisual Support Checklist	1	02/06/97	n/a	
	F-03	JPIC Director Checklist	2	02/06/97	n/a	
	F-05	JPIC Assistant Director Checklist	2	02/06/97	n/a	
	F-06	JPIC Graphic Support Checklist	0	07/28/92	n/a	
	F-07	JPIC Public Information Officer Checklist	1	02/06/97	n/a	
	F-08	JPIC Media Coordinator Checklist	0	07/28/92	n/a	
	F-09	JPIC Media Monitoring Team Checklist	0	07/28/92	n/a	
	F-11	JPIC Security Representative Checklist	0	07/28/92	n/a	
	F-12	JPIC Technical Advisor Checklist	0	07/28/92	n/a	
	F-13	JPIC Technical Information Coordinator Checklist	0	07/28/92	n/a	
	F-14	Writer Checklist	0	07/28/92	n/a	
	F-15	IP PIO Steno Checklist	1	07/06/93	n/a	
	F-16	JPIC Telefax Operator Checklist	0	07/28/92	n/a	

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NUMBER	EPIP TITLE	REVISION	DATE	ACN'S	ACN DATE
	F-17 JPIC Registration Staff Checklist	0	07/28/92	n/a	
PR-03	PREPARATION AND DISSEMINATION OF EMERGENCY INFORMATION	8	12/13/99	n/a	
PR-05	PUBLIC INFORMATION & EDUCATION	6	08/09/96	7/1, 7/2	02/03/99, 12/13/99

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NUMBER	EPIP TITLE	REVISION	DATE	ACN'S	ACN DATE
RADIOLOG	ICAL ASSESSMENT (RA)				
RA-01	MANUAL RADIOLOGICAL DOSE ASSESSMENT	6	08/20/99	7/1	11/29/99
RA-02	PROTECTIVE ACTION RECOMMENDATIONS	4	08/20/96	5/1	01/15/99
RA-03	RADIOLOGICAL EXPOSURE GUIDELINES	5	10/13/97	n/a	
RA-04	PERSONNEL MONITORING & DECONTAMINATION	7	08/03/99	n/a	
RA-05	PERSONNEL PROTECTION	6	02/24/00	n/a	
RA-06	STATION RADIOLOGICAL SURVEYS	6	06/03/96	n/a	
RA-07	FIELD RADIOLOGICAL MONITORING	6	08/03/99	n/a	
RA-09	POST ACCIDENT SAMPLING	6	10/12/94	7/1	06/19/97
RA-11	STACK EFFLUENT ANALYSIS & SAMPLING	7	08/27/00	n/a	
RA-14	DOSE RATE DETERMINATION BASED ON ENVIRONMENTAL AIR SAMPLES	6	12/14/99	n/a	
RA-15	PREDICTIVE RELEASE RATES	6	02/18/98	n/a	
RA-16	COMPUTERIZED RADIOLOGICAL DOSE ASSESSMENT	5	08/03/99	n/a	
RA-17	RADIOLOGICAL CONTROL OF THE EOF	8	08/30/99	n/a	
RA-18	EOF ENVIRONMENTAL LAB OPERATIONS	4	08/03/99	n/a	

PROCEDURE: AP-02 REVISION: 14 PAGE: 1 of 12

TITLE:

REVISIONS AND ADVANCE CHANGE NOTICES

SCOPE OF REVISION:

This is a complete revision. No revision bars are being used. Incorporated the new 50.59 process into this procedure as well as a new 50.54q process.

Removed Manager-Nuclear Support and replaced with Manager-Clinton Power Station. This change is already approved per USAR Change Package 9-288. This revision also changed the name of the FRG to the Plant Operations

Review Committee (PORC).

DOCUMENT CONTROL

MAR 22 2001 CONTROLLED COPY CLINTON POWER STATION

Authority

Function	Signature	Date
Prepared by:	Wayne Helenthal	3/15/01
Director-Security & Emergency Planning:	Jennes Smith	3/15/01
Concurrence:	NA	
Concurrence:	ДЦ	
Concurrence:	NA NA	
Independent Reviewer:	grating 1	5)15/01
Manager-Clinton Power Station:	1111	3/16/01

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TITLE:

REVISIONS AND ADVANCE CHANGE NOTICES

CONTENTS

- 2.0 RESPONSIBILITY
- 3.0 DEFINITIONS
- 4.0 INSTRUCTIONS
 - 4.1 Document Approval Process
 - 4.2 Advance Change Notices
 - 4.3 Administrative Changes
 - 4.4 Incorporating Review Comments
 - 4.5 50.59 Reviews
 - 4.6 Document Cancellation
 - 4.7 50.54q Review Process
 - 4.8 Distribution of Controlled Documents
 - 4.9 Records
- 5.0 REFERENCES
- 6.0 ATTACHMENTS
- 7.0 FORMS

PROCEDURE: AP-02 REVISION: 14 PAGE: 3 of 12

TITLE: REVISIONS AND ADVANCE CHANGE NOTICES

1.0 INTRODUCTION

The purpose of this procedure is to establish the administrative guidelines for approval, change, revision, and distribution of all Clinton Power Station (CPS) Emergency Plan, Emergency Plan Implementing Procedures (EPIPs) and Nuclear Emergency Manuals (NERMs), Technical Support Guidelines (TSGs), and Emergency Response Guidelines (ERGs).

2.0 RESPONSIBILITY

- 2.1 <u>Manager-Clinton Power Station</u> is responsible for the approval of this procedure and ensures its implementation.
- 2.2 <u>Director-Security and Emergency Planning</u> is responsible for the implementation and review of this procedure.
- 2.3 <u>Supervisor-Records Management</u> is responsible for the distribution of Emergency Preparedness Program controlled documents.

