



Entergy Operations, Inc.
P.O. Box 756
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October 18, 2001

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Changes to Emergency Plan Implementing Procedures – October 18, 2001
Grand Gulf Nuclear Station
Docket No. 50-416
License No. NPF-29

GNRO-2001/00082

Ladies & Gentlemen:

Entergy Operations, Inc. submits in accordance with 10CFR50 Appendix E, Section V changes to the following Emergency Plan Implementing Procedure:

01-S-04-21 Rev. 109

This letter does not contain any commitments.

Yours truly,

A handwritten signature in black ink, appearing to be "CA Bottemiller", with a long horizontal line extending to the right.

Charles A. Bottemiller,
Licensing Manager

MJL
attachment: 1. Procedure 01-S-04-21

cc: (See Next Page)

A045

Hoeg	T. L.	(GGNS Senior Resident)	(w/a)
Levanway	D. E.	(Wise Carter)	(w/a)
Reynolds	N. S.		(w/a)
Smith	L. J.	(Wise Carter)	(w/a)
Thomas	H. L.		(w/o)

Mr. E. W. Merschoff (w/2) Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011	ALL LETTERS
Mr. S. P. Sekerak, NRR/DLPM/PD IV-1 (w/2) ATTN: ADDRESSEE ONLY U.S. Nuclear Regulatory Commission One White Flint North, Mail Stop O7-D1 11555 Rockville Pike Rockville, MD 20852-2378	ALL LETTERS

PLANT OPERATIONS MANUAL

Volume 01
Section 04

01-S-04-21
Revision: 109
Date: 10/9/01

ADMINISTRATIVE PROCEDURE

EMERGENCY PREPAREDNESS TRAINING PROGRAM

SAFETY RELATED

Prepared: Dianne Gibson
Reviewed: [Signature]
 Technical
Concurred: [Signature]
 Responsible Manager
PSRC: [Signature]
Approved: [Signature] Plant General Manager [Signature] Manager, Training & Development

List of Effective Pages:

Pages 1-7

Attachments I-III

List of TCNs Incorporated:

<u>Revision</u>	<u>TCN</u>
0-3	None
4	1
5-9	None
10	None
11	None
12	2, 3
13	4
14	None
100	None
101	5
102	6, 7
103	None
104	None
105	None
106	None
107	None
108	None
109	None

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED ADMINISTRATIVE PROCEDURE	LI-101 Revision 1			
			ATTACHMENT 9.1	50.59 REVIEW FORM		Page

Facility: Grand Gulf Nuclear Station

Document Reviewed: 01-S-04-21Revision 109, Emergency Preparedness Training Program

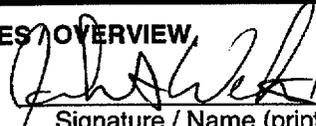
System Designator(s): N/A

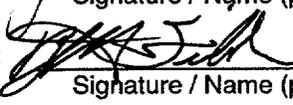
Check the applicable review(s):

<input checked="" type="checkbox"/>	SCREENING	Sections I, II, and III required
<input type="checkbox"/>	50.59 EVALUATION EXEMPTION	Sections I, II, III, and IV required
<input type="checkbox"/>	50.59 EVALUATION Evaluation #: _____	Sections I, II, III, and V required

NOTE: Only the sections required as indicated above must be included in the Review.

I. SIGNATURES / OVERVIEW

Preparer:  / John A Walton / Entergy Nuclear South / Training / 8/30/01
Signature / Name (print) / Company / Department / Date

Reviewer:  / Rodney A Fielder / Entergy Nuclear South / Training / 8/31/01
Signature / Name (print) / Company / Department / Date

(PSRC): NA
Chairman's Signature / Date (N/A for Screenings and 50.59 Evaluation Exemptions)

List of Assisting/Contributing Personnel:

Name:	Scope of Assistance:
_____	_____
_____	_____
_____	_____

Description of Proposed Change

- Deletes Qualification Cards
- Changes training re-qualification time to annual (Between January 1 and December 31)
- Clarifies qualification requirements for EOF Habitability Specialist
- Changes references to new NMM procedures

II. SCREENING

A. Licensing Basis Document Review

Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

Operating License	YES	NO	N/A	CHANGE # and/or SECTIONS TO BE REVISED
Operating License	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
TS	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
NRC Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If "YES", obtain NRC approval prior to implementing the change. (See Section 5.1.13 for exceptions.)				

