10 CFR 50, Appendix E

Progress Energy

Serial: RNP-RA/04-0021

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United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23

TRANSMITTAL OF EMERGENCY PROCEDURE REVISIONS

Ladies and Gentlemen:

In accordance with 10 CFR 50.4(b)(5) and Appendix E to 10 CFR 50, Progress Energy Carolinas, Inc. (PEC), is transmitting revisions to H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2, Emergency Implementing Procedures. The procedure revisions and effective dates are listed in the attachment to this letter.

A description of the procedure changes are provided on the "Summary of Changes" page for the emergency procedures. Please replace the superseded procedures with the enclosed revisions.

If you have any questions concerning this matter, please contact me.

Sincerely,

C. A. Castell
for

C. T. Baucom
Supervisor – Licensing/Regulatory Programs

CAC/cac

Attachment

Enclosures

c: L. A. Reyes, NRC, Region II
NRC Resident Inspector, HBRSEP
C. P. Patel, NRC, NRR (w/o Attachment and Enclosures)

A045

Progress Energy Carolinas, Inc.
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville, SC 29550

Procedure Revisions and Effective Dates

Procedure	Revision No.	Effective Date
EPJIC-02, "Joint Information Center Director"	8	01/21/04
EPPRO-00, "Emergency Preparedness Program and Testing"	8	01/28/04
EPPRO-05, "Scenario Development and Drill Control Guidelines"	3	01/28/04
EPPRO-01, "Program and Responsibilities"	16	02/10/04

Progress Energy

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Reference
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

EPJIC-02

Joint Information Center Director

REVISION 8

SUMMARY OF CHANGES

PRR 00114761

STEP #	REVISION COMMENTS
Old Step 8.2.3.4	Deleted old step 8.2.3.4, "Verify with the EOF through the PIEC that the NRC Director of Site Operations, if staffed, has reviewed copies of the CP&L press releases. The PIEC shall obtain this review prior to transmission to the JIC." This is not a requirement. The news releases will be available to the EOF and the JIC. The NRC is located in both of these facilities.
Entire Procedure	Replaced CP&L with Progress Energy
Entire Procedure	Reformatted procedure

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SECTION PAGE

1.0 PURPOSE

This procedure describes the functional responsibilities and procedure steps for the Joint Information Center (JIC) Director **AFTER** the JIC is activated.

2.0 REFERENCES

2.1 N/A

3.0 RESPONSIBILITIES

3.1 The JIC Director will:

3.1.1 Prepare non-technical press releases for issuance.

3.1.2 Receive, coordinate, and ensure approval and issuance of press releases from the Emergency Operations Facility (EOF).

3.1.3 Assume duties of the Company Spokesperson, if required.

4.0 PREREQUISITES

4.1 As per EPJIC-00.

5.0 PRECAUTIONS AND LIMITATIONS

As per EPJIC-00.

6.0 SPECIAL TOOLS AND EQUIPMENT

As per EPJIC-00

7.0 ACCEPTANCE CRITERIA

As per EPJIC-00

8.0 INSTRUCTIONS

NOTE:	Non-technical press releases containing only information regarding JIC activation, media/public inquiry telephone numbers, or press conference times do not require the Emergency Response Manager (ERM) approval.

8.1 Prepare the initial non-technical press release announcing JIC activation, media/public inquiry telephone numbers for the JIC, and the time of the initial press conference,(if available).

8.1.1 Obtain approval from the Company Spokesperson.

8.1.2 Inform the Public Information Emergency Communicator (PIEC) in the EOF when press releases are issued.

8.2 Notify Distribution Control Center upon activation of the JIC.

8.2.1 Provide the number for rumor control per the ERO phone book such that future calls may be appropriately directed.

NOTE:	Technical press releases require approval by the Emergency Response Manager. Technical revisions to approved press releases require an additional approval by the ERM. Non-technical revisions do not require additional approval by the ERM.

8.2.2 Coordinate timely preparation of technical press releases with the EOF.

1. Following the activation of the JIC, press releases should be available for issue to the news media following:

   a. A change in emergency classification, or

   b. A radiological release as a result of the emergency, or

   c. Other significant events provided to the offsite agencies via an Emergency Notification Form.

2. Obtain press release numbers from the Public Information Emergency Communicator (PIEC) to prevent duplicate press release numbers.

NOTE:	Attachment 10.1, Press Release Flowchart, describes the process for coordination of press release initiation, approval, and distribution.

3. Ensure that press releases for review are maintained in the Draft Press Releases Public Folder.

   a. Hard copies for approval should be controlled by marking them "draft" either by word processing or pen and ink.

NOTE:	General information for sharing the press releases via computer is included in the Emergency Press Release Folder.

8.2.3 Coordinate timely JIC review of press releases with the Company Spokesperson.

1. Inform the PIEC of non-technical revisions.

2. Ensure that approved press releases are marked with an issuance time.

3. Place approved press releases in the Approved Press Releases Public Folder.

8.2.4 Coordinate the issuance of Progress Energy press releases with the distribution of press releases from offsite agencies who are present at the JIC.

8.2.5 Direct the Administrative Staff to issue press releases to the designated locations per EPJIC-05, Press Release Distribution Log.

1. Ensure the NRC Emergency Communicator is notified of the issuance of each press release so that he may complete the required NRC notifications.

8.2.6 Provide significant plant status changes as they occur discreetly to the Company Spokesperson during press conferences (e.g., via hand carried note).

8.2.7 Ensure Corporate Communications is up-to-date on plant status and continue updates throughout the emergency.

8.2.8 Ensure State/County and Federal agency public information officers are updated on the plant status. Agencies not currently located in the JIC should be notified via telephone until their arrival at the JIC.

1. Refer to the ERO Telephone Directory for telephone numbers.

2. Request Corporate Communications personnel assistance if needed.

8.2.9 Deactivate the JIC as directed.

1. Ensure equipment and supplies are returned to the appropriate storage locations, as applicable.

2. Ensure that Corporate Communications and State/County and Federal agencies (not located in the JIC) are notified of the deactivation.

8.2.10 Ensure all documentation generated during the emergency or drill/exercise is forwarded to the Emergency Preparedness Staff.

9.0 RECORDS

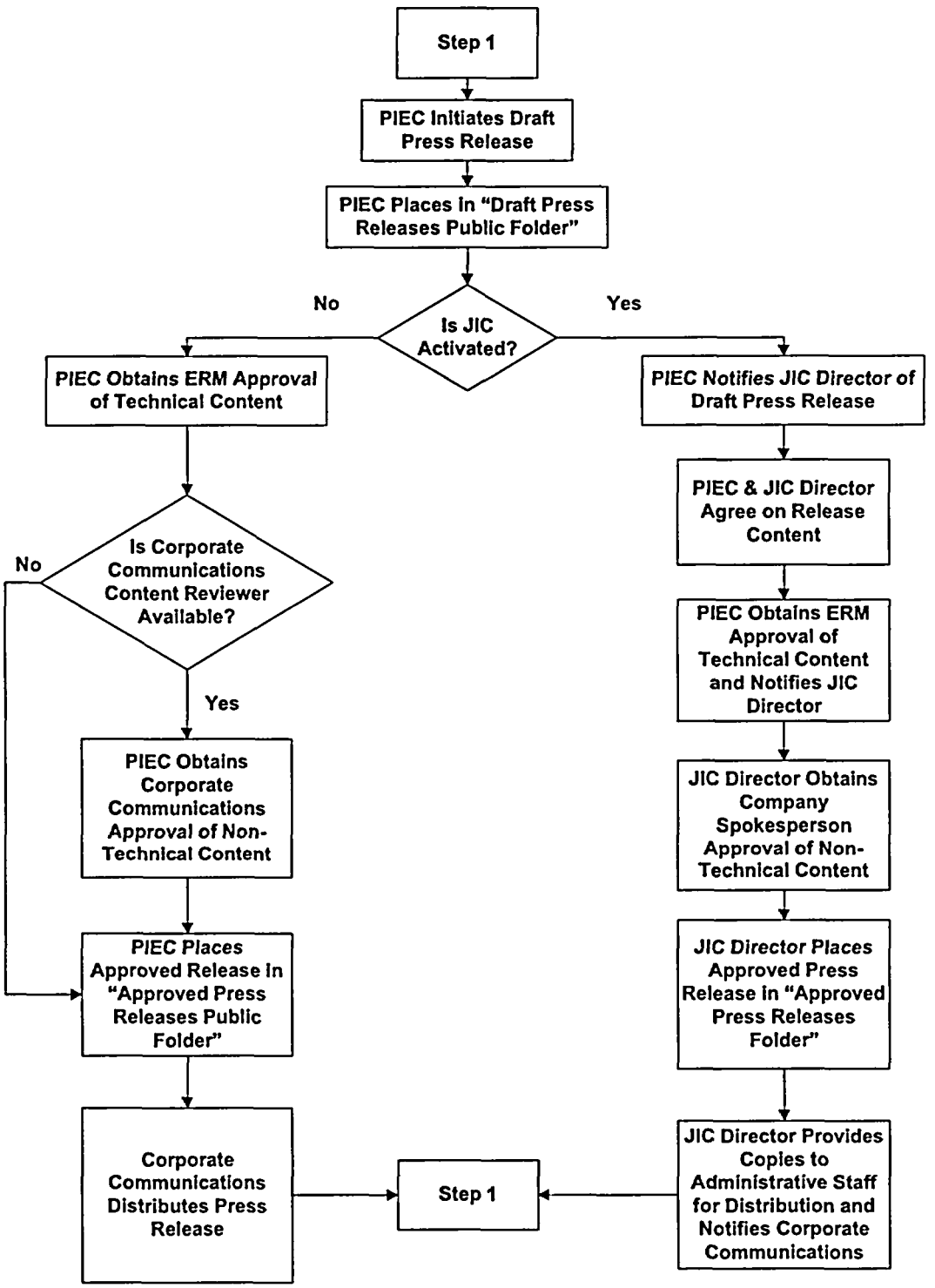
N/A

10.0 ATTACHMENTS

10.1 Press Release Flow Chart

10.2 Joint Information Center (JIC) Director Quick Start Guide

Attachment 10.1
Page 1 of 1
Press Release Flow Chart



Attachment 10.2
Page 1 of 1
Joint Information Center (JIC) Director Quick Start Guide

NOTE: Blanks are provided for place keeping √'s only, logs are the official record. This is a summary level guide and does not replace the procedure steps.

		Initials
1.	Sign in on the JIC Organization Board, sign-in log, and obtain position badge.	_____
2.	Initiate documentation of activities in the electronic log or in the logbook.	_____
3.	Contact the Public Information Emergency Communicator at 5002 to receive plant status briefing from the EOF.	_____
4.	Obtain copies of press releases that have been issued from the EOF.	_____
5.	Verify interface between JIC and Emergency Operations Facility (EOF) computers are working properly. If required, utilize back-up fax capability.	_____
6.	Log in to the Local Area Network (LAN) using your log in name AND password.	_____
7.	Delegate Administrative/Badging Staff responsibilities/tasks per EPJIC-05, if necessary, until the arrival of the Administrative/Badging Staff.	_____
8.	Coordinate JIC staffing requests and establish JIC relief shift plans with the Administrative & Logistics Manager in the EOF.	_____
9.	Assign available Administrative/Badging personnel to fill positions as needed.	_____
10.	Direct the Administrative Assistant to fill other JIC Emergency Response Organization (ERO) positions as necessary.	_____
11.	Establish interface with offsite agencies at the JIC.	_____
12.	Notify the Company Spokesperson as to readiness to activate.	_____
13.	Refer to procedure steps.	_____

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

EPPRO-00

EMERGENCY PREPAREDNESS PROGRAM AND TESTING

REVISION 8

SUMMARY OF CHANGES
PRR 114975

Section	REVISION COMMENTS
8.1.6	New
8.2	New as per NCR 73931 assignment 12.
Att 10.1	Clarified actions to be taken by EP in the event of a National Threat Level increase to "Orange" or "Red", changed manual beeper activations to "Metrocall activations" (section 7b), and added "Site PA System" (section 7b).

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SECTION PAGE

1.0 PURPOSE

To instruct personnel on the Emergency Preparedness Program and provide the method of qualification for the Emergency Response Organization (ERO).

2.0 REFERENCES

2.1 PLP-007, Robinson Emergency Plan

2.2 NUREG-0654/FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, January 1980

2.3 10 CFR 50, Licensing of Production and Utilization Facilities

2.4 H.B. Robinson response to NRC Inspection Report No. 50-261/97-13. Robinson File No 13510, Serial RNP-RA/98-0014, Dated Feb 12, 1998. (EPPRO-03)

2.5 NRC Regulatory Issue Summary 2002-12A, "Power Reactors NRC Threat Advisory and Protective Measures System"

2.6 PLP-122, Security Events

2.7 AP-007, Generic Procedure Writer's Instructions

3.0 RESPONSIBILITIES

3.1 Emergency Response Organization Member

3.1.1 Each member of the ERO is responsible for:

1. Attending or performing the initial and continuing training required for their position(s) held in the ERO (i.e., respirator qualification).

2. Developing and maintaining adequate skills and knowledge to perform duties for the assigned position(s) within the ERO.

3. Responding as directed in the event of a drill/exercise or a real emergency.
   a. Response to real emergencies is required as directed by pager, Dialogic, or plant PA, regardless of your "on-call" status.

4. Keeping Emergency Preparedness (EP) informed of any changes (i.e., change of home phone number, moving to new location, etc.) which will affect their ability to contact you for a response to an emergency/drill.

5. Becoming familiar with, and proficient in, the implementation of applicable procedures.

6. Responding to security events in accordance with PLP-122, Security Events.

7. After being contacted by the Dialogic system, ERO members are required to respond to computer requests and report to the applicable facility.

3.1.2 ERO members who are assigned a pager (beeper), individual or rotational, are also responsible for the following functions:

1. Compliance with Fitness for Duty regulations during the period the ERO member is "ON CALL". "On Call" is generally rotated by Team and the specific position and time period assigned is documented by the "ON CALL" Roster that is maintained by EP.

2. Arranging a relief for any period when the "ON CALL" position holder will not be able to respond to the applicable facility within the required time.

   a. When a relief is arranged, the requesting individual is responsible for ensuring that relief personnel obtain an ERO beeper for the period of relief.

   b. If the relief period is less than one week it is not necessary to notify Emergency Preparedness or the Control Room.

   c. If the relief period is for the entire week, then the requesting individual is responsible for notifying EP by noon on Wednesday before the on-call week begins.

3. During real emergencies, ERO personnel who carry a pager are required to call Dialogic upon arrival at their facility unless directed by beeper code to do so prior to departure for the facility.

   a. This practice may be modified for conduct of drills and exercises.

4. Maintaining the beeper in close proximity and turned on at all times regardless of "ON-CALL" status, and responding as directed.

5. When notified of a real emergency, ERO members on vacation or not fit for duty should call their position or supervisor and make themselves available for relief.

6. In the event that a beeper is lost by an on call person during non-working hours, the individual should:

   a. Obtain the spare beeper from Security **OR,**

   b. Arrange for a qualified individual, with a beeper, to be on call **OR,**

   c. Remain near your phone until a new beeper is obtained.

3.1.3 Individuals who are "ON-CALL" and **DO NOT** hold a beeper must:

1. Remain fit for duty during their "ON-CALL" period and stay within 60-75 minutes of their facility.

   a. Joint Information Center (JIC) personnel are required to report to the applicable facility within 2 hours following notification to activate.

   b. Personnel assigned to teams are considered "ON-CALL" the week their designated team has coverage.

3.2 Emergency Preparedness (EP) Staff

3.2.1 Ensuring an ERO is staffed and prepared to respond to and mitigate any postulated emergency at H. B. Robinson Steam Electric Plant, Unit No. 2.

3.2.2 Notifying the ERO of required actions for an increase in the Homeland Security Threat Level in accordance with Attachment 10.1.

