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June 18, 2008

A. Edward Scherer
Director
Nuclear Regulatory Affairs

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: **Docket Nos. 50-206, 50-361, 50-362, and 72-41**
Response to Request for Additional Information Regarding
Request for Emergency Plan Change
Increase in ERO Augmentation Time
San Onofre Nuclear Generating Station, Units 1, 2 and 3 and
Independent Spent Fuel Storage Installation

Reference: (1) Letter from B. Katz (SCE) to Document Control Desk (NRC), dated June 18, 2007, Subject: Docket Nos. 50-206, 50-361, 50-362, and 72-41, Request for Emergency Plan Change, Increase in ERO Augmentation Time, San Onofre Nuclear Generating Station, Units 1, 2, and 3, and Independent Spent Fuel Storage Installation.

(2) Letter from N. Kalyanam (NRC) to R. M. Rosenblum (SCE), dated May 8, 2008, 2008, Subject: San Onofre Nuclear Generating Station, Units 1, 2, and 3 and Independent Spent Fuel Storage Installation – Request for Additional Information on the Request for Emergency Plan Change, Increase in Emergency Repose Organization Augmentation Time (TAC Nos. MD5837 and MD5838).

Dear Sir or Madam:

By letter dated June 18, 2007 (Reference 1), Southern California Edison (SCE) submitted a proposed change to the Emergency Plan for San Onofre Nuclear Generating Station, which requested an extension to the time goal for the augmented staffing of Emergency Response Organization minimum staff positions.

By letter dated May 8, 2008 (Reference 2), the U. S. Nuclear Regulatory Commission (NRC) issued a request for additional information regarding SCE's proposed Emergency Plan change.

Enclosed is a response to the questions contained in Reference 2.

Rec'd 9/22/08
AV45
NMSS01

P.O. Box 128
San Clemente, CA 92674

Should you have any questions, please contact Ms. Linda T. Conklin at (949) 368-9443.

Sincerely,

Enclosure:

cc: E. E. Collins, Regional Administrator, NRC Region IV
D. B. Spitzberg, Region IV, San Onofre Unit 1
N. Kalyanam, NRC Project Manager, San Onofre Units 2 and 3
J. C. Shepherd, NRC Project Manager, San Onofre Unit 1
G. G. Warnick, NRC Senior Resident Inspector, San Onofre Units 2 and 3

Enclosure

Response to NRC Request for Additional Information
Regarding SONGS Proposed Emergency Plan Change

NRC Questions and SCE Responses

1. Request applicant provide evidence that the proposed change to the E-Plan for extending the Emergency Response Organization (ERO) augmentation time at SONGS has been reviewed by applicable State and local response organizations.

   SCE Response:

   The proposed Emergency Plan change was discussed with the Interjurisdictional Planning Committee, which consists of local offsite agencies, at a meeting dated January 9, 2007. Members of the California Office of Emergency Services were also in attendance. Unanimous support for the proposed change was received from the committee. Minutes of the meeting are provided as Attachment 1.

2. Attachment 1, Page 2 of the licensee's submittal states that, "The adoption of a 90-minute response time will provide an increased pool of available resources that currently exceed the 60-minute response time capability." Approximately how many additional personnel will be added to pool of available resources to staff the "minimum staff positions" and is there any additional compensation for the increase in response time?

   SCE Response:

   After a sample review of Operations, Maintenance, and Engineering, Southern California Edison (SCE) believes that approximately 200 additional people will become available as a result of this proposed change. This is compared to a total current Emergency Response Organization (ERO) population of 400. These additional 200 people will then become available for the ERO minimum augmented staff positions.

   No additional compensation will be provided for the increase in response time because the combination of the on-shift and proposed augmented staffing is 38 responders versus the 36 functions (responders) called out in Table B-1 of NUREG-0654. There are also 10 minimum staff positions that do not have any Table B-1 responsibilities for a total of 48 positions filled following augmentation.

3. Attachment 1 of the licensee's submittal, paragraph 3.8.3 titled, "Offsite Surveys," discusses that nine (9) fixed site detectors are 1 km from SONGS.

(3.1a) How do these detectors provide a complete coverage area to detect all off-site radiation effluents?

SCE Response:

Because the detectors are fixed in place they do not provide complete coverage. Protective Action Recommendations (PARs), however, are based primarily on exposure rates calculated at the Exlcusion Area Boundary (EAB) using the source term at the release point. The source term is typically measured with an installed plant effluent monitor. Pressurized Ion Chamber (PIC) readings can be used as an aid to direct the location of field teams. Field surveys and PIC readings also can be used to identify that a release is occurring in the event of an unmonitored release pathway.

(3.1b) Are these detectors accurate for all stability classes (see precaution 4.8 in SO123-VIII-40)?

SCE Response:

No, the detectors are not accurate for all stability classes. The Emergency Plan Implementing Procedure (EPIP) for the Health Physics Leader Duties, however, cautions the users of survey data (from both PIC and field teams) to consider the effects of atmospheric instability.

(3.1c) Do these detectors have the capability to monitor Iodine for emergency class determinations for Site Area and General Emergencies?

SCE Response:

No. These detectors do not have the capability to monitor iodine. Iodine is calculated based on iodine to noble gas ratios at the source of the release.

(3.1d) What are the positions of these detectors relative to the Exclusion Area Boundary?

The PICs are installed in nine (9) locations; seven (7) of which are located on the SCE property or the Camp Pendleton Marine Corps Base and are accessed by private roads.

The PICs are located at approximately one (1) kilometer from SONGS Units 2/3 in the approximate center of each of the nine (9) landward sectors. This is about 1000 ft. beyond the Exclusion Area Boundary (EAB).

(1) PRESSURIZED ION CHAMBERS
(2) Theta (Degrees)*
(3) DISTANCE* Meters / miles
(4) DIRECTION / SECTOR*

(1) S1: San Onofre Beach (2) 298° (3) 1070 / 0.7 (4) WNW / P

(1) S2: SONGS Former Evap. Pond (2) 313° (3) 890 / 0.6 (4) NW / Q

(1) S3: Japanese Mesa (2) 340° (3) 1150 / 0.7 (4) NNW / R

(1) S4: MCB - Camp Pendleton (2) 3° (3) 1120 / 0.7 (4) NORTH / A

(1) S5: MCB - Camp Pendleton (2) 19° (3) 1050 / 0.6 (4) NNE / B

(1) S6: MCB - Camp Pendleton (2) 46° (3) 940 / 0.6 (4) NE / C

(1) S7: MCB - Camp Pendleton (2) 70° (3) 870 / 0.6 (4) ENE / D

(1) S8: MCB - Camp Pendleton (2) 98° (3) 1120 / 0.7 (4) E / E

(1) S9: San Onofre State Beach (2) 121° (3) 940 / 0.6 (4) ESE / F

* Distance (meters / miles) and Direction (sector) are measured relative to Units 2 and 3 midpoints. Theta direction is determined from degrees true north.