LBDs controlled under 50.59	YES	NO	N/A	CHANGE # and/or SECTIONS TO BE REVISED
UFSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
TS Bases	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Technical Requirements Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Core Operating Limits Report	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Fire Hazard Analysis	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Fire Protection Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Offsite Dose Calculations Manual	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Process Control Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
NRC Safety Evaluation Reports ¹	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
If "YES", perform an Exemption Review per Section IV <u>OR</u> perform a 50.59 Evaluation per Section V.				

LBDs controlled under 72.48	YES	NO	N/A	CHANGE # and/or SECTIONS TO BE REVISED
Cask UFSAR	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Certificate of Compliance	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If "YES", evaluate/process any changes in accordance with 72.48				

LBDs controlled under other regulations	YES	NO	N/A	CHANGE # and/or SECTIONS TO BE REVISED
Quality Assurance Program Manual ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Emergency Plan ²	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Security Plan ^{2, 3}	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Inservice Inspection Program ⁴	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Inservice Testing Program ⁴	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
If "YES", evaluate/process any changes in accordance with the appropriate regulation.				

¹ If "YES," see Section 5.1.5.

² If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed.

³ The Security Plan is classified as safeguards and can only be reviewed by personnel with the appropriate security clearance. The Preparer should notify the security department of potential changes to the Security Plan.

⁴ If "YES", process the change in accordance with the 10CFR50.55a control program.

	NUCLEAR MANAGEMENT MANUAL	QUALITY RELATED ADMINISTRATIVE PROCEDURE	LI-101 Revision 1			
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- B. Does the proposed activity involve a test or experiment not described in the FSAR?** Yes If "yes," perform an Exemption Review per Section IV OR perform a 50.59 Evaluation per Section V.
 No

C. Basis

(Provide a basis for the "no" items checked in Sections II.A and II.B, above. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis. If a 50.59 Evaluation is required, this section may be N/A'd.)

01-S-04-21 describes the administration and qualification requirements of emergency preparedness training. This procedure is being revised in order to standardize Emergency Preparedness Training among Entergy Nuclear South Plants. The change to reference the new NMM procedures is editorial in nature, and does not change any training content or intent, nor does it impact regulatory required documents. An electronic search of governing documents including the SER, ASER, FSAR, QAPM, E-Plan, Tech Specs, and TRM using the keywords listed in the references section of this document was performed. In addition, a manual search was performed. Emergency Preparedness qualification cards are not addressed in the licensing basis documents (LBDs). Habitability Specialist is mentioned in the E-Plan (5.4.26) in general terms of responsibilities. This procedure goes beyond the E-Plan requirements for Habitability Specialist by adding a greater level of detail as to qualification requirements for that position. Emergency Preparedness training requirements are discussed in Technical Specifications/TRM (5.5.3 & 7.6.3), FSAR (7.7, 13.2, 18.1), and the E-Plan (1.6, 6.5.1, 8.2, Appendix H-6.0). Only the E-Plan discusses training frequency. Revision 46 to the E-Plan added the statement to the definition of "annual" which deferred ERO training frequency to this procedure. As a result of the above search, and manual reviews of LBDs, the revision of 01-S-04-21 does not contradict the regulations, nor does it represent a change to the facility or procedure which described in the FSAR. This procedure does not impact any plant hardware or affect any SSC, nor does it require any system to be operated, or provide for test or experiments on any SSC to be conducted. This procedure does not impact other LBDs controlled under 50.59, 72.48, or other regulations such as 50.54.

- D. Is the validity of this Review dependent on any other change?** (See Section 5.2.2.4 of the EOI 10CFR50.59 Program Review Guidelines) Yes
 No

If "Yes," list the required changes.

E. References

[Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.2.2.4 of LI-101.]

Documents:

An electronic search of the SER, Amended SER, Technical Specifications, TRM, E-Plan, QAPM, and FSAR using the listed key words.

Keywords:

Training, Qualification, Habitability, Annual

FSAR Sections Reviewed:

Manual review of the following was performed:
E-Plan Section 1, 6.5, 8.2, Appendix H (6.0)
FSAR Sections 7.7, 13.2, 13.3, 18.1
Tech Specs/TRM Sections 5.5.3, 7.6.3

FSAR Figures Reviewed:

None

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III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations."