3.2.3 Develop and maintain the Robinson Emergency Plan and all required implementing procedures.

3.2.4 Tracking ERO Qualifications by maintaining a computer database.

3.2.5 Maintaining a roster of all qualified ERO personnel.

1. Declared Pregnant Women will be placed on inactive status for the duration of their pregnancy or reassigned. (NCR #47657)

3.2.6 Planning, scheduling, and administration of drills and exercises (except fire drills).

3.2.7 Coordination of the public education and information program.

3.2.8 Assuring the annual dissemination of safety information in the possible plume exposure Emergency Planning Zone (EPZ).

(3.2 continued)

3.2.9 Ensuring EP lesson plans are current based on changes made to procedures.

3.2.10 Coordinating initial and continuing training needs.

3.2.11 Maintaining ERO Qualification Checklists.

3.2.12 Evaluate training feedback reports for improvements to the training program.

3.2.13 Perform a needs or job analysis as required.

3.3 Line Management

3.3.1 Coaching of personnel assigned an ERO position on proper performance of that position.

3.3.2 Selection of personnel to staff the ERO positions and obtain EP concurrence on the selection.

1. Alternately, selecting personnel to fill ERO positions at the request of EP.

2. Notifying personnel selected for the ERO of their selection and the expectations for completion of qualification and ERO participation.

3.3.3 Ensuring the personnel in their area of responsibility maintain a current Progress Energy identification/security badge.

3.3.4 Ensuring that personnel under their supervision are technically qualified for their ERO position.

3.3.5 Submitting request for additions or changes of personnel on the ERO.

3.3.6 Ensuring EP is notified of personnel changes that may affect their ability to respond to an emergency.

3.3.7 During a site or local Evacuation, management personnel are responsible for the following:

1. Ensuring that Contractors or offsite personnel reporting to them know where to assemble during the evacuation.

2. Ensuring that designees accounting for personnel during an evacuation are briefed on ensuring safe passage from one location to another.

3. Ensuring that personnel participate in the site wide (Owner Controlled Area) evacuation drills unless specifically exempted by EP Management for critical work.

3.4 EP Training Program Committee (TPC)

3.4.1 Identify ERO continuing training needs.

3.4.2 Review Drill/Exercise critiques and EP related operating experience feedback items to identify ERO training needs.

3.4.3 Evaluate the effectiveness of ERO initial and continuing training.

3.4.4 Review/establish ERO training schedules.

4.0 PREREQUISITES

N/A

5.0 PRECAUTIONS AND LIMITATIONS

N/A

6.0 SPECIAL TOOLS AND EQUIPMENT

N/A

7.0 ACCEPTANCE CRITERIA

N/A

8.0 INSTRUCTIONS

8.1 For additional programs and testing reference the following support procedures:

8.1.1 EPPRO-01, Program and Responsibilities

8.1.2 EPPRO-02, Maintenance and Testing

8.1.3 EPPRO-03, Training and Qualification

8.1.4 EPPRO-04, EP Performance Indicators

8.1.5 EPPRO-05, Scenario Development and Drill Control Guidelines

8.1.6 EPPRO-06, Operation and Maintenance of the Dialogic System

8.2 EP procedures should be written using the layout and formats described in AP-007, Generic Procedure Writer's Guide. Deviations to this should only be done with EP Supervisors approval and the deviations should be noted in the Precautions and Limitations section of procedure.

9.0 RECORDS

Memoranda to file that are generated as a result of this procedure should be submitted for retention in the plant vault.

10.0 ATTACHMENTS

10.1 EP Staff Response to Increased Security Threat Level Guidelines

EP Staff Response to Increased Security Threat Level Guideline (EXAMPLE)

This attachment is a guideline and may or may not require all actions listed to be performed and may require additional actions that are not listed. These actions may be altered as directed by the EP Supervisor or designee.

1. Upon notification that the Attorney General has increased the National Advisory Threat Level to **Orange**, Robinson EP should perform the following actions.
    a. **Verify** the TSC, EOF, and OSC are available and ready for use.
    b. **Contact** the Control Room to **verify** they are aware of the increase in threat level, let them know that the following communications will be made, **and review** the methods available for ERO notifications
    c. **Notify** ERO personnel with beepers of the change in threat level. The following may be used as the pager script (the Dialogic scenario 114 for National Terror Threat Level- Orange **OR** scenario 115 for Red may be used, accordingly):The National Terror Threat Level has been increased to *(insert designation)*. There is no known credible threat to the Robinson Plant at this time. ERO Members should be sensitive to the possibility of activation.
    d. **Distribute** a site-wide e-mail. The following text may be used:The National Terror Threat Level has been elevated to *(insert designation)*. Though there is no known credible threat to this site, we must be prepared at all times to quickly and efficiently respond to ERO callouts. Security events could cause us to activate our facilities with the same degree of urgency as the radiological scenarios that we commonly practice. All ERO members are reminded to have your company picture identification badges with you, when not at the site. The badges will be needed for rapid access to the site, facilities, and possibly through law enforcement traffic control points. If there is a security threat on plant site or your normal facility is inaccessible, then you may be directed to report to the Remote Facility on Railroad Avenue in Hartsville. JIC Staff Members will report to the Florence location under all conditions.

e. **Test** the Selective Signaling System to ensure contact can be made with Darlington, Chesterfield, and Lee Counties' EOCs, as well as the State of SC EOC **OR** all Warning Points. The following message may be used when conducting the test, "This is (your name) from the H.B.Robinson Plant. Because of the increased National Terror Threat Level, we are testing these phones. Currently, there is no known credible threat to the Robinson Plant and **no** response from you is expected or required at this time."

f. **Contact** the Control Room to let them know that the above items have been completed.

g. **Contact** the NRECs to verify they have their copy of the ERO Phone Book and make them aware of the increase in levels. The following message may be used:
As the National Terror Threat Level increases, so does the possibility of your position being needed to call members of the RNP ERO. Since you are qualified for the position of NREC, please ensure that you have a current copy of the ERO Phone Book. The correct revision is xx, dated xx/xx/xxxx. At this time, there is no known immediate threat to the Robinson Plant.

2. Upon notification that the Attorney General has increased the National Advisory Threat Level to **Red**, Robinson EP will perform the following actions.

   a. All actions taken for a level Orange will be repeated on a weekly basis.

   b. ERO Facilities may be activated.

   c. Provide the following information to the on-call personnel for ERO Key Positions:

      i. The National Terrorism Threat Level has been elevated to **Red**. Your ERO position has been identified as a Key Position and you are being placed on **stand-by** for response. Please,

         1. Remain within your response time to your respective facility.
         2. Keep your RNP security badge or Progress Energy security badge with you for quick response.
         3. Respond as directed by pager, Dialogic, or NREC instructions.
         4. Remain Fit For Duty.
         5. Complete Attachment 1, SEC-NGGC-2141 upon arrival at the site.

EP Staff Response to Increased Security Threat Level Guideline

(EXAMPLE)

3. **ERO Key Positions:**
    a. Emergency Preparedness Staff
    b. Control Room(CR)
    c. Site Emergency Coordinator (CR SEC)
    d. CR Emergency Communicator (CR EC)
    e. Technical Support Center (TSC)
    f. Site Emergency Coordinator (TSC SEC)
    g. Technical Analysis Director (TAD)
    h. Plant Operations Director (POD)
    i. NRC Emergency Communicator (NRC EC)
    j. Radiation Control Director (RCD)
    k. Emergency Security Team Leader (ESTL)
    l. Emergency Repair Director (RCD)
    m. Emergency Operations Facility (EOF)
    n. Emergency Response Manager (ERM)
    o. Administration and Logistics Manager (ALM)
    p. EOF Emergency Communicator (EOF EC)
    q. State/County Emergency Communicator (S/C EC)
    r. Dose Projection Team Leader (DPTL)
    s. Environmental Monitoring Team Leader (EMTL)
    t. Radiation Control Manager (RCM)
    u. Operations Support Center (OSC) Leader (OSCL)
    v. Joint Information Center (JIC) Company Spokesperson
    w. JIC Director

EP Staff Response to Increased Security Threat Level Guideline

(EXAMPLE)

4. If there is a region-specific (SC) credible threat, then the on-call **AND** one relief team will be identified for staffing the ERO Facilities. As a minimum, the following will be notified to activate:
    a. Emergency Preparedness Staff
    b. Emergency Response Manager
    c. EOF Emergency Communicator
    d. State/County Emergency Communicator
    e. Site Emergency Coordinator
    f. NRC Emergency Communicator
    g. Corporate/Site Communications
5. **IF**there is a specific credible threat to RNP, **THEN** the Remote Facility **AND** the Joint Information Center will be staffed **AND** activated as conditions dictate. The remainder of the ERO will continue on standby until needed to respond.
6. **IF** there is no known credible threat to the Robinson site, **THEN** the Emergency Response Organization needs to be prepared to respond as quickly as possible, as the scenario dictates.
7. The following may be used as guidelines:
    a. **Facilities activation**: The on-site facilities and the JIC, in Florence, will be activated in the event of a radiological emergency. If the threat is radiological and the normal facilities are uninhabitable or inaccessible, the ERO should be directed to report to the remote facility and determine actions to be taken and the JIC will activate as normal.
    b. **Methods for activation**: The ERO may be activated using any combinations of these: Dialogic activations, Metrocall activations, Site PA system, or NREC call-out.
8. A memo to file should be prepared indicating the above actions taken.

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

EPPRO-05

SCENARIO DEVELOPMENT AND DRILL CONTROL GUIDELINES

REVISION 3

SUMMARY OF CHANGES
PRR 98815

Step #	Revision Comment
Entire Procedure	Procedure revised to reflect AP-007 format.
Section 8 Instructions	Added section for development of the annual drill/exercise schedule.
Attachment 10.2 (previously Attachment 8.5.3.3)	Deleted attachment for simulator materials assembly phase and incorporated information into attachment for draft simulator scenario phase. Re-numbered subsequent attachments.
Attachment 10.5 (previously Attachment 8.5.3.6)	Added section for drill preparations six to nine months prior to scheduled drill. (NCR #105060) Updated the list of areas/facilities to be scheduled for drill activities. (NCR #105060) Revised ops turnover briefing to address the use of the Dialogic Drill Scenario codes.

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1.0 PURPOSE

1.1 This procedure provides instructions for scheduling, preparation, conduct, and evaluation of Emergency Preparedness drills and exercises.

NOTE: This procedure is an administrative guide for the development, conduct and assessment of drills and exercises. Specific circumstances or situations may dictate actions not specifically addressed in this procedure.

2.0 REFERENCES

2.1 PLP-007, Robinson Emergency Plan

2.2 NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants

2.3 10 CFR 50, Code of Federal Regulations

2.4 FEMA-REP-14, Radiological Emergency Preparedness Exercise Manual

2.5 FEMA-REP-15, Radiological Emergency Preparedness Exercise Evaluation Methodology

2.6 EPPRO-01, Program and Responsibilities

2.7 EPPRO-02, Maintenance and Testing

2.8 EPPRO-06, Operation and Maintenance of the Dialogic System

3.0 RESPONSIBILITIES

3.1 The Emergency Preparedness (EP) staff has the responsibility to oversee the development of Exercises, integrated drills, medical emergency drills, and shift augmentation drills, including scheduling, implementation, and evaluation. The EP staff also has the responsibility to establish the appropriate level of scenario confidentiality to be communicated to all developers, controllers, evaluators, and consultants.

3.2 Responsibilities for other groups are as outlined in the body of the procedure.

4.0 PREREQUISITES

None applicable

5.0 PRECAUTIONS AND LIMITATIONS

None applicable

6.0 SPECIAL TOOLS AND EQUIPMENT

None applicable

7.0 ACCEPTANCE CRITERIA

None applicable

8.0 INSTRUCTIONS

8.1 Drill and Exercise Schedule

8.1.1 An annual Drill and Exercise Schedule shall be developed in conjunction with Licensed Operator Continuing Training to the extent practical.

1. Small scale/specialty drills should be developed and scheduled based on ERO request, identified training needs, etc.
2. Obtain approval for the annual Drill and Exercise schedule from the Site Vice President/designee.
3. The schedule for the upcoming year should be published prior to the end of the current calendar year.

8.1.2 The Drill and Exercise Coordinator should coordinate assembly of the scenario development team, as needed, to accomplish the development schedule. A schedule for development of the scenarios for the upcoming year should be created annually, based on the scope and objective requirements. This schedule should take into account:

1. Scenario content and complexity needed to accomplish drill or exercise requirements and goals.
2. Availability of previously developed scenario materials.
3. Scheduled plant outage and maintenance activities.
4. Plant personnel training schedules.
5. Simulator availability.
6. State and local government needs based on their level of participation.

8.1 **Drill and Exercise Schedule** (Continued)

7. NRC and FEMA materials submittal requirements (Evaluated Exercises only).
   - **90** days prior to exercise: Exercise Objectives/Scenario Timeline Due to State/FEMA. This allows the state time to incorporate their objectives and interjects into the scenario timeline.
   - **75** days prior to exercise: Utility Exercise Objectives Due to NRC
   - **60** days prior to exercise: State submittal of Exercise Objectives/Scenario Timeline Due to FEMA.
   - **45** days prior to exercise: Utility Exercise Scenario/Timeline Due to NRC

8.2 **Scenario Development Team Composition and Expectations**

8.2.1 The Emergency Preparedness Supervisor should obtain concurrence for scenario development team assignments and approve the team composition prior to the end of the calendar year. Attachment 10.1 or an equivalent form should be used to document concurrence/approval.

8.2.2 A core team (required) for scenario development should be selected according to the following guidance:

1. The Drill and Exercise Coordinator will be a member of the EP Unit, as assigned by the Emergency Preparedness Supervisor.

2. Other members of the EP Unit staff will be responsible for coordination and completion of assigned areas of the scenario, including logistical support.

3. One (1) analyst or other experienced member of E&RC, who works normal work week hours, will be assigned to the team and will:
   - Provide calculations and in-plant expertise associated with chemistry and radiological aspects of the scenario.
   - Assist with radiological and/or chemical plume distribution and deposition aspects of the scenario.

8.2 **Scenario Development Team Composition and Expectations** (Continued)

4. A minimum of two (2) experienced members of the Maintenance or work planning units, who work normal work week hours, will be assigned to the team. One member will have expertise in mechanical maintenance activities, and the other in electrical and I&C activities. These individuals are to be experienced with the current work management processes and will:

   - Develop the materials necessary to simulate and evaluate plant assessment and damage control missions associated with the scenario.
   - Assist with the development of equipment malfunction causes based on industry operating experience, Nuclear Plant Reliability Data System (NPRDS), and so forth.
   - Manufacture, or otherwise develop, damage control mock-ups, as needed.

5. A member of Operations Support who holds or has held an SRO License or Certification at RNP. This individual will:

   - Develop, with assistance from Robinson Operations Training, equipment malfunction sequences necessary to achieve the scope and requirements of the scenario(s) including "message card" details needed to maintain scenario continuity.
   - Review plant response, procedures, and data to ascertain impediments to achievement of the goals and requirements of the drill or exercise.
   - Provide altered plant data or instructions needed to ensure that participants will proceed through the scenario as expected/required.

6. A member of Robinson Operations Training with an SRO License or Certification at RNP and who is participating in Licensed Operator Continuing Training (LOCT). This individual must also be knowledgeable in the use of the training simulator and will:

   - Assist Operations with development of equipment malfunction sequences necessary to achieve the scope and requirements of the scenario(s).
   - Coordinate proposed event sequences and data within the capabilities of the training simulator.

8.2 **Scenario Development Team Composition and Expectations** (Continued)

- Review plant data, procedure transitions, and instructions, as needed, to provide a smooth running scenario.

8. A member of the RNP Simulator Support group will:

   - Provide the primary support for initial "bounding" scenario sequences, utilizing the simulator development computer or training simulator.
   - Provide support for parameter override capabilities and modeling to achieve the needed results for the scenario.
   - Provide data capture and download resources to aid in manipulation and dissemination of data points needed for other calculations, and for back-up scenario data.

