Arkansas Nuclear One - Administrative Services
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Tuesday, July 01, 2003

Document Update Notification

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DOCUMENT NO: **OP-1903.004**

TITLE: **ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES**

CHANGE NO: **022-04-0**

ADDITIONAL INFO:

☒ ← ***If this box is checked, please sign, date, and return within 5 days.***

☐ *ANO-1 Docket 50-313*

☐ *ANO-2 Docket 50-368*

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SIGNATURE CONFIRMS UPDATE HAS BEEN MADE

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ENTERGY OPERATIONS INCORPORATED
ARKANSAS NUCLEAR ONE

TITLE: Admin. & Maintenance Of The Emergency Plan & Implementing Procedures SET # 103	DOCUMENT NO. 1903.004	CHANGE NO. 022-04-0
	WORK PLAN EXP. DATE N/A	TC EXP. DATE N/A
	SAFETY-RELATED ☒YES ☐NO	IPTE ☐YES ☒NO
	TEMP ALT ☐YES ☒NO	

When you see these ***TRAPS***	Get these ***TOOLS***
Time Pressure	Effective Communication
Distraction/Interruption	Questioning Attitude
Multiple Tasks	Placekeeping
Overconfidence	Self Check
Vague or Interpretive Guidance	Peer Check
First Shift/Last Shift	Knowledge
Peer Pressure	Procedures
Change/Off Normal	Job Briefing
Physical Environment	Coaching
Mental Stress (Home or Work)	Turnover

VERIFIED BY	DATE	TIME

FORM TITLE: VERIFICATION COVER SHEET	FORM NO. 1000.006A	CHANGE NO. 050-00-0

ENTERGY OPERATIONS INCORPORATED
ARKANSAS NUCLEAR ONE

TITLE: ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	DOCUMENT NO. 1903.004	CHANGE NO. 022-04-0

AFFECTED UNIT: ☒ UNIT 1 ☒ UNIT 2 | ☒ PROCEDURE ☐ ELECTRONIC DOCUMENT ☐ WORK PLAN, EXP. DATE _____ | SAFETY-RELATED ☒ YES ☐ NO

TYPE OF CHANGE:
☐ NEW ☒ PC ☐ TC ☐ DELETION
☐ REVISION ☐ EZ EXP. DATE: _____

DOES THIS DOCUMENT:

1. Supersede or replace another procedure? (If YES, complete 1000.006B for deleted procedure.) (0CAN058107)	☐ YES	☒ NO
2. Alter or delete an existing regulatory commitment? (If YES, coordinate with Licensing before implementing.) (0CNA128509)(0CAN049803)	☐ YES	☒ NO
3. Require a 50.59 review per LI-101? (See also 1000.006, Attachment 15) (If 50.59 evaluation, OSRC review required.)	☒ YES	☐ NO
4. Cause the MTCL to be untrue? (See Step 8.5 for details.) (If YES, complete 1000.009A) (1CAN108904, 0CAN099001, 0CNA128509, OCAN049803)	☐ YES	☒ NO
5. Create an Intent Change? (If YES, Standard Approval Process required.)	☐ YES	☒ NO
6. Implement or change IPTE requirements? (If YES, complete 1000.143A. OSRC review required.)	☐ YES	☒ NO
7. Implement or change a Temporary Alteration? (If YES, then OSRC review required.)	☐ YES	☒ NO

Was the Master Electronic File used as the source document? ☒ YES ☐ NO

INTERIM APPROVAL PROCESS	STANDARD APPROVAL PROCESS
ORIGINATOR SIGNATURE: (Includes review of Att. 13) DATE:	ORIGINATOR SIGNATURE: (Includes review of Att. 13) DATE: 6/17/03
Print and Sign name: PHONE #:	Print and Sign name: Roger Freeman PHONE #: 4994
SUPERVISOR APPROVAL: * DATE:	INDEPENDENT REVIEWER: DATE: 6/23/03
SRO UNIT ONE :** DATE:	ENGINEERING: N/A DATE:
SRO UNIT TWO:** DATE:	QUALITY: N/A DATE:
Interim approval allowed for non-intent changes requiring no 50.59 evaluation that are stopping work in progress.	UNIT SURVEILLANCE COORDINATOR (0CNA049803): N/A DATE:
Standard Approval required for intent changes or changes requiring a 50.59 evaluation.	SECTION LEADER: Roger Holcomb DATE: 6/25/03
*If change not required to support work in progress, Department Head must sign.	QUALITY ASSURANCE: N/A DATE:
**If both units are affected by change, both SRO signatures are required. (SRO signature required for safety related procedures only.)	OTHER SECTION LEADERS: DATE:
	OTHER SECTION LEADERS: DATE:
	OTHER SECTION LEADERS: DATE:
	OTHER SECTION LEADERS: DATE:
Dennis Carl Harris Dennis Carl Harris 6-23-03	OTHER SECTION LEADERS: DATE:
OSRC CHAIRMAN/TECHNICAL REVIEWER: (0CNA049312) DATE:	OTHER SECTION LEADERS: DATE:
FINAL APPROVAL: Roger Holcomb for S. Olson Date: 6/25/03	OTHER SECTION LEADERS: DATE:
REQUIRED EFFECTIVE DATE: 7/1/03	OTHER SECTION LEADERS: DATE:

FORM TITLE:	FORM NO.	CHANGE NO.
PROCEDURE/WORK PLAN APPROVAL REQUEST	1000.006B	051-00-0

ENTERGY OPERATIONS INCORPORATED
ARKANSAS NUCLEAR ONE

TITLE:ADMIN. & MAINTENANCE OF THE EMERGENCY PLAN & IMPLEMENTING PROCEDURES	DOCUMENT NO. 1903.004	CHANGE NO. 022-04-0

☒PROCEDURE ☐WORK PLAN, EXP. DATE_____ PAGE 1 OF 1

☐ ELECTRONIC DOCUMENT

TYPE OF CHANGE:
☐ NEW ☒ PC ☐ TC ☐ DELETION
☐ REVISION ☐ EZ EXP. DATE:_____

AFFECTED SECTION: (Include step # if applicable)	DESCRIPTION OF CHANGE: (For each change made, include sufficient detail to describe reason for the change.)
Table of Content Pages 1 & 2	Changed page numbers to reflect current page numbers for current sections. Deleted Forms 1903.004E (other means are available), 1903.004F,and 1903.004H (these process and forms have moved to NMM, Form EP-305). Added Form 1903.004I to Table of Contents (Page 2). Added Section 6.7 (Page 1). Added Attachment 3 (Page 2). Added Form 1903.044J (Page 2).
Definitions Page 5 Page 7	Added Definition for ANS (Alert and Notification System) and ANS Document/Report. Added Definition for Offsite E-Plans
Section 5 Step 5.2 & 5.3	Added step for EP Manager to ensure that decisions from the state monthly meetings that impact the E-Plan of ANS document are incorporated into procedures. Added a step for the Emergency Planner to coordinate and issue changes to the ANS document as necessary.
Step 6.1 Page 9	Added Step M, to annually review the ANS Document, State and County E-Plans.
Step 6.2 Page 10	Deleted steps 3, 4, and 5 because they are covered in Form EP-305. Re-number the steps and added a step "Before initiating revisions to the Emergency Plan, a review of the ANS document and the State and County E-Plans shall be preformed." Also added a statement to step 6.2.3 to ensure state's concurrence with changes.
Section 9.0, step 9.1.3	Deleted Step to perform review of of ANO Organizational Chart monthly.
Step 6.3.5 Page 10	Added Step 6.3.5 "The Emergency Plan revision shall be reviewed with the State prior to implementation."
Step 6.7 page 12	Added Step 6.7 to review and update ANS Document/Report.
Section 14, Page 20	Added Step Form 1903,004I – "Annual review of ANS Document and Offsite Plans". Deleted Steps for Forms 1903.004E, 1903.004F, and 1903.004H. Added Step Form 1903.004J, "Changes to the ANS Document/Report".
Attachment 1, Page 22	Deleted references to 1903.004F and 1903.004H and replaced with "Procedure EP-305".
Attachment 3	Added Attachment 3, "Significant Change" to A&N System.
1903.004I	Added a new form, 1903.004I, "Annual Review of ANS Document and Offsite Plans".
1903.004J	Added a new form, 1903.004J, "Changes to the ANS Document/Report".

TABLE OF CONTENTS

SECTIONS			PAGE NO.
1.0	Purpose		3
2.0	Scope		3
3.0	References		3
4.0	Definitions		5
5.0	Responsibility and Authority		7
6.0	Instructions		8
	6.1	Review and Updating of the Emergency Plan and Implementing Procedures	8
	6.2	Emergency Plan Changes	10
	6.3	Approval of Emergency Plan Revisions (As Shown in Attachment 1) shall be provided As Follows:	10
	6.4	Approval of Emergency Plan Implementing Procedure Revisions shall be provided as Follows	11
	6.5	Review and Revision of the EAL Bases Document	12
	6.6	Review Of Transmittals to NRC	12
	6.7	Review and Updating the ANS Document/Report	12
7.0	Drills and Exercises		13
	7.2	Conducting Drills and Exercises	14
	7.3	Documentation of Drills	17
8.0	Communications		17
9.0	Emergency Response Personnel		17
10.0	Facilities and Equipment		18
11.0	Dedicated Emergency Response Vehicle		18
12.0	Offsite Support Organizations		18
13.0	Training		19
	13.1	Training for Emergency Planning Staff	19
	13.2	Offsite Training	19

TABLE OF CONTENTS (Cont.)

SECTIONS — PAGE NO.

14.0 Attachments and Forms 20

14.1 Attachments

14.1.1 Attachment 1, Emergency Plan and Implementing Procedures Review 22

14.1.2 Attachment 2, Description of Offsite Training 23

14.1.3 Attachment 3, "Significant Change" to an A&N System 24

14.2 Forms

14.2.1 Form 1903.004A - "Emergency Planning Evaluation/Action Request" 25

14.2.2 Form 1903.004C - "Quarterly Emergency Telephone Directory Review" 26

14.2.3 Form 1903.004D - "EAL Bases Document Review" 28

14.2.4 Form 1903.004G -"EAL State and Local Agreement" .. 29

14.2.5 Form 1903.004I - "Annual Review of ANS Document and Offsite Plans" 30

14.2.6 Form 1903.004J - "Changes to the ANS Document/Report" 31

1.0 PURPOSE

The purpose of this procedure is to describe the methods for administration and maintenance of the Emergency Plan and associated procedures and provide guidance for the review of changes as required by 10CFR50.54q.

2.0 SCOPE

2.1 This procedure describes the responsibilities of the ANO Emergency Planning Staff in regard to the reviews, as required by 10CFR50.54q, administration and maintenance of the Emergency Plan and Implementing Procedures.

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

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

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

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

2.6 This procedure provides guidelines for drills and exercises.

3.0 REFERENCES

3.1 REFERENCES USED IN PROCEDURE PREPARATION

3.1.1 Emergency Plan

3.1.2 10CFR50.54, Conditions of Licenses, 10CFR50.54(q), 10CFR50.54(t)

3.1.3 10CFR50.47, Emergency Plans

3.1.4 10CFR50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities

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

3.1.6 1000.006, "Procedure Review, Approval, and Revision Control"

3.1.7 NUREG 0660, "NRC Action Plan Developed as a Result of the TMI-2 Accident"

3.1.8 Memorandum ANO-81-9510 (as amended by the SRC November 16, 1981)

3.1.9 Nuclear Management Manual Policy LI-102, Corrective Action Process

3.1.10 Nuclear Management Manual Procedure LI-101, 10CFR50.59 Review Program

3.1.11 NRC Inspection Procedure 71151

3.2 REFERENCES USED IN CONJUNCTION WITH THIS PROCEDURE:

3.2.1 1000.150, "Licensing Document Maintenance"

3.2.2 Nuclear Management Manual Procedure LI-101, "10CFR50.59 Review Program"

3.2.3 1903.002, "Assignment of Plant Emergency Team/Group Members"

3.2.4 1903.003, "Assignment of Personnel to the Emergency Response Organization"

3.2.5 1903.010, "Emergency Action Level Classification"

3.2.6 1903.062, "Communications System Operating Procedure"

3.3 RELATED ANO PROCEDURES INCLUDE:

3.3.1 1903 Series Procedures, "Emergency Plan Implementing Procedures"

3.3.2 1904 Series Procedures, "Offsite Dose Projections"

3.3.3 1905 Series Procedures, "Emergency Radiation Protection Procedures"

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

3.4.1 0CAN068320 (P-10767) Section 6.1.1H

3.4.2 0CAN048205 (P-10843) Section 11.0

3.4.3 0CAN128211 (P-10861) Section 5.5, Form 1903.004A

3.4.4 0CAN128211 (P-10863) Section 9.1.4

3.4.5 10CFR50. APP E.V. (P-14145), Attachment 1

3.4.6 0CAN058203 (P-10833) A method for assuring that an annual review of the EAL's is performed with the State of Arkansas will be established. Section 13.2.2 A