Will the proposed Change being evaluated:

Yes No

- Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)?
- Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
- Involve dredging activities in a lake, river, pond, or stream?
- Increase the amount of thermal heat being discharged to the river or lake?
- Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?
- Discharge any chemicals new or different from that previously discharged?
- Change the design or operation of the intake or discharge structures?
- Modify the design or operation of the cooling tower that will change water or air flow characteristics?
- Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?
- Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?
- Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?
- Involve the installation or use of equipment that will result in an air emission discharge?
- Involve the installation or modification of a stationary or mobile tank?
- Involve the use or storage of oils or chemicals?
- Involve burial or placement of any solid wastes in the site area that may effect runoff, surface water, or groundwater?



ENTERGY

10CFR50.54(q) EP Evaluation Checklist

1. DOCUMENT CHANGED:

01-S-04-21

2. EMERGENCY PLAN SECTION(S) OR PROCEDURE SECTION(S):

See Attached mark up

3. REVISION NUMBER:

109

4. DOCUMENT REVIEWED: 01-S-04-21 See attached mark up

5. PROPOSED CHANGE(S): Deletes the Qualification Card for each ERO position, changes training re-qualification period for EP training from 13 months to once per calendar year, requires Shift Manager to participate in EP Drill and other administrative changes.

6. 10CFR50.54(q) states in part: "The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans and the plans, as changed, continue to meet the standards of 50.47(b) and the requirements of Appendix E of 10CFR 50." Review the planning standards contained in 10CFR50.47(b) and 10CFR50, Appendix E to determine if any of the standards are affected by the change. Check the applicable abbreviated standard below if it is affected.

10CFR50.47(b) STANDARDS

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

10CFR50.54(q) Evaluation Checklist (Cont.)

10CFR50, APPENDIX E STANDARDS

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

7. DETERMINATION

YES **NO** Based upon the section 6 review, does the revision result in the loss of the ability to meet any of the standards described in 10CFR50.47(b) or 10CFR50, Appendix E, or decrease the effectiveness of the Emergency Plan?

If **YES** is checked, then the revision must receive prior approval from the NRC.

If **NO** is checked, provide justification below (attach additional pages, if necessary).

8. JUSTIFICATION

Deleting the Qualification Card for each ERO position does not reduce the effectiveness of the GGNS Emergency Plan because each ERO position is required to participate in a drill before being placed on-call and annually thereafter. The drill participation covers the items that were documented on the Qualification card and therefore was redundant.

Changing the training re-qualification period for EP training from 13 months to once per calendar year does not reduce the effectiveness of the plan because each ERO member will receive their EP training according to a published schedule. The training will occur sometime during the calendar year and if they fail to complete the training, they are removed from the ERO.

Requiring the Shift Manager to participate in EP Drill is an enhancement to the plan by ensuring that they have the opportunity to maintain their skills and proficiency as Emergency Director.

The proposed revision meets the Emergency Plan content requirements from 10CFR50 Appendix E, planning standards from 10CFR50.47(b), and guidance criteria from NUREG-0654. Therefore, the degree of effectiveness of the Emergency Plan has not been decreased. This procedure revision includes changes that enhance, streamline and clarify the emergency response program.

9. APPROVAL

Prepared by:	<u><i>OK Tawse</i></u> (Signature)	Date:	<u>9-25-01</u>
Reviewed by:	<u><i>Richard Small</i></u> (Technical Reviewer)	Date:	<u>9-25-01</u>
Approved by:	<u><i>M. Adams</i></u> (Manager, Emergency Planning)	Date:	<u>9-25-01</u>

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RPTS FORM

10CFR50.59 Review Required?	<input checked="" type="checkbox"/> Yes	If Yes, attach 50.59 Review Form
	<input type="checkbox"/> No	Not required per LI-101

Cross-Discipline review required?	<input checked="" type="checkbox"/> Yes	(Note affected Departments Below)
	<input type="checkbox"/> No	

Preparer Initials>>> **edg**

Department Cross-Discipline Reviews Needed	Signoff (signed, electronic, telcon)
Manager, Emergency Preparedness	<i>M.A.</i>