8.2.3 The core team may be augmented for specific scenarios to include the following disciplines:

1. A member of Operations Training who will provide drill-specific assistance for fire fighting and first aid related scenarios.

2. A member of Information Technology (IT) who will provide interface for necessary set-up and preparations of telecommunications and computer equipment and software.

3. A member of Engineering who will assist with equipment, maintenance, technical or analysis related aspects of the scenarios (such as Core Damage Assessment or Severe Accident Management).

4. A member of Security who will assist with scenarios pertaining to security-related Emergency Action Levels (EALs), or for scenarios designed to evaluate or practice security force activities as an element of the scenario.

5. Others, as may be specifically requested through the Emergency Preparedness Supervisor.

8.2 **Scenario Development Team Composition and Expectations** (Continued)

8.2.4 Scenario Team members are expected to perform the following tasks:

1. Attend scheduled scenario development meetings, critiques, and roll-up meetings;
2. Function as a Controller/Evaluator in drills/exercises as requested;
3. Maintain scenario development materials confidential and promptly report to EP any compromise of scenario elements, and;
4. Develop scenario materials and mock-ups as assigned.

8.3 **Scenario Package Development**

NOTE: For drills or exercises involving off-site participation or involving specific environmental related objectives, the development process may start with the definition of the desired off-site radiological and meteorological conditions, with back calculation of the desired source term at the release point.

8.3.1 Scenario Packages should be complete, comprehensive, and of sufficient detail to provide presentation of simulated plant and environmental conditions to the Participants.

8.3.2 NRC/FEMA Evaluated Exercise scenario materials should be validated, and scenario materials should be completed approximately one (1) week prior to the scheduled validation date.

1. Exercise scenario information is company confidential until after conduct of the exercise. Intentional distribution shall be limited to authorized reviewers;
2. Unintentional dissemination of scenario information is to be prevented through use of appropriate control of developmental and completed materials;
3. Electronic copies of scenario materials are not to be kept on network computer directories accessible to the participants to avoid accidental dissemination of the materials.
4. Full Scale Drill scenario materials should be completed, if possible, so that the packages for use in the drill may be assembled approximately two (2) weeks prior to the scheduled drill date.

8.3 **Scenario Package Development** (Continued)

8.3.3 The development of a scenario for a full-scale drill requires consistent and cohesive presentation of plant parameters and other symptoms. A well-planned approach to development of the scenario materials is important in order to minimize re-work. The team should:

1. Define the major events, equipment malfunctions and any required radiological conditions based on the scope and objectives for a given drill or exercise.
2. Define the operational data to be used for the scenario based on expected procedure usage, operator, and other in-plant responses.
3. Use the simulator to estimate/bound initial assumptions associated with malfunctions and magnitudes.
4. Use the training simulator to determine plant parameters of significance for the postulated scenario.
5. Develop training drills that place emphasis on realistic scenarios that do not require a significant release of activity to off-site environs.
6. Develop scenarios that provide the operating staff the opportunity to diagnose and correct problems.
7. When feasible, in order to optimize resource needs, reuse or alteration of a previously generated scenario may be selected for drills.
8. When the scope and objectives of a drill cannot be satisfied through use of a previous developed scenario, a new scenario will be developed.

8.3.4 Preparation of Scenario Materials

1. Review Scope and Objectives requirements for scenario.
2. Determine if scenario content corrective actions are needed from previous use.
3. Determine ERFIS data point or simulator modeling changes since last use. If any, determine impact. Verify damage control missions against current plant configuration and procedures.
4. Update Fire and First Aid materials, if required.

8.3 **Scenario Package Development** (Continued)

5. Outline damage control missions using Passport work history, INPO OE items, recent NRC Region II Inspection findings, and existing damage control missions as input.
6. Verify logistics requirements are consistent with planned activities.
7. Verify on-site and off-site radiation readings.
8. Verify meteorological requirements.
9. Verify procedure guidance verses captured data.

8.3.5 Assembly of Scenario Package

1. Develop a scenario outline, as necessary.
2. Verify plant configuration and assumptions of scenario outline.
3. Run scenario on the simulator and refine timeline to match actual simulator data run.
4. Capture data associated with break flows, radiation monitor readings, radiological releases, and other pertinent information for bounding calculations.
5. Check anticipated in-plant, on-site, and off-site radiation readings are within desired range.
6. Determine meteorological requirements (such as stability class, wind speed, or precipitation) to achieve desired radiological release implications.
7. Generate controlling and contingency message cards.
8. Generate meteorological data and forecasts.
9. Generate chemistry data.
10. Generate in-plant radiological data.
11. Generate on-site radiological data and off-site radiological data.
12. Run simulator scenario.
13. Refine timeline and Damage Control Mission assumptions.

8.3 **Scenario Package Development** (Continued)

14. Identify any parameters (such as thermal/hydraulic, radiation and so forth) which may need bounding.
15. Modify/update scenario materials, as needed.
16. Update Drill/Exercise Scenario Manuals, as needed.
17. Develop Evaluation Guidance Packages.
18. Prepare drawings, charts, or mock-ups as applicable for damage control and assessment missions.

8.3.6 Scenario Manual Review and Validation

1. Because of the multiple aspects of a scenario, it is important that the finished product be thoroughly reviewed for completeness and consistency.
2. It is recommended that the development team, as a group, go through all elements of the completed scenario manual.
3. This should be accomplished through review and evaluation of the initial conditions, presentation of symptoms, resultant indications, and re-review of anticipated questions and participant requests for information through scenario termination.
4. Attachment 10.3 or equivalent provides a checklist for accomplishment of this review. Attachment 10.4 or equivalent provides a means to annotate review of the scenario.

8.4 **Drill and Exercise Control Guidelines**

8.4.1 The Drill/Exercise Coordinator should ensure coordination and set-up for the drill/exercise in accordance with Attachment 10.5 or equivalent.

8.4.2 Personnel designated as Lead Facility Controllers and Evaluators should complete Part A of Attachments 10.6 and 10.7 or equivalents.

8.4.3 Lead Facility Controllers should:

1. Ensure distribution of applicable message cards and data packages to designated participants, in accordance with the timeline and Drill/Exercise Coordinator instructions.

8.4 **Drill and Exercise Control Guidelines** (Continued)

2. Control the sequence of events and the response of participants, as identified in the Controller/Evaluator briefing.
3. Obtain concurrence of the Drill/Exercise Coordinator prior to permitting any significant deviation from the anticipated response.
4. Ensure that participants, controllers, evaluators, and observers document their participation on appropriate facility rosters.

8.4.4 Controllers should control the progress of the drill/exercise to maintain the scenario timeline and player response. Deviation from the scenario is not allowed unless authorized by the Drill/Exercise Coordinator.

8.4.5 Controllers assigned to simulate non-Progress Energy activities, such as NRC, Mock Media, and so forth, should conduct their activities, in accordance with the instructions provided (Attachment 10.8, Attachment 10.9, Attachment 10.10, and Attachment 10.11 or equivalent instructions).

8.4.6 Evaluators should perform the following:

1. Maintain a chronology of significant events and Participant responses in sufficient detail to provide an accurate record of activities.
2. Use the evaluation criteria provided by the Drill/Exercise Coordinator to assess participant and/or facility performance.
3. Inform facility lead controllers when scenario objectives are met.
4. Observers should comply with the instructions provided to them by the appropriate controller, ensuring that they do not interact with participants, or impact the conduct of the drill/exercise.

8.4 **Drill and Exercise Control Guidelines** (Continued)

8.4.7 Participants should perform the following:

1. Respond to the simulated sequence of events to the best of their ability.
2. Comply with instructions provided by the appropriate controller.
3. Note problems and recommendations for changes and bring them to the attention of Controller/Evaluator organization at the conclusion of the drill/exercise during the facility critique.

8.4.8 Termination of a drill or exercise will be coordinated through the Drill/Exercise Coordinator when any one (1) of the following conditions are met:

1. The drill or exercise timeline has been completed.
2. All Facility Lead Controllers have concurred with drill/exercise termination due to any of the following:
   - Drill/exercise activities have been adequately evaluated.
   - Problems or other unexpected occurrences warrant early termination.
   - Performance of the drill or exercise is affecting plant, public, or personnel safety, **OR** the occurrence of an actual emergency.
3. At the completion of the drill/exercise, Facility Lead Controllers and Facility Lead Evaluators should perform activities outlined on their checklists (Attachments 10.6 and 10.7 or equivalents) to assist with the conduct of the facility critique and restoration of the facilities and equipment.
4. The Drill/Exercise Coordinator should ensure that all emergency response facilities and equipment used during the drill/exercise are restored and the facilities are ready for activation (Attachment 10.5 or equivalent).

9.0 **RECORDS**

No records are generated as a result of the performance of this procedure.

10.0 ATTACHMENTS

10.1 Scenario Development Team Assignments
10.2 Simulator Draft Scenario Phase
10.3 Scenario Materials Completion Checklist
10.4 Scenario Review Form
10.5 Drill/Exercise Coordinator Checklist
10.6 Facility Lead Controller Checklist
10.7 Facility Lead Evaluator Checklist
10.8 NRC ENS/HPN Control Cell Checklist (Example)
10.9 Communications Control Cell Checklist (Example)
10.10 Mock Media Checklist (Example)
10.11 Concerned Citizen and Rumor Simulation Checklist (Example)
10.12 Controller/Evaluator Briefing (Example)
10.13 Participants' Briefing Sheet (Example)

Attachment 10.1
Page 1 of 1

Scenario Development Team Assignments

The below named personnel are responsible for RNP Emergency Preparedness Scenario development for the time period _____ through _____❶.

The responsibilities and expectations for the conduct of these duties are delineated in Section 8.2 of this procedure.

Core Team Responsibility:	Name:
Coordinator	
Simulator Lead Controller	
E&RC	
Plant Radiation	
Off-site Radiation	
Operations	
Operations Training	
Simulator Support	
Mechanical Maint.	
Elec/I&C Maint.	

Augment. Team Responsibility:	Name:
Fire Protection	
Info. Technology	
Engineering	
Security	
Public Information	
Other	

❶ A schedule of activities and tentative resource needs should be attached.

Team Composition Approval: _____

Simulator Draft Scenario Phase

NOTE: *This checklist is for information only. No record retention requirements apply.*

_____Initiate the simulator exercise IC and verify ERFIS operation.

_____Initiate the periodic log print function to obtain SPDS sheets for scenario specific parameters of interest.

_____Establish malfunctions and other simulator instructions as needed.

_____Maintain a log of key activities performed as an aid in evaluation of data and development of the basic scenario time line.

_____Obtain graphs of simulator captured data. This data should be used to estimate or bound thermal, hydraulic, and chemistry related parameters of the scenario.

_____Print out alarms, instructor, and operator logs as needed.

_____Insert substitute values in simulator program to feed ERFIS meteorological conditions for the drill.

STABILITY CLASS	DELTA-TEMP (DEG-C/100m)
A . . . 1	<.90
B . . . 2	-1.89 to -1.70
C . . . 3	-1.69 to -1.50
D . . . 4	-1.49 to -0.50
E . . . 5	- 0.49 to +1.50
F . . . 6	+1.51 to +4.00
G . . . 7	> 4.00

NOTE: *This checklist is for information only. No record retention requirements apply.*

Scenario Materials Completion Checklist

NOTE: *This checklist is for information only. No record retention requirements apply.*

DRILL/EXERCISE SCENARIO MANUAL:

- ☐ Review contents and verify compliance with current procedures and practices.

SECTION 1: INTRODUCTION

- ☐ Controller/Evaluator organization specified.
- ☐ Participant briefing (extent of play, etc.)

SECTION 2: DRILL OBJECTIVES

SECTION 3: SCENARIO

- ☐ Scenario narrative and timeline - include major events, transitions, ERF activation, and emergency declarations.
- ☐ Scenario contains criteria for drill termination if applicable.

Subsection 3.1: Messages

Control Message Cards:

- ☐ Initial plant conditions and power history to be available to AAT-Reactor Engineer.
- ☐ Any external event not presented on the simulator.
- ☐ Any event occurrence observable in the plant.
- ☐ Contingency Emergency declaration cards.
- ☐ General Emergency card, and any other PAG exceeding events, provided reference to expected PARs.
- ☐ Each simulated action has been verified to have sufficient materials to provide participants with expected actions and communications, examples include:
  - Message to Security that the ambulance has left the site
  - Reports from HP tech that the patient is at the hospital
  - Reports that contaminated materials are back in H.B. Robinson control following off-site medical treatment of a contaminated, injured patient
  - State or County response actions such as park closings, school and day care closings (refer to State plan for actions), etc.

- State or County news releases
- NRC response actions
- NRC news releases
- Accountability is complete
- Site evacuation is complete

☐ Key mock media or rumor control items.

☐ Message cards to use in the event that the simulator crashes - this includes radiation monitor alarms, information needed to insure operations personnel awareness of procedure usage/transitions to maintain consistency with back-up data sheets.

☐ Drill completion message cards:

- Collect attendance sheets
- Ensure external personnel notified of drill termination
- Verify that dosimetry is returned and logged back in
- Collect all qualification and re-qualification paperwork, logs, and records.
- Ensure that post use inventories of EP equipment and supplies are completed
- Conduct a player critique

Subsection 3.2: Plant Parameters

☐ SPDS Data available to provide information if the simulator fails during course of the drill.

Subsection 3.3: Meteorological Data

☐ Weather synopsis included.

☐ Data at 15-minute intervals.

☐ 1-hour, 3-hour, 24-hour, and three-day forecasts

Scenario Materials Completion Checklist

Subsection 3.4: Radiological and Damage Control Mission Information

Radiological aspects of scenarios including major releases, dose rate increases and/or classification/PAR changes.

Subsection 3.4a – Onsite Radiological Data

- ☐ On-site radiation data (normally should include each survey point, plume boundaries, and potential personnel transit paths).
- ☐ Verify consistency between on-site and off-site radiation data.
- ☐ Derivation or basis for the data is provided.
- ☐ Airborne concentrations, air sample results, and contamination readings.
- ☐ Parameters altered from calculated are explained in basis.
- ☐ In-plant radiation, contamination, and airborne radiation level maps.
- ☐ All expected activities are adequately addressed by the in-plant maps.
- ☐ In plant maps enable determination of ingress and egress routes to drill activities.
- ☐ Affects/information regarding opening of doors and affect on ventilation or radioactive material movement are included.
- ☐ Verify consistency between RMS data (15 minute printouts and data tables) and in-plant radiation maps.
- ☐ Derivation or basis for the data is provided.
- ☐ Continuous Air Monitor (CAM) and local Radiation Monitor readings are provided as applicable.
- ☐ Parameters altered from calculated are explained in basis.

Chemistry Data

- ☐ Normal, pre-event chemistry data is available.
- ☐ Table or overview provides time dependent RCS and secondary systems sample results include all indications and radiation readings needed to perform activity (includes a review of associated procedures).
- ☐ Table or overview provides time dependent PASS activity data.
- ☐ Data presentation sheets or forms for issuance to participants (mimic format and content of expected results of analysis).

Scenario Materials Completion Checklist

Chemistry Data (Continued):

- ☐ Verify consistency in Core Damage Assessment results and plant parameters (reactor water level and temperature vs. Chemistry vs. RMS).
- ☐ Locations are adequately addressed by the in-plant maps.
- ☐ In-plant maps enable determination of ingress and egress routes to drill activities.
- ☐ Description of the derivation or basis for the data.
- ☐ Parameters altered from calculated are explained in basis.

Subsection 3.4b – Offsite radiological data and maps showing plume exposure pathway.

- ☐ Data is adequate for scope for scenario and evaluation.
- ☐ Instrument types/ranges match those of the user (H.B. Robinson or state).
- ☐ Verify consistency between on-site and off-site radiation data.
- ☐ Compare dose projection results and environmental data, package ID's any major differences.
- ☐ Derivation or basis for the data is provided.
- ☐ Parameters altered from calculated are explained in basis.

