

July 18, 2003

L-2003-185 10 CFR 50 Appendix E

U. S. Nuclear Regulatory Commission Attn: Document Control Desk

Washington, D. C. 20555

Re:

St. Lucie Units 1 and 2

Docket Nos. 50-335 and 50-389

Emergency Plan Implementing Procedures

In accordance with 10 CFR 50 Appendix E, enclosed is a copy of each of the following procedures that implements the St. Lucie Plant Radiological Emergency Plan.

Number	<u>Title</u>	Revision	Implementation Date
EPIP-12	Maintaining Emergency Preparedness – Radiological Emergency Plan Training	11A	July 14, 2003
EPIP-13	Maintaining Emergency Preparedness – Emergency Exercises, Drills, Tests and Evaluations	7A	July 14, 2003

EPIP-12 Revision 11A and EPIP-13 Revision 7A incorporated procedure change requests (PCR) to delete references to protection services manager. Please contact us if there are any questions regarding these procedures.

Very/truly yours

William Jefferson, Jr.

Vice President St. Lucie Plant

WJ/spt

Enclosures

A045



ST. LUCIE PLANT

EMERGENCY PLAN IMPLEMENTING PROCEDURE

SAFETY RELATED

Procedure No.

EPIP-12

Current Revision No.

11A

Effective Date 07/14/03

Title:

MAINTAINING EMERGENCY PREPAREDNESS - RADIOLOGICAL EMERGENCY PLAN TRAINING

Responsible Department: EMERGENCY PLANNING

REVISION SUMMARY:

Revision 11A - Incorporated PCR 03-1897 to delete references to protection service (Bonnie Wooldridge, 06/06/03)

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rotection services.
PROCEDURE PRODUCTION

Revision 11 – Added definitions, clarified drill participation requirements, eliminated notification of certain departments, removed PAR training requirements, added OSC manager trng, and made other minor changes. (J. R. Walker, 07/18/02)

REVISION 10 - Adjusted positions for which drill participation may be desirable prior to being placed in ERO. Added requirement for drill participation. Revised STA, NDDO, and ECO training requirements. (R. Walker, 09/27/01)

Revision 9 - Revised Chemistry training relative to PASS elimination. (J. R. Walker, 07/23/01)

Revision 8 - THIS PROCEDURE HAS BEEN COMPLETELY REWRITTEN. Removed training requirement for FAPDT (First-Aid Personnel Decontamination Tram) training for Chemistry personnel, added statement regarding Security First Aid Training, and made editorial and administrative changes. (J. R. Walker, 12/07/00)

AND

Added reference to NP-912, revised GET procedure number, updated trng. mgr. title, revised annual retraining to allow credit for drill/exercise participation, identified use of PSL/PTN common training modules, deleted RM training module from qual req for ECO and NDDO and made administrative changes. (J. R. Walker, 10/13/00)

Revision	FRG Review Date	Approved By	Approval Date	S	OPS
0	12/15/97	J. Scarola	12/15/97	DATE	
		Plant General Manager		DOCT	PROCEDURE
Revision	FRG Review Date	Approved By	Approval Date	DOCN	EPIP-12
11A	07/18/02	Dick Rose	07/18/02	SYS	
		Plant General Manager		СОМ	COMPLETED
		N/A	F 19 . 1	ITM	11A
		Designated Approver			
		D. Calabrese	06/06/03		
		Designated Approver (Minor Correction)			

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1.0 PURPOSE

- 1.1 This procedure provides the Emergency Plan (E-Plan) training requirements for site personnel and personnel in the St. Lucie Plant Emergency Response Organization (ERO).
- 1.2 In order to maintain emergency preparedness, personnel should be familiar with certain pre-planned actions specified in the Emergency Plan Implementing Procedures (EPIPs). The primary objectives of this training are as follows:
 - 1. Familiarize appropriate individuals with the E-Plan and related EPIPs.
 - 2. Instruct individuals in their specific duties to ensure effective and expeditious action during an emergency.
 - 3. Periodically present significant changes in the scope or content of the E-Plan and the EPIPs.
 - 4. Provide annual retraining to ensure that personnel are familiar with their emergency duties and responsibilities.
 - 5. Provide the various emergency organization groups with the required training that will ensure an integrated and prompt response to an emergency situation.
- 1.3 The annual training cycle normally occurs in the first quarter of each year.
- 1.4 The E-Plan Training Review Committee provides for the review and evaluation of changes, the impact on training, and the determination if training is needed prior to the next cycle.

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2.0 REFERENCES / RECORDS REQUIRED / COMMITMENT DOCUMENTS

NOTE

One or more of the following symbols may be used in this procedure:

- § Indicates a Regulatory commitment made by Technical Specifications, Condition of License, Audit, LER, Bulletin, Operating Experience, License Renewal, etc. and shall NOT be revised without Facility Review Group review and Plant General Manager approval.
- ¶ Indicates a management directive, vendor recommendation, plant practice or other non-regulatory commitment that should NOT be revised without consultation with the plant staff.
- Ψ Indicates a step that requires a sign off on an attachment.

2.1 References

- §₁ St. Lucie Plant Radiological Emergency Plan (E-Plan)
- ¶₁ QI 1-PR/PSL-1, Site Organization.
- ¶₂ QI-17-PSL-1, Quality Assurance Records.
- ¶₄ ADM-18.06, General Employee Training.
- AP 1800022, Fire Protection Plan.
- ADM-11.11, Severe Accident Management Guidelines Program Administration
- St. Lucie Plant Emergency Response Directory.
- NP-912, Respiratory Qualifications Requirements

2.2 Records Required

 ¶₂ Records documenting the Emergency Plan Training received by individuals are Quality Assurance records and shall be maintained in the plant files in accordance with QI-17-PSL-1, Quality Assurance Records.

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2.3 Commitment Documents

- 10 CFR 50.47, Emergency Plans.
- 10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities.
- 10 CFR 26, Fitness for Duty.
- NUREG 0737, 11.B.4, Training for Mitigating Core Damage
- §2 NOV Response L-97-20, Violation II.C, Part 4A.
- §3 NOV Response L-97-20, Violation II.C, Part 4B.
- §4 NRC Inspection Report 96-18 URI P5.2
- ¶₃ QAS-EMP-96-01, Finding 2
- ¶₅ PMAI PM99-05-183 (Use and Update of the Personnel Qualification Database (PQD))
- ¶₆ PMAI PM99-09-077, CR 99-1353 (Training requirements for TSC Dose Assessor)
- ¶₇ CR 00-0544, Audit QSL-EP-00-02 (Discrepancies with Primary and Backup ERO Augmentation Processes)

3.0 RESPONSIBILITIES

- 3.1 The Site Training Manager is responsible for:
 - 1. Designing, establishing, implementing and maintaining training programs for the St. Lucie Plant.
 - **2.** Ensuring initial orientation training is provided to permanently assigned new employees.
 - 3. Ensuring all Emergency Plan Training, both initial training and periodic retraining, is conducted and documented for the St. Lucie Plant ERO.