Does this directive contain Tech Spec Triggers? YES NO

REQUIREMENTS CROSS-REFERENCE LIST

Requirement Implemented Name	by Directive Paragraph Number	Directive Paragraph Number That Implements Requirement
UFSAR	7.7.1.11.4.3.S3	Att I.7, Att II-C13
Emergency Plan	8.2.1	6.2
UFSAR	18.1.22	6.4, Att I.2, Att II - Column 8
Emergency Plan	8.2.2.S2&S3	*
Emergency Plan	8.2.S1 & S2	*
	8.2.2.S1	6.2.1, 6.2.3, 6.3.1, Att I.7
TRM	7.6.3.1.a	6.4.3
Tech Spec	5.5.3.a	Att I.7, Att II-C13
ANSI N2.3	4.5.1.S1	6.2.2a
ANSI N2.3	4.5.2.S1	6.2.2a
ANSI N2.3	4.5.3.S2	6.2.2a
Emergency Plan	6.5.1.a.5	6.2
AECM-89/0202	Att 1.IV.S7	6.1.8, 6.1.1
Emergency Plan	8.2.2.S4	6.3.1, 6.3.2
GNRO-97/00080	50-416/9709-1 Item 1	6.4.4
CR 2000/0386	CA.15	6.1.9

* Covered by directive as a whole or by various paragraphs of the directive.

NOTE

The Component Database Change Request statement is applicable only to Volume 06 and 07 maintenance directives.

Component Database Change Request generated and the backup documentation available for setpoint and/or calibration data only Yes N/A CDBCR # _____

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Current Revision Statement

Revision 109:

- Deletes Qualification Cards.
- Changes training re-qualification time to annual.
- Clarifies Qual requirements for EOF Habitability Specialist.
- Changes References to new NMM procedures.
- Adds drill requirements to Shift Manager.

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1.0 PURPOSE

- 1.1 The objective of the Emergency Preparedness Training (EPT) Program is to define and implement training for GGNS emergency response personnel to ensure a constant state of preparedness for and during a radiological emergency.
- 1.2 Changes required for implementation of 1994 TSIP were incorporated in Revision 100. For historical reference this statement should not be deleted.

2.0 RESPONSIBILITIES

- 2.1 Site Vice President - Has authority and responsibility for establishing management direction and control to ensure that preparedness is maintained and that any required corrective actions are implemented.
- 2.2 Manager, Emergency Preparedness - Has overall responsibility for implementation of the Emergency Preparedness Program, including training, drills, standards of performance, and exercises involving Entergy Operations, Inc. (GGNS) Emergency Organization personnel.
- 2.3 Manager, Training & Development - Is responsible for providing and implementing an Emergency Preparedness Training Program that is in accordance with plant requirements, administrative directives and company policies.
- 2.4 Manager, Operations - Is responsible for Fire Brigade Training, including drills, standards of performance, and documentation of activities related to fire brigade training.
- 2.5 Facility Process Owners or their designee - Are responsible for:
 - 2.5.1 Making recommendations for their assigned facilities concerning:
 - a. Staffing
 - b. Operation
 - c. Readiness
- 2.6 Position Leads - Are responsible for:
 - 2.6.1 Reviewing EPTS lesson plans, as appropriate, for the ERO positions under their responsibility.

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3.0 REFERENCES

- 3.1 GGNS Emergency Plan
- 3.2 Administrative Procedure 01-S-05-1, Nuclear Records
- 3.3 Administrative Procedure 01-S-04-36, Handling of Training Documents
- 3.4 Administrative Procedure 01-S-05-15, GGNS Required Reading Program
- 3.5 Emergency Plan Procedure 01-S-10-4, Emergency Preparedness Drills and Exercises
- 3.6 Administrative Procedure 01-S-10-6, Emergency Response Organization
- 3.7 Site Directive No. G6.601, Emergency Preparedness Program Responsibilities
- 3.8 Technical Requirements Manual, Section 7.0, Administrative Control
- 3.9 Nuclear Management Manual, No. TQ 201, Systematic Approach to Training Process
- 3.10 Nuclear Management Manual, No. TQ 106, Instructor Training and Qualification Program

4.0 ATTACHMENTS

- 4.1 Attachment I - Summary/Outline of EPTS Classes
- 4.2 Attachment II - Training/Qualification Requirements
- 4.3 Attachment III - ERO Positions with Position Leads

5.0 DEFINITIONS

- 5.1 Emergency Preparedness Training Specialized (EPTS) - Includes training on related procedures and techniques necessary for proper response
- 5.2 Licensed Operators - Shift Managers, Shift Supervisors and Nuclear Operator A (NOA's)
- 5.3 Non-licensed Operators - Nuclear Operator B (NOB), Auxiliary Operator Nuclear (AON), and Radwaste Operators
- 5.4 Emergency Response Personnel - GGNS Emergency Operations personnel who are required to respond to an emergency.
- 5.5 EP Qualifying Activity - A radiation emergency drill, or exercise, of which the major component consists of a preplanned scenario designed to activate the Emergency Plan and test, or train, members of the ERO.
- 5.6 Participation - Includes, and is limited to, the following activities:
 - 5.6.1 Responding as an ERO member in the position qualifying for, or
 - 5.6.2 Serving as a Controller over the position qualifying for, or
 - 5.6.3 Serving as an Evaluator of the position qualifying for, or

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5.6.4 Serving as Coach over the position qualifying for.