Subsection 3.4c – Mission Cards

- ☐ Damage control missions are provided for applicable safety related equipment malfunctions.
- ☐ Damage control missions are provided for those non-safety related equipment malfunctions for which it is expected that the participants will dispatch teams.
- ☐ References list OEF items or other plant/industry events related to this malfunction, if applicable.
- ☐ Expected participant actions begin with determining the status of the equipment or system.
- ☐ Resultant indications present only that information which is obvious or available.
- ☐ Each successive participant action should be based on completion of the previous action.

Scenario Materials Completion Checklist

- ☐ Any limitations associated with resultant indications are included (for example, switch "A" must be held to the right while obtaining the reading) as an aid the controller assigned to the mission.
- ☐ Resultant indications do not include results of interpretation of the data. (assessment or resolution of the indicated condition is listed in "Controller Use only").
- ☐ Mock-ups, pictures, drawings or charts are included as needed to effectively present the symptoms.
- ☐ Information needed to assess the situation and proceed through repair, restoration, or determination that repairs are not feasible, is included.
- ☐ Locations are adequately addressed by the in-plant maps.
- ☐ In-plant maps enable determination of ingress and egress routes to drill activities.
- ☐ All major scenario events and transitions contain relevant information to guide personnel without providing prompting (instrument readings, audio/visual alarms, audio/visual indications).
- ☐ Verify operations data and damage control missions for consistency.

SECTION 4: CONTROLLER INSTRUCTIONS
SECTION 5: EVALUATOR INSTRUCTIONS
SECTION 6: SUPPLEMENTARY MATERIAL

Attachment 10.4
Page 1 of 1
Scenario Review Form

NOTE: *This checklist is for information only. No record retention requirements apply.*

The below named personnel have reviewed the RNP Emergency Preparedness Scenario for the _____ Drill/Exercise.
By our signature, we certify acceptance of this document with changes or modifications annotated.

Area	Name:	Signature:	Comments:
General Information			
Drill Objectives			
Narrative Summary			
Radiological Summary			
Message Cards			
SPDS Data			
Maintenance Missions			
Off-Site Rad Data			
On Site Rad Data			
Met Data			
Chemistry Sample Data			
Area Rad Survey Maps			
Security			

❶ I have reviewed this scenario for accuracy and representation of expected plant responses. This scenario represents a sequence of events sufficient to exercise the identified drill/exercise objectives. This scenario does not attempt to describe actual or postulated real events for which the plant was specifically designed to mitigate. My review does not endorse the described events as real or projected. I understand that scenario confidentiality is important. I further agree not to describe the scenario details to anyone not on the development team.

_____

_____

_____

_____
Reviewed: Emergency Preparedness Supervisor / Date

ATTACHMENT 10.5
Page 1 of 7

Drill / Exercise Coordinator Checklist

NOTE: *This checklist is for information only. No record retention requirements apply.*

PART A: LOGISTICAL AND PERSONNEL PREPARATIONS

Drill/Exercise Date: _____

Six to Nine Months Prior to Drill/Exercise

_____ Select scenario development team members and send correspondence to the appropriate management requesting participation of selected personnel. Copy the potential team member and their supervisors. Include date of first meeting and milestones for drill/exercise development.

_____ Publish the annual drill/exercise schedule. Ensure dates are added plant work schedules.

_____ Schedule facilities and rooms for use during EP drills: EOF/TSC, Rm 412, Rm 420, Rm 421, Rm 422, Rm 423, Remote Facility, JIC, Alternate Assembly Area (EOF), etc. (NCR #105060).

_____ Schedule rooms for pre-drill and post drill meetings, as appropriate. The room selected for the post drill meetings should be equipped with an In-Focus machine

_____ Determine the drill/exercise objectives to be demonstrated.

_____ Conduct team meetings, as necessary, to develop a draft timeline. If Operating Experience is used, note the source in the scenario package. Review previous drill/exercise and scenario problems.

_____ Coordinate with Simulator Training and schedule simulator runs to verify viability and to generate operational data necessary adjustments to the timeline and augment the scenario after the Simulator runs.

Greater than five weeks prior to the drill

_____ Reserve Controller communication network (radios if appropriate)

_____ Items to consider for small scale/specialty drills (NCR #95316):

- _____ Mock-up ENFs/Press Releases
- _____ Identification of control cells in lieu of participants
- _____ Transition briefing from routine ERO drill to specialty drill
- _____ Required procedures

PART A: LOGISTICAL AND PERSONNEL PREPARATIONS (CONTINUED)

Greater than five weeks prior to the drill (Continued)

_____ If Aux Operators will be used in the field, consider the use of special cell phone batteries for high noise environments. Contact NIT for availability

_____ Review plant scheduled activities which are planned concurrent with the drill and resolve potential conflicts.

_____ Determine if any "specific" objectives are desired for this drill cycle.

a. RC Tech-Facilities to demonstrate air sampling (SO-1)
b. First Responders to practice skills (SO-2)
c. Security to perform owner controlled area sweep (SO-3)

_____ Verify scheduling of resources for drill participation.

_____ If off-site agencies are participating, verify Site Communications is aware of the pending drill related activities.

_____ Obtain confirmation of level of support/interface from the following (as applicable):

☐ _____ State and County Emergency Management

Agency	Response
Darlington County	
Chesterfield County	
Lee County	
State of South Carolina	
DHEC	

☐ _____ NRC Resident Inspectors

☐ _____ Off-site fire, rescue, etc.

☐ _____ Non-RNP resources

_____ Determine the method of ERO notification (such as Pre-staged or Dialogic).

_____ Distribute a site wide communication describing the date, time, and scope of the drill.

Drill / Exercise Coordinator Checklist

PART A: LOGISTICAL AND PERSONNEL PREPARATIONS (CONTINUED)

Three weeks prior to the drill

_____ Add drill dates and associated activities to the MRT Agenda.

_____ Compare the data obtained from the scenario validation and adjust the data obtained from the spreadsheet to agree with the RMS Data.

_____ Copy scenario materials for briefing with Controllers.

_____ Order meals, snacks and drinks for the drill (on-site and JIC).

_____ Prepare Controller/Evaluator Briefing materials. Ensure C/E packages include training rosters, lead controller checklists, lead evaluator checklists, on-call lists, drill phone numbers, feedback forms, etc.

_____ Verify commitment for Controllers and Evaluators.

_____ Obtain commitment for mock personnel, vehicles, etc.

_____ Coordinate level of support for drill activities prior to ERF activation (for example, Corporate/Site Communications, INPO, etc.).

_____ Notify Site Communications to issue a memo to the Corporate Communications Department (CCD) prior to drills in which the JIC will be activated.

_____ Obtain listing of I & C Maintenance, Mechanical Maintenance, Radiation Control, and Chemistry personnel who will be available as the "on-shift" staff at the start of drill.

_____ Coordinate required level of support/demonstration activities with Security.

_____ Remind designated ERO personnel of the drill (i.e., via e-mail) and include pre-drill briefing materials.

_____ Coordinate needs of personnel to be qualified during the drill. Notify personnel via e-mail to bring qualification checklists with them.

PART A: LOGISTICAL AND PERSONNEL PREPARATIONS (CONTINUED)

One week prior to the drill

_____ Coordinate arrangements with Access Control for individuals who will require badging or escorts, if applicable.

_____ Verify off-site agency and response personnel participation.

_____ Conduct a briefing with off-site agencies participating in the drill.

_____ If off-site personnel or equipment will be responding to the site, verify Security is notified of the need to evaluate planned response against the requirements of the Physical Security Safeguards Contingency Plan.

_____ Verify availability and preparations for pre-staging SCBAs, if applicable to the scenario. Make arrangements with RC for stocking the RC Kits in the Simulator and SCBAs in the AO work area.

_____ If the scenario is being driven from the simulator, when feasible, run the scenario on the simulator to verify no negative impact from any recent modeling changes.

_____ Notify Information Technology and Telecommunications to perform simulator setup per TAP-411 one hour prior to drill/exercise start.

_____ If applicable, define non-ERO required actions (such as accountability and identification of exempt personnel) and disseminate to the plant (via a routine communication method).

_____ Conduct Controller/Evaluator Briefing.

_____ Verify any Observers have been authorized and briefed.

_____ Verify pre-drill information has been disseminated to Participants.

_____ If 911 calls will be made as a part of the drill or exercise, contact the Darlington County Emergency Director/designee to alert them to the details and level of participation of off-site agencies.

Drill / Exercise Coordinator Checklist

Two (2) Days Prior to Drill

_____ Verify Controller/Evaluator radios are charged.

_____ Check facility locations for procedure quality and cleanliness.

_____ Notify Computer Support at the JIC to check the facility computers for proper operation.

One (1) Day Prior to Drill **Date:** _____

_____ Contact the State/Counties to remind them of drill date and times.

_____ Notify NRC Resident of drill.

_____ Notify Unit 1 (1284) and the Darlington County Plant (8 452-3397) about drill logistics.

_____ Check batteries in video system wireless microphones (9 volt).

Prior to Start of Drill:

_____ Brief Simulator Staff and crew. (See page 7 of this attachment)

_____ Brief Main Control Room Staff on Drill Scenario (see page 7 of this attachment

_____ Verify computer terminals in the facilities are aligned to ERFIS.

_____ Verify Simulator Set-up per completed TAP-411.

PART B: TERMINATION RELATED ACTIVITIES:

_____ Canvass each facility to ensure that all facility objectives have been met and issue the drill termination message via the EOF Lead Controller.

_____ Verify with the EOF Lead Controller that the drill termination message has been completed and transmitted offsite to the State/Counties prior to setting the simulator to freeze. (AR #57063)

Drill / Exercise Coordinator Checklist

PART C: POST DRILL OR EXERCISE RELATED ACTIVITIES:

_____ Notify the Main Control Room to announce drill termination.

_____ Contact Information Technology to return simulator to pre-drill setup per TAP-411.

_____ Ensure facility inventory checklists have been completed.

_____ Coordinate completion of Critique Report.

_____ Ensure Corrective Actions from critique report are entered into the Corrective Action Program.

_____ Drill/exercise documentation completed and filed as follows:

_____ Originals of drill rosters and drill package are submitted for transmittal to
vault, as applicable.

_____ Ensure training roster information is updated.

_____ Maintain copies of rosters and other documentation to EP common files.

Drill / Exercise Coordinator Checklist

EP Drill/Exercise Briefing for Operations **Date** _____

Simulator Control Room

1. Discuss turnover information not included with scenario.
2. Provide name and phone number of Main Control Room contact, usually BOP Operator at 1443. BOP contact name _____
3. Discuss simulator setup
   - Phones/faxes swapped **Yes**/No
   - PA cross connected Yes/**No** ***If cross connected, use line 5***
4. Discuss items to be performed/simulated.
   - Local/site evacuation performed/**simulated**
     (circle one)
   - NRC Notification: Initial contact with the NRC resident and Operations Center are expected to be performed. **If the Resident/Ops Center choose not to participate, then further calls are to be made to the Mock NRC at xxxx.**
   - Notify Chemistry of ≥ 15% power level changes. Prior to OSC activation, call xxxx. Prior to OSC Activation, call for assistance at the following numbers:

On-Shift	Name	Number
Chemistry		
Health Physics		
Maintenance		
I&C		

   - After OSC activation, notifications/requests should go through the TSC.
   - Other Drill Phone Numbers: **Operations** *(other than BOP)* **at xxxx**
   - **Use Drill Dialogic Scenarios or Manual beeper activation**
5. Training/Previous drill concerns

Main Control Room

1. Provide overview of drill scenario to Main Control Room CRSS/BOP.
2. Discuss expectations for broadcast of pre-scripted EP Drill messages and sounding of alarms following contact from Simulator Control Room.
   - Calls will be made to the BOP from the Simulator Control Room or the POD for drill scenario actions. Calls originating from any other point should be questioned. (AR #43155)

Facility Lead Controller Checklist

PART A: LOGISTICAL AND PERSONNEL PREPARATIONS:

One (1) day prior to the Drill or Exercise:

- ☐ Verify operability of Controller communications equipment.
- ☐ Walk through facility and verify all items are functional.
- ☐ Verify assigned Controllers are fluent with scenario materials and data to be presented.

Prior to start of drill:

- ☐ Test controller communications equipment.
- ☐ Check the PA volume and other facility communications equipment.
- ☐ Verify computer terminals in the facilities are aligned to ERFIS.
- ☐ Verify appropriate and adequate documentation is provided.
  - ☐ Participant Phone List
  - ☐ Facility Training Roster
  - ☐ Controller Phone List
  - ☐ EP Improvement Forms (verify correct revision)
- ☐ Verify Controllers and Evaluators are present, properly briefed, and identified.
- ☐ Notify Drill and Exercise Coordinator of readiness to begin the drill or exercise.
- ☐ Set up snacks, as applicable.

PART B: TERMINATION RELATED ACTIVITIES:

- ☐ Issue the Drill/Exercise termination message at direction of Drill and Exercise Coordinator.
- ☐ Ensure that all ERO members stay for the critique, including administrative and support personnel.
- ☐ After the termination message is complete and the facility logs have been printed, ensure the simulator is reset. This can be done by notifying the Simulator Staff via the Drill / Exercise Coordinator.
- ☐ Verify that all Participants, Controllers, and Evaluators have signed in on the rosters.
- ☐ Assist Facility Leader with conduct of the Participant's Critique.

Facility Lead Controller Checklist

- ☐ Provide preliminary feedback to the Participants from the Controller/Evaluator perspective.
- ☐ Assemble the Controller/Evaluator staff from your facility.
- ☐ Debrief the Controllers and Evaluators in preparation for critique of the drill or exercise.
- ☐ Determine if any significant Deficiencies or Weaknesses appear to have been identified.
- ☐ Verify post-use inventories of Emergency Response Facility equipment are completed.
- ☐ Return the controller communications equipment to storage.
- ☐ Facilitate the Lead Evaluator Critique.

Facility Lead Evaluator Checklist

PART A: LOGISTICAL AND PERSONNEL PREPARATIONS:

Prior to the Drill:

The Facility Lead Evaluator should:

- ☐ Attend the Controller/Evaluator Briefing prior to the drill/exercise.
- ☐ Ensure a thorough understanding of the scenario.
- ☐ Perform a walk-down of their facility or area prior to the drill/exercise and review applicable procedures.

PART B: TERMINATION RELATED ACTIVITIES

Participant Critique

The Facility Lead Evaluator (SCR, TSC, OSC, EOF, JIC) should:

- ☐ Initiate the Participant Critique following termination of the drill/exercise.
- ☐ Turn over conduct of the critique to the Facility Leader.
- ☐ Collect all documentation from the drill/exercise (logs, records, forms) for transmittal to the Drill/Exercise Coordinator.

Controller/Evaluator Critique

The Facility Lead Evaluators should:

- ☐ Initiate the Controller/Evaluator Critique following the Participant Critique.
- ☐ Reconstruct timeline versus sequence of events in scenario, if necessary, to identify specific issues.
- ☐ Assess ERO performance and compare Controller/Evaluator evaluation with that of Participants.
- ☐ Complete the critique roll-up form for the affected facility using input from Participants, Controllers, and own observations.
- ☐ Identify objectives as either Met or Not Met.
- ☐ Consolidate and categorize identified critique items as Strengths, Deficiencies, Weaknesses, or Comments in preparation for the Lead Evaluator Critique.

Facility Lead Evaluator Checklist

Lead Evaluator Critique

☐ The EP Supervisor (or designee) should chair the critique with Facility Lead Evaluators in attendance.

☐ The EP Supervisor (or designee) and Facility Lead Evaluators should:

a. Review Participant and Controller/Evaluator critique comments.

b. Validate/categorize critique items as:

- Strengths
- Deficiencies
- Weaknesses
- Comments

☐ The Drill/Exercise Coordinator will coordinate the development of the Drill/Exercise Critique Report per EPPRO-01.