(3.2) The paragraph further states "the information obtained from these detectors provide data to support dose assessment calculations using the Raddose-V computer program." Does this program utilize these detectors as an input to generate dose projections?

SCE Response:

No. The primary method of generating dose projections is from calibrated, installed plant effluent monitors. Nevertheless, a field reading can be used to back calculate to the release point to derive a source term. This can be done either manually as described in EPIPs or in the Raddose-V computer program. However, the manual method must use survey data at the EAB and the PICS are beyond the EAB. The computer program can use survey data from any distance and azimuth. However, both methods require that the survey be taken at the plume centerline. Using PIC data for back calculation would require that the meteorological conditions place the plume centerline directly over the PIC.

(3.3) The paragraph states SONGS is in the process of developing a calibration protocol for these units and that "SCE commits to implement the new calibration protocol prior to the implementation of the E-Plan Change".

(3.3a) How long have these PICs been in service?

SCE Response:

The PICs were installed circa 1983.

(3.3b) How is their reliability?

SCE Response:

The main electronics chassis was updated from a Reuter Stokes RS1011 to a Reuter Stokes RS1013 in 1995. From Jan. 2004 thru Dec. 2007 there were nine (9) corrective Maintenance Orders (MO's) on PICs. These MO's indicated either a local maintenance issue (i.e. 12V battery maintenance) or a loss of remote communication issue. In Oct. 2007, a wildfire event on Camp Pendleton damaged power and communication lines causing loss of four (4) detector sites for five (5) months. As part of the wildfire repair to the telecommunication lines, a telecommunication bridge was updated allowing for unique transmit and receive level settings to each PIC location, improving remote communication availability. Based on current off-site calibration of PIC ion chambers, two (2) out of the nine (9) locations have not been available while cycling the PIC ion chambers out for calibration at Battelle Labs. This situation will remain until all PIC ion chambers have been calibrated.

(3.3c) What are their power sources (primary and backup, if applicable)?

SCE Response:

The PICs obtain AC power from San Diego Gas & Electric (SDG&E) offsite power lines. The units contain 12vDC backup batteries which will power the units for up to eight (8) hours following a loss of AC power. The low voltage battery is always being charged when AC power is available.

(3.3d) By what process will they be maintained (calibrations, surveillances, preventive maintenance, etc)?

SCE Response:

The PICs are checked as part of the plant Preventive Maintenance (PM) Program on a 30 day PM schedule. This includes local inspection, battery checks, system status, and verification that the instrument is responding to the background radiation in which it is located (5-15 μR/hr).

The PICs electronics chassis is calibrated on an 18 month surveillance schedule, at which time the I/O equipment only is calibrated.

The PIC's are currently calibrated by Battelle Labs with an 18 month calibration frequency. PIC ion chamber calibration started in May, 2007 and is currently on-going.

(3.3e) If this protocol is not completed successfully, what impact will this have on the implementation of the proposed E-Plan changes?

None. The new calibration protocol is in progress and the PICs will continue to be calibrated at 18 Month Intervals.

(3.4) The next paragraph states "Following activation of the offsite agency and government emergency organizations the local agencies will be responsible for the offsite monitoring with the overall direction and coordination from the Offsite Dose Assessment Center in the EOF."

(3.4a) What is (the) response time for the local government agencies to staff their off-site monitoring teams?

Barring any road impediments, a radiation monitoring team can be at the staging location within ninety minutes of notification. All off-site radiation monitoring teams are staffed by firefighting organizations. The Orange County radiation monitoring teams are located 25 miles from the San Onofre Nuclear Generating Station (SONGS), Camp Pendleton radiation monitoring teams are located 13 miles from SONGS, and San Diego radiation monitoring teams are located 16 miles from SONGS. Orange County and Camp Pendleton radiation monitoring teams are staffed 24 hours a day with on-duty firefighters. San Diego County radiation monitoring teams are staffed during the day by the Oceanside Fire Department staff. During off-hours, the Oceanside Fire Department staff must be recalled.

Off-site radiation monitoring teams are typically notified within 15 minutes of the licensee's off-site notification of an alert or higher emergency. After an initial 15 minute check-out of their plume survey kits, the team is considered activated. Once activated, they can be immediately deployed by the Off-site Dose Assessment Center (ODAC) to a specific location, or sent to a fixed staging area located three miles from SONGS.

(3.4b) Do these off-site radiation monitors meet the training requirements in accordance with station procedures (Technical Specifications, SO123-XXI-1.11.3, SO123-VIII-0.200, or any other applicable procedures) and 10 CFR 50.120?

The off-site radiation monitoring teams meet the criteria outlined in NUREG-0654 Planning Standard I, Accident Assessment, and Interim Radiological Emergency Preparedness (REP) Manual. FEMA does not require these teams to meet the

licensee's Technical Specifications, SO123-XXI-1.11.3, SO123-VIII-0.200, or 10 CFR 50.120.

(3.4c) How does the licensee direct the off-site, non-SONGS staff to conduct radiation monitoring near the site that is required to accurately assess the radiological release to determine event classification and development of PARs?

There are no plans or procedures in place that allows the licensee to direct or communicate with these resources until the ODAC is activated. Once the ODAC is activated, the Emergency Operations Facility (EOF) Health Physics Leader can request the ODAC Coordinator to deploy an off-site team to a specified location.

(3.4d) By what process does the licensee evaluate these monitoring teams and equipment to assure preparedness and qualifications?

The licensee does not evaluate off-site jurisdiction monitoring teams and equipment to ensure preparedness and qualifications. During biannual exercises, the Federal Emergency Management Agency (FEMA) evaluates the Orange and San Diego County Teams preparedness, qualifications, and equipment. Camp Pendleton is a Department of Defense (DOD) federal agency and therefore cannot be evaluated by another federal agency such as FEMA.

Nevertheless, the performance of these offsite jurisdiction monitoring teams is confirmed during drills and exercises.

(3.5) The County of Orange Nuclear Power Plant Emergency Plan, Part Two, Annex A-2 states "The Offsite Dose Assessment Center (ODAC) functions as the technical offsite center to coordinate and make independent offsite environmental assessments and measurements, radiological evaluations and Protective Action Recommendations (PAR)."

(3.5a) By what agreements or procedures does the ODAC direct the off-site monitoring teams performing surveys near the site to obtain and communicate survey results to the Emergency Coordinator to determine event classification and the development of PARS?

The ODAC makes independent off-site environmental assessments. This is accomplished using ODAC procedures that direct their off-site resources near the site to obtain survey results. These results are communicated back to the EOF at SONGS. The process of receiving off-site survey information from the ODAC is covered in the EOF Health Physics Leader EPIP. This information would be shared with the Emergency Coordinator to determine event classification and the development of Protective Action Recommendations (PARS).

There are no procedures or agreements that restrict the licensee teams from obtaining survey information only from on-site locations. The process of receiving

information from the licensee offsite survey teams is covered in the Technical Support Center (TSC) Health Physics Leader Duties EPIP.