3.4.7 0CAN128211 (P-10860) Emergency Planning Coordinators shall attend, as available, at least one training session concerning emergency preparedness annually. Section 13.1.1

3.4.8 0CAN068320 (P-10769) Plan does not indicate if on-the-spot (coaching) correction of erroneous performance will be made by the drill instructor (controllers). Section 7.2.1.B

3.4.9 0CAN068320 (P-10770) Health Physics drills do not include the analysis of in-plant liquid samples with actual elevated radiation levels on an annual basis. Sections 7.2.3(C, D, E)

3.4.10 0CAN068320 (P-10771) Radiation Monitoring Drills do not include provisions for communications (reporting of results to proper ERO position) and record keeping. Section 7.2.3.C

3.4.11 0CAN068320 (P-10772) Conduct Exercises in accordance with NRC and FEMA rules. Section 7.2.2

3.4.12 0CAN128305 (P-4109) Demonstrating communications and record keeping capabilities. Section 7.2.3.C

3.4.13 0CAN128305 (P-4175) Annual training of Off-Site Personnel. Sections 13.2

3.4.14 0CAN098106 (P-4822) Practical training sessions for monitoring team members. Section 7.2.3

3.4.15 0CAN058203 (P-10872) Training for individuals who are assigned responsibility for emergency preparedness is necessary for effective emergency planning. Section 13.1

3.4.16 0CAN079009 (P-1465) Conduct ERF Drills at least four times per year (in addition to the biennial exercise). The Arkansas Department of Health has requested that they be allowed to participate in each of the ERF drills. Section 7.2.3.G

4.0 DEFINITIONS

4.1 Annual - For the purposes of this procedure, annual is defined as that period between January 1st and December 31st of each year.

4.2 ANS - Alert and Notification System.

4.3 ANS Document/Report - The Alert and Notification System Document/Report is the document that details the design and specifications for the Alert and Notification System which provides early warning to the general public in the 10 mile EPZ. It is a living document that is maintained (IAW 44 CFR 350 Part 14 and FEMA REP 10). It is not a licensed based document for ANO. The ANS Document/Report is maintained by ANO Emergency Planning and reviewed and approved by FEMA as a part of the offsite state emergency plan requirements.

4.4 Drill - An activity aimed at developing, maintaining and testing skills in a particular portion of the Emergency Response Organization where on the spot corrections are made.

4.5 EAL Bases Document - The document that provides the technical bases for initiating conditions used to classify plant related emergencies.

4.6 Emergency Plan - A document required by 10CFR50, Appendix E which outlines the method of compliance with the standards described in 10CFR50.47b and NUREG 0654. Purpose of this document is to control and direct the response of Emergency Response Organizations to a plant emergency condition as directed in the plan.

4.7 Emergency Response Organization (ERO) - The organization which is composed of the IRS, the EOF staff, the TSC staff, the OSC staff, and the Emergency Team members. It has the capability to provide manpower and other resources necessary for immediate and long-term response to an emergency situation.

4.8 Exercise - An activity aimed at testing the integrated capability and a major portion of the basic elements of the Emergency Planning and Response Organizations. An exercise involves a major portion of the Emergency Response Organization and is evaluated by the NRC.

4.9 Implementing Procedures - Emergency plan procedures provide detailed direction for the Emergency Response Organization and implement actions directed by the Emergency Plan.

4.10 Initial Response Staff (IRS) - The emergency organization primarily composed of plant personnel which must be able to augment the onsite plant personnel in accordance with Table B-1 of the ANO Emergency Plan.

4.11 Letter Of Assignment - A memorandum of notification from the General Manager, Plant Operations to an individual which documents the assignment of the individual to an ERO position.

4.12 Letter Of Reinstatement - A memorandum of notification from the General Manager, Plant Operations to a suspended ERO individual which documents the reinstatement of the individual to their previous ERO position upon completion of the procedural training requirements.

4.13 Letter Of Selection - A memorandum of notification from the Manager, Emergency Planning to an individual which documents their selection for a proposed assignment to an ERO position. This letter also informs the individual that Emergency Planning will contact them to arrange the appropriate training.

4.14 Letter Of Suspension - A memorandum of notification from the General Manager, Plant Operations to an ERO individual which documents the suspension of an assigned individual who failed to meet the procedural training requirements.

4.15 Letter Of Termination - A memorandum of notification from the General Manager, Plant Operations to an ERO individual which documents the permanent termination of the individual from their ERO assignment.

4.16 Offsite E-Plans - Are documents required by 10CFR50, Appendix E which outlines the method of compliance with the standards described in 10CFR50.47b and NUREG 0654. Purposes of the documents are to control and direct personnel to assist ANO in case of ERO activation. For the purpose of this procedure, offsite E-Plans include State as well as County E-Plans.

4.17 Plan Change - A minor change or informal change to the Emergency Plan.

4.18 Plan Revision - The formal revision of the Emergency Plan which may incorporate one or more approved plan changes.

4.19 Position Workbook - A workbook prepared for a specific ERO position. These workbooks may be used in place of classroom instruction in requalification training.

4.20 Table Top Drill - A training activity designed to develop and maintain an individual's knowledge of their assigned ERO duties. The Table Top Drill will include discussion of ERO member's response to simulated emergencies.

4.21 Training Session - An activity designed to develop or maintain skills. (This may include classroom training, computer-based training, practical drills or any other type of session, excluding the biennial Emergency Preparedness Exercise, which meets these criteria. Any of these activities may be conducted in one or more segments.)

4.22 Walk-Through - A training activity designed to develop and maintain an individual's knowledge of their assigned ERO duties. The walkthrough is normally conducted in the emergency response facility, and includes discussion or demonstration of the appropriate facility activation, staffing, and organizational responsibilities for the individual's assigned ERO position.

5.0 RESPONSIBILITY AND AUTHORITY

5.1 Director, Nuclear Safety Assurance

The Director, Nuclear Safety Assurance is responsible for the overall implementation of the requirements set forth in this procedure.

The Director, Nuclear Safety Assurance is responsible for ensuring that changes which require prior NRC approval are submitted to the NRC and ensuring that periodic 10CFR50.54 submittals are made in accordance with the regulatory requirements.

5.2 Manager, Emergency Planning

The Manager, Emergency Planning shall be responsible for:

- The maintenance of ANO Emergency Preparedness.