NRC ENS/HPN Control Cell Checklist (Example)

- ☐ Verify blank copies of the NRC notification forms (AP-030, Attachment) are available for receipt of calls.
- ☐ Monitor simulator for significant plant changes. After the ERDS data link is established, the NRC has access to the parameters listed on the following page. Use this information to ask questions if you are notified of significant changes in plant status within a reasonable amount of time.
- ☐ After significant plant problems are known, or at least one fission product barrier is breached, coordinate with the Lead TSC Controller and inform the ENS Communicator that a site response team will be sent to the site, pick a number of personnel from 8 - 15, and a time of approximately 2-3 hours or near the end of the drill.
- ☐ After 2 or more fission product barriers are breached, coordinate with the Lead TSC Controller and inform the NRC Emergency Communicator that the site response team size is being increased to 45 - 60 to support 24 hour staffing.
- ☐ Simulated ENS (Event Notification System) communications should include plant response information. Refer to following excerpt from NRC IN 98-08 for example communication items:

The level of communication between NRC and the licensee will depend on the development and the significance of the event. The following is a list of sample questions, which are not exhaustive, that may be asked during an emergency:

1. Is there any change to the classification of the event? If so, what is the reason?
2. What is the ongoing/imminent damage to the facility, including affected equipment and safety features?
3. Have toxic or radiological releases occurred or been projected, including changes in the release rate? If so, what is the projected on-site and off-site releases, and what is the basis of assessment?
4. What are the health effect/consequences to on-site/off-site people? How many on-site/off-site people are/will be affected and to what extent?
5. Is the event under control? When was control established, or what is the planned action to bring the event under control? What is the mitigating action underway or planned?
6. What on-site protective measures have been taken or planned?
7. What off-site protective actions have been recommended to State/local officials?
8. What is the status of State/local/other Federal agencies? responses, if known?
9. If applicable, what is the status of public information activities, such as alarm, broadcast, or press releases (licensee/State/local/other Federal agencies)? Has a Joint Information Center been activated?

NRC ENS/HPN Control Cell Checklist (Example)

- ☐ Also on the simulated ENS, until the HPN phone is manned, obtain dose projections, environmental monitoring results, chemistry analysis, and source term determinations.
- ☐ If a release is occurring, or expected, request that the HPN (Health Physics Network) phone be manned, if you can handle communications on both lines (see next item).
- ☐ HPN information should include:
  - Meteorological conditions (current and projected)
  - Dose projection results

- Meteorological Conditions **Current:**
  Forecast:
- Dose Projection Results

	Site Boundary	1 Mi.	2 Mi.	5 Mi.	10 Mi.
TEDE					
CDE					

- Release pathway:
- Source term:
- Results of atmospheric / environmental monitoring (dose rates, contamination, isotopic analysis):

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Communications Control Cell Checklist (Example)

- ☐ Review EPNOT-01 for conducting State and County notification activities.
- ☐ Verify blank copies of the State/County Emergency Notification Forms are available for receipt of calls.
- ☐ Verify availability of current Authentication Code Words.
- ☐ Verify drill/exercise use telephone(s) operational.
- ☐ Closely monitor and log the time of initiation and completion of each call or notification received.
- ☐ When responding to the roll - call for notifications, respond as each of the following:
    1. State of South Carolina
    2. Darlington County
    3. Lee County
    4. Chesterfield County
- ☐ When the Drill/Exercise Participant (Communicator) gets to line 4 of the Emergency Notification Form, he/she should request the State to provide an authentication number. When this occurs or if not requested - when information from line 4 is read, notify the communicator that "the State requests authentication for Number _____." The Communicator should provide the proper word from the Authentication Code List.
- ☐ Each time a notification is received, use a different Authentication number.
- ☐ Monitor communications and Emergency Notification Forms for completeness, accuracy, and proper use of layman's terminology.
- ☐ Monitor to ensure that any of the following items are reported:
    - ☐ Estimate of any surface radioactive contamination in plant, on-site or off-site.
    - ☐ RNP emergency response actions underway (for example, relocation of site personnel).
    - ☐ Any requests for assistance (for example, Rescue, Fire or Sheriff).
    - ☐ Monitor for proper use of Initial or Follow-up message designations and message numbering.
    - ☐ Monitor for notification of drill/exercise termination.

Mock Media Checklist (Example)

BADGING:

- ☐ Enter the media briefing area.
- ☐ Obtain a "mock media" badge from the Admin/Media Badging Specialist, located at the entrance to the news media briefing area, identify yourself as mock media.
- ☐ Wear the "mock media" badge at all times, it is important that drill/exercise participants know that you are participating as "mock media".
- ☐ Continue to check the media badging table if the Admin/Badging Specialist is not in place upon your arrival.
- ☐ Obtain copies of news releases and/or other available information from the Admin/Badging Specialist.
- ☐ When you leave the news media briefing area, return your badge to the Admin/Badging Specialist.

NEWS MEDIA BRIEFING AREA:

- ☐ Mock media will spend their time in this area.
- ☐ This is the area where spokespersons from all participating agencies will conduct news media briefings.
- ☐ News releases will be posted in this area.

MEDIA PHONES:

- ☐ Telephones for use by the actual media and/or "mock media" are located in the news media briefing area.
- ☐ Make calls to the JIC Public Information Specialists located in the Joint Information Center Support Room. This number(s) will be provided to you via a news release.

CONDUCT:

- ☐ When talking to drill or exercise participants, let them know who you are and what company/agency you are associated with (for example, CNN, ABC, NBC, API).

Mock Media Checklist (Example)

MAKING CALLS:

NOTES:

- Begin and end all telephone communications with **"THIS IS A DRILL"** message.
- Utilize only that information which you have been provided by the drill participants, or related simulated activity message cards. The media would not have access to the time line or other scenario development materials.
- Telephone calls are not to be initiated until after the JIC has released the telephone numbers, or as otherwise directed by the JIC Lead Controller.

1. It is your role to make calls to the specified telephone numbers and portray the news media. Please, be creative! Sample questions are provided on the following pages. Use these as guidance but also be creative and develop questions of your own.
2. It is preferred that many of the questions be based on recent news releases, EAS messages and Press Conferences (either actual, or message card driven).
3. Ask for clarification of any items that would not be clearly understood by someone with a 3rd grade education.
4. Ask for information regarding any of the following if not provided (when appropriate):

- ☐ Current emergency conditions
- ☐ Current emergency classification
- ☐ How to maximize protection when sheltering
- ☐ Instructions for transients without shelter
- ☐ What to leave behind when evacuating
- ☐ What to take when evacuating
- ☐ Evacuation Routes
- ☐ Location of Relocation Centers
- ☐ Info for parents of students impacted
- ☐ Info for transportation-dependent individuals
- ☐ Info for special populations
- ☐ Rumor control telephone numbers
- ☐ Information to address false or misleading rumors
- ☐ Use of public information brochure and calendar
- ☐ Monitor for:
  - ☐ Accurate Information
  - ☐ Clear and understandable language
  - ☐ Content consistent with public information brochures and calendar
  - ☐ Consistent information regarding information and instructions regarding protective action decisions
  - ☐ Clear differentiation between previous and current information and instructions
  - ☐ Up-to-date information

Mock Media Checklist (Example)

SAMPLE QUESTIONS to PROGRESS ENERGY:

NOTES:

- Begin and end all telephone communications with "**THIS IS A DRILL**" message.
- Utilize only that information which you have been provided by the drill participants, or related simulated activity message cards. The media would not have access to the time line or other scenario development materials.
- Telephone calls are not to be initiated until after the JIC has released the telephone numbers, or as otherwise directed by the JIC Lead Controller.

1. What is PROGRESS ENERGY doing to fix this problem?
2. Why did it occur?
3. Was this emergency due to personnel error?
4. Isn't it true that this is the worst nuclear power plant accident in the history of nuclear power? How could Robinson let this happen?
5. I've heard my neighbors discuss how bad it is at Robinson and how employees have such bad attitudes and are so overworked. Is that why this emergency occurred?
6. How will PROGRESS ENERGY replace the power that will be lost by the shutdown of Robinson? Will the shutdown be permanent?
7. What are your expectations for total cost for the emergency? Who will pay...rate payers? stockholders?
8. Is there a release of radiation? How much? Is it iodine? How do I explain this to my readers/listeners?
9. What is a dose projection? What is an actual reading? How do the two compare?
10. How do the actual field readings compare to what we receive everyday as background or manmade radiation?
11. Will the CEO be available for an interview? What about Robinson Senior Management?
12. What is the NRC doing? Are they at the plant? Are they taking over the response or do they agree with PROGRESS Energy's efforts?
13. How are you planning to clean up the radiation? What will be done with it?

Mock Media Checklist (Example)

SAMPLE QUESTIONS to the COUNTIES: (ask each county individually the following questions)

NOTES:

- Begin and end all telephone communications with **"THIS IS A DRILL"** message.
- Utilize only that information which you have been provided by the drill participants, or related simulated activity message cards. The media would not have access to the time line or other scenario development materials.
- Telephone calls are not to be initiated until after the JIC has released the telephone numbers, or as otherwise directed by the JIC Lead Controller.

1. What is _____ county doing to protect its residents, school children, pregnant women, and so forth?
2. Where are the relocation centers (directions)? How many persons will each relocation center hold? What time will the centers be open? Can we take pets? Then, what do we do with our pets?
3. How will you decontaminate vehicles, homes, property, people, animals, livestock? What will be done with the radiation/contamination?
4. What is being done with individuals in rest homes? Where will they go? Directions? How will they be cared for? How will their families find them?
5. What is being done at the schools? Where are they being taken?
6. What about the Lake Robinson? How are these people notified? What about their boats? How are these people and their property decontaminated? What is done with the radiation/contamination?
7. How can you be sure that individuals are being kept out of the area? Is law enforcement forcing people out of their homes?
8. How is it assured that homes and businesses are protected from looters? How can looters get into the area? Isn't law enforcement controlling access to the area?
9. What can we take to a relocation center?
10. What does a person do to shelter in place?
11. Are you nuts! Do you think for one minute that I am not going to pick up my child? I am going to pick up my child now, so where is he/she? Boy, are you ever going to have a lawsuit on your hands!

Mock Media Checklist (Example)

NOTES:

- Begin and end all telephone communications with "**THIS IS A DRILL**" message.
- Utilize only that information which you have been provided by the drill participants, or related simulated activity message cards. The media would not have access to the time line or other scenario development materials.
- Telephone calls are not to be initiated until after the JIC has released the telephone numbers, or as otherwise directed by the JIC Lead Controller.

SAMPLE QUESTIONS to the STATE OF SC:

1. When will the governor be available for an interview?
2. How is the state responding to this emergency?
3. Do you agree with PROGRESS Energy's actions? Is PROGRESS ENERGY really keeping the state informed? How do you know? PROGRESS ENERGY could be hiding information from the state just like they do with the media and public?
4. What should farmers do?
5. What should the public do?
6. Are you obtaining radiation readings? What are they? Where are they? What do they mean? How do these compare with radiation received everyday?
7. How many agencies are involved from the state? Who are these agencies? What are they doing? Where are they located? How can they be contacted for interviews?
8. Is this a state of emergency/disaster? Is FEMA available? Will assistance be offered like after hurricanes or natural disasters?
9. Is the State helping the counties? How?

SAMPLE QUESTIONS to the NRC:

1. Do you agree with PROGRESS Energy's response to the emergency?
2. Will PROGRESS ENERGY receive a fine? If so, how much? When will you know?
3. Will Robinson be shut down permanently?
4. What is the NRC doing to respond? How many people are here with the NRC? Where are they?
5. Is the President's office involved? Will he be coming to the Robinson Plant?

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Concerned Citizen and Rumor Simulation Checklist (Example)

It is your role to make calls to the specified telephone numbers and portray the role of the general public.

NOTES:

- Begin and end all telephone communications with **"THIS IS A DRILL"** message.
- Utilize only that information which you have been provided by the drill participants, or related simulated activity message cards. The media would not have access to the time line or other scenario development materials.
- Telephone calls are not to be initiated until after the JIC has released the telephone numbers, or as otherwise directed by the JIC Lead Controller.

1. In order to effectively evaluate or train on rumor control activities, there must be:
   - at least six (6) calls per hour received per participating agency, prior to JIC activation.
   - at least six (6) calls per hour received per staffed telephone following JIC activation.
2. Pre-planned rumors will be provided during the pre-drill briefing or by the JIC Lead Controller.
3. Refer to the Mock Media Checklist for additional sample questions.
4. Rumors which focus on radiation, worker fatalities, public fatalities, and economic implications are preferred.
5. Rumors should be:
   - recurrent, to allow the JIC staff to evaluate for important trends in rumor related activity; and
   - some should be obscure and isolated.
6. Any additional rumors need to be authorized by the JIC Lead Controller and Drill and Exercise Coordinator.

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Controller/Evaluator Briefing (Example)

1. **Introduction** - Controller & Evaluator Introductions

2. **Controller / Evaluator Packages**

   - **Observer Guidelines** - Observers should talk only with a controller
   - **Simulations Allowed/Expected**
   - **Rosters** - ensure everyone signs on a drill roster

     * C/Es get credit for the drill IF they are evaluating their ERO position AND they sign on the drill roster.

     * Observers sign roster as an observer to receive training credit.

     * Candidates should sign roster as a participant.

3. **Conducting a Training Drill**

   Coaching - Coaching is instructing a participant by answering questions. It is best to guide the participant in the right direction by answering a question with a question to allow the participant to acquire the answer on their own.

   Example -

   Participant: "How often should we notify off-site agencies?"

   Controller: "What procedure would you use to find that information?"

   Prompting - Prompting is directing a participant to perform an action that appears to have been overlooked. Prompting should occur only as a last resort to prevent negative training. If prompting, try to offer the instruction as a question for the participant to consider.

   Example - No communications with the JIC are apparent, and no activities are occurring to generate a news release in the EOF.

   Controller: "How are we keeping the media and public informed of these events?"

   Documentation - When prompting is required, it should be documented in the critique process..

4. **Drill Evaluation Criteria**

Use the Drill Evaluation Criteria to assist evaluating the drill against the Drill Objectives/Acceptance Criteria. Each facility has a checklist of a few pages long. By verifying the items are evaluated and successfully completed or not performed, the Objectives can be documented as Satisfactorily Met or Not Met. A Comment Sheet is in the back of the section for additional comments. This will be used for future documentation on the drill and to facilitate the Drill Critique process.

5. **Conduct of Critiques**

Participant Critique - Immediately following drill (In each facility)

Controller/Evaluator Critique - Following Participant Critique (In each facility)

6. **Lead Controller/Evaluator Critique** - Wednesday, 1/16/02, at 1400 hours in Rm 216.

We will discuss major items that are observed during the drill. Each Facility Lead Evaluator should be prepared to discuss his/her facility in a presentation lasting **15-30** minutes. The discussion should center on major items. Items for consideration (minor equipment problems or suggestions for improvements) should be documented and briefly discussed. Order of Presentations: Control Room, TSC, OSC, EOF, and JIC.

7. **Drill/Exercise Package**

Objectives

Initial Conditions

Timeline

Communications Equipment (Radios, Cell Phones)

When discussing the drill on the radio remember to use **"This is a drill message."** Use Message numbers when possible to refer to events within the drill to prevent participants from overhearing information.

Controller/Evaluator Briefing (Example)

Radio Contact:

To keep all facilities current on the drill, please announce "To all drill controllers" any of the following:

1) Each message card as it is issued

2) As we approach and reach an EAL classification

3) Each OSC mission that is dispatched and when it returns

8. **Level of Play** Control Room, TSC, OSC and EOF. Environmental Monitoring Teams. EnMon Teams will collect samples. Make all PA announcements. If Simulator fails, Lead Controllers will pass out SPDS data. All personnel should report to their assigned Emergency Response Facility at **0800 (NO call out)**. Candidates should report to their assigned Emergency Response Facility at 0800.