4. Attachment 1, Page 16 of the licensee's submittal, paragraph 3.8.6 titled, "Chemistry/Radiochemistry," states, "an additional Chemistry Technician is normally on-shift to augmented response capability and ensure chemistry/radiochemistry related tasks in support of accident assessment are performed." Should this be reflected in the proposed SONGS shift staffing if it is needed to ensure these tasks are performed?

   SCE Response:

   This position is not needed to ensure chemistry/radiochemistry related tasks in support of accident assessment are performed. The current staffing of one Chemistry Technician and one augmented Chemistry Coordinator meet the requirements of Table B-1. SONGS is committed to one (1) Chemistry Technician and one (1) Chemistry Coordinator to meet the functions listed in Table B-1. For further information on how the Chemistry Coordinator can perform Chemistry technician functions see the RAI 11, below, for "Attachment 2 – Table 1, Chemistry / Radiochemistry".

5. Attachment 1, Pages 17-18 of the licensee's submittal, paragraph 3.10 titled, "Protective Actions (in-plant)," discusses the use of the REP access control computer system.

   (a) Are there typically emergency REPs active for use in case an event occurs?

   SCE Response:

   Yes, emergency Radiation Exposure Permits (REPs) remain active in the Integrated Health Physics System (IHPS) for use if an event occurs.

   (b) Do plant procedures require HP briefs prior to access into high radiation areas?

   SCE Response:

   Yes, plant procedures require a Health Physics (HP) Briefing on conditions prior to accessing a High Radiation Area (HRA). In addition individuals must have a dose rate meter or alarming dosimeter, or be accompanied by an HP technician with a dose rate meter.

(c) Who would provide additional information regarding entry into the RCA during a radiological release (e.g., steam generator tube rupture) if the HP Supervisor is performing dose assessment and HP technicians are performing on- and off-site surveys?

SCE Response:

The HP Supervisor will be able to provide additional information regarding entry into the Radiologically Controlled Area (RCA) during a radiological release. During the early phases of an event, the Emergency Coordinator/Shift Manager (EC / SM) will coordinate actions from the Control Room and most of the early actions will be performed by Operators (Primary Nuclear Plant Equipment Operators) that are capable of self-monitoring in the RCA, as described below. The HP Supervisor would also be in the Control Room and have radiological information from in-plant radiation monitors. Working with the EC / SM, the HP Supervisor would coordinate and prioritize activities within the RCA. Performing dose assessment requires little of the HP Supervisor's time and will not prevent him from providing additional information regarding RCA entries.

6. Attachment 1, Page 18 of the licensee's submittal, paragraph 3.10.2 titled, "Health Physics Coverage," discusses that the Primary PEOs will be trained on the use of handheld survey instruments to allow them to self-monitor. Later it states "This training will be made available following approval of this proposed change." What level of training will the Primary PEOs receive (i.e., air sampling, contamination surveys, protective clothing requirements, respiratory protection requirements, etc) and have will that aid in the response effort?

SCE Response:

Primary Nuclear Plant Equipment Operators (NPEOs) will receive training on the proper use of dose rate instruments to allow them to provide self-coverage in the RCA. This training will include inspection of the instrument prior to use, how to use the instrument to perform dose rate surveys, how to perform open/closed window readings to determine beta and gamma dose rates, and how it relates to determining if airborne radioactivity exists. This will aid the response effort by allowing on-shift HP Technicians to perform other event related functions. Primary NPEOs are currently trained on protective clothing requirements and respiratory protection requirements. They will not be trained on air sampling or contamination surveys.

7. Attachment 2, Page 1 of the licensee's submittal states, "Note that there are no changes being proposed to augmented ERO staffing other than increasing the response time goal." Attachment 2, Table 1 additional notes #3 and #4 clearly

shows that the numbers of HP technicians are reduced. Is this an accurate statement or is there additional information that will be provided for review?

SCE Response:

Currently there are three (3) HP Technicians and one (1) HP Supervisor on-shift and this meets the functional requirements of Table B-1 prior to the ERO being augmented at 90 minutes. There is no change to the number of on-shift HP Technicians as a result of this proposed E-plan change.

8. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Offsite Surveys there are no 30-minute or 90-minute responders in the proposed SONGS staffing. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response:

SONGS meets the functional requirements of Table B-1 for Offsite Surveys through the combination of on-shift HP resources, local Offsite Response Organization (ORO) offsite field survey teams and Pressurized Ion Chamber (PIC) fixed site detectors. Under the direction of the on-shift HP Supervisor, an on-shift HP Technician is directed downwind up to the SONGS Exclusion Area Boundary (EAB) to perform surveys in the first 90 minutes of an emergency event. Beyond the EAB, ORO field teams perform the offsite surveys. PIC readings can be used as an aid to direct the location of field teams. Consequently, the functions of the Table B-1 60-minute responders and the Table B-1 30-minute responders are handled adequately through the combination of the Onsite (out-of-plant) HP Technician conducting sampling downwind up to the EAB, ORO offsite field survey teams, and the use of downwind PICs as described in Attachment 1, Section 3.8.3 of the SONGS submittal.

9. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Radiological Accident Assessment - Onsite (out-of-plant), the augmented SONGS position is the HP Leader (TSC).

   (a) How is a person designated for this position available to perform onsite (out-of-plant) surveys when there are procedurally required duties in the TSC?

SCE Response:

The on-shift HP Supervisor is responsible for the HP Coordinator and HP Leader duties until relieved of those duties. After the TSC HP Leader arrives, the on-shift HP Supervisor becomes available to perform surveys or other mitigation actions. The HP Leader does not perform on-site / out-of-plant surveys.

(b) Does this position maintain the training and qualifications to perform these surveys in place of a HP Technician?

SCE Response:

The HP Leader does not perform on-site/out-of-plant surveys. After the TSC HP Leader arrives, the on-shift HP Supervisor, who is a fully qualified HP Technician, becomes available to perform surveys.

(c) The augmented position in Table B-1 is a HP Technician. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response:

SONGS is augmented as reflected in Table B-1 because the HP Supervisor has the skills and knowledge of the HP Technician and is fully qualified in that position.

10. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of In-plant surveys, the augmented SONGS position is the HP Coordinator.

(a) How is a person designated for this position available to perform in-plant surveys when there are procedurally required duties in the OSC?

SCE Response:

The Operations Support Center (OSC) HP Coordinator is not a full time position. If the HP Coordinator leaves the OSC to perform other functions, the OSC will still function normally. This is because the HP Coordinator is dispatched via the OSC team dispatch process, and during this process communication methods will be established to ensure the HP Coordinator can interface with the OSC leadership. Since this augmented position is not a full time position, the need to use the OSC HP Coordinator to identify or verify radiological areas would be determined by the on-shift HP Supervisor or the augmented TSC HP Leader.

In addition, one of the first duties of the HP Coordinator as delineated in the EPIPs, is to call in additional HP Technicians if required to perform tasks called out in Attachment 1 of the procedure. SONGS also performs an "all-call" recall of the ERO so all four of the ERO Response Teams will respond to emergency events.