3.0 DEFINITIONS

- Approved Term used to denote that a document has been through the appropriate approval process and is authorized for issuance and use until officially revised or canceled.
- 3.2 <u>Cancellation</u> The process by which documents are rescinded. A canceled document is no longer authorized for use.
- 3.3 Advance Change Notice An approved change to a document which is issued to controlled document holders for use prior to incorporation of the change in the next document revision.
- 3.4 <u>Emergency Preparedness Program</u> The program which coordinates the plans, procedures, equipment and facilities, and ensures trained emergency response personnel and other resources are prepared for responding to an emergency at Clinton Power Station.
- 3.5 <u>Originator</u> the individual who prepares new Emergency Preparedness Program documents or reviews to Emergency Preparedness Program documents.
- 3.6 Plan Clinton Power Station Emergency Plan.
- 3.7 <u>50.59 Review</u> The applicability review is conducted in accordance with CPS No. 1005.06, Conduct of Safety Reviews.
- 3.8 <u>50.54q Review</u> The review conducted in accordance with this procedure. The review shall determine whether the proposed change decreases the effectiveness of the Emergency Preparedness program.

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PROCEDURE: AP-02 REVISION: 14 PAGE: 4 of 12

TITLE: REVISIONS AND ADVANCE CHANGE NOTICES

4.0 <u>INSTRUCTIONS</u>

4.1 <u>Document Approval Process</u>

New documents and document revisions shall be approved in accordance with the following:

- 4.1.1 Clinton Power Station Emergency Plan revisions and advance change notices(ACNs).
 - 4.1.1.1 The preparation of Plan revisions and ACN's shall be coordinated by the Director-Security and Emergency Planning and approved as provided in Attachment 1, CPS EMERGENCY PLAN APPROVAL PROCESS.
 - 4.1.1.2 Concurrence shall be obtained for each Plan revision from all Nuclear Power Program Department Managers in addition to the other Departments/Organizations/Individuals identified on Attachment 1, CPS EMERGENCY PLAN APPROVAL PROCESS. Concurrence for ACN changes shall be obtained from the affected NPPD Director/designee only.
 - 4.1.1.3 Plan revisions are approved by the CPS Site Vice President or designee. ACNs are approved by the Manager-Clinton Power Station/designee.
 - 4.1.1.4 Plan revisions shall be marked with revision bars and/or ACN bars in the right margin where changes have been made since the previous revision.
 - 4.1.1.5 The Director-Security and Emergency Planning shall ensure the preparation of a 50.59 applicability review, in accordance with CPS No. 1005.06, CONDUCT OF SAFETY REVIEWS.
 - 4.1.1.6 The Director-Security and Emergency Planning shall ensure that any change to the CPS Emergency Plan is reviewed against the requirements of 10CFR50.54q in accordance with section 4.7 to ensure that the effectiveness of the plan is maintained.
 - 4.1.1.7 This review is documented by completing Attachment 6, 10CFR50.54q
 Program Evaluation and Effectiveness Review and retaining it with the change package to the CPS Emergency Plan.
- 4.1.2 Emergency Plan Implementing Procedure (EPIP) and EPIP Form revisions and advance change notices (ACNs).
 - 4.1.2.1 The preparation of new EPIPs or changes to EPIPs shall be coordinated by the Director-Security and Emergency Planning.
 - 4.1.2.2 New and revised EPIPs are approved as provided in Attachment 2, IMPLEMENTING PROCEDURE APPROVAL PROCESS. Concurrence organization(s) shall include, as a minimum, those organizations or individuals tasked by the EPIP with review responsibility for technical content.

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PROCEDURE: AP-02 REVISION: 14 PAGE: 5 of 12

TITLE: REVISIONS AND ADVANCE CHANGE NOTICES

4.1.2.3 The Director - Security and Emergency Planning will designate an organization which will be responsible for performing an independent technical review to each EPIP revision. In those cases where more than one organization is required to perform independent technical review for an EPIP revision, the Director - Security and Emergency Planning will designate the procedure sections to be reviewed by each organization.

- 4.1.2.4 For some EPIP revisions, the only technical expertise to perform independent reviews resides within the Emergency Planning Division. In this case the Director Security and Emergency Planning will designate a member of the Emergency Planning Division to perform the independent technical review. In all cases the individual performing the independent technical review shall meet the selection criteria in ANSI/ANS-3.1-1978, AMERICAN NATIONAL STANDARD, "FOR SELECTION AND TRAINING OF NUCLEAR POWER PLANT PERSONNEL".
- 4.1.2.5 The individual performing the independent technical review shall document it by signing and dating the "Independent Reviewer" line of the title page of the applicable procedure. If more than one individual performed an independent technical review they shall both sign and date the title page and in addition put the sections of the procedure they reviewed next to their signature.
- 4.1.2.6 Manager-Clinton Power Station or designee shall have final approval of new and revised EPIPs..
- 4.1.2.7 Procedure revisions shall be marked with revision bars and/or ACN bars in the right margin where changes have been made since the previous revision.
- 4.1.2.8 The Director-Security and Emergency Planning shall ensure that the 50.59 applicability review and 50.54q effectiveness review are conducted as needed in accordance with applicable sections of this procedure.
- 4.1.3 Nuclear Emergency Response Manual (NERM)
 - 4.1.3.1 Each NERM is unique in that its contents are specific to the needs of the particular Emergency Response Organization position to which it is assigned. The Director-Security and Emergency Planning determines the contents of the NERMs, incorporating recommendations of the personnel assigned to the emergency response organization.
 - 4.1.3.2 The Director-Security and Emergency Planning shall transmit a revised list of NERM contents to the Supervisor-Records Management whenever changes are made to NERM contents.
 - a. EPIPs in the NERMs are approved as provided elsewhere in this procedure.
 - b. The NERM contents other than the EPIPs are approved by the Director-Security and Emergency Planning with no other concurrence or review required.
 - c. NERMs and revisions to it are distributed by the Document Control Group.