Simulations*

JIC will be a Control Cell*

PASS/Chemistry - dispatch team to perform sampling missions but simulate drawing a sample. Operations personnel in the Simulator should manipulate valves to allow drawing a sample.*

Notifications: 911 - Inform Lead Controller *

Simulate Fire Brigade response to fire events*

Simulate Site Evacuation and alarms

NOTE: Eating and Drinking ban will **NOT** be simulated.

9. Off-site Agency Participation (See Participant Phone List)

   Notify State/County EOCs. Warning Points will **not** participate. **Use Selective Signaling to call the EOCs.** If advised that an EOC can no longer support the drill, inform the Lead Controller or Communications Evaluator.

   PARTICPATING AGENCIES:

   Darlington County

   Lee County

   Chesterfield County

   South Carolina Emergency Management Division

   DHEC

   NRC notifications will be made to a controller (do **not** use ENS and HPN phone numbers).

   INPO & ANI - make calls per procedure

10. SAFETY:

    Ensure personnel safety first and foremost.

    Maintain good ALARA practices throughout the drill.

    Environmental Monitoring teams should be safety conscious on the highways.

11. Collect all drill paperwork including a copy of all logs at the conclusion of the drill. All Simulator logs (SEC and Emergency Communicator, etc.) must be included with the drill package.

12. At the conclusion of the drill, ensure all facility deactivation steps have been completed and facility is ready for immediate activation (Example: whiteboards are erased).

Controller/Evaluator Briefing (Example)

13. At the conclusion of the drill, have Admin Support personnel perform Inventory Checklists in EPPRO-02 (OSC/TSC/EOF/JIC) as appropriate to be collected by Lead Controller.

14. **Controller / Evaluator Arrival Times**

    Simulator – 0630

    TSC – 0730

    OSC – 0730

    EOF – 0730

    JIC – 0900

Closing Comments

Participants' Briefing Sheet (Example)

PARTICIPANT GUIDELINES

1. Maintain status boards, log books, communication forms, etc, in as much detail as possible. Document all actions. Remember, if the Evaluator does not see it, *you did not do it. Put it in writing*.

2. Periodically identify key actions and decisions to the Controller and Evaluators. Ensure that the Controllers and Evaluators are aware of reference to procedures; and that they can give you credit for your thought process. This may seem artificial, but it will assist in the evaluation process, and is the Participants' chance to excel.

3. Participants should play out their emergency response fully. Radiological monitoring teams, search and rescue teams, emergency repair teams, etc, ... should be deployed, as appropriate. Controllers will NOT provide information to Participants for use in determining response actions or resolving problems unless Participants take action necessary to obtain information through their own organization.

4. Participants may ask Controllers for information or clarification of scenario data.

   Examples are:

   - Initial condition of systems including: system status and availability valve line-ups, chemistry and radiological activity operating history, meteorological data, e.g., wind direction, speed, temperature, and forecasts.

   - Operational parameters and indication. Area radiation data. Airborne data at locations where sampling has been performed. Isotopic data resulting from sample analysis. Data normally obtainable from emergency response facility computers.

Participants' Briefing Sheet (Example)

NOTE: In order to comply with scenario time limits, analysis data may be provided sooner than analysis would normally take to complete. This is to permit actions/decisions to be made based on the analysis results.

5. Participants may **NOT** ask for the following from Controllers:

   - Information contained in procedures, drawings or instructions.
   - Determinations of which procedures to use.
   - Data not normally available.
   - Assistance in activating facilities.
   - Assistance in performing emergency response.
   - Assistance in repairing, replacing or substituting emergency response equipment, i.e., telephones, fax machines.
   - Explanation of scenario events.

6. Some Participants may insist that certain aspects of the scenario are unrealistic. Scenario events and timelines are designed to permit demonstration of specific objectives. It is NOT always possible to be realistic, but events are plausible.
7. Remember that the Emergency Plan requires a multitude of participants; and all facets of the organization must be tested. There may be some introduced artificiality's during the drills / exercises.
8. If you disagree with a Controller, you may request reconsideration or seek advice from the Lead Controller. Under NO circumstances are you to argue or indulge in theoretical discussions with the Controller.
9. You must **NOT** accept any data, message or instructions from Evaluators or Observers, including Federal Evaluators.
10. If Evaluators want to initiate actions, test individual abilities, or interject a "surprise", they must work through a Controller.

Participants' Briefing Sheet (Example)

11. If a Controller intervenes with emergency response actions, it is for a good reason.

12. Follow the Controller's direction at all times. This is essential for the overall success of the drill/exercise.

13. Participants must respond as if any radiation hazards presented by the scenario are actually present. This includes, but is not limited to, the following:

    - Wearing of dosimetry and protective clothing.
    - Observing good radiation protection practices.
    - Minimizing radiation exposures.
    - Responding to failed instruments in the field
    - Reporting radiological hazards to proper personnel
    - Proper contamination control, i.e., rad waste, eating, smoking, food deliveries
    - Moving upwind/crosswind from venting smoke or known airborne plumes.

14. Maintain a professional attitude throughout the drill/exercise. Dead times may arise when scenario events are exercising other areas of emergency response. Use this time to clean up work areas. Minimize socializing.

15. Intentional violations of Federal, State or local laws are NOT permitted. All local traffic laws, especially speed limits, must be observed.

16. Termination of drill/exercise activities will be authorized by the Drill/Exercise Coordinator.

17. Listen closely to all PA announcements.

18. One of the main purposes of the drill/exercise is to identify areas requiring improvement to increase the overall effectiveness of Emergency Preparedness at RNP.

19. Following termination of the drill/exercise, participate in the facility critique.

20. If any facility equipment is inoperable and requires attention to place in an operable or stand-by condition, report information to the Facility Lead Controller for follow-up.

21. *All* logs, journals, worksheets, checklists and other documentation completed during the drill/exercise must be retained and turned over to the Facility Lead Controller at the critiques.

SAFETY

1. Ensure personnel safety first and foremost.

2. All normal RNP rules and procedures will be followed when entering actual radiological controlled or radiation areas.

3. NO ONE, including Controllers, Evaluators and Observers, is exempt from normal site radiological practices and procedures.

4. Actual emergencies take precedence over all drill/exercise activities. If a real emergency occurs during the drill/exercise, the emergency will be reported to the Site Emergency Coordinator. If the decision is made to terminate the drill/exercise, the Lead Controller in the TSC should inform the Drill/Exercise Coordinator in the Control Cell who will then notify all other Controllers of the situation and decision to terminate. The situation may require the drill/exercise to be put on "hold" for a period of time and resumed when the emergency is terminated.

5. Personnel will be informed of status via the Plant Page system.

6. Participants would also be informed by their Controller.

7. Protection and safety of employees, the public and the environment shall be the primary concern at all times.

8. Participants may be permitted liberal "free play" in their response. However, Controllers, after making note of actions to be taken, may prohibit certain actions to maintain the appropriate response within the planned scenario and timeline.

9. Some areas of emergency response may be limited to protect personnel and equipment.

10. Participants must not operate, manipulate, or implement repairs on installed plant equipment or valves.

11. Participants must not enter into actual High and Very High Radiation Areas.

12. Appropriate onsite Participants should demonstrate use of SCBAs once, but must not discharge air tanks.

13. Fire hoses must NOT be charged.

CONTROLLERS AND EVALUATORS

1. Controllers & Evaluators for the drill (See attached listing)

2. Participants should not talk with Evaluators or Observers.

3. Participants may ask questions of Controllers for drill-related information only. Questions should be limited to information normally available to ERO personnel in a real event.

4. Observers and Evaluators should not talk to Participants.

PARTICIPATING FACILITIES AND DRILL INFORMATION:

1. Simulator Control Room, TSC, OSC, EOF, and JIC. If Simulator fails, the Facility Lead Controller will pass out SPDS data in Simulator only.

2. Make all PA announcements on the Plant PA System. (Begin and end communications with "This is a drill message.").

Participants' Briefing Sheet (Example)

3. There will **NOT** be an actual Site Evacuation. If drill conditions warrant a Site Evacuation, the Site Evacuation alarm will be sounded . Accountability is expected to be performed

DRILL TIMES:

All ERO personnel should report to their facilities as directed by Plant PA, Dialogic, or beeper activation.

OFF-SITE AGENCY PARTICIPATION

1. Participating Agencies: Darlington, Lee, Chesterfield Counties, State of South Carolina, DHEC. If advised that an offsite agency can no longer participate, inform the Lead Controller or Communications Evaluator.

2. NRC notifications per procedure.

3. INPO & ANI: Make calls per procedure.

4. Weather Information: The simulator will provide ERFIS meteorology. Do **NOT** use live Met Tower readings

SIMULATIONS:

5. Participants may request and obtain additional data or information from Controllers that would normally be available upon completion of the appropriate actions.

6. All communications (public address announcements, telephone, facsimile, radio) and any notifications made to offsite agencies should begin and end with -This is a Drill-. This phrase should also be repeated at frequent intervals to ensure intercepted transmissions do not cause public alarm.

7. Note: Ensure use of correct radio channel when transmitting via radio. Unless authorized by a Controller, no actions may be simulated.

8. If authorized to simulate an action, tell the appropriate Controller or Evaluator how and when you would normally perform the simulation at the time of the action. Simulation involves identification and explanation of required actions and procedures.

9. Actual performance involves deployment of resources and physical implementation of procedures.

10. Controllers use time-related messages as the mechanism of initiating, orchestrating, modifying and completing scenario events. Operational and radiological data are also issued through time-related messages. Accept these messages immediately. They may contain scenario information essential to your successful performance.

11. Participants are responsible for coordinating with their Controller before being dispatched into a facility or out into the field. The Controller may have data that *is* vital to scenario events. This is of paramount importance to the success of the drill/exercise.

12. Chemistry: Request data from assigned OSC Rad. Controller for sampling missions.

13. Any building or Site Evacuation will be SIMULATED. All Evacuation Alarms will be initiated in the Main Control Room.

COMMUNICATIONS:

1. Remember to use "This is a drill message" for communications outside the facility or that could be heard by personnel outside the facility.

2. Refer to procedure and the ERO Phone Book for phone numbers not listed in Participant Phone List.

3. The Plant PA CANNOT be used to page the Control Room Simulator, use phones.

4. The ARD phones in facilities are live and can be used.

5. Challenge data and info that does not appear valid through established communications channels. If information is confirmed but does not appear correct, request clarification from Facility Lead Controller.

Participants' Briefing Sheet (Example)

DRILL CONCLUSION:

1. Sign the drill roster in each facility in which you participate. Observers should sign the roster as an observer to receive training credit.

2. Observers do NOT interface with participants. Observer questions should only be directed to a Controller.

3. Turn all drill paperwork over to the Lead Controller. This includes copies of logs.

4. Ensure all facilities are left clean (i.e. trash and drink cans placed in applicable containers), and facility re-arranged as it was prior to start of the drill.

5. Ensure all TSC, OSC, EOF, and JIC facility deactivation steps have been completed, and the facility is ready for immediate activation (Example: whiteboards are erased; equipment is re-stored in its proper location, etc,). Admin Staff Support personnel in the TSC/OSC/EOF/JIC will perform Inventory Checklists in EPPRO-02 and give to Lead Controller.

6. EP Improvement Forms should be used to document suggestions and general comments. The corrective action program should be used to document problems with equipment, processes or facilities.

CRITIQUES

1. Participant Critique immediately following the drill (led by facility leads; all participants should be included).
2. Controller/Evaluator Critique following Participant Critique in each facility
3. Lead Evaluator Critique on Wednesday, 0900 hours in the EOF.
4. **Presentation of Critique Findings to Management** will occur at **Wednesday, 01/23/02** following MRT. Facility leaders are strongly encouraged to attend.

DRILL OBJECTIVES
Please review attached objectives.

INITIAL CONDITIONS (see attached) (Provide phone list to CR staff)

QUESTIONS AND COMMENTS

Progress Energy	R Reference Use

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 2

PART 5

EPPRO-01

PROGRAM AND RESPONSIBILITIES

REVISION 16

SUMMARY OF CHANGES

PRR 117180

STEP #	REVISION COMMENTS
8.1.2.3.c Bullet 7 Step 1	Editorial change: Changed "seven" to "ten" to agree with previous step.

TABLE OF CONTENTS

8.1 PROGRAM AND RESPONSIBILITIES

8.1.1 DRILL AND EXERCISE PARTICIPATION

1. ERO personnel are expected to drill/exercise with their designated team.

   a. If they will be unavailable for the drill it is their responsibility to ensure some one from another team will fill their position.

   b. Relief team personnel will participate in at least one team Drill, Exercise, or Tabletop each year.

   c. Non-Team designated ERO personnel are expected to coordinate with the other persons qualified for their position to ensure the position is staffed for each drill/exercise and that each ERO member participates in at least one Drill per calendar year.

2. ERO personnel filling critical positions shall be observed at least once in a calendar year performing their ERO duties.

3. Unless otherwise directed by Emergency Preparedness (EP), ERO personnel should respond during augmentation for their facility.

   a. Those personnel available to respond should establish 24 hour coverage for the position.

   b. Personnel on night shift may be exempted from augmentation, but should be used to establish 24 hour coverage.

   c. After the rotation is established, personnel may be simulated to be sent home and return to their place of work.

   d. Personnel are required to keep the manager responsible for their accountability informed of their location should an evacuation be conducted at a later time.

8.1.2 DRILLS AND EXERCISES

1. Emergency Response Organization (ERO) personnel will participate in periodic drills at least once each calendar year. Additionally one team, on a rotational basis, will participate in the Graded Exercise. The purpose of conducting drills is to ensure that each team has the skills to successfully deal with a real emergency. The following are the types of drills conducted:

   a. Medical Emergency Drills: Medical emergency drills will be conducted annually. They will involve a simulated contaminated and injured individual. Off-site portions of these drills may be conducted as part of an exercise.

   b. Health Physics Drills: Health Physics drills, including response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements, will be conducted semi-annually. **{NRC Amendment No. 192}**

      – Participation in the Medical Services (MS-1) drill may also be included.

   c. Combined Functional Drills: Combined Functional Drills may include any of the required drills and serve as the primary method of practical training for new ERO members and continuing training for existing members.

2. An Exercise will be conducted as required by 10 CFR, Part 50, Appendix E.

   a. The scenario which will ultimately escalate to at least a Site Area Emergency.

   b. The scenario will be varied from year to year such that major elements of the Plant, County, and State Plans and emergency organizations are tested within a six (6)-year period. Major elements to be demonstrated are outlined as drill/exercise objectives in Attachment 8.1.14.4. Deletion of any of the elements outlined in Attachment 8.1.14.4 requires PNSC approval. (AR #44128/PNSC Meeting #1999)

8.1.2.2 **DRILLS AND EXERCISES** (Continued)

c. Consideration should be given to vary the scenarios during the six year cycle to include accidents identified in Chapter 15, Accident Analysis, of the UFSAR. (CR 44132)

d. Combined Functional Drills: Combined Functional Drills may include any of the required drills and serve as the primary method of practical training for new ERO members and continuing training for existing members.

- An integrated drill involving the fire brigade, Dedicated Shutdown procedures (DSP) and the ERO should be practiced once during a two year cycle.

e. Each Exercise scenario will include a list of performance objectives and a description of the expected responses. Specific tasks that should be evaluated are listed in Attachment 8.1.14.4 and 8.1.14.5, "Drill Objectives" and "Acceptance Criteria" respectively.

- Attachments identify the Emergency Response facility where the activity is most likely to occur, however, the objective may be judged acceptable if performed in an alternate location.