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- 3.2 Plant Services Manager is responsible for:
 - 1. ¶₁ Ensuring that a qualified Emergency Response Organization (ERO) is maintained in compliance with the St. Lucie Radiological Emergency Plan.
 - 2. Coordinating emergency planning at the plant.
- 3.3 Emergency Preparedness is responsible for:
 - 1. Establishing qualifications standards for ERO personnel.
 - A. ¶₇ Ensuring non-bargaining unit personnel pagers are correctly programmed.
 - 2. Reviewing and approving the Emergency Plan Training Program.
 - 3. §₁ Offering training to each contracted local hospital, at least once each year.
 - A. The content of that training should consist of radiological controls, medical consideration of contaminated injuries, and other topics as appropriate.
 - 4. §₁ Offering training to each State and local emergency response agency, at least once each calendar year.
 - A. The content of that training should consist of an overview of normal and emergency plant operations and concepts of radiation protection, including protective actions.
 - B. This training may be in the form of a presentation, text, or other acceptable means.
 - 5. Providing the table of Emergency Action Levels (EALs) to state and local officials for their review, on an annual basis.
 - 6. Revising the St. Lucie Plant Emergency Response Directory (ERD) and the FPL Emergency Recall System (autodialer) database when notified via a form similar to Attachment 1.
 - 7. Providing a list of personnel designated to fill emergency response positions and requiring training per this procedure, to the Training Department.
 - 8. Removing individuals who fail to maintain training qualifications from the ERD and the FPL Emergency Recall System (autodialer) database when notified by the appropriate department head or the Training Department.

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- 3.3 Emergency Preparedness is responsible for: (continued)
 - 9. Providing guidelines to plant management to assist in identifying the appropriate number of ERO personnel for each ERO position.
 - 10. Notifying the Site Training Manager if changes in the E-Plan and/or EPIPs justify additional training for ERO personnel.
 - 11. Chairing EP Training Review Committee Meetings.
- 3.4 Each Manager and Department Head is responsible to ensure that each ERO member under his/her supervision attends training in accordance with Attachments 2 and 3, and remains fully qualified at all times to perform his/her assigned emergency response duties.
 - 1. Ensure personnel in his/her department who are assigned an on-site position in the ERO maintain unescorted access to the Protected Area and Radiation Controlled Area.
 - 2. Ensure changes in his/her employees' status which would impair or limit the ability to perform emergency response duties be promptly reported to the Manager (directly or through EP).
 - A. Provide alternate personnel to be trained to fill open positions.
 - 3. \P_7 Ensure that non-bargaining unit personnel have pagers.
- 3.5 The Manager is responsible to ensure that Security personnel maintain EP training qualifications per this procedure.
- 3.6 ERO members, supervisors, training instructors, HP dosimetry personnel and medical facility staff are responsible for promptly reporting any failure in training, testing or other condition, which would disqualify an emergency responder, to the Manager (directly or through EP).
- 3.7 Each ERO member is responsible for advising the Manager (directly or through EP) when changes in status occur that could impact ERO participation.
- 4.0 DEFINITIONS
- 4.1 Annual occurring once per calendar year (January 1 through December 31).
- 4.2 Duty Call Supervisor (DCS) is a specifically designated and trained supervisor responsible for assisting the Emergency Coordinator in making notifications and calls to the Emergency Response Organization.

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- 4.3 Emergency Plan formally known as the St. Lucie Plant Radiological Emergency Plan, establishes the requirements for training the Emergency Response Organization; also referred to as the Plan or E-Plan.
- **4.4 Emergency Planning (EP)** activities undertaken to satisfy the commitments of the Emergency Plan, used interchangeably with Emergency Preparedness.
- **4.5** Emergency Recall System a computer-based automated call-out system used to activate the ERO. This system is also referred to as the "autodialer".
- 4.6 Emergency Response Directory (ERD) formally known as the St. Lucie Plant Emergency Response Directory, provides a list of the current (revised on a quarterly basis) Emergency Response Organization personnel.
- 4.7 Emergency Response Organization (ERO) personnel trained and qualified to provide specific emergency response functions as defined by their individual positions. Persons can become members of the Emergency Response Organization by following the instructions outlined in this procedure.
- 4.8 EP Training Review Committee (TRC) representatives from Emergency Preparedness, Training, and other departments who meet periodically to discuss training issues related to the Emergency Response Organization.
- 4.9 SAMG Severe Accident Management Guidelines.

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5.0 INSTRUCTIONS

NOTE

- In the event of an emergency, the Emergency Coordinator or Recovery Manager has the authority to assign personnel to positions for which they have not received the required Emergency Plan training, if that action is prudent in order to protect the health and safety of the public and plant personnel.
- The training requirements listed in this procedure are for the purpose of emergency preparedness and are in addition to other training required to hold a position, e.g., Nuclear Plant Supervisor (NPS).
- Personnel filling the position of Emergency Coordinator, TSC OPS Coordinator, or EOF RM OPS Advisor/Logkeeper should have SRO level knowledge (i.e., current or previous SRO license or SRO equivalent training such as Engineering Management Operations Training (EMOT)).

5.1 Initial Training

NOTE

- Initial Training is intended for personnel who are new to the ERO and is designed to orient the individual to his/her function and responsibilities within the ERO.
- Certain ERO positions, as indicated in Attachment 2, ERO Initial Training Matrix, require drill participation as part of initial ERO qualification.
- It may be desirable to allow persons filling the following positions to participate in and/or observe their position in a drill prior to being assigned to the ERO:
 - TSC Supervisor
 - TSC Coordinator with OSC
 - OSC Coordinator with TSC
 - St. Lucie County Technical Advisor
 - Martin County Technical Advisor
- 1. §₁ Initial Orientation Training (Plant Access Training PAT) shall be PROVIDED to permanently assigned new employees.
 - A. Training includes information describing:
 - 1. Actions to be taken by an individual who discovers an emergency condition.

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- 5.1 Initial Training (continued)
 - 1. A. (continued)
 - 2. Location of assembly areas.
 - 3. Identification of emergency alarms.
 - **4.** Action to be taken upon hearing alarms.
 - B. ¶₄ PAT Training is CONDUCTED in accordance with ADM-18.06, General Employee Training.
 - 2. §₃¶₃ Personnel shall COMPLETE the Initial Training requirements identified in Attachment 2, ERO Initial Training Matrix, prior to being assigned to the ERO.
 - 3. To become a member of the ERO, an individual should FILL OUT Attachment 1, Emergency Response Organization Change Request.
 - A. COMPLETE the personal information (originator section).
 - B. OBTAIN Department Head approval.
 - **C.** FORWARD the Attachment to Emergency Preparedness Supervisor.
 - 4. Emergency Preparedness (EP) should AUTHORIZE the training of personnel designated to become new members of the ERO on Attachment 1.
 - 5. Training Department personnel should DOCUMENT completion of required training on Attachment 1 and forward to the Emergency Preparedness Supervisor when new members complete the training requirements as identified in Attachment 2, ERO Initial Training Matrix.
 - 6. EP should MAKE changes to the Emergency Recall System (ERS) and the Emergency Response Directory (ERD) upon receipt of Attachment 1 from Technical Training.

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NOTE

Retraining is intended to ensure that ERO personnel maintain the level of skill and knowledge necessary to accomplish their emergency duties. Retraining may be accomplished through a combination of programmed instruction and/or participation in drills or exercises.

5.2 Annual Retraining

- 1. §1 Annual retraining shall be PROVIDED at least once per calendar year.
- 2. Annual retraining may be ACCOMPLISHED by classroom training, drill / exercise participation option or other training method.
 - A. ¶₃ Classroom training shall INCLUDE topics identified in Attachment 3, ERO Annual Retraining Matrix.
 - 1. The drill / exercise participation option is NOT an acceptable alternate for the following topics:
 - a. Emergency classification
 - b. Protective Action Recommendations (PARs)
 - c. Accident assessment / corrective actions
 - d. Core melt scenario
 - e. Core damage assessment
 - f. ERDADS operations
 - g. Off-site Dose Calculation (OSDC)
 - h. Recovery Manager training
 - i. Sever Accident Management Guidelines (SAMGs)
 - 2. Individuals may challenge annual retraining examinations for topics not accounted for in the drill / exercise participation option.
 - 3. Personnel who teach a class should receive credit for completion of that class at the discretion of the Site Training Manager.

