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CALLAWAY PLANT
EMERGENCY PLAN IMPLEMENTING PROCEDURE
EIP-ZZ-A0001
EMERGENCY RESPONSE ORGANIZATION

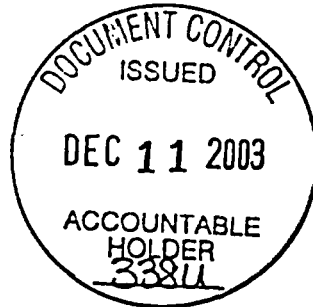
RESPONSIBLE DEPARTMENT Emergency Preparedness

PROCEDURE OWNER D.R. Lewis

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APPROVED BY Warren A. Witt



DATE ISSUED 12-11-03

This procedure contains the following:

Pages	<u>1</u>	through	<u>11-9</u> ^{JAB} ₁₂₋₁₁₋₀₃
Attachments	<u>1</u>	through	<u>1</u>
Tables	<u> </u>	through	<u> </u>
Figures	<u> </u>	through	<u> </u>
Appendices	<u>1</u>	through	<u>1</u>
Checkoff Lists	<u> </u>	through	<u> </u>

This procedure has checkoff list(s) maintained in the mainframe computer.

Conversion of commitments to TRS reference/hidden text completed by Revision Number:

Non-T/S Commitments 003

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EMERGENCY RESPONSE ORGANIZATION

1 PURPOSE AND SCOPE

- 1.1 This procedure defines the activities necessary to maintain the Emergency Response Organization (ERO). Additionally it identifies the expectations of Callaway Plant personnel to support the adequate staffing of the ERO.

2 DEFINITIONS

- 2.1 **Emergency Response Organization (ERO) Position Owner** – Department Head or individual selected by the Dept Head to be responsible for identifying individuals to be trained, qualified and staff the (ERO) positions for which the department is responsible.
- 2.2 **Emergency Response Personnel** – Personnel designated, trained, qualified, and assigned to fill specific Emergency Response Organization (ERO) positions. They staff the Emergency Response Facilities to make them capable of fulfilling all intended emergency functions. Emergency Response Personnel may be duty responders, non-duty responders or as needed responders.
- 2.3 **“As Needed” Personnel** – Some Emergency Response Personnel are identified as “as needed” on Table 5 of the Radiological Emergency Response Plan (RERP). “As Needed” responders are notified to respond by manual callout as requested by their respective coordinator or supervisor.
- 2.4 **Duty Responders** – Emergency Response Personnel are assigned for rotating on-call coverage. They are scheduled for duty around the clock to ensure adequate response during off normal working hours. When on duty, they remain fit for duty, maintain their pager within hearing distance, and remain within the identified response time goal from their Emergency Response Facility.
- In the event of an actual emergency, Duty Responders that are not on duty, but fit for duty and able to respond are also required to respond as Non Duty Responders.
- 2.5 **Non-Duty Responders** – Emergency Response Personnel that are not on a duty schedule but are expected to respond at all times to emergency or drill pages, if fit-for-duty, and within the response goal times. These are also referred to as “pool” positions.

- 2.6 **Rapid Responders** – Pre-designated Duty Responders assigned to positions to relieve the On-shift personnel of emergency functions not directly related to operation of the Plant.
- 2.7 **Emergency Response Organization** - An organization that has been established to provide managerial, technical and logistical support in the event of a radiological emergency declaration at the Callaway Plant. This organization is structured to provide control and coordination of on-site response, coordination of off-site response and dissemination of information to the public.
- 2.8 **Emergency Response Organization Staffing Levels** – The desired or optimum staffing level for the Emergency Response Organization is to maintain six (6) individuals qualified in each emergency response position identified in the RERP, chapter 5. The minimum acceptable staffing level is three (3) qualified individuals per position.
- 2.9 **Mobilization** – The process of staffing the Emergency Response Facilities with the Emergency Response Organization. This process is initiated by announcements over Plant Gai-tronics System and activation of the Callaway Plant Emergency Callout System.