- Responsible for implementing the requirements set forth in this procedure.
- 10CFR50.54(q) and NUREG-0654 reviews of changes to the Emergency Plan
- Evaluation of drill/exercise results
- Identifying the training requirements for personnel assigned to the Emergency Response Organization.
- Distributing revisions to the Emergency Plan or implementing procedures to the NRC within 30 days of their implementation, as specified in 10CFR50.54(q) and 10CFR50, Appendix E.
- Ensure that decisions from the monthly State meetings that impact the Emergency Plan or ANS Document/Report are incorporated into procedure/document/Report.

5.3 Emergency Planner

The Emergency Planner shall perform:

- Those tasks assigned by this procedure
- Shall coordinate activities to assure consistency between the Emergency Plan and Implementing Procedures.
- Assure that the administrative program elements are addressed
- Schedule initial training and re-qualification training
- Collect and forward to the ANO records management system appropriate training documentation and for providing training to personnel in the Emergency Response Organization.
- The Emergency Planner(s) shall coordinate and issue changes to the Emergency Plan and the Emergency Plan Implementing Procedures.
- The Emergency Planner(s) are responsible for preparing the 10CFR50.54 evaluation by researching appropriate reference material and documenting the answers to the questions on the appropriate review form.
- The Emergency Planner(s) shall coordinate and issue changes to the ANS Document/Report as necessary.

5.4 Revisions to the Emergency Plan and Implementing Procedures shall be approved in accordance with Sections 6.2 and 6.3 of this procedure.

(P-10861)

5.5 **[Suggestions for improvement of the Emergency Plan and Implementing Procedures may be made at any time by the plant staff using Form 1903.004A.]**

6.0 INSTRUCTIONS

6.1 Review and Updating of the Emergency Plan and Implementing Procedures

6.1.1 The review and updating of the Emergency Plan and Implementing Procedures shall include the following actions by the Emergency Planning Manager or designee:

A. Provide for continuing review of the Emergency Plan and Implementing Procedures concerning ANO response.

B. Notify affected site departments of Plan and Procedure changes.

C. Notify affected site based ERO members of Plan and Procedures changes, as necessary.

D. Process requests for improvements submitted on Form 1903.004A.

E. Annually, review the Plan and Procedures in their entirety to verify that changes that have occurred which impact the Plan and/or procedures have been incorporated.

F. At the conclusion of drills and/or exercises involving site ERO members, or at the conclusion of an incident which required implementation of the Plan, provide for a critique and evaluation by participants and revise the Plan and Procedures where appropriate.

G. Evaluate feedback from Emergency Plan Training (including feedback from class critiques) and incorporate changes and improvements into the Emergency Plan and Procedures as necessary.

(P-10767)

[H. Quarterly, ensure that the Emergency Telephone Directory is complete and current for emergency response personnel and that related sections of Procedures 1903.010 correspond to the Emergency Telephone Directory. Document the review on Form 1903.004C.]

I. Coordinate approval of the Emergency Plan changes in accordance with Section 6.2 of this procedure.

J. Coordinate approval of the Emergency Plan Implementing Procedure changes in accordance with Section 6.4 of this procedure.

K. Respond to QA/INPO audits and NRC inspections of emergency planning activities.

L. Ensure that the Emergency Response Duty Roster and guidelines are updated and distributed annually.

M. Annually, review the ANS Document/Report, State and County E-Plans to verify that changes that have occurred which impact the Plan and/or procedures have been incorporated, Form 1903.004I.

6.2 Emergency Plan Revisions/Changes

6.2.1 Plan changes may be requested by any person within Entergy, State, Local, or Federal Emergency Response Agencies (e.g. Nuclear Regulatory Commission) by notifying the Manager, Emergency Preparedness at the applicable site.

6.2.2 Before initiating revisions to the Emergency Plan, an evaluation is conducted of proposed changes to ensure compliance with the requirements of 10CFR50. The evaluation is documented on Form EP-305, "10CFR50.54(q) Evaluation", (Nuclear Management Manual, Emergency Preparedness).

6.2.3 Before initiating revisions to the Emergency Plan, a review of the ANS document/Report and State and County E-Plans shall be performed. Proposed changes that impact the State and County E-Plans should be discussed with State officials for concurrence and to allow update of offsite plan.

6.2.4 Revisions to the Emergency Plan may be made without prior NRC approval provided that:

A. There is no decrease in the effectiveness of the Emergency Plan,
B. The Emergency Plan continues to meet the requirements of 10CFR50.

6.2.5 Proposed changes that decrease the effectiveness of the approved Emergency Plan shall not be implemented without prior NRC approval.

6.3 Approval of Emergency Plan Revisions/Changes (as shown in Attachment 1) shall be provided as follows:

6.3.1 Revisions to the Emergency Plan shall be coordinated by the Emergency Planner(s).

6.3.2 The Emergency Planner(s) shall perform an independent review of the Emergency Plan revision.

6.3.3 The Emergency Planner(s) shall perform a 50.54(q) review for all Emergency Plan revisions (EP-305).

6.3.4 The Emergency Plan revision approval process will be conducted in accordance with Licensing Document Maintenance Procedure.

6.3.5 The Emergency Plan revision shall be reviewed with the State prior to implementation.

6.3.6 The approved plan revision shall be distributed in accordance with established document control procedures.

6.3.7 A record of each change to the Emergency Plan made without prior approval by the NRC, shall be retained for three years from the date of the change.

6.3.8 The Emergency Plan and records of any changes to the Emergency Plan that decrease the effectiveness of the Plan, shall be retained until the NRC terminates the license for both ANO units.

6.3.9 The Emergency Planning Program, as described and implemented by the ANO Emergency Plan and Implementing Procedures shall be audited once per 12 months by persons who have no direct responsibility for implementation of the Emergency Planning Program.

6.4 Approval of Emergency Plan Implementing Procedure Revisions/Changes shall be provided as follows:

6.4.1 Revisions/Changes to the Emergency Plan Implementing Procedures shall be coordinated by the Emergency Planner(s).

6.4.2 The Emergency Planner(s) may perform an independent review of the Emergency Plan Implementing Procedure revision/change.

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

6.4.4 The Emergency Planner(s) shall perform a 50.54(q) review for any of the following:

A. Revisions/Changes to the Emergency Action Levels (EALs) contained in Procedure 1903.010, "Emergency Action Level Classification"

B. Revisions/Changes to any implementing procedure that affects the Emergency Plan or procedure 1903.010, "Emergency Action Level Classification".