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- **5.2** Annual Retraining (continued)
 - 2. (continued)
 - B. Drill / exercise participation option shall include:
 - 1. ¶₃ A review of significant changes in the scope or content of the Emergency Plan and / or applicable Emergency Plan Implementing Procedures.
 - 2. Additional annual retraining topics identified by the EP Training Review Committee, which may include:
 - Review of selected initial training topics
 - Industry operating experience
 - A review of past drill / exercise performance problems
 - 3. Attendance at a pre-drill / exercise facility specific briefing.
 - 4. Participation in the drill / exercise as a player, controller or mentor (drills only).
 - 5. Participation in the post drill / exercise facility critique or controller critique.
 - C. Other training methodologies may be USED on an as needed basis when approved by the EP Training Review Committee and the Site Training Manager and which are consistent with the training requirements of the Emergency Plan.

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5.2 Annual Retraining (continued)

NOTE

Deviation from this schedule requires the approval of the Chief Nuclear Officer.

3. §2 Emergency Response Facility (ERF) drills shall be conducted at least four times per calendar year and should be conducted approximately once each quarter.

NOTE

It is the intent of the drill and exercise program that each ERO member have an opportunity to function in his/her position annually.

- A. Participation in drills and exercises should be TRACKED by Emergency Preparedness Supervisor and forwarded to Technical Training.
 - 1. Drill rosters should be REVIEWED <u>and</u> USED to record participants in all Emergency Response Facilities (ERFs) including the Emergency News Center (ENC).
 - 2. Drill critiques should LIST Players, Controllers, Evaluators, Mentors and Observers for each facility.
 - 3. Drill participation should be RECORDED in the training database.
- B. Personnel should be ROTATED through drills and exercises with the goal of having as many as feasible participate in at least one drill or exercise per year. This applies to all ERO members, including those who are NOT in the Nuclear Division.
 - 1. Participation in a drill or exercise shall be RECOGNIZED if an ERO member functions as a player, controller or mentor (drills only).
 - 2. Failure to participate in an ERF drill annually may RESULT in remedial training as determined by the Site Training Manager and Plant Services Manager.

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5.3 \P_3 Loss of ERO Qualifications

- 1. <u>If</u> an individual FAILS an initial training topic, <u>Then</u> that individual shall NOT BE ASSIGNED to the ERO until he/she has successfully met requirements.
- 2. <u>If</u> an individual FAILS Plant Access Training (PAT), Radiation Controlled Area Training (RCAT), <u>or</u> FAILS TO MAINTAIN qualifications for use of respiratory protection (as specified in Attachment 3), <u>Then</u> he/she shall promptly be REMOVED from the ERO.
- 3. <u>If</u> an individual FAILS an annual retraining evaluation, <u>Then</u> the Site Training Manager or designee shall NOTIFY the Emergency Preparedness Supervisor or designee of the results.
 - A. The individual shall not respond to an emergency until such time as remediation has been successfully completed.
 - B. The individual should be REMOVED from the ERS and ERD until appropriate remedial training, as recommended by the Site Training Manager and approved by the Emergency Preparedness Supervisor, has been completed.
- 4. The individual should COMPLETE remedial training at the earliest opportunity.

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5.4 Training for Security Personnel

- 1. Security personnel shall RECEIVE initial training and annual retraining for emergency response in accordance with this procedure.
- 2. Security personnel shall RECEIVE First Aid Team training in accordance with Security procedures.

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5.5 Fire Brigade

1. Fire Brigade training is COVERED by the Fire Protection Plan, AP 1800022.

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5.6 Training Exemptions and Substitutions

- 1. No specific Emergency Plan Training is REQUIRED for ERO positions whose emergency job functions are similar to normal job functions. Examples of these positions include:
 - A. Emergency News Center / Corporate Communications Staff
 - B. Governmental Affairs Staff
 - C. Risk Manager
 - D. Regulatory Affairs
- 2. The Nuclear Division Duty Officer (NDDO) is not required to participate in a drill / exercise as the emergency duties associated with the position do not differ from normal duties.

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ATTACHMENT 1 EMERGENCY RESPONSE ORGANIZATION CHANGE REQUEST

	NOTE Personnel will not be assigned to an emergency response organization position until required training for that position is completed.
0	Originator: Dept.
RIGINATOR	□ Add □ Remove □ Change (Circle new info) * Name: Soc. Sec. No.: * Position number: * Position: Work Phone: Home Phone: Pager: Other:
DEPT HEAD	NOTE Non-bargaining unit personnel will not be assigned to a position if they do not have a pager.
	Department Head/Supv. Signature: Date://
E P	Authorization for ERO training EP Supervisor Date:/_ /
TRA-N-NG	¶ ₅ ☐ The individual listed above meets the training/qualification requirements of EPIP-12 for the position(s) indicated per the Personnel Qualification Database (PQD). Signature: Date//
E P	¶₁□ Pager correctly programmed: Date:// Init.: □ Emergency Recall System database updated: Date:/_/ Init.: □ Emergency Response Directory (draft) updated: Date:/_/ Init.: □ Notifications to ERO: Date:/_/ Init.: ¶₅□ Notification of Personnel Qualification Database (PQD) Administrator Date:/_/ Init.:

* Only information required if removing from ERO (by EP)

END OF ATTACHMENT 1

11A

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ATTACHMENT 2 ERO INITIAL TRAINING MATRIX

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs .	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	oaso	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
	Licensed EC					G	G ²	X	X	X	X	X											Х			
	STA	Х				G						X	X	X												
	NLO	Χ_			X	G	G²											Ğ				G²				
	PS/SEC/First Aid Responder							L										G				<u> </u>				igsquare
100	DCS	Х				G			Х	X'																
101	Emergency Coordinator	Х		X		G		Х	X	X	Х	X		X									X		X	X
102	TSC Supervisor	X		X		G			Х												<u> </u>					Ш.
103	TSC HP Supervisor	X		X		G															L		_X_		<u> </u>	X
104	TSC Chem. Supervisor	X.		X		G			<u> </u>	X	X								X	X	X		L		<u> </u>	X
105	TSC Reactor Engineer	X		X		G		L	L				<u> </u>	X	<u> </u>	<u> </u>					<u> </u>		<u> </u>		<u> </u>	لـــــا

X = Required

= Respirator Only = Included in ERO Activation training for DCS only:

Autodialer JPM

• Written exam

Simulator practice session with E-Plan events
 If qualified to hold shift position, Then position meets ERO qualification criteria

E = PSL/PTN Common Responder Version

G = Training/Requal Frequency IAW other Plant Procedures

H = FFD Pool

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ATTACHMENT 2 ERO INITIAL TRAINING MATRIX

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess/Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	ospc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
106	TSC Communicator	X		Х		G			Х																	
107	TSC EM PST Rep.	Х		Х		G																			X	
108	TSC MM PST Rep.	Х		X		G																			X	ш
109	HP Shift Supervisor					G				Х																<u> </u>
110	TSC OPS Coordinator	X		Х		G		Х			Х										L			$ldsymbol{ldsymbol{ldsymbol{ldsymbol{eta}}}$	<u> </u>	
	TSC Dose Assessor	Х		X		G													X	X						ш
112	TSC HP Communicator	X		<u> </u>		G									<u> </u>	X			L	Ь—						igspace
	TSC SP Phonetalker	X		X		G			X							ļ			 	<u> </u>	ļ			<u> </u>		
114	TSC ERDADS Op.	X	L	<u>x_</u>	<u> </u>	G		L	L			L	<u> </u>	L	L		X			<u> </u>						ш