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4.1.4 Technical Support Guidelines and Emergency Response Guidelines

- 4.1.4.1 The contents of Technical Support Guidelines (TSGs) and Emergency Response Guidelines (ERGs) are controlled by the Director-Security and Emergency Planning. Recommendations of the personnel who use these documents are incorporated into the appropriate document as it is revised.
- 4.1.4.2 The Director-Security and Emergency Planning controls the TSG's and ERGs by transmitting a list of controlled document holders to the Supervisor-Records Management whenever changes are made.
- 4.2 Advance Change Notices (ACN)
 - 4.2.1 An advance change notice (ACN) shall be issued to change a document when:
 - a. the change should be entered and effective before the expected date of the next revision, and
 - b. the change does not alter the intent or scope of the document.
 - 4.2.2 The Director-Security and Emergency Planning coordinates the preparation and approval of ACNs in accordance with the process specified in Attachment 1 for the Emergency Plan and Attachment 2 for the EPIPs and EPIP Forms.
 - 4.2.3 The Director Security and Emergency Planning shall ensure that a 50.59 applicability review and 50.54q effectiveness review are conducted in accordance with the appropriate sections of this procedure.
 - 4.2.4 ACNs shall normally be incorporated into the next revision of the applicable document within 60 days after the effective date of the fifth outstanding ACN.
 - 4.2.5 ACNs shall be numbered for each document and shall include the number of the next revision and sequential number of the ACN as illustrated below:

where

n = number of the next document revision

ACN n/m

m = sequential number (up to 5) of the ACN to the document.

- 4.2.6 Each ACN shall be issued in an ACN distribution package and shall include the following:
 - a. Advance Change Notice Authorization Page (a copy is enclosed as Attachment 3).
 - b. Replacement pages of the affected document which incorporate the change(s).

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4.2.7 Replacement pages shall be denoted with a revision bar in the right side of the affected page(s) which spans those lines which have been changed by the ACN. To the right of these revision bars shall appear "ACN n/m" where the appropriate numbers for "n" and "m" are entered.

- 4.2.8 The Manager-Clinton Power Station or designee shall approve ACNs.
- 4.2.9 Approved ACNs shall be issued by the Supervisor-Records Management and be incorporated into applicable controlled documents.
- 4.2.10 ACNs shall be annotated on the implementing procedure status report or list of effective pages.

4.3 Administrative Changes

- 4.3.1 Administrative changes to the emergency plan or procedures, such as telephone numbers or position titles not described in the emergency plan, do not require the review of the Plant Operations Review Committee (PORC).
- 4.3.2 For administrative changes, 50.59 applicability reviews and 50.54q effectiveness reviews are not required.
- 4.3.3 The Director-Security and Emergency Planning is the only signature required prior to issuance of the change.
- 4.3.4 The ACN Authorization Page shall be issued with the administrative change.
- 4.3.5 Administrative changes shall count as an ACN to the procedure and be numbered as specified in Section 4.2.5.
- 4.3.6 Forms that are used as an aid in performing/documenting an activity (i.e., data sheet) may be approved using the administrative process as described in this procedure. Forms designated as administrative are listed in Attachment 4, ADMINISTRATIVE FORMS.

4.4 <u>Incorporating Review Comments</u>

- 4.4.1 As Emergency Preparedness Program documents proceed through the review process, comments may be made which must be resolved before the document receives final approval. If a comment(s) results in a change(s) to a document which has completed all or part of the concurrence and approval process and received one or more concurrence signatures prior to the change being made it must be returned for reconcurrence.
- 4.4.2 Review comments should be submitted to the Director Security and Emergency Planning using a CPS Comment Control Form.
- 4.4.3 Reconcurrence signatures shall be dated. They may be made beside the first signature on the original concurrence sheet or on a new cover sheet.

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TITLE: REVISIONS AND ADVANCE CHANGE NOTICES

4.5 <u>50.59 Applicability Reviews</u>

- 4.5.1 Revisions to the CPS Emergency Plan must receive a 50.59 applicability review in accordance with CPS No. 1005.06, CONDUCT OF SAFETY REVIEWS. Administrative changes outlined in section 4.3 do not require a 50.59 applicability review.
- 4.5.2 Revisions to the CPS Emergency Plan Implementing Procedures and Forms must receive a 50.59 applicability review in accordance with the requirements of CPS No. 1005.06. Administrative changes outlined in section 4.3 do not require a 50.59 applicability review.
- 4.5.3 Preparation of 50.59 applicability reviews shall be conducted by certified individuals as specified in CPS No. 1005.06.
- 4.5.5 The Director-Security and Emergency Planning shall ensure that the 50.59 applicability review is prepared and submitted with the proposed document revision/change in accordance with Attachments 1 and 2 to this procedure.

4.6 <u>Document Cancellation</u>

- 4.6.1 To recommend cancellation of an Emergency Preparedness Program Document, or part thereof, the recommending individual(s) shall forward a written recommendation and explanation to the Manager-Clinton Power Station for consideration.
- 4.6.2 If in agreement, the Director Security and Emergency Planning shall have a cancellation notice (Attachment 5) prepared which identifies the document, or portions thereof, to be canceled.
- 4.6.3 The cancellation notice shall be approved as an advance change notice.

4.7 <u>10CFR50.54q</u> Review Process

- 4.7.1 Changes to the Emergency Plan require a 50.54q evaluation review to determine if those changes decrease the effectiveness of the Emergency Plan.
- 4.7.2 Changes to emergency procedures, or modifications to equipment or facilities used to implement the Emergency Plan or maintain the Emergency Preparedness Program require a 50.54q evaluation review to ensure those changes do not directly or indirectly decrease the effectiveness of the Emergency Plan.
- 4.7.3 Changes to plant procedures or other non-emergency preparedness documents require a 50.54q evaluation review if the change to the subject matter impacts the Entergency Preparedness Program to ensure those changes do not directly or indirectly decrease the effectiveness of the Emergency Plan.
- 4.7.4 Any evaluation that results in a decrease in effectiveness requires NRC approval prior to implementation.