- Credit may be taken for objectives that are satisfactorily completed during actual events. A memo should be generated that provides a summary/synopsis of the event and the performance objectives that were demonstrated during the actual event. (AR #79167)

f. An off-hours exercise which starts between 6:00 p.m. and 4:00 a.m. will be conducted once every six (6) years.

g. Advance knowledge of the scenario content and the times of the exercises will be kept to a minimum to ensure a realistic participation by those involved.

8.1.2.3 **DRILLS AND EXERCISES** (Continued)

3. The EP Staff is responsible for planning and conducting drills and exercises not addressed elsewhere (e.g., Fire Drills are addressed in the Fire Plan). They shall provide:

   a. The scenario including objectives for the drill/exercise.

      - From time to time "specific objectives" which are in addition to required performance objectives will be added to the Training Exercise Objectives. These may be in response to previous deficiencies, EP TPC items or require that normally simulated items be actually performed. A prompt to consider these items is contained in the pre-drill checklist.

      - An extent of play describing the degree of simulation for drill/exercise activities.

      - Qualified Controller/Evaluators to evaluate the drill/exercise.

      - As a minimum, Controller/Evaluators should be available to evaluate the following:

        - each facility activating,
        - Environmental Monitoring Teams,
        - Mechanical Damage Control Missions (as applicable),
        - Electrical Damage Control Missions (as applicable),
        - Chemistry/Health Physics Missions,
        - Offsite functions to be simulated,
        - any special functions (e.g. fire, injury)

   b. A yearly plan for ERO exercises. The yearly plan should identify the drill/exercises that should be counted in the NRC Performance Indicator for drill and exercise performance.

   c. Critiques will be conducted after each drill/exercise in accordance with Attachment 8.1.14.6 (AR #44128,CAPR). Critique observations should be categorized during the lead evaluator critique roll-up as noted below:

NOTE:	Critique reports for small scale drills may be documented in memo format.

8.1.2.3.c **DRILLS AND EXERCISES** (Continued)

- **Strength:** an action or activity performed in an above average manner, or in a creative manner to resolve a problem without the violation of a requirement. These are items which all teams should consider adopting.

- **Deficiency:** an action or activity that results in failure to comply with the Emergency Plan/procedures, or failure to meet the acceptance criteria resulting in inadequate demonstration of a drill/exercise objective; an activity or action which interferes with the ability of the ERO to mitigate the consequences of an accident and protect the health and safety of the public.

- **Weakness:** an action or activity that interferes with the operation of the Emergency Response Organization to a degree that is correctable, however, if not corrected could to a reduction in the ability of the ERO to protect the health and safety of the public.

- **Comment:** an action or activity that meets current minimum response requirements and is within procedural requirements, but improvement would increase the efficiency and effectiveness of the response effort.
  - Comments reported on EP improvement forms will be screened for entry into Passport as a NCR, PRR, NTM, or WR, as applicable.
  - Feedback regarding disposition of items entered on an EP Improvement Form should be provided to the individual who initiated the comment, normally within ten working days.

- The draft critique report should be issued for comment to the participating ERO team members within ten working days following the post drill controller/evaluator meeting.
  1. If multiple drills are conducted during consecutive weeks, then the seven working day criteria will begin at the end of the final post drill controller/evaluator meeting.

- **Strength:** an action or activity performed in an above average manner, or in a creative manner to resolve a problem without the violation of a requirement. These are items which all teams should consider adopting.

- **Deficiency:** an action or activity that results in failure to comply with the Emergency Plan/procedures, or failure to meet the acceptance criteria resulting in inadequate demonstration of a drill/exercise objective; an activity or action which interferes with the ability of the ERO to mitigate the consequences of an accident and protect the health and safety of the public.

- **Weakness:** an action or activity that interferes with the operation of the Emergency Response Organization to a degree that is correctable, however, if not corrected could to a reduction in the ability of the ERO to protect the health and safety of the public.

- **Comment:** an action or activity that meets current minimum response requirements and is within procedural requirements, but improvement would increase the efficiency and effectiveness of the response effort.
  - Comments reported on EP improvement forms will be screened for entry into Passport as a NCR, PRR, NTM, or WR, as applicable.
  - Feedback regarding disposition of items entered on an EP Improvement Form should be provided to the individual who initiated the comment, normally within ten working days.

- The draft critique report should be issued for comment to the participating ERO team members within ten working days following the post drill controller/evaluator meeting.
  1. If multiple drills are conducted during consecutive weeks, then the seven working day criteria will begin at the end of the final post drill controller/evaluator meeting.

8.1.2.3 **DRILLS AND EXERCISES** (Continued)

- The critique report will normally consist of the following:
  1. Cover Letter and Summary, signed by the Supervisor of Emergency Preparedness, with a brief statement containing the date the drill(s) was conducted; team(s) that participated; and a summary statement of overall drill performance.
  2. Objectives and Objective Status
     - The objectives should be listed for each facility.
     - The status of each objective will be listed for each facility based on the objective acceptance criteria.
     - Satisfactory completion of an objective by any team will satisfy that requirement for the Site.
     - Any team failure to demonstrate an objective is a deficiency and will be handled as such. At the discretion of EP Supervision failure to demonstrate an objective(s) may require re-demonstration by the team.

d. A pre-drill and post-drill review of items needed to prepare for the drill/exercise or return to normal following the drill/exercise (i.e., reset simulator telephones).

e. Trend identification and analysis of ERO drill processes in accordance with CAP-NGGC-0200.

8.1.3 EP PROCEDURE MAINTENANCE AND PROGRAM IMPROVEMENTS

1. The annual Emergency Plan and Implementing Procedures Review will be documented as a mandatory self assessment per CAP-NGGC-0201 and should be a cross-functional.

2. Procedure improvements may be recommended by initiating a procedure revision request (PRR) in Action Tracking.

8.1.3 (Continued)

3. Procedure changes to the Robinson Emergency Plan and/or Emergency Procedures will be accomplished as required by AP-044, Procedure Review and Approval Process, and PRO-NGGC-0204.

   a. Emergency Preparedness will be responsible to maintain the Emergency Action Levels (EAL) and supporting basis documents, as well as the Emergency Procedures.

   b. Documents will be developed and maintained to comply with applicable regulations.

   c. The EAL basis document will be revised to reflect NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," or other management directives and policies.

   d. All Emergency Procedures, EALs, and the Emergency Plan shall be reviewed per REG-NGGC-0010, 10 CFR 50.59 and Selected Regulatory Reviews.

8.1.4 **INADVERTENT SIREN ACTIVATION**

1. *Upon receiving a report of an inadvertent siren activation:*

   a. If a real emergency or drill/exercise is in progress that involves sounding of the sirens, then direct the callers to tune to an Emergency Alerting System Station listed in the emergency public information distributed by Progress Energy.

   b. If no event is in progress obtain information requested on attachment 8.1.14.2, Siren System Inadvertent Activation Report and ask the caller if a call back is desired once more information is known.

8.1.4 **INADVERTENT SIREN ACTIVATION** (Continued)

2. If an inadvertent siren activation has been confirmed, then notify the following:

   a. All County Emergency Operations Center or Warning Points concerning the plant status. This can be accomplished via Selective Signaling or the Bell lines.

      Sirens are located as follows:

      – Chesterfield County - 13 Siren Locations
        Siren #'s - 01, 02, 03, 04, 05, 06, 09, 10, 11, 15, 16, 17, and 45

      – Darlington County - 28 Siren Locations
        Siren #'s - 07, 08, 12, 13, 14, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 30, 31, 32, 33, 34, 36, 37, 38, 39, 41, 42, 43, and 44

      – Lee County - 4 Siren Locations
        Siren #'s - 28, 29, 35, and 40

      Total Sirens - 45 Siren Locations (All Counties)

   b. Notify the Telecommunications Help Desk that an inadvertent siren activation has occurred and request that repair personnel be dispatched to correct the problem. Request a work order Number and a return call when the sirens have been silenced.

   c. Notify Emergency Preparedness by phone or pager. The ERO Phone Book has the necessary information.

   d. Notify Robinson Communications of the inadvertent siren activation and request immediate notification if a press release is to be issued. A press release relating to this event is reportable to the NRC. Consult AP-030, NRC Reporting Requirements.

8.1.4 **INADVERTENT SIREN ACTIVATION** (Continued)

3. When the Unit 2 Control Room is notified that the siren(s) have been silenced ensure that:

   a. Evaluate AP-030, NRC Reporting Requirements, for potential NRC reporting.

   b. Notify the State and County Warning Points concerning the status of the sirens.

   c. Notify Robinson Communications.

4. Forward information gathered and any completed Attachment 8.1.14.2 forms to Emergency Preparedness for retention as appropriate.

8.1.5 **EMERGENCY RESPONSE ORGANIZATION BEEPER DISTRIBUTION**

1. After qualifying as an ERO member, EP will arrange an ERO beeper for the positions identified in Attachment 8.1.14.3, ERO Beeper Distribution.

2. Beepers are to ensure that the plant has the ability to meet the 30-45 minute response staffing requirements.

3. Plant Public Address, Non-Responding Emergency Communicators, dialogic and/or beepers are used to contact the 60-75 minute staff, and other positions not required by NUREGs.

8.1.6 **HURRICANE PREPARATION GUIDANCE (CR 16553)**

OMM-021 "Operation During Adverse Weather Conditions", provides direction for hurricane/adverse weather preparations. Additional tasks for the EP staff to consider are:

- Establish the response teams.
- Designate and post sleeping areas.
- Set up and test the satellite telephone.

8.1.7 **INTENTIONALLY BLANK**

8.1.8 **INTENTIONALLY BLANK**

8.1.9 **INTENTIONALLY BLANK**

8.1.10 **SCENARIO DEVELOPMENT**

Guidelines for the development, conduct, and assessment of drill/exercise scenarios are contained in EPPRO-05, Scenario Development and Drill Control Guidelines.

8.1.11 **DRILL/EXERCISE SELF EVALUATION (AR #44128)**

1. Evaluate the effectiveness of each of the following drill/exercise cycle phases at least once during the biennial exercise cycle:
   a. Analysis
   b. Design
   c. Development
   d. Implementation
2. Select one or more of the following self-evaluation programs to determine the effectiveness of a specific phase:
   a. Corrective action
   b. Operating experience
   c. Self-assessment
   d. Benchmarking
3. Probe to identify the following:
   a. Flawed defenses
   b. Error precursors
   c. Weak organizational processes

8.1.11 (Continued)

4. Consider the following elements:
   a. Results
   b. Behaviors
   c. Task demands
   d. Work environment
   e. Individual capabilities

8.1.12 **PUBLIC EDUCATION AND INFORMATION**

1. Emergency Preparedness and Site Communications shall perform the following actions:

   a. In cooperation with the State of South Carolina, local governments and with corporate CP&L efforts, ensure that public education and information efforts are consistent and complementary.

   b. Ensure that a public information program for persons living in the possible plume exposure Emergency Planning Zone includes the following elements:

      – Brochures or other media containing educational information on emergency preparedness, nuclear power and radiation, and how to contact CP&L for more information.

      – Coordination of speakers to address emergency preparedness when requested.

      – Supplying news material for the media.

8.1.12.1 (Continued)

c. Ensure that the public education program includes the following information:

- The potential for occurrence of a radiological emergency.
- How to recognize a radiological emergency notification.
- What proper, immediate actions (e.g., return to home, close windows and turn on radio) should be taken upon notification.
- Protective actions to be taken if shelter is prescribed.
- General procedure to follow if an evacuation is required.
- General education on radiation.
- A contact for how to learn more about emergency preparedness.

8.1.13 **RECORDS**

1. Attachment 8.1.14.2 is to be maintained in the EP Unit files for a period of two years unless otherwise specified.
2. The following documents are to be submitted for retention as vital records in the plant vault per RDC-NGGC-0001:
   - Recurring drills/exercise maintenance and testing records documented per EPPRO-02.
   - NRC Biennial Graded Exercise scenario narrative/timeline, scope and objectives, and final critique report.
3. For Full Scale Drills/Exercises, copies of the scenario timeline, draft critique reports, attendance records, and final critique reports should be maintained by the EP Staff for a period of six (6) years.
4. For Small Scale Drills, copies of the covered topics, attendance records, and critique reports should be maintained by the EP Staff for a period of six (6) years.

8.1.14 ATTACHMENTS

8.1.14.1 EP Improvement Form

8.1.14.2 Siren System Inadvertent Activation Report

8.1.14.3 ERO Beeper Distribution

8.1.14.4 EP Drill and Exercise Objectives

8.1.14.5 Acceptance Criteria

8.1.14.6 Guidelines for Emergency Response Organization (ERO) Critiques

ATTACHMENT 8.1.14.1
Page 1 of 1

EP IMPROVEMENT FORM

DATE:_____ ERO POSITION: _____

NAME: _____

RECOMMENDED CHANGE IS IN REFERENCE TO:

_____ EMERGENCY PLAN _____ EMERGENCY FACILITY

_____ EP-_____ _____ EP TRAINING
(Give Number)

_____ EQUIPMENT _____ OTHER (List) _____

I RECOMMEND THE FOLLOWING CHANGE, ADDITION OR IMPROVEMENT:

(Be specific - list all information)_____

_____

_____

_____

_____

For Emergency Preparedness Use

AR # (NTM,PRR, NCR, WR): _____

Date Received:_____ Date Originator Notified: _____

This form is for information only. No record retention requirements apply.

ATTACHMENT 8.1.14.2
Page 1 of 1

SIREN SYSTEM INADVERTENT ACTIVATION REPORT

Date:__/__/__ Time:_____

Fill out as much of the following information as possible:

1. Incident Date:__/__/__ Incident Time:_____

2. Caller's Name:_____ Caller's Phone No.:_____

3. Location of siren(s) (include County and Community of caller):

The siren number is the preferred information. The siren number is located on the siren pole. If the caller cannot provide the siren number, obtain any information which may aid in identifying the siren. For example, request a description of the siren location, a road number, or of the location of the person who is making the report and the direction from which the sound is coming.

Siren Number(s) or Location _____

_____

_____

4. Additional questions: (circle one)

- What noise did the siren make (steady tone, wavering tone, etc.)?
- Is the siren still sounding? (Yes / No)
- For what length of time did the siren sound?
  (1 min / 2 min / 3 min / Continuous / Unknown)
- Is more than one siren sounding? (Yes / No)

5. Name of Person Receiving Report | Location | Telephone Number

Completed documents to be maintained in EP Files for a period of two years.

ATTACHMENT 8.1.14.3
Page 1 of 1

ERO BEEPER DISTRIBUTION

All Team Members in the following positions.

SEC	OSC Leader	AERM
POD	ERM	NRC
TAD	A&LM	EP
ERD	TAM	JIC Director
RCD/RCM	POA	Reactor Engineer
ESTL	EC	Computer Support
Superintendent Shift Operations Desk	DPTL	Company Spokesperson
State/County Communicator		RC Tech-Damage Control
RC Tech Facilities (45 min)		En Mon Team (45 min)
JIC Technical Spokesperson		

Rotational Beeper positions

NRC Communicator	Environmental/Chemistry Tech
PI Communicator	Electrical Engineer
Security Lieutenant	Mechanical Engineer
Damage Control Leaders	RC Tech-Facilities (75 min)
(1) Mechanics	En Mon Team Leader
(1) I&C/Electricians	En Mon Team (75 min)

(1) Normally on shift, beepers available

This information is for resource allocation only. No record retention requirements apply.