X = Required

C = Respirator Only

= Included in ERO Activation training for DCS only:

- Autodialer JPM
- Written exam

• Simulator practice session with E-Plan events

² = If qualified to hold shift position, <u>Then</u> position meets ERO qualification criteria

E = PSL/PTN Common Responder Version

G = Training/Regual Frequency IAW other Plant Procedures

H = FFD Pool

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ATTACHMENT 2 ERO INITIAL TRAINING MATRIX

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess./Corrective Action	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	osoc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
115	TSC PST Leader	Х		Х		G																			Х	X
116	TSC ERDADS Tech	Х		X		G											Х									ш
	TSC I&C PST Rep.	X		Х		G																			Х	ш
118	TSC SRO PST Rep.	X		X		G										<u> </u>									Х	Ш
119	TSC Security Supv.	X		Х		G																	Х			$oldsymbol{\sqcup}$
120	TSC Coord. with OSC	X		X		G																				igsquare
121	TSC Admin Staff	Х		X		g																L				igspace
	TSC EC Assist/Log.	Х		Х		G		Х	X		X									<u> </u>		L				X
151	OSC HP Tech.	Х			<u> </u>	G	G_		<u> </u>	X_				į .		Х						<u> </u>	<u> </u>	<u> </u>		

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ATTACHMENT 2 ERO INITIAL TRAINING MATRIX

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	ospc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
152	OSC EM Re-Entry Supv.	Х			X	G	G																			
	OSC I&C Re-Entry Supv.	Х			X	G	G																			
154	OSC MM Re-Entry Supv.	X			X	G	G																			
	OSC Chem. Supv.	X			Х	G	G			X											Х					
	OSC Electrical Chief	X			Х	G	G																			
157	OSC Supervisor / Manager	X			X	G																				X
	OSC Coord. with TSC	X			Х	G								<u> </u>												
	OSC HP Supv.	X			Х	G				X	L					X							X			\square
160	OSC Chemist	X			Х	G	G	$ldsymbol{ld}}}}}}$	<u> </u>	<u></u>	<u> </u>						<u> </u>	L			X					

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C = Respirator Only

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Simulator practice session with E-Plan events
 If qualified to hold shift position, Then position meets ERO qualification criteria

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G = Training/Requal Frequency IAW other Plant Procedures

H = FFD Pool

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ATTACHMENT 2 ERO INITIAL TRAINING MATRIX

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notification	ERO Activation	PARs	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	ospc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
161	OSC Electrician	Х			Х	G	G																			
162	OSC Mechanic	Х			X	Ğ	G																			\Box
163	OSC I&C Spec.	X			Х	G	G																			
	OSC On-Shift Security Spec.	X			Х	G																	Х			
	OSC Dosi. Tech.	Х			X	G																				
168	OSC MM Foreman	X			Х	G	G																			
	OSC NMM Staff Rep.	Х			Х	G																				
	OSC Safety Rep.	Χ_			X	G	G														•					

X = Required

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	osoc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
	OSC Admin Tech/Log.	X			Х	G																				
	Assembly Area Supv.	Х			X	G																	X			
	OSC OPS Re-Entry Supv.	Х			X	G	G																			
	OSC Prot and Control Rep	Х			Х	G																				
	OSC I&C Shop Supv.	Х			X	G	G																			
	Field Mon Team Driver	X			X	G	G/C																			
	OSC Info Services Rep.	X			X	G																				
	Recovery Manager	X	X			Н			Х		X													X		Х
205	Govt. Affairs Mgr.	E	E							ш																

X = Required

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Written exam

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ATTACHMENT 2 ERO INITIAL TRAINING MATRIX

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	ospc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
	EOF RM OPS Adv/Log.	Х	Х			Н			X		Х													X		X
	EOF ERDADS Op.	Х	X	İ		Н											Х									
216	EOF Status Board Keeper	X	Х			Н																				
	EOF Emerg Technical Mgr	Х	X			Н				X																ш
	EOF Project Engineer	Х	Х			Н		L		X			<u></u>					<u> </u>					<u> </u>	Ь		
	EOF Mech. Engineer	<u> </u>	X			H		<u> </u>	<u> </u>				<u> </u>				X			<u> </u>			<u> </u>	ļ		$\boldsymbol{\longmapsto}$
	EOF Nuclear Engineer	X	X			H	╙	<u> </u>		X		<u> </u>	ļ		ļ.,	<u> </u>	X						<u> </u>		<u> </u>	\vdash
	EOF Nuc Fuels Eng.	X	X	ļ		H	┞	<u> </u>		ļ	<u> </u>	├—		_X_	X	 -	X		 						Х	$\boldsymbol{ol}}}}}}}}}}}}}}}}}$
236	EOF Civil Engineer	<u> </u>	<u> </u>	1		H	<u> </u>	L					<u> </u>	L		<u> </u>	<u> </u>	<u> </u>	<u> </u>			L	L	<u> </u>	L	لـــــا

X = Required

C = Respirator Only

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Autodialer JPM

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	OSDC	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
	EOF I&C Engineer	X	X			Н											X									
238	EOF Electrical Engineer	Х	Х			Н											X									
	EOF HP Manager	Х	X			Ξ					X	L							X	X						Х
245	EOF Dos Assessor/FMT	X	Х			H					X		<u> </u>						<u> </u>	X						X
246	EOF HP Tech Support	X	X			I			<u> </u>		X		<u> </u>						X	X						ш
247	EOF Rad Stat Bds Keeper	X	X	<u> </u>	<u> </u>	Ŧ			L				<u> </u>			<u> </u>					L					igwdown
	EOF Nuc. Lic. Mgr.	X	X			Н		<u> </u>	X							L	<u> </u>									
	EOF Communicator	X	X		└	Н			<u> </u>				<u> </u>	<u> </u>			 					<u> </u>				igspace
260	Emerg. Security Mgr.	<u> X</u>	<u> </u>	<u> </u>	<u></u>	H	<u> </u>		<u> </u>	<u> </u>	<u></u>	<u> </u>	L	<u> </u>	<u> </u>	<u> </u>	<u> </u>				Ь			l	L	ш

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= If qualified to hold shift position, Then position meets ERO qualification criteria

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ERO#	POSITION	Emergency Plan Overview	EOF Responder	TSC Responder	OSC/Re-entry Team	RCA Access	SCBA	Emergency Classification	Emergency Notifications	ERO Activation	PARs	Accident Assess./Corrective Actions	Tech. Spec. Review	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	Ventilation Systems	osoc	Accident Chemistry Considerations	Fire Brigade	Evacuation & Accountability	Recovery Mgr. Training	SAMG	Drill Participation
270	EOF Emerg Info Mgr.	E	Е			H				E																
271	NDDO	E	E			H			E	E	Ε															
273	EIM/ENC Tech Advisor	X	Х			Τ					L															
280	EOF Admin Supervisor	X	X			Ξ																				
281	EOF Admin Staff	X	Х			Ξ																				
291	Governor's Advisor																									
294	St. Lucie Co Tech Adv	X	Х			Н																				
295	Martin Co Tech Adv	X	Х			Ξ					<u> </u>															
300	Emer Control Officer	E	Е			Н			E	E	E								L		<u> </u>					

X = Required

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- Autodialer JPM
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Simulator practice session with E-Plan events
 If qualified to hold shift position, Then position meets ERO qualification criteria