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4.7.5 Performing Effectiveness Reviews

- 4.7.5.1 Upon receipt of a procedure or other document for review, a member of the Emergency Planning organization will evaluate and document the 50.54q effectiveness review using Attachment 6 as follows:
 - a. Complete Part 1, "Preliminary Screen," to determine if the change impacts the items which describe the planning standards of 50.47(b), the requirements of Part 50 Appendix E, or additional emergency planning related commitments.
 - b. Complete Part 2 'Assessment of Impact' to indicate whether the change involves an item requiring a detailed review to evaluate the impacts.
 - 1) If all items listed in Part 1, "Preliminary Screen," are checked 'NO', the change does not impact the standards of 50.47(b), the requirements of Part 50 Appendix E, or additional Emergency Planning related commitments. No further review and evaluation is required.
 - 2) If any item listed in Part 1, "Preliminary Screen," is checked 'YES', an evaluation of the change against the specific elements of 50.47(b), 10 CFR 50 Appendix E and other applicable regulations, requirements, and commitments is required.
 - c. Complete Part 3, "Effectiveness Review," to document the affect the change has on each of the impacted items.
 - 1) Review each change that impacts a listed item.
 - 2) Document the review in the outline format below:
 - <u>Background and Scope</u>: A description of the reason for and scope of the change.

NOTE

For changes that are large in scope in which a one-to-one comparison is not practical, a detailed discussion of the change which compares the current content with the proposed content may be developed.

• <u>Change Comparison:</u> A comparison showing both old and new wording, including step or section number references as applicable. Changes which incorporate new information are marked as "Added to Document." Changes which involve the deletion of information are marked as "Removed from Document.".

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 <u>Program Requirements:</u> A description of the regulation, commitment or planning criteria for <u>which</u> the Emergency Preparedness Program must demonstrate compliance.

- <u>Change Assessment:</u> A discussion of how the change degrades, does not affect, or <u>enhances</u> the effectiveness and abilities of the Emergency Preparedness Program as it relates to the program requirements.
- <u>Justification</u>: A formal justification that describes the basis and reason the change is appropriate and necessary for any degradation (otherwise, not required).
- References: A list of references such as regulations, licensing commitments, guidance documents, information notices, inspection reports or other sources which contain criteria incorporated by the Emergency Plan related to the change.
- 3) Attach the review to the 50.54q evaluation package and record the number of additional pages in the space provided.
- 4) Document whether areas impacted by the proposed changes (which impact the planning standards, requirements of Appendix E, or regulatory commitments) affect the content of the Emergency Plan.
- 5) Document whether the change maintains an equivalent capability or establishes an improved capability of the effectiveness of the Emergency Preparedness Program by checking appropriate assessment of effectiveness boxes. If the change was evaluated to have no affect, check 'N/A'.
- 6) Document whether the proposed change decreases the effectiveness of the Emergency Plan by checking the appropriate statement.
- 7) Document whether the Emergency Plan continues to meet the standards of 10 CFR 50.47(b), the requirements 10 CFR 50 Appendix E, and all other applicable regulations, requirements, and commitments by checking the appropriate statement.
- d. Attach the review documentation to the completed forms, if applicable, and forward the evaluation package to the Supervisor Emergency Planning for approval.
- 4.7.5.2 If the proposed change does not affect the Emergency Plan, the document may be revised, approved and implemented.

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4.7.5.3 If the proposed change does affect the Emergency Plan, the revised Emergency Plan and the document imposing the change must be approved through PORC.

- 4.7.5.4 For revisions to the Emergency Plan that do decrease the effectiveness of the program:
 - a. Apply to the NRC for change approval <u>prior to</u> implementation of the proposed changes.
 - b. Retain a record of each change to the Emergency Plan that decreases the effectiveness until the NRC terminates the license for the reactor.
- 4.7.5.5 For revisions to the Emergency Plan that do not decrease the effectiveness of the program, and for revisions to the implementing procedures:
 - a. Submit a report, as specified in 10CFR50.4, to the NRC within 30 days after the change is made effective.
 - b. Retain a record of each change to the Emergency Plan made without prior NRC approval for a period of 3 years from the date of change.

4.8 Distribution of Controlled Documents

- 4.8.1 The Director Security and Emergency Planning shall provide a distribution list with the names of individuals and organizations who shall be provided controlled copies of the CPS Emergency Plan and Implementing Procedures to the Supervisor-Records Management.
- 4.8.2 These organizations shall receive a controlled copy of the CPS Emergency Plan and appropriate Implementing Procedures.
- 4.8.3 Any changes to the distribution list shall be sent to the Supervisor-Records Management.
- 4.8.4 All approved revisions and ACNs to the CPS Emergency Plan, EPIPs, TSGs, ERGs, and NERMs, are promptly transmitted to the Supervisor-Records Management for distribution.
- 4.8.5 The Supervisor-Records Management shall distribute these revisions and ACNs in accordance with CPS 1017.10, CPS DOCUMENT CONTROL.
- 4.8.6 The Supervisor-Records Management shall distribute revisions and ACNs to the NRC within 30 days of receiving these documents.

4.9 Records

4.9.1 The Clinton Power Station Emergency Plan and Emergency Plan Implementing Procedures and their revisions and ACNs shall be considered as records requiring vaulting.

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5.0 REFERENCES

- 5.1 CPS Emergency Plan, Chapter 5, MAINTAINING EMERGENCY PREPAREDNESS.
- 5.2 10CFR50.54(q), CONDITIONS OF LICENSES.
- 5.3 10CFR50.59, CHANGES, TESTS AND EXPERIMENTS.
- 5.4 ANSI/ANS-3.1-1978, American National Standard, "For selection and training of nuclear power plant personnel".
- 5.5 ANSI/ANS-3.2-Rev. N18.7-1972, American National Standard, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants".
- Record of Coordination dated 8/10/87 on Emergency Planning, File Code Y-205650, L30-87(08-13)-6.
- 5.7 CPS 1017.01, RECORDS MANAGEMENT
- 5.8 CPS 1017.10, CPS DOCUMENT CONTROL
- 5.9 CNP 1.01, PREPARATION AND CONTROL OF CORPORATE NUCLEAR PROCEDURES, AND DEPARTMENT PROCEDURES
- 5.10 CPS 1005.06, CONDUCT OF SAFETY REVIEWS

6.0 ATTACHMENTS

- 1. CPS EMERGENCY PLAN APPROVAL PROCESS
- 2. IMPLEMENTING PROCEDURE APPROVAL PROCESS
- 3. ADVANCE CHANGE NOTICE AUTHORIZATION PAGE
- 4. ADMINISTRATIVE FORMS
- 5. CANCELLATION NOTICE
- 6. 10CFR50.54q EFFECTIVENESS REVIEW