(b) Does this position maintain the training and qualifications to perform these surveys in place of a HP Technician?

SCE Response:

The HP Coordinator position is filled by first line HP supervisors who possess the skills and knowledge of the HP Technician and are fully qualified in that position.

(c) The augmented position in Table B-1 is a HP Technician. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response:

SONGS is augmented as reflected in Table B-1 because the HP Coordinator has the skills and knowledge of the HP Technician position. The HP Coordinator position is filled by first line HP supervisors who are fully qualified in that position.

11. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Chemistry/Radiochemstry, the augmented SONGS position is the Chemistry Coordinator.

(a) How is a person designated for this position available to perform chemistry/radiochemistry functions when there are procedurally required duties in the OSC?

SCE Response:

The first duties of the Chemistry Coordinator, as delineated in the Chemistry Coordinator EPIP, are to report in at the OSC and call-in additional Chemistry Technicians as required. If the Chemistry Coordinator leaves the OSC to provide Chemistry Technician support, the OSC will still function normally because the Chemistry Coordinator would be dispatched via the OSC team dispatch process. During this process, communication methods will be established to ensure the Chemistry Coordinator can interface with the OSC leadership.

(b) Does this position maintain the training and qualifications to perform these activities in place of a Chemistry Technician?

SCE Response:

The Chemistry Coordinator has the skills and knowledge of the Chemistry Technician position. The Chemistry Coordinator position is filled by first or second line Chemistry Supervisors / Technical Specialists and in some cases the Chemistry Coordinator is fully qualified in the Chemistry Technician position. If not

fully qualified, the Chemistry Coordinator has the ability to assist the Chemistry Technician as a helper, i.e., directed by the Chemistry Technician.

(c) The augmented position in Table B-1 is a Chemistry Technician. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response:

SONGS is augmented as reflected in Table B-1 because the Chemistry Coordinator has the skills and knowledge of the Chemistry Technician position. The Chemistry Coordinator position is filled by first or second line Chemistry Supervisors /Technical Specialists.

12. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Core/Thermal Hydraulics there is no augmented SONGS position for this Table B-1 position. Credit can be given to move this position from the 30-minute to a 60-minute responder based on the capabilities of various on-shift personnel to recognize core damage indications, and technological advances since the implementation of NUREG-0654/FEMA-REP-1, Revision 1 (i.e., Severe Accident Mitigation Guidelines, core damage assessment methodology, etc.). Note #11 in Attachment 2, Table 1 (page 27 of 28 of the licensee submittal) states that the core/thermal hydraulics assessment will be performed by the TSC Assessor when the TSC is activated.

(a) If this assessment is being performed by a designated position when the TSC is staffed, should it be included in the augmented staffing?

SCE Response:

Yes, the "TSC Assessor" performs the Core / Thermal Hydraulics function defined in Table B-1. The Assessor was listed as an augmented position under the Mechanical / Electrical positions in Attachment 2, Table 1. Responses to sub-question 12 (b) and Question 13 (below) further clarify how the Assessor and Mitigator meet Table B-1 functions.

(b) The augmented position in Table B-1 is a Core/thermal hydraulics Engineer on-shift or within 30 minutes. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response

SONGS meets the functional requirements of Table B-1 for Technical Support through the combination of the on-shift STA and the recalled Engineers designated as the Mitigator and Assessor. Initially, the Shift Technical Advisor (STA) performs the Core / Thermal Hydraulics function and after augmentation the Assessor performs the Core / Thermal Hydraulics function. The Mitigator, who is a trained

engineer with strong nuclear plant systems skills, performs mitigation activities. Once an initial core damage estimate is concluded, the Assessor, also a trained engineer, assists the Mitigator in conducting necessary Technical Support functions. In addition, drill experience has shown that the initial core damage estimate does not require the full time focus of the Assessor.

13. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Technical Support (Electrical and Maintenance) the augmented SONGS position is the Assessor or Mitigator. What are the qualifications / expertise for personnel designated to staff these two titles?

    SCE Response:

    The Assessor and Mitigator positions are staffed by degreed Engineers or Senior Engineers from the Nuclear Fuel Management, Design Engineering, Maintenance / System Engineering, and Reactor Engineering departments. Areas of expertise for these personnel are in nuclear plant and electrical systems, electrical and mechanical print reading, core damage assessment, and Reactor Coolant System (RCS) leakrate calculations.

14. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Mechanical Maintenance, the augmented SONGS position is the Maintenance Coordinator.

    (a) How is a person designated for this position available to perform repair and corrective actions when there are procedurally required duties in the OSC?

    SCE Response:

    The Maintenance Coordinator duties in the OSC are not full-time in nature. The OSC will still function normally because the Maintenance Coordinator is dispatched via the OSC team dispatch process, and during this process communication methods will be established to ensure the Maintenance Coordinator can interface with the OSC leadership. Thus the Maintenance Coordinator can be dispatched into the field to perform repair activities as plant conditions necessitate.

    (b) Does this position maintain the training and qualifications to perform these repair and corrective actions in place of a Mechanical Maintenance?

    SCE Response

    The Maintenance Coordinator is a 1st or 2nd level Maintenance craft supervisor. This supervisor normally has many years of craft experience and stays current through the daily supervision of craft workers as well as through the review of work documents.

(c) The augmented position in Table B-1 is a Mechanical Maintenance. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response:

SONGS meets the functional requirements of Table B-1 for Repair and Corrective Actions through the combination of the on-shift electrical craft and mechanical craft responders, Plant Equipment Operators who will be cross-trained to perform minor maintenance activities, the recalled Maintenance Coordinator, and the on-shift Shift Rotating General Foreman (SRGF). The SRGF is cross-trained in the three Maintenance disciplines (Mechanical, Electrical, and Instrumentation and Controls) and is a full time resource with the exception of outages. During outages the SRGF may be assigned other roles within Maintenance, but the SRGF or another qualified individual will still be available to perform the on-shift duties for the duration of the outage. The combination of these four (4) types of experienced maintenance personnel can cover Table B-1 functions until other personnel arrive. The other personnel will be recalled by the on-shift SRGF in accordance with a Maintenance Policy Guideline immediately following an event declaration depending on plant conditions and requirements.

15. Attachment 2, Table 1 of the licensee's submittal indicates that for the function of Electrical Maintenance/I&C Technician, the proposed SONGS staffing has one I&C Technician position filled by Electrical Maintenance Personnel and a note #10 (May be provided by other shift personnel) for the Electrical Maintenance position. There is no proposed augmented staffing for these positions. Table B-1 lists an on-shift (**May be provided by other shift personnel) with an additional two 30-minute and one 60-minute responders. Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SCE Response:

SONGS meets the functional requirements of Table B-1 for Repair and Corrective Actions through the combination of the 24/7 on-shift electrical craft and mechanical craft responders, Plant Equipment Operators who will be cross-trained to perform minor maintenance activities, the recalled Maintenance Coordinator, and the on-shift Shift Rotating General Foreman (SRGF). The SRGF is cross-trained in the three Maintenance disciplines (Mechanical, Electrical, and I&C) and is a 24/7 resource with the exception of outages. During outages the SRGF or another qualified individual will still be available to perform the on-shift duties for the duration of the outage. The combination of these four (4) types of experienced maintenance personnel can cover Table B-1 functions until other personnel arrive. The other personnel will be recalled by the on-shift SRGF in accordance with a Maintenance Policy Guideline immediately following an event declaration depending on plant conditions and requirements.