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H = FFD Pool

D = Included in Emerg. Rad. Monitoring

END OF ATTACHMENT 2

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ATTACHMENT 3 ERO ANNUAL REQUALIFICATION MATRIX

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	osoc	Fire Brigade	Recovery Mgr. Training	SAMG
	Licensed EC	X		·	G	G²	Х	X	X	Х									
	STA	X			G					Х	X		-						\vdash
	NLO	X			G	G²									G²	 	G²		$\neg \neg$
	PS/Sec/First Aid Responder		<u> </u>												G				
101	Emergency Coordinator	X			G		Х	_X	Х	Х	Х								F
102	TSC Supervisor	X			G			X											
103	TSC HP Supervisor	X			G														
104	TSC Chem. Supervisor	Х			G				Х							X			
105	TSC Reactor Engineering	X			G						Х	Х							F
106	TSC Communicator	Х			G			X											

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C = Respirator Only
2 = If qualified to hold shift position, Then position meets ERO qualification criteria:

E = PSL/PTN Common Responder Version F = SAMG Requal Frequency IAW ADM-11.11

G = Training/Requal Frequency IAW other Plant Procedures

H = FFD Pool

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ATTACHMENT 3 ERO ANNUAL REQUALIFICATION MATRIX (Page 2 of 9)

ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	osoc	Fire Brigade	Recovery Mgr. Training	SAMG
107	TSC EM PST Rep.	X			G														F
108	TSC MM PST Rep.	X			G														F
110	TSC OPS Coordinator	X			G		Х		Х										ᄕ
111	TSC Dose Assessor				G											X			
112	TSC HP Communicator	X			G								X						
113	TSC SP Phonetalker	X		L	G			X											
114	TSC ERDADS Op.	X			G									X					
115	TSC PST Leader	X			G														щ
116	TSC ERDADS Tech	X	L	L	G									X					Щ

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G = Training/Requal Frequency !AW other Plant Procedures

H = FFD Pool

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operation	First Aid Tea	osoc	Fire Brigade	Recovery Mgr. Training	SAM
117	TSC I&C PST Rep.	X			G														F
118	TSC SRO PST Rep.	Х			G														F
119	TSC Security Supv.	Х			G														
120	TSC Coord, with OSC	X			G														
121	TSC Admin Staff	Х			G														
124	TSC EC Assist/Log.	Х		<u> </u>	G		Х	X	Х							L			
151	OSC HP Tech.	_	X	L	G	G							X	ļ					$ldsymbol{ldsymbol{ldsymbol{eta}}}$
152	OSC EM Re-Entry Supv.	 	_X_	L	G	G													$ldsymbol{ldsymbol{ldsymbol{eta}}}$
153	OSC I&C Re-Entry Supv.		X	L	G	G	L	<u></u>											

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ATTACHMENT 3 ERO ANNUAL REQUALIFICATION MATRIX

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	ospc	Fire Brigade	Recovery Mgr. Training	SAMG
154	OSC MM Re-Entry Supv.		X		G	G													
155	OSC Chem. Supv.		Х		G	G													
156	OSC Electrical Chief		X		G	G													<u> </u>
157	OSC Supervisor / Manager		X		G														igsquare
158	OSC Coord. with TSC		X		G					<u> </u>	L	<u> </u>		<u> </u>		ļ	L		igsquare
159	OSC HP Supv.		X		G						ļ		X	L	<u> </u>	L			
160	OSC Chemist	↓	X		G	G	L		<u> </u>	<u> </u>	<u> </u>	ļ				<u> </u>			igsquare
161	OSC Electrician		X		G	G		<u> </u>						ļ		<u> </u>	<u> </u>		ш
162	OSC Mechanic		X		G	G				<u> </u>	<u> </u>	l	L	<u> </u>					ш

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	osoc	Fire Brigade	Recovery Mgr. Training	SAMG
163	OSC I&C Spec.		Х		G	G													
165	OSC On-Shift Security (Spec.)		Х		G														
166	OSC Dosi, Tech.		Х		G														
168	OSC MM Foreman		X		G	G													
169	OSC NMM Staff Rep.		X		G														
	OSC Safety Rep.		×		G	ø													
171	OSC Admin Tech/Log.		X		G														
172	Assembly Area Supv.		X		G														

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	osoc	Fire Brigade	Recovery Mgr. Training	SAMG
173	OSC OPS Re-Entry Supv.		X		G	G													
174	OSC Prot and Control Rep		X		G														
175	OSC I&C Shop Supv.		Х		G	G													
176	Field Mon Team Driver		X		G	G/C													
177	OSC Info Services Rep.		Х		G														
200	Recovery Manager			X	H			X	X									X	
205	Govt. Affairs Mgr.			E															
209	EOF RM OPS Adv/Log.			X	Н		Ļ	Х	Х									X	
213	EOF ERDADS Op.			<u> </u>	Н	L .				<u> </u>	<u> </u>		L	<u> </u>					

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess / Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	osoc	Fire Brigade	Recovery Mgr. Training	SAMG
216	EOF Status Board Keeper			Х	Н														
230	EOF Emerg Technical Mgr			X	Н														
231	EOF Project Engineer			X	Н														
232	EOF Mech. Engineer			Х	H									Х	ļ				
233	EOF Nuclear Engineer			Х	<u> </u>						L	L		X		ļ	<u> </u>		<u> </u>
235	EOF Nuc Fuels Eng.	↓		X	H						Х	Х		Х			L		F
236	EOF Civil Engineer	<u> </u>	<u> </u>	X	H					<u> </u>					<u> </u>				\vdash
237	EOF I&C Engineer	↓		X	H				ļ		<u> </u>						<u> </u>		$\vdash \vdash \vdash$
238	EOF Electrical Engineer	<u></u>	<u> </u>	X	H	<u> </u>	L	L			<u> </u>		L	<u> </u>	<u> </u>	L	<u> </u>	<u> </u>	

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H = FFD Pool

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ATTACHMENT 3 ERO ANNUAL REQUALIFICATION MATRIX (Page 8 of 9)

ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess / Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	ospc	Fire Brigade	Recovery Mgr. Training	SAMG
240	EOF HP Manager			X	Н				X							Х			
245	EOF Dose Assessor/FMT			Х	Н				Χ							X			
246	EOF HP Tech Support			X	Н				X							X			
247	EOF Rad Stat Bds Keeper			Х	Н														
250	EOF Nuc. Lic. Mgr.			X	H			X											
255	EOF Communicator			X	Н			Х											
260	Emerg. Security Mgr.			X	H														
270	EOF Emerg Info Mgr.			E	Н						<u></u>								
271	NDDO			E	H	<u></u>	<u> </u>	E	<u> </u>							<u></u>			

X = Required
C = Respirator Only
² = <u>If</u> qualified to hold shift position, <u>Then</u> position meets ERO qualification criteria:

E = PSL/PTN Common Responder Version F = SAMG Requal Frequency IAW ADM-11.11 G = Training/Requal Frequency IAW other Plant Procedures H = FFD Pool

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ATTACHMENT 3 ERO ANNUAL REQUALIFICATION MATRIX

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ERO#	POSITION	TSC Annual Update	OSC Annual Update	EOF Annual Update	RCA Access	SCBA	Emergency Classification	Emergency Notifications	PARs	Accident Assess./Corrective Actions	Core Melt Scenario	Core Damage Assessment	Emergency Rad. Monitoring	ERDADS Operations	First Aid Team	osoc	Fire Brigade	Recovery Mgr. Training	SAMG
273	EIM/ENC Tech Advisor			Х	Н														
280	EOF Admin Supervisor			Х	Н														
281	EOF Admin Staff			Х	Η														
291	Governor's Advisor																		
294	St. Lucie Co Tech Advisor			Х	H	<u> </u>		L						L			<u> </u>		
295	Martin Co Tech Advisor	<u> </u>		X	Н.	L		L						<u> </u>					
300	Emergency Control Officer	<u> </u>		E	Н		L	<u> </u>	E_						<u> </u>				

X = Required

C = Respirator Only
² = <u>If</u> qualified to hold shift position, <u>Then</u> position meets ERO qualification criteria:

E = PSL/PTN Common Responder Version
F = SAMG Requal Frequency IAW ADM-11.11
G = Training/Requal Frequency IAW other Plant Procedures

H = FFD Pool



ST. LUCIE PLANT

EMERGENCY PLAN IMPLEMENTING PROCEDURE

SAFETY RELATED

Procedure No.