7.0 FORMS

None

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CPS EMERGENCY PLAN APPROVAL PROCESS

Step Number	Individual/Group	Responsibility
1.	Originator	 Prepares Plan revision and applicable review documents 50.59 applicability review 50.54q effectiveness review
2.	Director-Security and Emergency Planning	 Review and concur Plan revision and documents For ACNs - only affected department Managers need to concur
3.	Nuclear Power Program Managers	Review for technical content and concur
4.	Plant Operations Review Committee	 Review for technical content and sign Plan cover sheet
5.	CPS Plant Manager	 Review and concur Plan revision. Final approval for ACN changes.
6.	CPS Site Vice President	Review and approve Plan revision
7.	Administrative Support Personnel	Transmit approved Plan for distribution

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IMPLEMENTING PROCEDURE APPROVAL PROCESS

Step Number	Individual/Group	Responsibility
1.	Originator	 Prepares Procedure/Form/ACN revision and applicable review documents 50.59 applicability reveiw 50.54q effectiveness review
2.	Director-Security and Emergency Planning	 Review and concur Procedure/Form/ACN revision and documents Determine appropriate concurrence
3.	Concurrence Organization(s)	 Conduct Independent Technical review in accordance with Operational Requirements Manual Sign Procedure/Form/ACN cover sheet and/or provide comments
4.	CPS Plant Manager	 Review and approve Procedure/Form/ACN revision
5.	Administrative Support Personnel	 Transmit approved Procedure/Form/ACN for distribution

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ADVANCE CHANGE NOTICE AUTHORIZATION PAGE

Document:	ACN Numb	oer:
Summary of Change:		
Reason for Change:		
Replacement Pages:		
	Signature	Date
Originator:		1
Director-Security and Emergency Planning:		1
Concurrence:		
Concurrence:		
Concurrence:		
Independent Reviewer:		
Plant Operations Review Committee:		
Manager-Clinton Power Station:		1

PROCEDURE: AP-02 REVISION: 14 ATTACHMENT: 4

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ADMINISTRATIVE FORMS

<u>EPIP</u>	Form#	Attachment Title
AP-07	F-01	ANS Test Report
AP-07	F-02	Siren Maintenance/Repair Report
FE-05	8	Hospital Kit
FE-05	10	TSC Administrative Supplies
FE-05	11	OSC Administrative Supplies
FE-05	14	EOF Administrative Supplies
FE-05	15	BEOF Administrative Supplies
FE-05	16	JPIC Administrative Supplies

Document:

Reason for Cancellation:

Independent Reviewer:

Manager-Clinton Power Station:

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CANCELLATION NOTICE

	Signature	Date
Originator:		
Director-Security and Emergency Planning:		- Military
Concurrence:		
Concurrence:		
Concurrence:		

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50.54q PROGRAM EVALUATION AND EFFECTIVENESS REVIEW

				Review No.:
Document Title:			No.:	Revision:
PART	1 P	RELIMINARY SCREEN		
Does	the p	roposed change impact:		en e
YES	NO	ITEM		
		The assignment of responsibilities related to respond initially or on a continuous		al or supporting organizations, or the abilit
		The staffing and/or responsibilities of emergency response facilities.	on-shift personnel, or ir	nitial activation and long term staffing of
		The interface between onsite and offs	ite support response acti	vities.
		Arrangements for requesting and effe accommodations for federal, state, an	• •	or resources from offsite authorities, or the F.
		Emergency Action Levels.		
		The periodicity of communications ar	nd emergency equipment	tests.
		Notification procedures to either the I	ERO, local, state, or fede	ral entities.
		Content of initial and follow-up mess	ages.	
		Communications capability among propublic.	incipal response organiz	ations to emergency personnel or the
		Dissemination of coordinated information formation dissemination (brochures	~	nsient public including periodic
		Emergency facilities and support equi	pment used in emergeno	y response, provisions, or maintenance.
		Methods, systems and/or equipment f radiological consequences.	or the assessment and m	onitoring of actual or potential offsite
		Protective Actions developed for either protective actions.	er the Plume or Ingestion	Exposure Pathways including onsite
		Means for controlling emergency wor by the EPA.	ker radiation exposures	consistent with the guidelines established
		Arrangements for medical services fo	r contaminated injured in	ndividuals.
		Plans for plant reentry and/or recovery	y organization operations	s.
		Periodicity of drills and/or exercises a	s well as deficiency reso	lution.
		Training requirements for ERO or loc	al site support personnel	
		Responsibilities for Radiological Emewell as training requirements for personal requirements.	=	evelopment, maintenance, and review as plans.
		Implementation of federal regulations Emergency Preparedness Program.	and requirements or for	mal commitments related to the Exelon
 Comp	☐ lete P	The operation, maintenance, or testing art 2.	g requirements of the ER	DS.

PROCEDURE: AP-02 REVISION: 14 ATTACHMENT: 6 PAGE: 2 of 3

50.54q PROGRAM EVALUATION AND EFFECTIVENESS REVIEW

			Review No.:
Doo	cument Title:	No.:	Revision:
PAI	RT 2: ASSESSMENT OF IMPACT		
	All items in Part 1 are not impacted.		
	This change does not involve the standards of § commitments as described within the Emergence		nents of Part 50 Appendix E or additional
	No further review and evaluation is required.		
	Item(s) listed in Part 1 are impacted.		
	An evaluation of the change against the specific applicable regulations, requirements, and comm), 10 CFR 50 Appendix E and other
	Complete Part 3 of this review.		
EP I	Reviewer:		Date:
EP S	Supervisor:		Date:

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50.54q PROGRAM EVALUATION AND EFFECTIVENESS REVIEW