5.7 CBOP - Participation in the EOI Continuing Behavioral Observation Program, with access authorized.

5.8 TLD - Assigned a Thermo Luminescent Dosimeter and no current Radworker Restrictions.

5.9 Key Card - Possession of active key card and unescorted access to Protected Area and EOF.

5.10 CBE - Credit by Examination

5.11 FW - Facility Walk-through

6.0 DETAILS

6.1 Training Program Requirements

6.1.1 All exam failures in the Emergency Preparedness Training Program must be immediately reported to the Manager, Emergency Preparedness, in accordance with 01-S-10-6.

6.1.2 Training/qualifications in the Emergency Preparedness Training Program shall be documented and retained in accordance with Reference 3.2 and Reference 3.3.

6.1.3 EPTS lesson plans should be approved by a Training Supervisor, and reviewed by the Manager, Emergency Preparedness or designee.

6.1.4 Written examinations and/or performance evaluations are normally given to ensure adequate understanding and retention of material covered in the classroom/or other qualification activity. These examinations/evaluations shall be administered in accordance with Reference 3.9.

6.1.5 EPTS classroom training instructors shall be qualified in accordance with Reference 3.10.

6.1.6 Specialized training may be provided by vendors qualified in a specific area with documentation furnished to Training in accordance with Reference 3.2.

6.1.7 Notification of changes to procedures and equipment that happen between scheduled training sessions will be done, as appropriate, in accordance with Reference 3.4. The EP Training Review Group determines if formal training is required for these changes.

6.1.8 Waivers for Training/Qualification requirements in this procedure must be documented and approved in accordance with Reference 3.9.

6.1.9 When Training/Qualification requirements change, all affected personnel must be trained/qualified in the new requirements before the requirements are changed in this procedure.

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6.2 Emergency Plan Training for All Personnel

6.2.1 Information on the Emergency Plan is administered as part of Plant Access Training (PAT) to all personnel (excluding visitors) coming onsite for the first time and to all personnel participating in the annual PAT retraining program. This portion of PAT meets the following objectives:

- a. Trains personnel with respect to their responsibilities during an emergency situation.
- b. Keeps personnel informed of any applicable changes to the Emergency Plan.

6.2.2 To meet these objectives, instructions concerning the following will be given to all personnel participating in Plant Access Training:

- a. Signals and alarms
- b. Evacuation routes and procedures
- c. Response during an emergency
- d. Response on observing an unusual occurrence
- e. Emergency classifications
- f. Public relations

6.3 Emergency Preparedness Training for ERO Personnel

6.3.1 All personnel who respond as part of the GGNS Emergency Plan shall be qualified in accordance with this procedure.

6.3.2 All personnel reporting to work to satisfy staffing in accordance with the requirements of 01-S-10-6 shall be qualified in accordance with this procedure.

6.3.3 All personnel who are designated to augment station staffing (On-Call ERO) in accordance with 01-S-10-6 shall meet all qualification requirements of assigned position before being placed on-call.

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6.3.4 Training is required annually unless indicated differently in Attachment II. Annually is defined for this procedure as that period between January 1 and December 31st of each year.

6.3.5 Should a person perform duties that indicate the need to qualify for more than one Emergency Position (see Attachment II), the qualifications for the persons assigned ERO position shall prevail in determining the persons ERO qualification status.

6.4 Emergency Preparedness Training Specialized (EPTS)

6.4.1 Emergency response personnel shall receive specialized training based on their expected involvement in specific emergency response areas. This training should include, but not be limited to, attendance at, and completion of, one or more of the modules listed in Attachment I.

- a. CBE may be given in lieu of class attendance at the discretion of the instructor.
 - (1) The CBE should include providing information on pertinent changes to the Emergency Plan and Procedures, and relevant industry events that have occurred since the last qualifying EPTS class.
 - (2) Any person failing any part of the CBE must retake the normal EPTS qualifying class and satisfactorily complete any skills items, as appropriate.
 - (3) All failures are reported IAW 6.1.1.
 - (4) CBE will not be used for initial ERO position qualification.