EPIP-13

Current Revision No.

7A

Effective Date 07/14/03

Title:

MAINTAINING EMERGENCY PREPAREDNESS EMERGENCY EXERCISES, DRILLS, TESTS

AND EVALUATIONS

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Responsible Department: **EMERGENCY PLANNING**

REVISION SUMMARY:

Revision 7A - Incorporated PCR 03-1890 to delete references to protection Services DUCTION (Margaret DiMarco, 06/06/03)

Revision 7 – Added step to forward critique items to TRNG MGR via PMAI, added steps to ensure drill exercise scope and duration adequate to meet each participating agency objectives and made editorial / administrative changes. (J. R. Walker, 06/28/02)

Revision 6 - THIS PROCEDURE HAS BEEN COMPLETELY REWRITTEN. Reformatted program maintenance checklists. Changed frequency of facility surveillances. Made administrative/editorial changes. (R. Walker, 09/27/01)

Revision 5 - Added quarterly test for ERDS link and reference to Generic Letter #GL 93-01. (J. R. Walker, 12/07/00)

AND

Deleted reference to PSL policy PSL-110, revised FRG review of EPIPs, changed the symbol of response to CR00-0544 from regulatory commitment to mgmt directive and added EPIP-08 to the list of EPIPs. (J. R. Walker, 10/13/00)

Revision 4 - Added staff augmentation program maintenance items and NRC performance indicator tracker. (D. Calabrese, 04/27/00)

	Revision	FRG Review Date	Approved By	Approval Date	S.	OPS
ı	0	12/15/97	J. Scarola	12/15/97	DATE	
			Plant General Manager		DOCT	PROCEDURE
	Revision	FRG Review Date	Approved By	Approval Date	DOCN	EPIP-13
1	7A	06/27/02	Dick Rose	06/28/02	SYS	
-			Plant General Manager		COM	COMPLETED
			N/A		ITM	7A
			Designated Approver			
1			D. Calabrese	06/06/03		
			Designated Approver (Minor Correction)			

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1.0 PURPOSE

- **1.1** This procedure provides instructions for:
 - 1. Periodic exercises and drills conducted in order to test the state of emergency preparedness by FPL personnel, support organizations and off-site governmental agencies.
 - 2. Periodic tests and reviews of components of the Emergency Planning Program (e.g. facilities, equipment, Emergency Plan and Emergency Plan Implementing Procedures, etc.) conducted to ensure availability, operability and reliability.

2.0 REFERENCES / RECORDS REQUIRED / COMMITMENT DOCUMENTS

NOTE

One or more of the following symbols may be used in this procedure:

- § Indicates a Regulatory commitment made by Technical Specifications, Condition of License, Audit, LER, Bulletin, Operating Experience, License Renewal, etc. and shall NOT be revised without Facility Review Group review and Plant General Manager approval.
- ¶ Indicates a management directive, vendor recommendation, plant practice or other non-regulatory commitment that should NOT be revised without consultation with the plant staff.
- Ψ Indicates a step that requires a sign off on an attachment.

2.1 References

- §1 St. Lucie Plant Radiological Emergency Plan (E-Plan)
- ¶₁ QI 1-PR/PSL-1, Site Organization
- ¶₂ QI-1-PSL-15, Security Organization
- ¶₃ QI-5-PSL-1, Preparation, Revision, Review/Approval of Procedures
- ¶₄ QI-17-PSL-1, Quality Assurance Records
- NBS-NPS-EP-WP-001, Public Alert and Notification System Testing, Maintenance and Engineering
- ADM-25.02, NRC Performance Indicators

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2.2 Records Required

- The following records are maintained in accordance with QI-17-PSL-1, **Quality Assurance Records:**
- Data Sheet 1, Quarterly EP Maintenance Checklist
- Data Sheet 2, Emergency Plan 6 Year Element Demonstration
- Data Sheet 3, EPIP Biennial Review

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- Data Sheet 4, EP Annual Exercise Checklist
- Attachment 1, EP Program Maintenance Checklist

2.3 **Commitment Documents**

- 10 CFR 50, Domestic Licensing of Production and Utilization Facilities §2
- **§**5 Generic Letter #GL 93-01, Emergency Response Data System Test Program
- PMAI #96-02-237, Evaluation of Continuous Emergency Response ¶5
- NOV Response L-97-20, Violation II. A, Part 4.D. §3
- CR 00-0544, QA Audit (Ineffective Corrective Actions) QSL-EP-00-02 ¶6
- Quality Assurance Audit Report, QSL-EP-02-02, Improvement Item ¶7 (Forward Critique Reports to Site Training Manager)
- PMAI PM02-03-001 (Adequacy of Drill / Exercise Scope and Duration) ¶8

3.0 **RESPONSIBILITIES**

- 3.1 The Plant Services Manager is responsible for: \S_1
 - Planning, scheduling, and coordinating emergency exercises involving off-1. site agencies.
 - 2. Reviewing Attachment 1, EP Program Maintenance Checklist, upon completion.
 - 3. Reviewing results of exercises and major drills.

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- 3.2 §1 The Plant Services Manager, in conjunction with plant management, is responsible for ensuring that adequate resources are made available to support and conduct emergency preparedness activities including:
 - 1. Exercise and drill scenario development and control
 - 2. Exercise and drill participation
 - 3. Support for maintenance of emergency facilities and equipment
- 3.3 §₁ The Facility Review Group (FRG) is responsible to review the following:
 - 1. Revisions to the St. Lucie Plant Radiological Emergency Plan.
 - 2. Revisions to Emergency Plan Implementing Procedures (EPIPs) other than minor changes.
 - 3. Biennial Exercise Critique Report.
- 3.4 The Emergency Preparedness (EP) Supervisor is responsible for:
 - 1. Maintaining awareness of EP activities.
 - 2. Ensuring coordination of EP drills and exercises in accordance with this procedure.
 - 3. Ensuring documentation of EP program maintenance in Attachment 1, EP Maintenance Checklist.
 - 4. Ensuring documentation of major element demonstration as indicated on Data Sheet 2, Emergency Plan 6 Year Element Demonstration.
 - 5. Ensuring critiques of exercises, drills, and actual events are conducted, documented, and that deficiencies are addressed in accordance with plant corrective action practices.
 - A. ¶₇ Drill and exercise critiques should be forwarded, via PMAI, for review by the Site Training Manager for needed changes to training courses or materials.
 - B. Drill and exercise critiques should be forwarded to the applicable Emergency Response Facility (ERF) managers and / or supervisors for possible correction to open performance discrepancies, if deemed appropriate by the EP Supervisor.