16. Attachment 2, Table 1 of the licensee's submittal has a note #8, "Personnel will be trained in the use of survey instruments to support individual response activities. There is no proposed augmented staffing for these positions. Table B-1 lists two on-shift (**May be provided by other shift personnel) with an additional two 30-minute and two 60-minute responders. It was discussed earlier that the PEOs would receive handheld survey instrument training.

(16a) Will any other plant ERO personnel receive this training?

SCE response:

No, only Primary NPEOs will receive handheld survey instrument training.

(16b) Who will provide HP coverage for repair, corrective actions, search and rescue, first aid and firefighting activities after the on-shift staff is augmented?

SCE response:

The augmentation of the on-shift staff by the TSC HP Leader, the OSC HP Coordinator, and the EOF HP Leader allows HP Technician #2 and the HP Supervisor to assist HP Technician #3 in providing HP coverage for repair, corrective actions, search and rescue, first aid and firefighting activities. Also, Primary NPEOs trained on the use of handheld survey instruments can support individual response activities.

(16c) Please justify why the on-shift staffing is not augmented as reflected in Table B-1.

SONGS meets the augmented functional requirements of Table B-1 Protective Actions (In-Plant) through the use of the REP access control computer system (Integrated Health Physics System), HP Tech # 3, and/or HP Tech #2 and HP Supervisor (depending upon plant conditions), Operators trained on using survey instruments, and Personnel Electronic Dosimeters (PEDs).

Proposed SONGS Staffing Note # 8 should have stated: "Credit is taken for (a) REP access control computer system (Integrated Health Physics System), (b) HP Tech # 3, and/or HP Tech #2 and HP Supervisor (depending upon plant conditions), (c) Operators trained on using survey instruments, and (d) Personnel Electronic Dosimeters (PEDs)."

17. Attachment 5, Page 3 of the licensee's submittal states that "additional field monitoring personnel are available with the activation of the Operations Support Center." This is not reflected in the Attachment 2 Table 1 note #3 as it discusses the surveys performed by personnel from offsite respond agencies. Who are the

"additional field monitoring personnel" as discussed in the proposed emergency plan wording?

SCE Response:

The additional field monitoring personnel are recalled HP Technicians. If an emergency is declared, the HP Supervisor will notify HP Management of the event in progress. In addition, the HP Supervisor will perform a look-ahead to determine the need for additional HP personnel to assist with the emergency condition. The recalling of additional HP personnel is delineated in EPIPs.

18. Attachment 7, Pages 5-16 and 5-17 of the licensee's submittal contains references to the Federal Radiological Emergency Response Plan (FRERP). These references to the FRERP need to be revised. The FRERP was superseded in 2004 by the National Response Plan, and specifically the Nuclear-Radiological Response Annex addresses actions in support of emergencies at a nuclear power plant. Currently the NRP is being superseded by the National Response Framework (NRF) and its supporting annexes. Please revise accordingly.

SCE response:

On May 23, 2008, SONGS issued Revision 23 of the Emergency Plan. Revision 23 removed references to the Federal Radiological Emergency Response Plan (FRERP), replacing them with references to the Nuclear-Radiological Response Annex (NRRA) or the National Response Framework (NRF) as appropriate.

19. Attachment 7, Page 5-28, Table 5-5 of the licensee's submittal. There are no HP technicians, mechanical and electrical maintenance or I&C technicians listed in this table. Does the proposed SONGS shift staffing include any additional working level staff personnel to augment the on-shift staff and if so, should it be listed on the minimum staffing list?

SCE Response:

HP Technicians, mechanical and electrical maintenance, or I&C technicians are not listed in Table 5-5 because they do not fill minimum staff positions.

If an emergency is declared, the HP Supervisor will notify HP Management of the event in progress. Also, the HP Supervisor will perform a look-ahead to determine the need for additional HP personnel to assist with the emergency condition. The recalling of additional HP personnel is delineated in SONGS EPIPs. In addition, SONGS performs an "all-call" recall of the ERO so all four of the ERO Response Teams will respond to emergency events.

A SONGS Maintenance Policy Guideline provides direction for the on-shift Shift Rotating General Foreman (SRGF) to "call-out Maintenance personnel to assist in mitigating the emergency condition." This guideline is implemented as soon as the necessity for craft personnel arises. It is expected that the SRGF or other Maintenance supervisor will begin this process shortly after an emergency is declared.

20. Please provide any plan, procedure or document that describes or conducts the current ERO augmentation process and lists the personnel recalled.

    SCE Response:

    Attachment 2 of this enclosure provides the SONGS procedure for the ERO recall process. The relevant sections of the procedure are section 6.2, and Attachment 2.

    The personnel that are recalled as part of the ERO augmentation process are described in Table 5-2, "Emergency Response Organization Duties," of the SONGS Emergency Plan, provided in Attachment 7 of SCE's proposed Emergency Plan change.

21. Please describe how the current SONGS ERO augmentation meets the minimum staffing positions as specified in Table B-1 of NUREG-0654, Revision 1, within 60 minutes.

    SCE Response:

    Table B-1 minimum staffing requirement totals for On-Shift, 30 Minutes, and 60 Minutes equals 36 personnel. SONGS maintains 23 On-shift ERO personnel and recalls an additional 25 responders to report within 60 minutes, which equals a total of 48 personnel.

    Listed below are the Table B-1 requirements and how the current SONGS ERO augmentation meets the minimum staffing requirements.

    Plant Operations and Assessment of Operational Aspects:

    - Shift Supervisor (SRO) (1) is filled by the On-Shift Control Room Supervisor #1.
    - Shift Foreman (SRO) (1) is filled by the On-Shift Control Room Supervisor #2.
    - Control Room Operators (2) are filled by On-Shift Control Operators #1 and #2.
    - Auxiliary Operators (2) are filled by On-Shift Primary NPEO # 1 and # 2.

    In addition, the augmented Operations Leader reports to the Control Room.

Emergency Direction and Control (Emergency Coordinator):

- The Emergency Coordinator [defined in Table B-1 as the Shift Technical Advisor, Shift Supervisor or designated facility Manager (1)] is filled by the On-Shift Shift Manager. The on-shift STA is available and assists the Shift Manager with core damage and plant assessments.
- The augmented Station Emergency Director (SED) will report to the TSC.

In addition, the augmented OSC Operations Coordinator, TSC Admin Leader, TSC Emergency Advisor Operations, and the TSC, OSC and EOF Emergency Planning Coordinators report to their respective Emergency Response Facilities.