ATTACHMENT 8.1.14.4
Page 1 of 7

EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
1	A.1.e F.1.a	Provide 24 hour per day on shift emergency response personnel as required by the Emergency Plan including the capability of 24 hour per day manning of communications.	X					6 yr
2	A.4	Demonstrate ability to staff Emergency Response Facilities (ERF) 24 hours per day.		X	X	X	X	6 yr
3	B.5 H.4 B.7 [1]b.2	Demonstrate the ability to augment shift staff and activate ERFs with Emergency Plan Table 5.3.2-1, "Capability for Additions" column for 30-45 min and 60-75 min.		X	X		X	2 yr
4	B.7.a B.7.b B.7.c B.7.d	Demonstrate the ability to augment shift staff with: -Logistics support personnel -Technical support for reentry/recovery operations -Management interface with governmental authorities -Corporate interface with news media		X		X	X X X	2 yr

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

[1]10CFR50.47

EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
5	B.8	Demonstrate the ability to contact Contractors and private organizations for technical assistance.					X	Ann
6	B.9 L.4 [1]b.12	Demonstrate the ability to obtain assistance from law enforcement, medical, and fire-fighting organizations including assistance for contaminated personnel.	X					Ann
7	C.2.b	Demonstrate the ability to provide a representative to the SEOC (when activated) and County EOCs.					X	2 yr
8	C.3 [1]b.9	Demonstrate the ability to coordinate radiological monitoring and analysis.					X	Ann
9	D.1 I.1 [1]b.4	Demonstrate the ability to identify and properly classify events using appropriate procedures, plant system parameter values, and the EALs.	X	X				Ann
10	E.2 F.1.e [1]b.2	Demonstrate the ability to alert, notify, and mobilize ERO personnel	X	X	X	X	X	Ann
11	E.3 [1]b.5	Demonstrate the ability to make initial emergency notification to State and Chesterfield, Darlington, and Lee County Warning Points or EOCs within 15 minutes following declaration of each emergency classification.	X				X	Ann

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

[1]10CFR50.47

EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
12	E.4 [1]b.5	Demonstrate the ability to make follow-up notifications to State and Chesterfield, Darlington, and Lee County Warning Points or EOCs within 60 minutes following initial and change of classification notifications.	X				X	Ann
13	E.7 J.7 [1]b.10	Demonstrate the ability to formulate protective action recommendations and transmit to State and County personnel.					X	Ann
14	F.1 F.1.a F.1.b	Demonstrate the ability to communicate with State and County personnel using primary and backup communication systems.	X				X	Ann
15	F.1.c	Demonstrate the provisions to communicate with Federal emergency response organizations.	X	X				Ann
16	F.1.d [1]b.6	Demonstrate the ability to communicate between the CR, TSC, EOF, OSC, and Enmon teams.	X	X	X		X	Ann
17	F.1.f	Demonstrate the ability to communicate with the NRC within 60 minutes following each emergency classification declaration.	X	X				Ann
18	G.3.a G.3.b	Demonstrate timely activation of the Joint Information Center.				X		2 yr

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

[1]10CFR50.47

EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
19	G.4.a [1]b.7	Demonstrate the ability to obtain emergency related information.				X		2 yr
20	G.4.b G.4.c	Demonstrate the ability to disseminate timely, accurate, and appropriate emergency information including provisions for rumor control.				X		2 yr
21	H.6.a H.6.b I.5	Demonstrate the ability to obtain data from meteorological, hydrologic, seismic, radiological monitors, and sampling devices.	X				X	Ann
22	I.2 [1]b.9	Demonstrate the ability to analyze data from post accident monitoring equipment. **{NRC Amendment No. 192}**			X			Ann
23	I.3.a I.3.b	Demonstrate the ability to determine the source term and magnitude of releases.	X				X	Ann
24	I.8 I.9 J.7	Demonstrate the ability to project dosage to the public based on plant and field data.					X	Ann
25	J.1 [1]b.2	Demonstrate the ability to alert and advise individuals who are visitors, contractors, and members of the public onsite.	X					Ann

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

[1]10CFR50.47

EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
26	J.3 K.7	Demonstrate the ability to evacuate non-essential personnel from site to be monitored and decontaminated at an offsite location.			X		X	6 yr
27	J.4	Demonstrate the ability to monitor, decontaminate and evacuate non-essential personnel from site.			X		X	6 yr
28	J.5	Demonstrate the ability to account for individuals in the protected area and identify the names of those unaccounted for within 30 minutes.		X				6 yr
29	J.6 K.3.a K.3.b	Demonstrate the ability to provide ERO personnel protective clothing, respiratory protection, dosimetry, and radioprotective drugs. This also includes determination of doses received and maintenance of dose records 24 hours per day.	X	X	X		X	2 yr
30	K.1 [1]b.11	Demonstrate the ability to establish onsite exposure guidelines consistent with EPA emergency worker and lifesaving activities.		X				Ann
31	L.2	Demonstrate the ability to provide onsite first aid capability.			X			Ann

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

[1]10CFR50.47

EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
32	M.1 M.2 M.3 M.4	Demonstrate the ability to reassess plant conditions and evaluate recovery/reentry considerations.					X	6 yr
33	N.1.b	Demonstrate the ability to augment the ERO, during an Exercise, between 6:00 p.m. and 4:00 a.m. or any weekend hours.	X					6 yr
34	N.2.d	Perform Radiological Monitoring Drills which involve collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping.					X	Ann
35	N.2.b	Perform fire drills which demonstrate the ability of the fire brigade to respond to a fire and interface with offsite fire assistance.	X					6 yr
36	N.2.c	Perform medical emergency drills which demonstrate the ability to deal with a medical emergency involving a simulated contaminated individual including participation of offsite medical treatment agencies.	X		X			Ann

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

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EP DRILL AND EXERCISE OBJECTIVES

	NUREG 0654	OBJECTIVE	CR	TSC	OSC	JIC	EOF	FREQ
37	N.2.e (1) [1]b.9	Perform Health Physics Drills which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment.			X			6 mo
38	ACR 94-01156 CA .1	Perform an offsite hazards drill which will involve response to, and analysis of simulated offsite hazards (examples: chlorine, propane, hydrogen, gasoline or some other offsite hazard either natural man made). Samples and measurements as well as protective measures should be taken.	X	X	X		X	Ann
39	N.4	Perform a critique at the conclusion of an exercise to evaluate the ability of organizations to respond as required.	X	X	X	X	X	Ann
40		Demonstrate that NRC identified open items resulting from previous exercises are corrected.						
41	CR 98-02026	Demonstrate actual use of SCBA's including field change out of spare cylinder.			X			Ann
42	J.6.c	Demonstrate the ability to control radiological exposure to emergency workers including the issuance of radioprotective drugs.	X	X	X		X	2 yr

NOTE: Deletion of EP Drill and Exercise Objectives from this attachment requires PNSC approval. (AR #44128/PNSC Meeting1999)

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
1	Provide 24 hour per day on shift emergency response personnel as required by the Emergency Plan including the capability of 24 hour per day manning of communications.	This objective is met as long as the staffing requirements of Technical Specifications, Emergency Plan Table 5.3.2-1 "Minimum Shift Size" column are satisfied.
2	Demonstrate ability to staff ERFs 24 hours per day.	This objective is met when the ERFs are staffed and a shift turnover is complete.
3	Demonstrate the ability to augment shift staff and activate ERFs with Emergency Plan Table 5.3.2-1, "Capability for Additions" column for 30-45 min and 60-75 min.	This objective is met when the staffing requirements of the Emergency Plan Table 5.3.2-1, "Capability for Additions" column is satisfied.
4	Demonstrate the ability to augment shift staff with: -Logistics support personnel -Technical support for reentry/recovery operations -Management interface with governmental authorities -Corporate interface with news media	This objective is met when facilities are capable of being activated.
5	Demonstrate the ability to contact Contractors and private organizations for technical assistance.	This objective is met when the ability to contact has been demonstrated. The ability to contact should include a verification of the appropriate phone number.
6	Demonstrate the ability to obtain assistance from law enforcement, medical, and fire-fighting organizations including assistance for contaminated personnel.	This objective is met when the ability to contact has been demonstrated. The ability to contact should include a verification of the appropriate phone number.

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
7	Demonstrate the ability to provide a representative to the SEOC (when activated) and County EOCs.	This objective is met when the facilities are activated and an ERO representative is present.
8	Demonstrate the ability to coordinate radiological monitoring and analysis.	This objective is met when appropriate monitoring and analysis data are received. (Portions may be simulated as a control cell.)
9	Demonstrate the ability to identify and properly classify events using appropriate procedures, plant system parameter values, and the EALs.	This objective is met when events are correctly classified in a timely manner.
10	Demonstrate the ability to alert, notify, and mobilize ERO personnel.	This objective is met when the ERFs are activated.
11	Demonstrate the ability to make initial emergency notification to State and Chesterfield, Darlington, and Lee County Warning Points or EOCs within 15 minutes following declaration of each emergency classification.	This objective is met when initial notifications are accomplished within the required 15 minutes. Time starts at emergency declaration and ends at first contact.
12	Demonstrate the ability to make follow-up notifications to State and Chesterfield, Darlington, and Lee County Warning Points or EOCs within 60 minutes following initial and change of classification notifications.	This objective is met when follow-up notifications are accomplished within the required 60 minutes. Time starts at completion of the previous notification and ends at first contact.

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
13	Demonstrate the ability to formulate protective action recommendations and transmit to State and County personnel.	This objective is met when protective action recommendations are transmitted to the State and Counties within 15 minutes following the declaration of a General Emergency.
14	Demonstrate the ability to communicate with State and County personnel using primary and backup communication systems.	This objective is met when communications have been established using the Selective Signaling system and one of the backup systems.
15	Demonstrate the provisions to communicate with Federal emergency response organizations.	This objective is met by agreement letters.
16	Demonstrate the ability to communicate between the CR, TSC, EOF, OSC, and Enmon teams.	This objective is met when none of the other Objectives fail due to communications.
17	Demonstrate the ability to communicate with the NRC within 60 minutes following each emergency classification declaration.	This objective is met when communications are established within the required time. Time starts at emergency declaration and ends at first contact.
18	Demonstrate timely activation of the Joint Information Center.	This objective is met when the Company Spokesperson has declared the Joint Information Center activated and the information has been entered into the log.

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
19	Demonstrate the ability to obtain emergency related information.	This objective is met when facility briefings between the EOF and JIC have been conducted as appropriate.
20	Demonstrate the ability to disseminate timely, accurate, and appropriate emergency information, including provisions for rumor control.	This objective is met when a press conference has been conducted by a Company Spokesperson and false information has been corrected by responsible personnel.
21	Demonstrate the ability to obtain data from meteorological, hydrologic, seismic, radiological monitors, and sampling devices.	This objective is met when data has been obtained and provided to appropriate personnel.
22	Demonstrate the ability to analyze data from post accident monitoring equipment. **{NRC Amendment No. 192}**	This objective is met when core damage assessment has been performed in accordance with applicable procedures.
23	Demonstrate the ability to determine the source term and magnitude of releases.	This objective is met when source term and release magnitude/dose protection have been accurately determined.
24	Demonstrate the ability to project dosage to the public based on plant and field data.	This objective is met when Dose Projection information is included in the General Emergency declaration notification or as a follow-up to the General Emergency notification.

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
25	Demonstrate the ability to alert and advise individuals who are visitors, contractors, and members of the public onsite.	This objective is met when individuals receive, understand, and respond as required to notifications provided by alarms and PA.
26	Demonstrate the ability to evacuate non-essential personnel from site to be monitored and decontaminated at an offsite location.	This objective is met when personnel are sent to an offsite location for decontamination. (Actual transport may be simulated.)
27	Demonstrate the ability to monitor, decontaminate and evacuate non-essential personnel from site.	This objective is met when personnel are able to discuss decontamination procedures.
28	Demonstrate the ability to account for individuals in the protected area and identify the names of those unaccounted for within 30 minutes.	This objective is met when accountability is completed within 30 minutes.
29	Demonstrate the ability to provide ERO personnel protective clothing, respiratory protection, dosimetry, and radioprotective drugs. This also includes determination of doses received and maintenance of dose records 24 hours per day.	This objective is met when adequate supplies are available and dose records are maintained during the drill.

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
30	Demonstrate the ability to establish onsite exposure guidelines consistent with EPA emergency worker and lifesaving activities.	This objective is met when emergency worker and lifesaving exposure guidelines are implemented.
31	Demonstrate the ability to provide onsite first aid capability.	This objective is met when First Responders have provided initial treatment and the victim(s) have been delivered to the rescue squad. (Portions may be simulated as a control cell.)
32	Demonstrate the ability to reassess plant conditions and evaluate recovery/reentry considerations.	This objective is met when a recovery plan and an organization is formulated.
33	Demonstrate the ability to augment the ERO, during an Exercise, between 6:00 p.m. and 4:00 a.m. or any weekend hours.	This objective is met when augmentation is successfully completed between the hours of 6:00 p.m. and 4:00 a.m. or any weekend hours.
34	Perform Radiological Monitoring Drills which involve collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping.	This objective is met when environmental measurement through analysis of water, vegetation, soil, and air sample media have been completed, recorded and communicated.
35	Perform fire drills which demonstrate the ability of the fire brigade to respond to a fire and interface with offsite fire assistance.	This objective is met when the fire brigade arrives at the scene with appropriate equipment and offsite fire assistance is coordinated. (Portions may be simulated as a control cell.)

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ACCEPTANCE CRITERIA

	OBJECTIVE	ACCEPTANCE CRITERIA
36	Perform medical emergency drills which demonstrate the ability to deal with a medical emergency involving a simulated contaminated individual including participation of off site medical treatment agencies.	This objective is met when First Responders arrive at the scene and offsite assistance is coordinated. (Actual transport may be simulated. Off-site medical treatment may be demonstrated in conjunction with the medical services (MS-1) drill.)
37	Perform Health Physics Drills which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment.	This objective is met when response and analysis is made to simulated elevated airborne and liquid samples and direct radiation measurements in the environment. Credit may be taken for participation in the medical services (MS-1) drill.
38	Perform an offsite hazards drill which will involve response to and analysis of simulated offsite hazards (example chlorine, propane, hydrogen, gasoline or some other offsite hazard either natural or man made). Samples, measurements as well as protective measures should be taken.	This objective is met when an offsite hazard is included in a drill or exercise and protective measures are taken and the hazard is measured for the protective measures.
39	Perform a critique at the conclusion of an exercise to evaluate the ability of organizations to respond as required.	This objective is met when facility critiques have been conducted.
40	Demonstrate that NRC identified open items resulting from previous exercises are corrected.	This objective is met by successful demonstration of the task in the area(s) of concern.
41	Demonstrate use of SCBAs including field change out of spare cylinder.	This objective is meet when actual use of SCBAs and change out of cylinder are demonstrated.
42	Demonstrate the ability to control radiological exposure to emergency workers including the issuance of radioprotective drugs.	This objective is met when the need for radioprotective drugs has been determined in accordance with applicable procedures.

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ATTACHMENT 8.1.14.6
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Guidelines for Emergency Response Organization (ERO) Critiques

Critiques are an important part of the process of self-identifying problems and improvements for the Emergency Response Organization. The following are guidelines for conducting a facilitated critique of the Emergency Response Organization.

Critique Process

The facility leader should conduct a facilitated critique as follows: INIT.

1. Assign someone to record the critique notes. ____
2. Ask for input on each objective and the acceptance criteria on the facility listing.
3. After the participants for each position have completed their input, ask for input from the position evaluators. ____
4. Probe to identify ____
   - Flawed defenses
   - Error precursors
   - Weak organizational processes.
4. Consider the following elements: ____
   - Results
   - Behaviors
   - Task demands
   - Work environment
   - Individual capabilities
5. If problems are identified, prior to continuing, determine whether the problem should be: ____
   a) identified in a Condition Report (CR),
   b) identified on an EP Improvement Form (EPIF), or
   c) included in the critique as a general comment.

   If a Condition Report or EP Improvement Form is warranted, ensure critique participants identify who is responsible to initiate and evaluate the CR or EPIF, and document this in the critique notes.

6. Identify any remediation due to less than acceptable performance and document the recommended remediation in the critique notes. ____
7. After all of the objectives have been addressed, ask for any general comments from:
   - Participants ____
   - Controllers/Evaluators ____
   - NAS ____
   - NRC ____
8. Instruct the note taker to electronically transmit the critique notes to EP prior to the Lead Evaluator /Controller Critique (roll-up). ____