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- 3.4 The Emergency Preparedness (EP) Supervisor is responsible for: (continued)
 - **6.** Ensuring that EPIPs are reviewed through feedback from the following sources:
 - A. Daily use
 - B. Drills and exercises
 - C. Actual events
 - **D.** Training
 - E. Biennial EPIP review as indicated on Data Sheet 3, EPIP Biennial Review
 - 7. Ensuring biennial review of the Recovery Plan.
- 4.0 DEFINITIONS
- **4.1 Annual** Annual is defined as once per calendar year (January 1 through December 31).
- **4.2** Biennial Biennial is defined as once per two calendar years.
- 4.3 Drill
 - Communications Tests and Drills Communications tests involve the use of emergency communications equipment to verify operability. Communications drills involve use of emergency communications equipment to notify and transfer simulated emergency information to off-site governmental agencies.
 - 2. Health Physics Drills Health Physics drills test various tasks employed by that department during an emergency condition. Health Physics drills are conducted semi-annually and one of the semi-annual drills may be incorporated into the radiological monitoring drill.
 - 3. Medical Emergency Drill A medical emergency drill involves a simulated contaminated individual, with provisions for activation of the plant First Aid/Personnel Decontamination Team. Participation by local support services (i.e., ambulance and off-site medical treatment facility) is tested separately once per year or as part of the annual medical drill. Medical Emergency Drills are conducted at least once every calendar year.

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4.3 Drill (continued)

- 4. Radiological Monitoring Drill Radiological monitoring drills include collection and analysis of air samples, testing of communications, and understanding of messages between Health Physics supervision and the off-site monitoring teams. A radiological monitoring drill will be conducted at least once every calendar year.
- 5. Emergency Response Facility (ERF) Drill An ERF Drill demonstrates various emergency response capabilities including management and coordination of emergency response, accident assessment, protective action decision-making, and plant system repair and corrective action involving all or certain Emergency Response Facilities [Control Room, Technical Support Center (TSC), Operational Support Center (OSC), Emergency Operations Facility (EOF), and/or Emergency News Center (ENC)]. These drills are conducted at least four (4) times per calendar year and should be conducted approximately once each calendar quarter. One of these drills is designed to satisfy the requirements of an exercise as defined below.

Non-exercise drills provide an opportunity to consider accident management strategies. Supervised instruction can be permitted for these drills, with operating staff having the opportunity to resolve problems (success paths) rather than have controllers intervene. Additionally, non-exercise drills may focus on on-site training objectives.

- 4.4 Exercise An exercise is an event that tests the integrated capability of a major portion of the basic elements existing within the St. Lucie Plant Radiological Emergency Plan. An exercise is required biennially per 10 CFR 50. Off-site agency participation is required biennially. Exercises are developed, scheduled, and conducted in a manner consistent with the regulations and guidance of 10 CFR 50 Appendix E, NUREG 0654, and other appropriate regulatory documents. Biennial exercises involving off-site agencies shall be conducted as a Site Area Emergency and should escalate to General Emergency. The exercise scenarios are varied such that all major elements of the Plan are tested at least every six (6) years.
- 4.5 Letter of Agreement (LOA) Support or assistance from outside agencies is established and maintained through Letters of Agreement or, in some instances, purchase orders/contracts.

Letters of Agreement are confirmed annually through correspondence, direct contact, or by telephone. Each agreement is renewed at least every three (3) years. Purchase orders/contracts are renewed as required.

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- **4.6 Monthly** Monthly is defined as at least once each calendar month, being the first day of each month until the last unless otherwise specified.
- 4.7 Quarterly Quarterly is defined as once per calendar quarter, with the quarters being January through March, April through June, July through September and October through December.
- **4.8 Semi-annual** Semi-annual is defined as twice per calendar year, with one time from January 1 to June 30 and one from July 1 to December 31.

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5.0 INSTRUCTIONS

- **5.1** Plant Services Manager Instructions
 - 1. REVIEW completed documentation of Attachment 1, EP Program Maintenance Schedule, on an annual basis.
 - 2. ENSURE that State and County Emergency Management officials are made aware of non-emergency events that have a potential for media interest.
 - A. INFORM Emergency Preparedness (EP) of event
 - B. VERIFY that EP has informed appropriate Emergency Management officials.
 - 3. §1 ENSURE that State and County Emergency Management officials are made aware of the following on an annual basis:
 - A. Significant changes to the Emergency Plan/EPIPs.
 - B. Emergency Action Levels (EALs)
 - **4.** MAINTAIN awareness of the status of the Alert and Notification System (ANS) operability.
 - A. ENSURE that degradations of the ANS are promptly addressed.
 - 1. The Manager, Nuclear Plant Support Services is responsible to maintain operability of the ANS per NBS-NPS-EP-WP-001, Alert and Notification System Testing, Maintenance and Engineering.
 - **5.** §₁ ENSURE the following is performed in support of exercises:
 - A. SCHEDULE a date for the exercise in coordination with the primary State and County emergency response agencies.
 - B. PROVIDE the opportunity for State and County response agencies to participate in an exercise.
 - C. \P_8 ENSURE that annual exercise scenarios address the objectives of each participating agency.

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- 5.1 Plant Services Manager Instructions (continued)
 - 5. (continued)
 - D. COORDINATE FPL efforts with other participating personnel, organizations, and agencies.
 - 1. If the Federal Emergency Management Agency (FEMA) is evaluating State and County emergency response, Then ENSURE that the exercise scenario is developed within the timeframes specified by the regulations, as defined in Data Sheet 4, EP Annual Exercise Checklist.
 - E. DISCUSS <u>and</u> EVALUATE annual exercise performance with plant management, FPL controller/evaluators and principal participants.

END OF SECTION 5.1

5.2 Emergency Preparedness Supervisor

- 1. At the beginning of each calendar year:
 - A. REVIEW the items on Attachment 1, EP Program Maintenance Checklist <u>and</u> ESTABLISH a working schedule.
- 2. MAINTAIN awareness of status of completion of Attachment 1, EP Program Maintenance Checklist.
 - A. Response actions performed as part of actual plant emergencies may be CREDITED as completing one or more of the following drills or tests:
 - integrated facility activation drill
 - call out phone test/drill
 - HP drill
 - off-site agency communications
 - medical drill
 - B. Activities incorporated within a multiple scope drill or exercise may be CREDITED as completing a drill or test, for example:
 - HP drill, medical drill, off-site communications, etc.
 - **C.** \P_6 Off Hours Augmentation including:
 - weekly tests of automated recall system
 - quarterly off-hours phone test (at least one per year should be manual)
 - monthly review of Emergency Response Directory
 - quarterly verification of Emergency Response Directory data
 - quarterly verification of Emergency Response Directory distribution list
 - quarterly publication and distribution of Emergency Response Directory

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- **5.2** Emergency Preparedness Supervisor (continued)
 - 2. (continued)
 - D. NRC Performance Indicators
 - PREPARE and SUBMIT in accordance with ADM-25.02
 - 3. ENSURE completion of the items on Data Sheet 1, Quarterly EP Maintenance Checklist.
 - 4. ENSURE the completion of the items on Data Sheet 2, Emergency Plan 6 Year Element Demonstration.
 - **5.** ENSURE the completion of the items on Data Sheet 3, EPIP Biennial Review.
 - **6.** ENSURE the completion of the items on Data Sheet 4, EP Annual Exercise Checklist.
 - **7.** REVIEW annual drill and exercise program with state and county representatives.
 - 8. ¶8 ENSURE the scope and duration of annual exercise is adequate to meet objectives of each participating off-site agency.