6.4.5 The Emergency Planner (s) shall review any revisions/changes to Procedure 1903.010, "Emergency Action Levels" with the State and local government authorities prior to approval.

6.4.6 The Emergency Plan Implementing Procedures revision/change approval process will follow the requirements of Procedure 1000.006, "Procedure Control".

6.4.7 The approved procedure revision/change shall be distributed in accordance with established document control procedures.

6.5 Review and Revision of the EAL Bases Document

6.5.1 The review and revision of the EAL Bases Document will be coordinated by Emergency Planning.

6.5.2 The following directors/managers shall ensure that proposed changes to the document are reviewed for technical accuracy and/or applicability as emergency classification criteria.

A. Operations Managers

B. Director, Design Engineering

C. Manager, Radiation Protection and Chemistry

D. Director, Nuclear Safety Assurance

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

6.6 Review of Transmittals to NRC

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

6.7 Review and Updating the ANS Document/Report

6.7.1 The ANS Document/Report shall be maintained as a living document IAW 44 CFR 350 Part 14b and FEMA REP 10.

6.7.2 For any planned changes to ANS equipment/processes which will cause the ANS Document/Report to be changed the, Arkansas Department of Health Nuclear Planning and Response Program shall be notified.

6.7.3 FEMA Region VI shall be notified via email (if expeditious approval is required) and/or by formal letter of any planned changes.

6.7.4 Significant changes (see Attachment 3 for examples), as described in 44 CFR 350, will require a revision to the document and be submitted to FEMA Region VI for review and approval prior to the actual change. This level of change may require an independent Quality Assurance engineering review (normally paid for by FEMA) and may require additional verification measures as described in FEMA REP 10 to validate the change effectiveness. This determination is made by FEMA.

6.7.5 Minor changes (telephone number changes, typo corrections etc.) shall be submitted to FEMA Region VI, but do not require the level of evaluation mentioned above.

6.7.6 Use 1903.004J to document changes to ANS Document/Report.

7.0 DRILLS AND EXERCISES

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

7.1.1 The Emergency Planner(s) shall:

A. Submit a copy of the biennial emergency preparedness exercise scenario manual to the NRC regional office approximately 30 days prior to the exercise date in accordance with NRC Inspection Procedure 71151.

B. Submit a copy of the drill scenario to the NRC Resident Inspector approximately 14 days prior to the drill date.

C. Publish a schedule of emergency preparedness drills for the upcoming year during the last quarter of the current year.

D. Schedule a critique at the conclusion of each exercise/drill to evaluate the ability of the members of the ERO to respond as required by the Emergency Plan and Implementing Procedures.

E. Submit documentation of each emergency preparedness practice drill/exercise to ANO Records Management System. This documentation as a minimum shall include the following:

1. Narrative Summary

2. Objectives

3. Attendance roster (maintained in training database)

4. Correction Actions (maintained in corrective actions database and Emergency Planning Action Tracking System (EPATS))

5. Emergency Planning should maintain a master copy of each full scale drill or exercise.

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

7.2 Conducting Drills and Exercises

7.2.1 Drills and Exercises should be conducted in the following manner:

A. A scenario shall be prepared prior to the drill or exercise. The scenario should be as realistic as possible and should include the following items:

1. Objective(s)

2. Participating organizations

3. Chronology of events

4. A time schedule of real and simulated initiating events

5. A narrative summary describing the simulated events and the appropriate responses and actions

6. Arrangements for drill controllers and evaluators

(P-10769) B. Evaluators shall be assigned to view and critique the drill or exercise. **[The evaluators shall make on-the-spot corrections of any erroneous performance identified (drills only).]** Their critique shall be conducted as soon as practical after the drill or exercise.

C. A review/evaluation should result from the exercise and drill critique. The review should include an evaluation of any weaknesses identified and recommended corrective actions.

D. Appropriate action shall be taken to make improvements, as necessary.

E. Table Top Drills may include any or all of the components recommended in items A-D above. Table Top Drills typically include a scenario-based situation to which ERO personnel can respond, and which provides opportunities for them to interact with other personnel in their Emergency Response Facility. In addition, improper responses can be corrected at the time they are made, and may be evaluated to determine if they are programmatic in nature.

(P-10772) **[7.2.2 Exercises**

At least biennially, local and state agencies shall be invited to participate in an exercise with the ANO staff. The scenarios for exercises shall be varied such that the major elements of the Emergency Plan and emergency response organizations are tested within a six- (6) year period. The exercise will attempt to include mobilization of state and local personnel and resources adequate to verify the

capability to respond to the accident scenario, as required. Provisions shall be made to start an exercise between 6 p.m. and 4 a.m. once every six- (6) years.]

(P-10872) [7.2.3 Drills

The following types of drills shall be conducted (in addition to the biennial exercise) at the indicated frequency:

A. Fire Emergency (Fire Brigade) - Fire Brigade Drills are conducted in accordance with 1063.020, "Fire Brigade Training Program".

B. Medical Emergency (ANNUALLY) - This drill requires activation of the Emergency Medical Team and, if feasible, transportation by the Pope County Emergency Medical Service of a simulated injured individual to the offsite medical treatment facility and activation of the offsite medical treatment facility. The offsite portions of the medical drill may be performed as part of an exercise.

(P-10770,P-10771
(P-4019) C. Radiological Monitoring Drills - Reference NUREG-0654 II.N.d - These drills may be done independently or they may be included in any of the regularly scheduled ERO Drills.

1. Environmental Monitoring Drills (ANNUALLY) - These drills include collecting environmental samples, actual analysis of the samples and documentation of analysis results for water, soil, vegetation and air samples.

2. In-plant Monitoring Drills (ANNUALLY) - These drills include detection and measurement of simulated inplant radiological conditions. These measurements of simulated elevated radioactive releases are reported to the appropriate person, the results are evaluated and appropriate protective/corrective actions are recommended.]

(P-10770) [D. Health Physics Drills - Reference NUREG-0654 II.N.e - These drills may be done independently or they may be included in any of the regularly scheduled ERO Drills.

1. Field Monitoring Drills (SEMI-ANNUAL) - These drills include assessment of simulated elevated radiological releases to the environment and response to radiological conditions. Direct radiation readings and air samples of a simulated radioactive releases offsite are taken, results are reported to the appropriate ERO position, the

results are evaluated and appropriate protective/corrective actions are recommended.

2. Post Accident Sampling Drills (ANNUALLY) - These drills include sampling and analysis of inplant liquid with actual elevated radiation levels. RCS samples may be used as the actual elevated sample. The samples are taken, results are reported to the appropriate ERO position, the results are evaluated and appropriate actions are recommended.]