6.4.2 The following groups require EPTS-2 by UFSAR 18.1.22. Not having EPTS-2 does not affect their ability to respond in an emergency unless the emergency position requires EPTS-2.

- a. Plant General Manager
- b. Manager, Operations and Manager, Maintenance and Modifications
- c. Senior Health Physicists
- d. Instrument Technicians
- e. Radiochemists

6.4.3 Training will be provided to in-plant radiological monitoring personnel on the collection, analysis, and evaluation of airborne radioiodine in vital areas under accident conditions. This training is normally completed under the Health Physics Qualification Program.

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- 6.4.4 Personnel who provide the on-shift radiological assessment function shall train with an Operations crew in the Control Room or simulator, commensurate with their emergency function, before first assignment as On-shift Chemist and annually thereafter. This training cannot occur during an Evaluated EP Exercise.

6.5 Training and Qualification Process

- 6.5.1 All Training/Qualification Requirements are listed in Attachment II.
- 6.5.2 When a person needs to be trained or qualified for emergency response duties, the position candidate must contact Training to schedule a training class, if appropriate.
- 6.5.3 A person qualifying for a new or different ERO position must participate in a drill as a player in the position qualifying for.

NOTE

Requalification courses are normally scheduled, by Training, in advance.

- 6.5.4 The position candidate then completes all requirements per Attachment II for the position the candidate is attempting to qualify for before being assigned or reassigned to the ERO.

NOTE

If the candidate fails any aspect of the qualification process, refer to Section 6.1.1 of this procedure.

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- 6.5.5 Training submits all completed Course Packages to Records in accordance with Reference 3.2 and 3.3.
- 6.5.6 If the candidate is qualifying for a NEW ERO position, the candidate notifies Emergency Preparedness in accordance with 01-S-10-6.
- 6.5.7 If the position candidate is not qualifying for a new ERO position, no additional action is necessary.

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SUMMARY/OUTLINE OF EPTS CLASSES

The training shall include, but not be limited to, the information listed in this attachment.

1. EPTS-1 Security
 - a. Organization in an emergency
 - b. Responsibilities
 - c. Interaction between security and other emergency facilities
 - d. Response to fire truck or ambulance arrival
2. EPTS-2 Mitigation and/or Recognition of Core Damage - Is broken into two major division(s): (1) Operator-oriented class (2) Basic-oriented class for selected management and support personnel. The initial training in MCD should be an in-depth lecture/discussion. Any requalification may be an overview of MCD with any new information, problems or happenings in industry discussed. Credit for similar training from another nuclear site for management personnel, not part of a shift operating crew, may be given with proper proof and documentation.

NOTE

Normally, requalification is not required.

3. EPTS-3 Radiological Assessment
 - a. Meteorological conditions
 - b. Meteorological readings and measurements
 - c. Process monitoring systems for release points
 - d. Offsite dose calculations
 - e. Protective Action Guides
 - f. Dose calculator responsibilities
 - g. Coverage of appropriate Volume 10 procedures
 - h. Emergency action levels
 - i. Responsibilities of REM, RAC, and RPM
4. EPTS-4 Control Room Communications
 - a. Necessary forms
 - b. Communication devices and their uses
 - c. Principles of communication
 - d. Necessary notification and information

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SUMMARY/OUTLINE OF EPTS CLASSES (Continued)

5. EPTS-5 Radiological Monitoring
 - a. Equipment available
 - b. Responsibilities
 - c. Communications
 - d. Sample taking and measurements in the field
 - e. Sample points
 - f. EOF Operations
 - g. Monitoring Teams/Plume Tracker requirements/operations
 - h. Interface responsibilities
6. EPTS-6 Emergency Assessment
 - a. Coverage of Volume 10, Emergency Plan Procedures
 - b. Emergency action levels
7. EPTS-7 Post-Accident Sampling - Should be a complete, in-depth lecture/discussion/demonstration of the system operation, uses, sampling and measurement and proper handling of highly radioactive samples in a post-accident condition. The yearly requal should be a review of these techniques with any new problems, lessons learned or procedures discussed. Also covered are interfaces, responsibilities and personnel protection during emergencies and communications.
8. EPTS-8 TSC Communications
 - a. Necessary forms
 - b. Communication devices and their uses
 - c. Principles of communications
 - d. Necessary notification and information
9. EPTS-9 Standard First Aid - A Red Cross course taught under the authority of the Red Cross and in accordance with its lesson plans and conduct of operations. A higher level medical program such as Emergency Medical Technician (EMT) may be used instead of standard first aid.
10. EPTS-10 Onsite Monitoring
 - a. Onsite equipment available
 - b. Responsibilities
 - c. Communications
 - d. OSC operations