					Review No.:		
Document Title:				No.:	Revision:		
PART 3 EFFECTIVENESS REVIEW			ess Review				
Docum	entation	of the aft to this e	fect of the proposed changes valuation.	s impacting the Emergency	y Preparedness Program are attached as		
The pro	posed c	hanges wi	hich impact the planning sta the content of the Emergen	andards, requirements of A cy Plan.	appendix E, or regulatory commitments		
Does th	e change	e maintair	n the equivalent or establish	an improved capability:			
YES	NO	N/A	ITEM				
			To respond to an emerge Emergency Plan.	ency or meet actions or oth	ner requirements described in the		
			In protecting the health a an emergency.	and safety of plant personi	nel and the general public in the event of		
		. 🗆	In implementation of a f	ederal regulation or requir	rement or formal commitment.		
reductio commit respond NRC ap	n in a coment is of the coment is of the coment in the com	ommitmendefined as a semenger of the contract	nt without a commensurate s a statement made in the Enacy).	change or reduction in the nergency Plan that affects	red if there has been a change or bases for that commitment (a the capability or resources for nange decreases the effectiveness of the		
Based o	n this ev	raluation t	the proposed change doe	es does not decrease t	the effectiveness of the Emergency		
			continues		ds of 10 CFR 50.47(b), the tirements, and commitments.		
EP Reviewer:					Date:		
EP Sup	ervisor:	<u>.</u>			Date:		

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TITLE:

EMERGENCY PREPAREDNESS TRAINING PROGRAM

SCOPE OF REVISION:

As a result of a self-assessment, the ERO requalification program was revised to a knowledge and performance based program. With the change in requalification training, the procedure was revised to clarify the procedures used to requalify personnel. Other small changes such as title changes and clarifications to the procedure were made. This revision also serves as the biennial review.

DOCUMENT CONTROL

MAB 23 2001 CONTROLLED COPY CLINTON POWER STATION

Authority

Signature	Date
Ken Evans	3/13/01
dennis Jonth	3/15/01
μΑ	
AU	1
NA (a (a 1	
Wague Alb Hal	3/12/01
Moch	3/16/2/
	Ken Evans NA NA

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TITLE:

EMERGENCY PREPAREDNESS TRAINING PROGRAM

CONTENTS

1.0	INTRODUCTION			
2.0	RESF	RESPONSIBILITY		
3.0	DEFINITIONS			
4.0	INSTRUCTIONS			
	4.1 4.2 4.3 4.4 4.5 4.6 4.7 4.8 4.9 4.10 4.11	Program Development Training Requirements Initial Training Requalification Training Remedial Training Access Training Specialized Training Drills and Exercises Training for Offsite Organizations Other Training Training Critiques		
5.0	RFFF	FRENCES		

- 6.0 **ATTACHMENTS**
- 7.0 **FORMS**

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TITLE: EMERGENCY PREPAREDNESS TRAINING PROGRAM

1.0 INTRODUCTION

The purpose of this implementing procedure is to describe the methods for conducting Emergency Planning (EP) training.

2.0 RESPONSIBILITY

- 2.1 <u>Director-Security and Emergency Planning</u> is responsible for review and implementation of this procedure, initial and refresher training as outlined in the Emergency Planning Training Program Description (EP TPD).
- 2.2 <u>Manager-Clinton Power Station</u> is responsible for final approval of this procedure.
- 2.3 <u>Supervisor-Security</u> is responsible for providing annual Medical First Responder Training (or equivalent) and ensuring that a sufficient number of security force members are on shift, at all times, qualified in First Responder training (or equivalent).
- 2.4 <u>Department Managers</u> are responsible for ensuring their personnel attend assigned initial and refresher ERO Training.

3.0 DEFINITIONS

- 3.1 <u>Abbreviated Radiation Worker Training</u> The abbreviated version of Radiation Worker Training for individuals qualified in accordance with the Radiation Worker and Respirator Protection Training Program Description.
- 3.2 <u>Audit Only</u> The term Audit Only refers to classroom training an individual shall receive which does not relate directly to his emergency duties but should be provided for background information. An examination is not required for Audit Only training. Refresher training is not required for Audit Only training.
- 3.3 Expired Training ERO Refresher Training which has not been received within 15 months of last receiving it. For access training this is within 13 months of last receiving it.
- 3.4 <u>Initial Training</u> Initial training consists of the initial training courses provided to an individual assigned to an emergency response position as part of their ERO initial qualifications.
- 3.5 Overdue Training Requalification training which has not been received within 12 months of last receiving it.
- 3.6 Radiation Worker Training The course required for any individual who is to be granted unescorted access within the Radiological Controlled Area and to ERO members who need access to the EOF.

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TITLE: EMERGENCY PREPAREDNESS TRAINING PROGRAM

3.7 Requal Training - Training provided annually for emergency response personnel.

- 3.8 Required Reading Required readings may be used to provide emergency response personnel information for which classroom training is not necessary.
- Respiratory Protection Training Respiratory protection training is given to individuals who will perform work requiring respiratory protection, individuals who will supervise work requiring respiratory equipment, and individuals required to wear protective equipment for emergency situations. The training program is based on the hazards to be encountered and the types and uses of respirators to be worn.
- 3.10 EP TPD Contains the training matrix for required ERO training.
- 3.11 <u>Training Drills</u> The primary method used to provide requalification training for most ERO members. These are normally Facility or Tabletop drills.

4.0 <u>INSTRUCTIONS</u>

4.1 Program Development

- 4.1.1 Nuclear Training Learning Services and/or the Emergency Planning Group shall develop initial and requalification training material for the EP TPD consistent with the following goals:
 - To familiarize employees with the CPS Emergency Plan and it's implementing procedures.
 - To ensure that Emergency Response Organization (ERO) personnel are initially trained to function properly and efficiently for their assigned CPS Emergency Plan duties and responsibilities.
 - To provide ongoing requalification training to ensure that ERO personnel remain familiar with their assigned CPS Emergency Plan duties and responsibilities.
- 4.1.2 The ERO training program includes knowledge and performance based training as well as evaluations in which individuals demonstrate the ability to perform their assigned emergency function.
- 4.1.3 Initial ERO training material shall be approved by or concurred by the Supervisor Emergency Planning. Concurrence shall be obtained from Radiation Protection if the instructional material deals with radiological control. Concurrence shall be obtained from the Supervisor-Security, if the instructional material pertains to-Security Controls.