(P-10770)

[E. Radiological Dose Assessment Drill (ANNUALLY) - A radiological dose assessment drill utilizing simulated field monitoring data shall be conducted annually. The drill may be in conjunction with a health physics drill and will address dose projection calculations and offsite Protective Action Recommendations.

1. Dose Assessment activities will be included in the full-scale Emergency Response Organization Drills for the purpose of providing Dose Assessment Team members and Dose Assessment Supervisors with practical applications of Dose Assessment skills. These activities will be in addition to the scheduled exercises.]

F. Communication - Communication drills shall be conducted in the following areas along with the corresponding time frames.

1. Monthly - With the state and local governments within the plume exposure pathway emergency planning zone.

2. Quarterly - With federal emergency response organizations and states within the ingestion pathway.

3. Annually - Between the nuclear facility, state and local emergency operations centers, and field assessment teams.

(P-1465)

[G. Emergency Response Organization Drills - Drills shall be conducted for the Emergency Response Organization at least four (4) times each calendar year. Federal, State, and local governments shall be invited to observe and critique scheduled exercises and drills.]

H. The above drills may be conducted as individual drills or as an integrated part of a larger scope drill activity.

7.3 Documentation of Drills

7.3.1 Documentation for emergency response offsite training (Non-ANO personnel) is maintained by the Arkansas Department of Health's Nuclear Planning and Response Program Office.

7.3.2 Documentation of fire emergency (fire brigade) drills will be in accordance with 1063.020, "Fire Brigade Training Program".

(P-10771, P-4109)

[7.3.3 Documentation for the following drills is the responsibility of the Manager, Emergency Planning. Records of these drills are entered on the ANO Records Management System.

A. Medical Emergency

B. [Radiological Monitoring]

C. Semi-annual Health Physics

D. Radiological Dose Assessment

E. Communications]

8.0 COMMUNICATIONS

8.1 The Emergency Planner(s) shall:

8.1.1 Perform the designated quarterly communications test and phone number verification per Procedure 1903.062, "Communications System Operating Procedure".

8.1.2 Perform the designated monthly test and quarterly phone number verification per Procedure 1903.062, "Communications System Operating Procedure".

8.1.3 Perform annual communications tests between ANO and the county EOC's.

9.0 EMERGENCY RESPONSE PERSONNEL

9.1 The ANO Emergency Planner(s) shall:

9.1.1 Issue and update letters of assignment, suspension, re-instatement and termination for ERO personnel as required by Procedures 1903.002 and 1903.003.

9.1.2 Determine staffing adequacy when a letter of termination/ suspension is issued.

(P-10863) 9.1.3 **[Ensure that the Emergency Telephone Directory and the Computerized Notification System (CNS) data base are updated on a quarterly basis.]**

9.1.4 Perform a critique process to identify strengths, weaknesses and improvement items on all emergency classifications and medical emergencies where the Emergency Medical Team has been activated. The results of the critique should then be published and distributed as a training aid for the other team members. The critique process will be similar to the critique process used for Drills and Exercises. This process is described in the ANO Emergency Planning Drill/Exercise Manual.

10.0 FACILITIES AND EQUIPMENT

10.1 The Emergency Planner(s) shall:

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

11.0 **[DEDICATED EMERGENCY RESPONSE VEHICLE**

(P-10843)

11.1 A vehicle has been dedicated for use as an ANO emergency response vehicle. This vehicle, a four-wheel-drive Chevrolet Blazer, is normally parked in the parking lot West of discharge canal near the entrance to the Administration Building.

11.2 The offsite monitoring section of the Emergency Radiation Team has priority use of this vehicle to conduct field surveys in the event of a radiological release at ANO.

11.3 Keys for this vehicle are located in the red key box outside of Room 110 of the EOF and in the emergency kit in the OSC.

11.4 In the event that the four-wheel drive vehicle becomes unavailable, the Manager of Emergency Planning will designate another ANO vehicle for emergency response use.]

12.0 OFFSITE SUPPORT ORGANIZATIONS

12.1 The Manager, Emergency Planning shall provide the Nuclear Planning and Response Program with appropriate information involving Emergency Plan and Implementing Procedures revisions.

12.2 The Manager, Emergency Planning shall maintain liaison between ANO and the Arkansas Department of Health and other appropriate support organizations.

12.3 The Manager, Emergency Planning shall coordinate to ensure that letters of agreement with offsite support organizations are reviewed every two years and updated if necessary.

13.0 TRAINING

13.1 Training For Emergency Planning Staff

(P-10860) [13.1.1 **The Manager, Emergency Planning and Emergency Planners shall attend, as available, at least one annual training session for professional development to enhance emergency planning skills.]**

13.1.2 Individuals assigned to a position in the Emergency Response Organization and who also teach Emergency Response Training are allowed attendance credit for classes that they teach. These trainers are not required to take any associated examinations.

(P-4175)

[13.2 Offsite Training

13.2.1 Training for offsite (non-ANO personnel) emergency response personnel is conducted primarily by the Arkansas Department of Health's Nuclear Planning and Response Program staff. This training is described in Attachment 2, "Description of Offsite Training." The following documentation is kept on file in their office:

A. Attendance Rosters

B. Training Course Curriculum

13.2.2 In addition to Attachment 2, offsite emergency response personnel (i.e. local government officials and Arkansas Department of Health officials) should receive the following training:

(P-10833) **A. [Annual review of the Emergency Action Levels.]**

B. Annual review of applicable implementing procedures (to include procedures for notification and, where applicable, site access procedures and identification of coordination personnel).]

[13.2.3 The Pope County Emergency Medical Service and London Fire Department will be invited to participate in site specific emergency response training sessions provided by ANO personnel. These training sessions should include:

A. Procedures for notifications

B. Basic radiation protection

C. Site Access procedures

D. Emergency Response functions]

[13.2.4 The following training shall be conducted:

A. Professional medical consultants shall receive training in the treatment of patients that are contaminated and/ or overexposed.

B. London Fire Department personnel shall be invited annually to participate in a fire emergency drill.]

[13.2.5 General Public

A. Training of the public on how they should respond in the event of an emergency at ANO is primarily conducted by the state and local governments.