Notification / Communication:

- The Shift Communicator (Nuclear Operations Assistant) fills the on-shift requirement of one (1). The 30 Minute capability is filled by On-Shift Control Operator # 3, and the 60 Minute capability is filled by the augmented Emergency Operations Facility (EOF) Emergency Advisor for Notifications (EAN) and the Technical Support Center (TSC) EAN.
- The augmented TSC Red Phone Communicator (SRO) and the EOF Yellow Phone Communicator report to their respective Emergency Response Facilities

In addition, the EOF Emergency Advisor Offsite and Emergency Notifications Center (ENC) Director report to their respective Emergency Response Facilities.

Radiological Accident Assessment and Support of Operational Accident Assessment:

- Emergency Operations Facility (EOF) Director 60 Minute capability is filled by the augmented EOF Corporate Emergency Director (CED).
- Offsite Dose Assessment 30 Minute capability is filled by the On-Shift Health Physics (HP) Supervisor.
- Offsite Surveys 30 Minute capability (2) is filled by On-Shift HP Technician # 1 and the Pressurized Ion Chambers (PICs) aid in assessment and detection of releases. The 60 Minute capability (2) is filled by On-Shift HP Technician # 1 and the PICs and local Offsite Response Organization (ORO) offsite field survey teams aid in assessment and detection of releases.
- Onsite (out-of-plant) 30 Minute capability (1) is filled by On-Shift HP Technician # 1 (This person is sent to the Exclusion Area Boundary in the plume direction, satisfying both Onsite (out-of-plant) and Offsite Survey functions). The 60 Minute capability (1) is filled by the augmented TSC HP Leader (who relieves the HP Supervisor).

- In-plant surveys capability is performed by the On-Shift HP Technician # 2. The 30 Minute capability (1) is also filled by On-Shift HP Technician # 2 as these functions do not require the full-time attention of one person. The 60 Minute capability (1) is filled by the augmented OSC HP Coordinator.
- Chemistry / Radiochemistry capability is filled by the On-Shift Nuclear Chemistry Technician. The 60 Minute capability (1) is filled by the augmented OSC Chemistry Coordinator.
- The augmented EOF HP Leader reports to the EOF.

Plant System Engineering, Repair and Corrective Actions:

- Shift Technical Advisor is filled by the On-Shift STA
- Core / Thermal Hydraulics 30 Minute capability (1) is filled by the On-Shift STA until the augmented TSC Assessor reports to the TSC. The On-Shift Control Room Supervisor # 2 can also provide assistance to this position.
- Electrical support 60 Minute capability (1) is filled by the augmented TSC Mitigator and once core damage assessment is complete the Assessor assists with mitigation.
- Mechanical Support 60 Minute capability (1) is filled by the augmented TSC Mitigator and once core damage assessment is complete the Assessor assists with mitigation.
- Mechanical Maintenance is filled by the On-Shift Maintenance Mechanic. The 60 Minute capability (1) is filled by the augmented OSC Maintenance Coordinator.
- Rad Waste Operator 60 Minute capability (1) is filled by On-Shift Primary NPEO # 3.
- Electrical Maintenance On-Shift and 30 Minute capability is filled by a combination of the On-Shift Electrical Maintenance person and the On-Shift NPEO # 1. The 60 Minute capability (1) is filled by On-Shift Primary NPEO # 2.
- Instrument and Control (I&C) Technician 30 Minute capability (1) is filled by a combination of on-shift electricians and the On-Shift Shift Rotating General Foreman (SRGF) who is cross-trained in all disciplines.

In addition, the augmented EOF Technical Leader and the Emergency Group Leader report to their respective Emergency Response Facilities.

Protective Actions (In-Plant):

- HP Technicians (2) are filled by On-Shift HP Technician # 3 and HP Technician # 2 or the HP Supervisor depending upon plant conditions. The 30 Minute capability (2) is filled as follows:
  - Access control: REP access control computer (IHPS)
  - HP Coverage: HP Tech # 3 and/or HP Tech # 2 and HP Supervisor depending upon plant conditions
  - Personnel Monitoring: Operator training using survey instruments
  - Dosimetry: PEDs.

  The 60 Min capability (2) is filled in the same manner as the 30 minute capability.

Firefighting:

- On-Shift capability (5) is filled by the 24/7 SONGS Fire Department Fire Captain and firefighters # 1 thru # 4, and the 30 Minute capability is filled by Local Support.

Rescue Operations and First-Aid:

- The On-Shift capability (2) is filled by the 24/7 SONGS Fire Department firefighters #1 through #4 and the On-Shift Operations Support Center (OSC) Emergency Services Coordinator (Fire Captain), and the 30 Minute capability is filled by Local Support.

Site Access Control and Personnel Accountability:

- Security Personnel are all per the security Plan.
- The augmented EOF Security Director and the EOF Security Liaison report to the EOF.

Attachment 1

Interjurisdictional Planning Committee

Meeting Minutes

January 9, 2007

Interjurisdictional Planning Committee

P.O. Box 4198, San Clemente, CA 92674

County of Orange • County of San Diego • City of San Clemente • City of San Juan Capistrano
City of Dana Point • California State Parks • U.S. Marine Corps • Southern California Edison

IPC MONTHLY MEETING

January 9, 2007

Attendees

Anderson, Andy	City of Dana Point	760-942-3486
Arora, Vinod	SONGS	949-368-6361
Asturias, Susan	San Diego County	858-715-2206
Bundy, Denise	Orange County Sheriff's	714-628-7164
Cantor, Mike	City of San Juan Capistrano	949-234-4565
Chin, Kenneth	US DHS	510-627-7122
Cleavenger, Dan	SONGS	949-368-8340
Culverhouse, Barbara	SONGS	949-368-8435
Drake, Mike	MCB Camp Pendleton	760-725-6419
Echavarria, Richard	US DHS (Oakland)	510-027-7217
Fennessy, Mike	OC Environmental Health Services	714-433-6281
Garcia, Rick	SONGS	949-368-8845
Haller, Mike	OC Environmental Health Services	714-433-6012
Jindra, Darrin	CUSD	949-234-9343
Leinwander, Penny	CA Department of Health Services	916-449-5921
Long, Steve	California State Parks	949-366-8503
Oesterle, Donald	CA Department of Health Services	818-366-1795
Osborn, Vicki	Orange County Sheriff's	714-628-7019
Rose, Mike	City of Dana Point	949-248-3535
Russell, Jim	City of San Clemente	949-361-6109
Skiermont, Michele	CA State OES	916-845-8762
Tong, Ben	CA State OES	916-845-8797

1. **Call to Order and Self Introductions**

   The January 9, 2007 IPC meeting was called to order at 9:37 a.m. by Mike Rose, IPC Chairperson (City of Dana Point).

   Self introductions were made.

2. **Review and Approval of the December 6, 2006 Meeting Minutes**

   Review of the December 6, 2006 IPC meeting minutes were unanimously approved.