3 **RESPONSIBILITIES**

- 3.1 **Emergency Preparedness (EP) Dept.** – Emergency Preparedness is responsible for:
- 3.1.1 Assisting the Department Heads or ERO Position Owners in maintaining the optimum staffing level of the ERO. This will include as a minimum, a periodic review in the last quarter of each year.
- 3.1.2 Coordinating with Operations, Training, and the Training Simulator Group at the end of each calendar year, to develop the drill schedule for the upcoming year and publish it. (Some drills are required to be unannounced.)
- 3.1.3 Developing, controlling and evaluating drills for the ERO. Other ERO members may assist in this function as requested by EP.
- 3.2 **ERO Position Owner** – This responsibility may be maintained by the Department Head of the department that “owns” the ERO position or may be delegated to a designee. The responsibility of ERO position owner is as follows:

- 3.2.1 Designate individuals to fill the respective ERO position(s) identified in Appendix 1. Staffing levels for the ERO positions are included in section 2.8 of this procedure. This includes filling any position vacancies due to transfers, rotations, retirements, training course failures, or terminations.
- 3.2.2 Ensure personnel in the respective ERO positions are aware of their ERO position designation and that they maintain their ERO qualifications.
- 3.2.3 Coordinate with Emergency Preparedness and identify who will be participating in drills and Exercises as participants and as controllers.
- 3.2.4 Inform Emergency Preparedness clerk when personnel have been designated to the ERO position and when personnel will be removed from the ERO position.
- 3.3 **ERO Team Owners** – These are the Emergency Coordinators (ECs) for the TSC responders or Recovery Managers (RMs) for the EOF and JPIC responders. They have responsibility for:
- The performance of their team.
 - Coordination with the ERO Position Owner to review any changes to responders assigned to their team.
- 3.4 **Superintendent Protective Services** – The Superintendent of Protective Services or his designee has the responsibility to:
- monitor the ERO staffing levels periodically,
 - have specific ERO codes assigned to the selected responders,
 - approve revisions to Appendix 1.
- 3.5 **Emergency Preparedness Clerk** – When directed, the EP Clerk or designee will assign the appropriate ERO code in the ERO and Personnel databases. The clerk or designee will initiate a CARS for completion of RERP CBT by the new responders. The clerk or designee will also arrange for the assignment of an ERO pager for the new responder upon being qualified.
- 3.6 **Emergency Response Organization (ERO) Members** – Members have the following specific responsibilities:
- 3.6.1 Maintaining qualifications and requalifications as per EIP-ZZ-A0066.

3.6.2 Being aware, that if declared pregnant, they should not respond to any declared emergency and that their ERO code will be inactivated. (CARS 200000370)

3.6.3 Being aware that if their TLD is taken due to medical procedures, they should not respond to any On-site Emergency Response Facility, including the EOF, until their TLD is returned.

JPIC ERO members, except for the Technical Representatives in the EOF, should still respond even if their TLD has been taken. (CARS 200105018)

3.6.4 Participating in required tests, drills, and exercises.

NOTE:

1. When notified by the Plant for an Emergency, instructions are given. Any Group Pages that do not display Emergency Response Organization instructions should be disregarded.

(CARS 199802824)

2. Pager messages are typically repeated. Responders do not need to call in for each duplicate message.

3.6.4.1 The minimum response for a TEST is a phone call to the emergency Audix. The pager message will identify the response required.

3.6.4.2 A DRILL or an EMERGENCY requires that the responder read the complete pager message and follow the instructions in the pager message.

NOTE:

If an ACTUAL Plant Emergency message is received, all ERO members that are fit for duty should respond.

3.6.5 Apply an ERO sticker to driver license and get a new sticker if license is renewed.

3.6.6 Duty Responders (when on duty):

3.6.6.1 Wear or maintain assigned pager within hearing range at all times.

3.6.6.2 Maintain the duty cellular phone (if assigned) available for use or maintain the ability to call the plant/audix at all times.