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SUMMARY/OUTLINE OF EPTS CLASSES (Continued)

11. EPTS-11 Response Teams
 - a. Damage Control and Repair
 - b. Injuries Instruction
 - c. Medical Equipment and Supplies
 - d. Search and Rescue
 - e. Radiological Hazards
 - f. Responsibilities
 - g. Re-entry and Recovery Planning and Operations
12. CPR (Cardiopulmonary Resuscitation) - A Red Cross course taught under the authority of the Red Cross and in accordance with its lesson plans and conduct of operations.
13. EPTS-12 EOF Overview
 - a. Responsibilities
 - b. Organization and Set-up
14. EPTS-13 ENMC Overview
 - a. Responsibilities
 - b. Organization and Set-up
15. EPTS-14 EIC Overview
 - a. Responsibilities
 - b. Organization and Set-up
16. EPTS-16 HP Coordinator and OSC Coordinator Training
 - a. Responsibilities
17. EPTS-17 Security Coordinator Training
 - a. Responsibilities
 - b. Includes EPTS1 content
18. EPTS-19 Severe Accident Procedures Training
 - a. Responsibilities
 - b. Basis for decisions

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SUMMARY/OUTLINE OF EPTS CLASSES (Continued)

19. EPTS-20 EOF Communicator
 - a. Responsibilities
 - b. Organization and Set-up
20. Facility Walk-through (FW)
 - a. Tour of facility
 - b. Location of equipment
 - c. Facility Organization
21. Drill Participation (EPDRILL)
 - a. Participate in a Qualifying EP Activity in the ERO position assigned.

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TRAINING/QUALIFICATION REQUIREMENTS

Emergency Position	PAT	FFD	FFS	KEY	CARD	TU	RWT	RHT	FT	PHYS	EP	DRILL	2**	3	4	5	6	7	8	9***	10	11	12	13	14	16	17	19	20	CPR	OTHER
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Fire Brigade	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
Operations Coord.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X				
N/O/R/W/D	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			
RO	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Onsite Chemists	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
SRO/STA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
SHIFT MANAGER	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Company Spokesperson	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X			
EIC Coordinator	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
EIC Staff	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ENM/C Clear Coordinator	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ENM/C Clear Staff	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ENM/C Manager	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
ENM/C Support Shift	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Media Monitor	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Technical Spokesperson	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

Accident Eng. Assessment	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
Emergency Support Manager	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
EOE Eng. Mech.	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	
EOE Eng. Support	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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TRAINING/QUALIFICATION REQUIREMENTS

Emergency Position	PAT FFD FFDS *	KEY CARD	TLD	RWT *	RRT FIT PHYS *	EP DRILL	EPTS 2**	EPTS 3	EPTS 4	EPTS 5	EPTS 6	EPTS 7	EPTS 8	EPTS 9***	EPTS 10	EPTS 11	EPTS 12	EPTS 13	EPTS 14	EPTS 16	EPTS 17	EPTS 19	EPTS 20	CPR *	OTHER	
EOF (continued)																										
EOF Eng. Elec. EPEOFELEG	X	X		X		X												X								
EOF Eng. Civil	X	X		X		X												X								
EOF Admin. Dir.	X	X		X		X												X								
EOF Communicator	X	X		X		X																	X			
EOF Facility Coord.	X	X		X		X												X								
EOF Habitability Specialist	X	X		X		X												X								Rad Monitor/CAA Qualified or HP Qualified
Food & Lodging Coordinator	X	X		X		X												X								Background Check and MMPI **, and Breathalyzer Training *
Licensing Coord.	X	X		X																						
Offsite Emergency Coordinator	X	X		X		X						X											X			
OEC Tech. Asst.	X	X		X		X						X											X			
Offsite Monitoring Team Driver	X	X	X	X	X	X					X															
Offsite Monitoring Team Monitor	X	X	X	X	X	X					X															
Offsite Technical Advisor	X	X		X																						
Plume Tracking Specialist	X	X		X		X					X															
Radiation Emergency Mgr.	X	X		X		X		X															X			
Radiological Assessment Coord.	X	X		X		X		X																		
Tech/Engineering Support Manager	X	X		X		X												X					X			