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TITLE: EMERGENCY PREPAREDNESS TRAINING PROGRAM

4.1.4 The Manager - Training, or designee, shall coordinate and schedule personnel, facilities, instructors, and instructional periods as requested to support the initial and the refresher ERO training program.

- 4.1.5 The Director-Security and Emergency Planning shall provide sufficient ERO refresher training and initial training courses as listed in the EP TPD.
- 4.1.6 The Training Manager or designee shall maintain records pertaining to the CPS Emergency Preparedness Training Program.
- 4.1.7 Department Managers should ensure their personnel are provided time to attend scheduled initial and requalification ERO training.

4.2 Training Requirements

- 4.2.1 The EP TPD shall delineate training requirements for each ERO position. Course substitutions are permissible if approved by the Director-Security and Emergency Planning. These substitutions should be documented by using a Training Waiver to indicate the course substitution.
- 4.2.2 Emergency Planning shall develop and maintain the EP TPD.
- 4.2.3 The EP TPD shall be approved by the Director-Security and Emergency Planning.
- 4.2.4 Successful completion of licensed operator training may satisfy certain ERO training requirements as indicated in the training matrix.
- 4.2.5 Additional training for Senior Reactor Operators, Reactor Operators, Non-Licensed Operators, and Shift Technical Advisors who have an additional ERO position should be determined on a case by case basis by the Director-Security and Emergency Planning. The additional training may be in the form of classroom training, briefing, required reading, and/or self-study.
- 4.2.6 Training for individuals moving from one Emergency Response position to another should be determined on a case by case basis by the Director-Security and Emergency Planning/designee.
- 24.2.7 Revisions to the EP TPD do not necessarily require retraining for individuals previously qualified. If any retraining is required the training matrix revision summary will include the scope of retraining required.
- 4.2.8 ERO training requirements may be waived using an approved IMP04, Training. _____ Exemption Form.

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4.3 <u>Initial Training</u>

- 4.3.1 Initial training shall as a minimum consist of a course or series of courses pertaining to each trainee's ERO position as outlined in the EP TPD. Initial training may include briefings, seminars, walkthroughs, and drills.
- 4.3.2 Successful completion of initial training shall include completion of classroom training in accordance with the EP TPD.
- 4.3.3 Successful completion of initial classroom training shall require a minimum score as designated on the written examination or satisfactory performance on a practical demonstration, as appropriate. A separate examination/practical demonstration should be administered for each course attended.

NOTE:

Successful completion of the following courses shall require attendance of the course and demonstration by the course participants through hands on use that they are familiar with course content. In the courses with an * the demonstration is accomplished by a check for understanding. Therefore, no examination will be administered:

- ERO Notifications*
- Computerized Dose Assessment
- 4.3.4 Self-study may be approved for classroom training.
- 4.3.5 Remedial training shall be accomplished in accordance with section 4.5 of this procedure.
- 4.3.6 When initial training has been completed, the ERO roster shall be updated in accordance with AP-10, EMERGENCY RESPONSE ORGANIZATION ASSIGNMENTS.
- 4.3.7 In the event procedural changes occur in the interim period between scheduled training sessions, training may be accomplished via ERO correspondence, such as EP Bulletins.

4.4 Requalification Training

- 4.4.1 Requalification training shall be conducted at least annually. Requalification training shall be conducted in twelve month intervals not to exceed fifteen months from:
 - a. the status "1" date for recently qualified individuals or
 - b. the completion of training for those qualified for greater than 1 year.

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4.4.2 Performance based evaluations are the primary method by which ERO members receive requalification training. Tabletop or Facility drills are structured to facilitate requalification training. As such, the EP TPD lists a TD (Training Drill) as a requalification requirement for most ERO positions. For this reason, ERO members are expected to participate in at least one training drill per year.

- 4.4.3 A performance-based evaluation may be conducted outside the scope of a normal training drill using approved evaluation measures for the appropriate ERO position to be evaluated. This would fulfill the annual requalification training requirement normally satisfied with drill participation.
- 4.4.4 Requalification training consists of one or more of the following methods:
 - Training in accordance with the EP TPD.
 - Required reading or discussion of duties and responsibilities as indicated on the EP TPD.
 - Training regarding applicable performance related deficiencies in emergency drills/exercises conducted since the previous requalification training.
 - Review of significant Emergency Response Organization (ERO) correspondence since the previous training.
 - Training regarding applicable procedural changes since the previous requalification training.
- 4.4.5 Successful completion of classroom requalification training shall include completion of training in accordance with the EP TPD.
- 4.4.6 Successful completion of a challenge examination may be used for classroom requalification training. Failure to attain a minimum score, as designated on the challenge examination, requires attendance and successful completion of the initial classroom training.

NOTE

In accordance with the EP TPD, positions whose emergency task is essentially equivalent to their normal job function do not require requalification training.

NOTE

Successful completion of the following courses does not require a written exam: ERO Notifications and Computerized Dose Assessment.

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4.5 Remedial Training

- 4.5.1 When an individual fails to attain the minimum score as designated on the examination for any course included in this procedure, remedial training should be provided. In the case of requalification training the remedial training shall be conducted before the training expires.
- 4.5.2 If the individual fails the first remediation experience, the suitability for retraining shall be resolved between the employee's Department Head, the Training Manager and/or Director-Security and Emergency Planning.
- 4.5.3 All remedial examinations for courses included in this procedure shall be written examinations. Oral examinations shall not be provided or accepted.
- 4.5.4 Should a second remedial examination be required, it should differ by at least 40% from the first.

4.6 Access Training

- 4.6.1 Personnel assigned to the Emergency Operations Facility shall complete Radworker Training in accordance with the EP TPD.
- 4.6.2 Personnel assigned to the Main Control Room, Technical Support Center, and Operations Support Center shall complete Radworker Training as outlined in the Radiation Worker and Respiratory Protection TPD.

NOTE

Abbreviated Radiation Worker may be substituted for Radiation Worker in accordance with the Radiation Worker and Respiratory Protection TPD.