- 3.6.6.3 Remain "fit for duty" as specified in Callaway Plant Policies and Procedures.
- 3.6.6.4 Maintain ability to respond to their respective Emergency Response Facility within their response time goal, as specified in the RERP.
- 3.6.6.5 Respond to paging instructions safely and immediately.
- 3.6.6.6 Ensure duty exchange and turnover is verbal.
- 3.6.6.7 Notify Emergency Preparedness of previously arranged trades involving one day or greater so the duty schedule can be updated.
- 3.6.6.8 Rapid Responders responding to the EOF should be in possession of a key to the EOF to allow quick access.
- 3.6.6.9 Recovery Managers/Company Spokespersons, Technical Assessment Coordinators, Off-site Liaison Coordinators/EOF Communicators, and Dose Assessment Coordinators have Rapid Responder duty responsibilities as well as other Emergency Response Organization positions, and should respond to all emergency pages if fit for duty, even if not on duty.
 - 3.6.6.9.1 All Spokespersons that are not Recovery Managers report to the JPIC. All other Recovery Managers report to the EOF. The JPIC has a 2-hour activation commitment; this would allow time for a Recovery Manager to report to the JPIC from the EOF in the event a Spokesperson had not reported for duty.
- 3.6.7 Responsibilities of Non-Duty Responders (Pool Positions):

NOTE: Non-Duty Section Responders are considered emergency responders at all times. Exceptions are when the responder is not fit for duty, sick, on vacation, or out of the response area.
- 3.6.7.1 Non-Duty Section Responder (all Pool Positions) are expected to maintain assigned pager within hearing range at all times.
- 3.6.7.2 Follow the instruction displayed on the pager in an immediate and safe manner.

4 PROCEDURE

4.1 Emergency Response Organization (ERO)

Mobilized at the ALERT or higher emergency classification or when deemed necessary by the Shift Supervisor. The ERO augments the on-shift emergency organization and consists of the Rapid Responders and Designated Emergency Response Personnel.

<p><i>NOTE:</i> Working hours are defined in plant policy UEND-Working Hours-02 for management personnel and the applicable union contract for bargaining unit personnel.</p>
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- 4.1.1 Normal Hours. Assigned members of the ERO are expected to activate their respective Emergency Response Facility as soon as practical. The response goal for the TSC and EOF is 15 minutes from the time an ALERT declaration or decision to call out the ERO. The goal is to relieve the Control Room of peripheral duties within 30 minutes or less of declaration.
- 4.1.2 Off-Normal Hours. Assigned members of the ERO are expected to activate their respective Emergency Response Facility as soon as practical. The response goal for the TSC and EOF is 75 minutes from the time of an ALERT declaration or decision to call out the ERO. The goal is to relieve the Control Room of the peripheral duties within 90 minutes or less of the declaration during off-normal hours.
- 4.2 Maintaining the Emergency Response Organization
- 4.2.1 Adding ERO Designations and Deleting ERO Designations
- 4.2.1.1 To add a person to the ERO or to remove a person from the ERO, the ERO Position Owner MUST use Form CA-#2448, Attachment 1. EIP-ZZ-A0066 requires that the new responders for selected "key" positions participate in an evaluated drill with a mentor as part of their qualification.
- 4.2.2 ERO Staffing and Scheduling
- 4.2.2.1 Appendix 1 lists the ERO positions and the associated departments responsible for designating the personnel for the various positions.