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TRAINING/QUALIFICATION REQUIREMENTS

Emergency Position	PAT FFD FFDS *	KEY CARD	YLD	RWT *	RRT FIT PHYS *	EP DRILL	EPTS 2**	EPTS 3	EPTS 4	EPTS 5	EPTS 6	EPTS 7	EPTS 8	EPTS 9***	EPTS 10	EPTS 11	EPTS 12	EPTS 13	EPTS 14	EPTS 16	EPTS 17	EPTS 19	EPTS 20	CPR *	OTHER	
EOF (continued)																										
Radiological Assessment Dose Calculator	X	X		X		X		X																		
OPERATIONS SUPPORT CENTER																										
Chemistry Teams/ On-call Chemist	X	X	X	X	X	X						X														
First Aid Team (Elec, I&C)	X	X	X	X	X									X		X									X	
First Aid Team (HP)	X	X	X	X	X									X (OR EMT)						X					X OR CPRP	
Health Physics Coordinator	X	X	X	X	X	X	X													X						
Response Teams (Mech, Elec, I&C)	X	X	X	X	X											X										
On-Call Health Physicist/On-shift HP	X	X	X	X	X	X	X													X						
Onsite Monitor	X	X	X	X	X	X									X											
OSC Communicator	X	X	X	X		X																				FW**
OSC Coordinator	X	X	X	X	X	X														X						
OSC Planner	X	X	X	X																						FW**
SECURITY																										
Security Contract Personnel	X	X	X	X																						EPTS1 or EPTS17
Security Coordinator	X	X		X																	X					
TECHNICAL SUPPORT CENTER																										
Computer Engineer	X	X	X	X		X																				FW**
Emergency Director	X	X	X	X		X	X					X											X			
Information Specialist	X	X	X	X		X						X											X			
Radiation Protection Manager	X	X	X	X		X	X	X															X			
Records Document Manager	X	X	X	X		X																				FW**
Technical Manager	X	X	X	X		X	X					X											X			

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TRAINING/QUALIFICATION REQUIREMENTS

Emergency Position	PAT FFD FFDS *	KEY CARD	TLD	RWT *	RRT FIT PHYS *	EP DRILL	EPTS 2**	EPTS 3	EPTS 4	EPTS 5	EPTS 6	EPTS 7	EPTS 8	EPTS 9***	EPTS 10	EPTS 11	EPTS 12	EPTS 13	EPTS 14	EPTS 16	EPTS 17	EPTS 19	EPTS 20	CPR *	OTHER	
TSC (continued)																										
TSC Communicator	X	X	X	X		X							X													
TSG Coordinator	X	X	X	X		X	X				X												X			
TSC Coordinator Assistant	X	X	X	X		X	X				X												X			
Engineer (Elec/Mech)	X	X		X		X																				FW**
Radiological Assessment Dose Calculator	X	X	X	X		X		X																		
ENS Communicator	X	X	X	X		X							X**													

Note:
 * Required every 13 months
 ** Not required annually
 *** Required every 3 years

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ERO POSITIONS WITH POSITION LEADS

FACILITY	ERO POSITION
TSC	EMERGENCY DIRECTOR
	TSC COORDINATOR
	TECHNICAL MANAGER
	RADIATION PROTECTION MANAGER
	INFORMATION SPECIALIST
	TSC COORDINATOR ASSISTANT
	TSC/EOF RADIOLOGICAL ASSESSMENT DOSE CALCULATOR
	TSC COMMUNICATOR
OSC	OSC COORDINATOR
	HP COORDINATOR
	ON-SITE MONITOR
	OSC COMMUNICATOR
EOF	OFF-SITE EMERGENCY COORDINATOR
	OEC TECHNICAL ASSISTANT
	RADIATION EMERGENCY MANAGER
	RADIOLOGICAL ASSESSMENT COORDINATOR
	PLUME TRACKING SPECIALIST
	OMT MONITOR
	EOF COMMUNICATOR
	TECH/ENG. SUPPORT MANAGER
	EOF FACILITY COORDINATOR
	ACCIDENT ASSESSMENT ENGINEER
	EOF ADMINISTRATIVE DIRECTOR
EMNC/EIC	COMPANY SPOKESPERSON
	ENMC MANAGER
	EIC COORDINATOR