- 4.6.3 Those personnel whose ERO positions may require them to wear respirators shall complete Respiratory Protection Training and Self Contained Breathing Apparatus (SCBA) training, if they are required to wear SCBAs, as outlined in Radiation Worker and Respiratory Protection TPD. The ERO positions requiring respiratory protection training and SCBA training are delineated in the EP TPD.
- 4.6.4 Those OSC personnel who are required to maintain Respiratory Protection Training and SCBA training will be monitored to ensure that at least 90% of them by discipline are qualified.
 - 4.6.4.1 Printouts listing individuals whose ERO training is coming due within 90 days should be sent to the responsible training coordinator.

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4.6.4.2 A memo will be sent to the responsible Director for any individuals whose Respiratory Protection/SCBA training is overdue.

- 4.6.4.3 The above steps are designed to ensure that greater than 90% of the Emergency Team Members for any plant discipline are qualified on Respiratory Protection/SCBA training. If an individuals Respiratory Protection/SCBA Training should expire, a memo will be sent to the responsible Director with a copy to the Manager Clinton Power Station. A Condition Report will be written if >10% of the Emergency Team Members for any plant discipline are not qualified in Respiratory Protection/SCBA training.
- 4.6.5 Up to 10% of the individuals for any position may not be qualified on respiratory protection equipment. These individuals would still be qualified to perform other duties assigned to their position.
- 4.6.6 Key personnel as defined in EC-01, CPS EMERGENCY RESPONSE ORGANIZATION AND STAFFING, for the TSC and OSC will be monitored for compliance with Radiation Worker Training Requalification to ensure response times of key personnel are maintained.
- 4.6.7 Contract personnel assigned an emergency response position at Clinton Power Station should complete the training requirements in accordance with this procedure for the appropriate emergency response facility.
- 4.6.8 In the event services of personnel that have not received site specific training are required, training shall be administered as needed. The training shall be in accordance with the applicable policies/procedures.

4.7 Specialized Training

4.7.1 The following specialized training shall be provided to the applicable positions per the EP TPD:

Source Term Estimation Reactor Core Damage Estimation Manual Dose Assessment Computerized Dose Assessment ERO Notifications

4.8 <u>Drills and Exercises</u>

Refer to AP-04, PREPARATION AND CONDUCT OF EMERGENCY DRILLS AND EXERCISES.

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4.9 Training for Offsite Organizations

- 4.9.1 Offsite organizations and individuals are offered training on an annual basis by the Illinois Emergency Management Agency.
- 4.9.2 Clinton Power Station personnel, State/local agencies, or consultants may conduct the offsite training.
- 4.9.3 Offsite organization training conducted by the CPS Emergency Planning Group shall include:
 - Plant layout and access procedures.
 - Handling contaminated injuries.
 - Identification of individuals in the CPS Emergency Response Organization responsible for coordinating offsite activities.
- 4.9.4 Training on self-contained breathing apparatus shall be offered annually to offsite fire departments, which do not provide their own SCBA training.
- 4.9.5 The Illinois Emergency Management Agency should include training for notifications, communications, and radiological controls in the appropriate courses for offsite personnel.
- 4.9.6 Organizations and training offered are outlined on the training matrix maintained by the Illinois Emergency Management Agency.
- 4.9.7 The Director-Security and Emergency Planning shall ensure that offsite training is conducted and shall maintain copies of offsite training attendance sheets for training conducted by the CPS Emergency Planning Group.

4.10 Other Training

- 4.10.1 The CPS Emergency Preparedness Training Program credits the training provided to Station personnel in other areas, such as Fire Brigade and Medical First Responder.
 - 4.10.1.1 Fire Brigade training shall be conducted in accordance with CPS No. 1001.06, CPS FIRE BRIGADE.
 - 4.10.1.2 The Supervisor-Security/Designee shall provide sufficient training in Medical First Responder training or equivalent to ensure there are two personnel onsite at all times that are trained in Medical First Responder (or equivalent) and are capable to respond.

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4.10.2 Medical support personnel for Dr. John Warner Hospital, Decatur Memorial Hospital, and Clinton Ambulance personnel who may be involved in response to an emergency at CPS shall receive training in how to handle radiation accident cases.

- 4.10.2.1 They shall be invited to annual requalification training on how to handle radiation accident cases.
- 4.10.2.2 This training may be provided by a Medical Consultant.
- 4.10.2.3 Local medical professionals are offered training in the treatment of patients that are contaminated and/or over exposed to radiation.
- 4.10.2.4 These medical professionals may be offered annual requalification training in the treatment of radiation accident patients.

4.11 Training Critiques

- 4.11.1 To satisfy the regulations as stated in 10CFR50 Appendix E, IV.F.3, emergency preparedness training courses shall be critiqued by offering the opportunity to trainees to formally critique courses.
- 4.11.2 These critique comments may include student-generated comments on the Emergency Preparedness Program, in particular recommendations for changes/improvements to the procedures or plans.
- 4.11.3 Nuclear Training shall be responsible for reviewing training critique comments associated with courses they have taught to determine if any relate to the CPS Emergency Plan or Implementing Procedures.
- 4.11.4 Nuclear Training should forward Emergency Planning training critique comments that deal with the CPS Emergency Plan or Implementing Procedures to Emergency Planning.
- 4.11.5 The Director-Security and Emergency Planning shall be responsible for tracking the resolution of critique items.

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5.0 REFERENCES

- 1. 10CFR50, Appendix E, "Emergency Planning and Preparedness for Production and Utilization Facilities"
- 2. CPS Emergency Plan, Section 5.4
- 3. AP-04, PREPARATION AND CONDUCT OF EMERGENCY DRILLS AND EXERCISES
- 4. CPS No. 1001.06, CPS FIRE BRIGADE
- 6. Illinois Plan for Radiological Accidents, Volume VIII, Clinton
- 7. Radiation Worker and Respiratory Protection Training Program Description.
- 8. AP-10, EMERGENCY RESPONSE ORGANIZATION ASSIGNMENTS
- 9. EC-01, CPS EMERGENCY RESPONSE ORGANIZATION AND STAFFING
- 11. PR-01, JOINT PUBLIC INFORMATION CENTER OPERATION AND STAFFING

6.0 ATTACHMENTS

None.

7.0 <u>FORMS</u>

None.