- 4.2.2.2 The ERO Position Owners should be aware of the training qualification dates for the designated ERO personnel, the schedule of RERP training and retraining. The drill schedule is available on the EP Web Page.
- 4.2.2.3 RERP Retraining is scheduled annually and the ERO Position Owner should coordinate the needed ERO retraining and the training schedule to maintain the desired staffing levels for the position.
- 4.2.2.4 ERO Positions filled by Duty Responders will be assigned to a team by the ERO Position Owner and coordinated with the team leader.
- 4.2.2.5 ERO Positions filled by non-Duty Response personnel (Pool Positions) will be required to attend the annual retraining as scheduled and participate in drills as identified by the ERO Position Owner.
- 4.2.2.6 If an assigned ERO member is promoted, transfers between departments, or rotates to a position that does not fill an ERO position, the assigned ERO member is expected to maintain qualifications for the position until a replacement is designated and the ERO Position Owner and Team Leader agree to release the departing member and have the ERO code inactivated.

It is recommended that ERO Position Owners have an additional person or two designated for the Emergency Response Positions for which their departments are responsible. These designated personnel should be trained and prepared to be assigned to an ERO position with minimal or no preparation in the event of transfer, promotion, or departure of assigned ERO Personnel.

4.2.3 ERO Drill Participation

- 4.2.3.1 EP will update the schedule of drills on the EP web page when identified but no later than the start of each year.
- 4.2.3.2 The ERO Position Owner must ensure that the team members, Duty Responders, and non-Duty Responders (Pool Positions) are scheduled for the drills to provide adequate support for the ERO and the drill schedule.

Individual changes to the scheduled drill participation will be coordinated through the ERO Position Owner and Emergency Preparedness (EP).

4.2.4 Qualification Tracking

4.2.4.1 EP publishes and distributes the Emergency Telephone Directory per the Surveillance program. This is a listing of all qualified personnel assigned to specific ERO Positions at the time of the printing.

4.2.4.2 Training and EP can provide additional reports showing designated personnel and the status of their qualifications.

4.2.4.3 EP will review the staffing levels and contact the respective Department Heads or their designee if the number of qualified responders assigned to the specific ERO positions is below the optimum staffing level. This will ensure that Department Heads and ERO Position Owners are aware of position staffing levels.

5 REFERENCES

- 5.1 10CFR26, Fitness for Duty
- 5.2 10CFR50.47, Emergency Plans
- 5.3 10CFR50 Appendix E, Emergency Planning and Preparedness for
Production and Utilization
- 5.4 Callaway Plant Radiological Emergency Response Plan (RERP)
- 5.5 NRC Reg Guide 1.101, Emergency Planning and Preparedness for
Nuclear Power Reactors
- 5.6 NUREG 0654/FEMA-REP-01, Revision 1, November 1980
- 5.7 APA-ZZ-00902, Employee Personnel Changes, Termination,
and/or Access Withdrawal
- 5.8 EIP-ZZ-A0066, RERP Training Program
- 5.9 UEND-Working Hours-02

6 RECORDS

6.1 Q. A. Records

None

6.2 Commercial Records

6.2.1 Emergency Response Organization Maintenance Form, CA 2448
(File Number K250.0010)

6.2.2 Emergency Response Organization Qualification Report (File
Number K250.0030)

SUMMARY OF CHANGES

2.0 DEFINITIONS

1. 2.9 New software was purchased and the name changed from the Cellular Paging System to the current name, Callaway Plant Emergency Callout System. An additional system (CAN system) has been added for the off hours callout process. This is an administrative title change in the RERP and will be included in the next revision.

3.0 RESPONSIBILITIES

2. 3.2.1 Added the additional situation of "training course failures" to the conditions for filling vacancies since this situation had not been included.
3. 3.4 Deleted the third bullet that stated that training would be completed prior to assigning an ERO code and deleted the following NOTE.
4. 3.5 Added the sentence "The clerk or designee will initiate a CARS for the completion of the RERP CBT." This was not clear in the previous revision.
5. Added a second note following 3.6.4. That new note is "2. Pager duplicate message." Some responders have called in for duplicate pages which may tie up phone lines for other responders calling in.
6. Combined steps 3.6.4.2 and 3.6.4.3 such that it now reads, "3.6.4.2 A drill or an emergency requires that the responder read the complete pager message and follow the instruction in the pager message".
7. 3.6.6.2 was modified by adding "or maintain the ability to call the Plant/Audix at all times". Some duty responders carry their own phones and do not carry the "duty phone".
8. 3.6.6.4 added the NOTE about required duty response coverage if not on site and having the duty.
9. 3.6.7 Added the clarifier "(Pool Positions)" to the title Non-Duty Responders.