B. ANO shall assist in these efforts by providing information, as agreed upon by ANO, the State and regulators, to the Nuclear Planning and Response Program for dissemination to the population within approximately 10 miles of ANO regarding how they will be notified and what their actions should be in an emergency. This information includes the following:

1. Educational information on radiation,

2. Sheltering,

3. Evacuation routes, and

4. Contact for additional information.]

[13.2.6 News Media

A program shall be conducted annually to acquaint the media with the Emergency Plan, information concerning radiation, and points of contact for release of public information in the event of an emergency.]

14.0 ATTACHMENTS AND FORMS

14.1 ATTACHMENTS

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

14.1.2 Attachment 2 - "Description of Offsite Training"

14.1.3 Attachment 3 - "Significant Change" to an A&N System

14.2 FORMS

14.2.1 Form 1903.004A - "Emergency Planning Evaluation/Action Request"

14.2.2 Form 1903.004C - "Quarterly Emergency Telephone Directory Review"

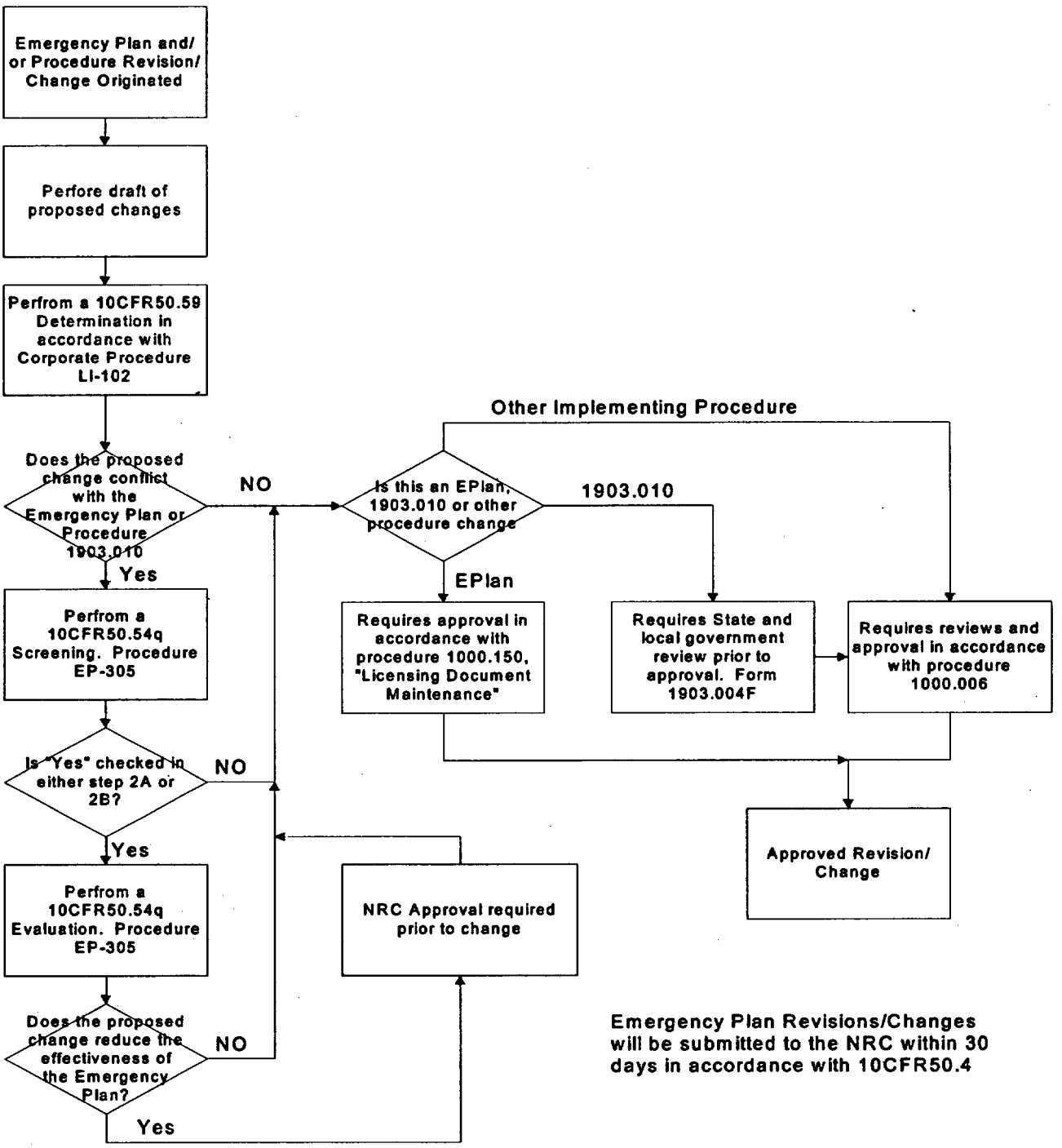
14.2.3 Form 1903.004D - "EAL Bases Document Review"

14.2.4 Form 1903.004G -"EAL State and Local Agreement"

14.2.5 Form 1903.004I - "Annual Review of ANS Document and Offsite Plans"

14.2.6 Form 1903.004J - "Changes to the ANS Document/Report"

ATTACHMENT 1
(P-14145 Complete Attachment)
EMERGENCY PLAN AND
IMPLEMENTING PROCEDURES REVIEW



Emergency Plan Revisions/Changes will be submitted to the NRC within 30 days in accordance with 10CFR50.4

ATTACHMENT 2

DESCRIPTION OF OFFSITE TRAINING

Radiological Monitoring Course - The Radiological Monitoring Course conducted in support of the offsite radiological emergency response plans is a modified version of the standard 12-hour FEMA approved Radiological Monitoring Course. Three additional hours were added to include subject matter pertaining to the radiological emergency response plans, emergency response, environmental surveillance, public information, care centers and hot-line procedures. The course is presented primarily to law enforcement, fire departments and volunteer groups.

Management of Persons Contaminated with Radioactive Material - This training course is approximately 16 hours in duration and is presented to the hospital emergency room staff members and ambulance services who may have a direct support function in the event of an incident at Arkansas Nuclear One. The course includes information concerning emergency response plans, warning system, basic concepts of radiation protection, nuclear radiation, contamination vs. exposure, units and standards, nuclear power plants, personnel dosimetry, radiological detection equipment, dress out techniques, hot-line procedures, decontamination procedures, disposal of contaminated material and emergency handling of radiation accident cases.

Radiological Monitoring (Refresher Training) - The refresher training program is a four (4) hour training program. The program is a review of the Radiological Monitoring Course program with emphasis on radiological detection equipment and area and personnel monitoring.

Management of Persons Contaminated with Radioactive Material (Refresher Training) - The refresher training program is a four (4) hour training program. The program is a review of the 16-hour program with emphasis on changes to emergency response plans, radiological detection equipment, hot-line procedures and decontamination procedures.