3. **Presentation**

Mike Rose presented Ken Chin (who is retiring) a plaque from the IPC honoring his years of support and commitment to SONGS and the IPC. Ken thanked the IPC and acknowledged his appreciation for the partnership between him, the DHS and the IPC.

4. **Offsite EP Interface Audit Results – Nuclear Oversight**

Vinod K. Arora, a Technical Specialist, in the Nuclear Oversight and Assessment Division at San Onofre provided the results of Emergency Preparedness Program Audit conducted during October - November 2006 (for period November 19, 2005 – November 29, 2006). In accordance with 10CFR50.54(t) the results from the part of the audit involving the evaluation for adequacy of interface with the State and local governments shall be made available to the appropriate State and local governments.

Offsite Emergency Planning (OEP) maintains an effective working relationship with offsite organizations. Several initiatives contribute to these successful relationships, including participation of offsite personnel and organizations in routine informational meetings and team building sessions. Observations and interviews with local jurisdiction representatives noted that OEP was very effective in coordinating and communicating with Inter-jurisdictional Planning Committee (IPC) members and associate members and provided well-organized and highly relevant training. Noted Beneficial Practice.

5. **Siren Public Address Testing**

Dan C. reported that the results of the October siren public address testing were less than adequate for the City of San Clemente. Since October, the problems have been addressed and a retest of the public address systems will be scheduled for four (4) selected sirens in San Clemente on January 24, 2007. The City of San Clemente will provide a media release for the public and will post information about the retest on their City web page. Dan C. requested that Jim R. send him copies of the media release prior to the retest.

6. **Performance Indicator Status Update**

Dan C. reported that the NRC reviews three Emergency Plan Performance Indicators 1) Drill Participation 2) Drill and Exercise Performance 3) Alert & Notification, i.e. sirens. New siren technology was installed at SONGS in the last year and is continually tested to ensure it operates per industry standards. Based on Industry Performance Indicators (PI's) SONGS sirens were on the low end of the on Performance Indicator scale for the third quarter of 2006 (96.8%). However, now that the system has been completely installed the fourth quarter Performance Indicator percentages have risen to 98.8% which is close to the industry norm of 99%.

Dan also reported that on 12/26/06, the SONGS siren computer system was noticed to be reporting a 30 second run time instead of 180 seconds. However, upon further intensive investigation it was reported that the siren system is set at a default run time of 180 seconds and would never have been activated to run for only 30 seconds. The initial concern was captured in SONGS Corrective Action program and was discussed with both FEMA and the NRC.

7. **90 Minute SONGS E-Plan Change for Staff Recall**

Barbara C. reported that SONGS is requesting NRC approval to increase the time for augmenting on-shift staffing with emergency responders who are called in from 60 to 90 minutes. This increase is necessary due to employees living father from the site and traffic growth on area highways, resulting in increased travel times. The 90-minute time frame is consistent with response times for offsite emergency responders to licensee and offsite emergency response facilities and will not adversely impact the interface with or support of offsite emergency responders. Barbara C. asked if IPC had any issues with this request; no known concerns were identified by the IPC. For the record, Denise B. made a motion of support for 60 to 90; Susan A. seconded; the vote was unanimous in support.

8. **PAR Change Implementation Timeline**

Mike R. reported that the IPC was on schedule to implement changes to PAR. The target date to implement the new PAR methodology is February 5, 2007 at 12:00 p.m. To effectively provide public education regarding the new PAR, a new communication plan is being developed. In discussion it was pointed out that there would be no significant change in existing public information; however, additional public information would be provided with more specific evacuation details. Ken C. and Richard E of DHS both agreed with the public information update.

9. **New EPZ Maps**

Rick G. reported that new maps will be distributed by March 10, 2007. They will include rolldowns, hardmounts and foldables; hardmounts might arrive after March 10. In addition, high resolution JPEGS will be delivered. The new maps will reflect all EOC locations and the PAZ. Rick G. asked each jurisdiction to advise him of the number of map types they wanted.

10. **Courtesy Evaluation for 2007 Dress Rehearsal**

Mike R. reported that DHS offered to provide courtesy evaluators for the dress rehearsals on March 14th to help with the transition for the new PAR. The evaluators will be there to help with the training exercise and to implement the new PAR; this is not a formal evaluation. Richard E. said that the evaluation teams would be available to meet the day before and or the day after the dress rehearsal. SONGS will host the Pre/Post DHS meeting. The DHS priority is to use the same evaluators for the dress and the graded exercises. Ken C. added that it would be a benefit to receive input prior to the graded exercise. All jurisdictions, except San Clemente, requested the courtesy evaluators.

11. **2007 IPC Schedule**

Mike R. reported that the IPC meeting schedule for 2007 would be the same as 2006. Meetings will be held on the first Wednesday of each month, subject to special conflicts, i.e., NREP, Decision Makers, and Exercises, etc. Steve L. said that he would coordinate a joint meeting with Law Enforcement officials and the IPC. The meeting date would be coordinated with the IPC chair, Mike R.

12. Roundtable Discussion

Andy A. officially welcomed Mike D back and wished all a happy and healthy new year.

Rick G. distributed new TLD's to the off-site jurisdictions. He indicated that last year's distribution must be returned when requested and that any units lost will cost the jurisdiction $20 each. ODAC and the EOF will hold TTX training on new PAR scenarios on February 1, 2007 from 10:00 am. to 12:00 p.m. Notify Rick G. if you want to attend TTX. At the ODAC meeting this morning, they approved the new PAR into their respective plan.

Ken C. shared that he was not sad, nor unhappy about retiring. He said that it was like a graduation to the next phase of his life. He wished all good thoughts and good memories. He felt and hoped that we were better off now than we he first started.

Dan C. reported that there will be ENC-PIO training available in mid February.

Michele S. requested that the jurisdictions should submit updated copies of their Emergency Operations Plan to her in the next week; additional plan procedures could be submitted in the next 30 days. Rick G. asked that hard copies of the updated plans be submitted to him ASAP.

Michele S. provided an update regarding NREP. The Marines would provide a color guard presentation; the state of California would provide a panel presentation. 400-500 expected to attend. To register to attend and or for hotel reservations, go to www.nationalrep.org.

Steve L. reported that 150 years ago today there was a 7.9 earthquake on the San Andreas, as reported in the LA Times. There is a 30-70% chance that a 7.9 or larger will impact our area in the next 30 years. He asked that we consider an earthquake scenario as part of a future SONGS exercise.

Barbara C. reported that she attended a CUSD safety meeting at their new facility on Valle Road in San Juan Capistrano. The meeting was educational and well done.

The next IPC meeting will be held on Wednesday, February 7, 2007, at 9:30 a.m. at SONGS.

Mike R. adjourned the meeting at 10:54 a.m.

Attachment 2

SONGS Emergency Plan Implementing Procedure

"Emergency Notifications"

EMERGENCY NOTIFICATIONS

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EMERGENCY NOTIFICATIONS

1.0 OBJECTIVE

1.1 Provide direction to Shift Communicators, Yellow Phone Communicators, and Emergency Advisors for Notifications (EAN) for performing emergency notifications from Control Room, Technical Support Center (TSC) or Emergency Operations Facility (EOF).