4.0 PROCEDURE

10. Added NOTE on working hours after 4.1. Note: Working hours are defined in Plant Policy UEND Working Hours-02. Refer to CARS 200308156 that addresses the coverage with the alternative work schedule. This was evaluated under the 10CRF50.54(q) requirement with no decrease in effectiveness determined.
11. 4.2.1.1 added "EIP-ZZ-A0066 requires that new responders for selected "key" positions participate in an evaluated drill with a mentor as part of their qualification" as a NOTE and included the key positions that require mentoring. Some ERO positions now require evaluated drill participation with a mentor or under instruction prior to being placed in the qualified responder group.
12. Changed 4.2.3.1 to reflect the updating of the drill schedules and identified the EP web page as the source for finding the schedules.
13. Changed 4.2.3.2 such that it clearly identified the Position Owner as being the individual to schedule both Duty and Non-duty responders for drills.
14. 4.2.4.3 clarified who will be contacted by EP if ERO staffing levels are below optimum levels.

5.0 REFERENCES

15. Added the reference UEND Working Hours – 02 and CARS 200308156.

Attachment 1

16. Complete reorganization of Attachment 1 and added a flow chart to help identify the designation and qualification process. Changed the sequence for designation of ERO personnel to accommodate the limitations of the training system database. Changed ERO pager issue to completion of qualification instead of time designation.

EMERGENCY RESPONSE ORGANIZATION
ERO POSITION MAINTENANCE FORM

Name of person to be added/removed from ERO

PIN Number

ERO Position

When Complete

ERO ADDITION/CHANGE

- To be completed by the ERO Position Owner

1. Does the individual have color vision impairment? Yes No

NOTE: If color vision impairment is identified by the individual, Fitness for Duty Nurses will evaluate to determine if the impairment would prevent the individual from performing Emergency Response Organization duties. (CARS 199700904)

2. ERO Responsibilities (Section 3.6) have been discussed with the new ERO member.
3. Team Leader accepts this person to fill the ERO position. (Emergency Coordinator for TSC positions and Recovery Manager for EOF positions.) Discussed with EC or RM.

_____ on _____
Name Date

4. Contact EP clerk to assign ERO code to the designated responder. The EP clerk will assign ERO code, initiate Action Notice CAR to new responder to complete the RERP CBT within 30 days, and add new responder to distribution list.
5. Initial Training/Retraining has been scheduled for the new ERO member and the new ERO member is aware of the scheduled training.
6. Drill observation or Facility Walk-Through scheduled with a qualified individual (Qualified ERO member, Training Department, or Emergency Preparedness). (CARS 199803843) (May be N/A if experience warrants). "Key" position needs mentored drill. (See EIP-ZZ-A0066).
7. ERO member qualified for the position in accordance with EIP-ZZ-A0066.
8. Submit CA#2448 to EP clerk for addition to web page and rotation assignment.

- To be completed by the Emergency Preparedness Clerk

1. Issue responder sticker for driver's license.
2. Pager Assigned. Number _____
3. ERO Listing updated on the EP Intranet Page and Personnel Database. (ERO code is "Active Status")

When Complete

ERO DELETION

- To be completed by the ERO Position Owner

1. Arrangements have been made to ensure duty section is staffed until a permanent replacement has been identified, trained, and qualified.
2. Replacement ERO member has been identified and a CA # 2448 has been initiated for replacement.
3. ERO member advised not to respond as an ERO member, unless reinstated.

- To be completed by the Emergency Preparedness Clerk

1. ERO Code removed from Personnel Database and ERO member name updated on the EP Web Site
2. Pager and/or cellular telephone returned to EP Clerk.