END OF SECTION 5.2

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ATTACHMENT 1 EP PROGRAM MAINTENANCE CHECKLIST (Page 1 of 3)

			(YEAR)
<u>Sem</u>	i-Ann	ual/Annual/Biennial EP Maintenance Items:	INITIAL / DATE
§ 1	1.	HP Drill (Semi-Annual)	
		A. (Jan-Jun) Date//	
		B. (Jul-Dec) Date/	
§1	2.	Radiological Monitoring Drill (Annual)	
		A. Date/	
§1,2	3.	Biennial Exercise (Include Data Sheet 4, EP Exercise C	hecklist)
		A. Date/	
:		B. FEMA Evaluated (Even Years Only) Yes / No	/
§1	4.	Annual Offsite Agencies Communications Drill	
		A. Date//	/
§1	5.	Annual Unannounced Communications Drill	
		A. Date//	
§1	6.	Annual Medical Drill	
		A. Date/	1

S_OPS			
DATE_			
DOCT_	CHECKLIST		
DOCN	EPIP-13		
SYS			
COMP	COMPLETED		
ITM	REV		

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ATTACHMENT 1 EP PROGRAM MAINTENANCE CHECKLIST (Page 2 of 3)

(YEAR)____ Semi-Annual/Annual/Biennial EP Maintenance Items (continued): **INITIAL / DATE** 7. **Emergency Plan Review:** \S_1 A. Emergency Plan Review (Annual) B. Letters of Agreement Certification (Annual Confirmation/Triennial Renewal) C. EPIP Review (Even years only) (Include Data Sheet 3, EPIP Biennial Review) Media Day (Annual) 8. 9. **Public Information Brochure (Annual)** 10. Review and update Six Year Plan (Annual) §1 (Include Data Sheet 2, Emergency Plan 6 Year Element Demonstration) 11. Significant Emergency Plan/EPIP Changes, Emergency \S_1 Action Levels (EALs) Meeting with State/County **Emergency Management (Annual)** 12. Hospital Training (Annual) \S_1 §1 13. Off-site Training (Annual) 14. Recovery Plan Review (Biennial)

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ATTACHMENT 1 EP PROGRAM MAINTENANCE CHECKLIST (Page 3 of 3)

			(YEAR)
Semi-An	nual/	Annual/Biennial EP Maintenance Items (continued):	INITIAL / DATE
15.	. An	nual training review of ERO	
	A.	Solicit verification of annual ERO training completion from the Training Department.	/
	В.	Review training completion feedback and remove any ERO members not qualified.	/
		Maintenance Items (complete Data Sheet 1 Maintenance Checklist for each of the following):	
1.	Qu	arter 1	/
2.	Qu	arter 2	/
3.	Qu	arter 3	/
4.	Qu	arter 4	/
	Со	mpleted by Emergency Preparedness Supervisor	
	Re	viewed by Plant Services Manager	

END OF ATTACHMENT 1

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DATA SHEET 1 QUARTERLY EP MAINTENANCE CHECKLIST (Page 1 of 2)

		(- 3	
		QUARTER	(YEAR)
			INITIAL / DATE
1.	Eme	rgency Response Facility Surveillance:	
		<u>Date</u>	
	A.	TSC	
		§ ₁ 1. Monthly Communications Survey	
		Dates:	
	B.	osc	
	C.	EOF	
2.	¶6 O	ff-Hours Augmentation Methodologies:	
	A.	Weekly test of automated emergency recall system (Autodialer).	/
		Dates:	
	В.	Monthly review of Emergency Response Directory.	/
		Dates:	
	C.	Quarterly verification of Emergency Response Directory Data.	/
	D.	Quarterly verification of Distribution List for Emergency Response Directory.	/
	E.	Quarterly publication of Emergency Response Directory.	/
3.	Qua	rterly Integrated Facility Activation Drill	
		Drill Date	

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DATA SHEET 1 QUARTERLY EP MAINTENANCE CHECKLIST (Page 2 of 2)

		QUARTER	(YEAR)
4.	Qua	arterly Off-Hours Call-Out Phone Test	INITIAL / DATE
ŀ		Drill Date	/
5.	Qua	arterly Self-Assessment	
6.	Qua	arterly submittal of EP Performance Indicators	/
	A.	Participation	
	B.	Drill & Exercise Performance	
	C.	Alert & Notification System	
7.	§ 5	Quarterly test of the NRC Emergency Response Data System (ERDS) link.	
NO.	TES:		

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DATA SHEET 2 EMERGENCY PLAN 6 YEAR ELEMENT DEMONSTRATION (Page 1 of 1)

YEAR	

Element	Year Last Performed	Year Next Scheduled	Date Completed/ Initial
Off hours staffing (6 P.M 4 A.M.)			
Activation of Emergency News Center			
Use of fire control teams			
Use of medical support personnel			
Use of Security personnel for prompt access to emergency equipment or support			
Use of one or more portions of backup communications for notification			
Field monitoring			
Capability for determining the magnitude and impact of the particular components of a release			
Capability for post-accident coolant sampling and analysis			
Assembly and accountability			
Initial recovery planning activities			

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DATA SHEET 3 EPIP BIENNIAL REVIEW (Page 1 of 2)

VEAD'	\
(YEAR)]

I. Emergency Plan Implementing Procedures (Biennial)

		Revision No.	Date Reviewed	PCR Y/N
EPIP-00	Discovery and Identification of an Emergency Condition (including Chemical, Fire and Natural Emergencies)			
EPIP-01	Classification of Emergencies			
EPIP-02	Duties and Responsibilities of the Emergency Coordinator			
EPIP-03	Emergency Response Organization Notification/Staff Augmentation			
EPIP-04	Activation and Operation of the Technical Support Center			
EPIP-05	Activation and Operation of the Operational Support Center			
EPIP-06	Activation and Operation of the Emergency Operations Facility			
EPIP-07	Conduct of Evacuations/Assembly			
EPIP-08	Off-site Notifications and Protective Action Recommendations			
EPIP-09	Offsite Dose Calculations			
EPIP-10	Off-Site Radiological Monitoring			
EPIP-11	Core Damage Assessment			
EPIP-12	Maintaining Emergency Preparedness - Radiological Emergency Plan Training			
EPIP-13	Maintaining Emergency Preparedness - Emergency Exercises, Drills, Tests and Evaluations			
HP-90	Emergency Equipment			
HP-200	HP Emergency Organization			
HP-201	Emergency Personnel Exposure Control			

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(YEAR)

I. Emergency Plan Implementing Procedures (Biennial) (continued)

		Revision No.	Date Reviewed	PCR Y/N
HP-202	Environmental Monitoring During Emergencies			
HP-203	Personnel Access Control During Emergencies			
HP-204	In Plant Radiation and Contamination Surveys during Emergencies			
HP-205	Emergency Inplant Air Sampling			
HP-206	Analysis of Emergency Inplant Air Samples			
HP-207	Monitoring Evacuated Personnel During Emergencies			
HP-208	Personnel Decontamination During Emergencies			
COP-06.06	Guidelines for Collecting Post Accident Samples			
COP-06.11	Establishing Remote Laboratory for Analysis of Accident Samples			

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REVISION NO.:	PROCEDURE TITLE:	PAGE:
7A	MAINTAINING EMERGENCY PREPAREDNESS -	
PROCEDURE NO.:	EMERGENCY EXERCISES, DRILLS,	21 of 21
EPIP-13	TESTS AND EVALUATIONS	
	ST. LUCIE PLANT	

DATA SHEET 4 EP EXERCISE CHECKLIST (Page 1 of 1)

		Y	EAR		
Exercise Items:			INITIAL / DATE		
	1.	Exercise Date Selection:			
		A. Evaluated Date//	/		
	2.	ERO Participant Notification	/		
	3.	Scenario Development Personnel Assigned	/		
	4.	Controllers/Evaluators Assigned	/		
	5.	Exercise Objectives			
		A. Plant Services Manager Approval	/		
		B. Submitted to Licensing (75 Day NRC Submittal, Even years only)	/		
	6.	Exercise Scenario			
		A. Provided to Florida DEM (60 Day FEMA Submittal, Even years only)	/		
		B. Submitted to Licensing (45 Day NRC Submittal, Even years only)	/		
	7.	Post Exercise Critique Date://	/		
§1	8.	Facility Review Group (FRG) Critique Report Review	/		