School Presentations - A video presentation is made for the purpose of showing students what they should do in the event of an emergency evacuation.

Congregate Lodging Facilities: (Care Center) the Congregate Lodging Facility Training Program is eight (8) hours in duration and is presented to the Care Center Managers and Staff. The course includes information concerning the establishment and operations of a lodging facility for potential evacuees around ANO. The standard American Red Cross material plus FEMA approved material is used in the conduct of this course. In addition to the congregate lodging facility management procedures additional information concerning radiation, decontamination and hot line procedures are included.

Informational Programs on the Nuclear Planning and Response Program (NP&RP) - The length of program is adjusted according to the needs of the audience. The program is designed to inform the public on the off-site activities of NP&RP. Includes information on the emergency plans, warning systems, environmental surveillance,

ATTACHMENT 3

"Significant Change" to an A&N System

FEMA Rule 44 CFR 350 establishes the policy and procedures for review and approval by FEMA of state and local emergency plans and preparedness for offsite effects of a radiological emergency that may occur at a commercial nuclear power facility. 44 CFR 350.5 requires that "the means to provide early notification ...to the populace within the plume exposure pathway Emergency Planning Zone (EPZ) have been established." In accordance with 44 DFR 350.14, a "significant change" involves any change to State and local plans and preparedness that may affect its adequacy to protect public health and safety and must be processed and reviewed in the same manner as an initial plan submission.

As it relates to an A&N system, a "significant change" includes:

- A change in EPZ boundaries requiring the addition of new alerting devices or changes the number of local governments that must be involved in alert and notification.
- A change in EPZ population requiring a change to the A&N system siren sound levels.
- Substituting one form of alerting for another (e.g., sirens for special alerting devices).
- Addition to or upgrading of alerting devices based on evidence of inadequate A&N system coverage.
- A change to maintenance methods that is not addressed in the design report.
- A change to testing methods that is not addressed in the design report.
- A loss of administrative control of special alerting devices that brings into question whether affected populations(s) can be notified in a timely manner.
- A change in siren locations and/or ratings not explicitly considered as acceptable by the FEMA technical evaluation.
- A change to the siren control system that is not addressed in the design report.
- Any change that can reasonably be expected to reduce siren sound coverage. Such changes include:
    - o Degradation in sirens output below that assumed in the design report due to design due to installation or maintenance practices;
    - o Substitution using a siren with a lower sound rating;
    - o Substitution using directional siren for an omni-directional siren;
    - o Increasing the siren operating frequency;
    - o Siren control system design, configuration control or software quality assurance problems identified during system operation and maintenance that can be reasonably expected to cause more that 10% of the sirens not being actuated in an actual emergency unless the A&N system is modified; or
    - o Addition of buildings of man-made changes in topographical features that can be reasonably expected to result in "shadowing" of sound from nearby siren(s) not previously accounted for.
- Any other item that brings into question the ability of the A&N system to perform in the way it was described in the Design Report. This can be based on NRC inspection findings or significance determination, emergency exercise results, telephone survey results or the FEMA Regional Assistance Committee (RAC) chair judgment.

[P-10861 Complete Form]

REQUEST NO. _____

INSTRUCTIONS: Initiator should complete steps 1-4, then forward to Emergency Planning.

Emergency Planning Evaluation/Action Request

1. Date _____

2. Description Of Problem/Improvement (Be specific; use additional pages if necessary.)

3. Written By _____ 4. Department _____

5. Reviewed By Emergency Planning _____ 6. Recommend Action: ☐ YES ☐ NO

7. If "NO" is checked in step 6, state reason: _____

8. Action Assigned To: _____ 9. Due Date: _____

10. Action Taken

11. Action Complete By: _____ Date: _____

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

		Check
10.	Pager Assignments	
	A. Assigned individuals are listed correctly	_____
	B. Pager number assignments are correct	_____
11.	Entergy Corporation Contacts	
	A. Assigned individual listing is correct	_____
	B. Telephone numbers are correct	_____
12.	Procedure Verification	
	A. Related sections of Procedures 1903.011 correspond to the Emergency Telephone Directory Listing.	_____
13.	The entries in the Computerized Notification System (CNS) database have been compared to those in the Emergency Telephone Directory and changes made as necessary.	_____

Comments: _____

_____

_____

Performed by _____ Date _____

Reviewed by _____ Date _____

This document provides technical bases which explain the ANO Emergency Action Level criteria found in Procedure 1903.010, "Emergency Action Level Classification". This document is intended for use as a writers guide for procedure 1903.010, a resource for training program development, as a self-study guide, and as a reference for use in audits and inspections.

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

Manager, Operations Unit One _____ / _____
Signature Date

Manager, Operations Unit Two _____ / _____
Signature Date

Director, Design Engineering _____ / _____
Signature Date

Manager, Rad Protection & Chemistry _____ / _____
Signature Date

Director, Nuclear Safety Assurance _____ / _____
Signature Date

The following individuals (or their designee's) have reviewed the changes to procedure 1903.010, "Emergency Action Levels".

1903.010 Rev.# _____

NOTE
Review may be obtained per telephone conversation.

Ark. State Dept. of Health (NP&RP): _____ _____
DATE

Conway County: _____ _____
DATE

Johnson County: _____ _____
DATE

Logan County: _____ _____
DATE

Pope County: _____ _____
DATE

Yell County: _____ _____
DATE

Annual Review of ANS Document/Report and Offsite Plans

Document	REV or date last approved	Signature	Date
ANS Document/Report			
State E-Plan			
Conway County E-Plan			
Johnson County E-Plan			
Pope County E-Plan			
Logan County E-Plan			
Yell County E-Plan			

Changes to the ANS Document/Report

1. Correspondence is initiated jointly by ANO EP and ADH NP&RP with FEMA.

   Date Completed _____ Signature _____

2. ANO Emergency Planning prepares the changed ANS Document/Report.

   Date Completed _____ Signature _____

3. The ANS Document/Report is provided to ADH for transmittal to FEMA for review and approval.

   Date Completed _____ Signature _____

4. FEMA notifies the state of the approval or changes necessary.

   Date Completed _____ Signature _____

5. Once FEMA approval is granted, ANO EP transmits a copy of the ANS Document/Report and FEMA approval to the NRC.

   Date Completed _____ Signature _____

6. All correspondence on the change with FEMA shall be entered into station permanent records along with this form.

   Date Completed _____ Signature _____