2.0 REFERENCES

2.1 Procedures

2.1.1 SO123-VIII-10, Emergency Coordinator Duties

2.1.2 SO123-VIII-10.3, Protective Action Recommendations (PARs)

2.1.3 SO123-VI-0.9, Author's Guide for the Preparation of Orders, Procedures, and Instructions

2.2 Other

2.2.1 Form EP(123) 10, Event Notification Form (ENF)

2.2.2 Form EP(123) 11, Verbal Notification Form (VNF)

2.2.3 Emergency Response Telephone Directory (ERTD)

3.0 PREREQUISITES

3.1 Emergency Planning (EP) is responsible for ensuring current copy of this document is in emergency notebook(s) for use during declared emergencies and drills.

3.2 Personnel are responsible for ensuring current copy of this document, when not in a declared emergency or drill, by checking Nuclear Document Management System (NDMS) and any issued TCNs or ECs or by one of the methods described in SO123-VI-0.9, Author's Guide for the Preparation of Orders, Procedures, and Instructions.

3.3 Verify level of use requirements on the first page of the document.

4.0 PRECAUTION(S)

4.1 Emergency Coordinator (EC) duties shall normally be performed by Units 2/3 Shift Manager (SM) prior to turnover to Station Emergency Director (SED), and ultimately by Corporate Emergency Director (CED).

4.2 Shift Communicator (SC)or EOF Yellow Phone Communicator shall interrupt all Yellow Phone System (YPS) communications when an emergency notification needs to be performed. Notifications to meet 15-minute regulatory time requirement shall take precedence over all other YPS communications.

5.0 CHECKLIST(S)

☐ UE ☐ ALERT ☐ SAE ☐ GE

5.1 **15-Minute Verbal Notification** (See Step 6.3)

- ☐ Prepare Form EP(123) 11, Verbal Notification Form (VNF)
- ☐ Obtain a PAR, if applicable, the affected Protective Action Zone(s) (PAZ), and radioactive release information from the EC
- ☐ Obtain Verbal Notification approval initials from the EC
- ☐ EAN/EC to initiate completion of Form EP(123) 10, Event Notification Form (ENF)
- ☐ Initiate Recall using Attachment 2 as required (Control Room activity only)
- ☐ Perform Blue Phone Verbal Notification
- ☐ Perform YPS Verbal Notification
- ☐ Report Verbal Notification status to the EAN/EC

5.2 **30-Minute Printed Message** (See Step 6.4)

- ☐ Retrieve completed EC-approved, hand-drafted ENF
- ☐ Enter ENF data into the YPS computer
- ☐ Press Print Local (F4)
- ☐ Obtain approval of the printed message by the EAN/EC
- ☐ Transmit printed message to offsite agencies
- ☐ Fax printed message to the Office of Emergency Services (OES)
- ☐ Report printed message status to the EAN/EC

5.3 **Follow-Up Notification** (See Step 6.7)

- ☐ Perform Blue and Yellow Phone verbal notification using a completed VNF
- ☐ Retrieve completed EC-approved, hand-drafted ENF
- ☐ Enter ENF data into the YPS computer
- ☐ Press Print Local (F4)
- ☐ Obtain printed message review and approval from the EAN/EC
- ☐ Transmit the printed message to offsite agencies
- ☐ Fax the printed message to OES

*** *End of Checklist* ***

6.0 PROCEDURE

6.1 Initial Actions

6.1.1 SC - Assume initial responsibility to implement this procedure.

.1 If transfer of EC duties to SED has occurred, then SC shall turn over responsibility for this procedure to TSC EAN.

.2 If transfer of EC duties to CED has occurred, then TSC EAN shall turn over responsibility for this procedure to EOF EAN.

6.1.2 Report to EC prepared to initiate notifications when directed or upon awareness that abnormal conditions may lead to one of the following:

- Initial Event Declaration/PAR
- Event Reclassifications
- Upgrade in PAR including additional PAZ(s), if applicable
- Start or stop of radiological release

NOTES: (1) Notification duties shall follow EC duties when turnover to SED or CED occurs based on turnover agreement.

(2) TSC responders are required to log into Protected Area Personnel Accountability (PAPA) system.

6.1.3 EANs - Sign-in on minimum staffing board upon arrival at TSC or EOF.

6.1.4 Verify YPS equipment is ready for use.

.1 Ensure both monitor and printer have power, are on-line, and printer has paper.

.2 Verify software is loaded and running, and YPS clock is set to facility clock. (The Pacific Time Zone at http://www.time.gov can be used as a back up, JAVA animation may need to be disabled.)

6.1.5 Direct copies of all printed messages to EAN, Communicator, Emergency Planning Coordinator (EPC), and EOF Administrative Coordinator as applicable.

.1 If printed message is not legible; then request a FAX copy from originating YPS station.

6.1.6 If any YPS stations on status display are not highlighted, (indicating data circuits are off-line) then inform EOF Telecom Supervisor.

.1 Ensure all printed messages are transmitted by FAX to off-line stations until they are returned to service.

6.1.7 Monitor all YPS communications.

6.2 Emergency Recall Activation

6.2.1 If this is the initial event declaration from the Control Room, then perform emergency recall activation per Attachment 2.

6.2.2 If upgrading from an Unusual Event (UE) to an Alert or higher classification, and entire Emergency Response Organization (ERO) has not already been recalled, then use recall system to stop current scenario, and start a new scenario using new Scenario ID per Attachment 2.

6.2.3 If ERO has already been recalled and are to be redirected to another facility (e.g., Alternate EOF [AEOF], E-50, or Staging Area), then initiate ERO Recall System using Intranet method, Attachment 2, Section D.

6.2.4 If ERO has already been recalled, then enter "N/A" in time blank on the VNF, EP(123) 11, otherwise record time of activation.

6.3 15-Minute Verbal Notification

NOTES: (1) The initial (GE) PAR and verbal notification should be made within the same 15 minutes.

(2) A GE PAR upgrade should be made within 15 minutes after recognizing the need for a PAR upgrade. The verbal notification then has to be made within 15 minutes after the PAR upgrade has been determined.

6.3.1 Perform the following steps within 15 minutes of an initial event declaration, event reclassification, an upgrade in PAR including additional PAZ(s), a start or stop of radiological release.

.1 Prepare VNF, during declaration announcement or immediately afterwards (refer to Attachment 1 for VNF Key Points).

.2 Enter Message No., Emergency Class, Event Status, Event Declaration Time (EDT), and Event Code.

.3 Enter wind direction and wind speed.

.4 Ask EC these questions and record on VNF by checking appropriate boxes.

- What is the PAR associated with classification and the affected PAZ(s), if applicable?
- If upgrading PAR, then what is upgraded PAR and affected PAZ(s) and the time it changed, if applicable?
- Is there a radiological release associated with this event?

.5 If completing form, then initial "Prepared by" block.

.6 Ensure Independently Verified By block is initialed and obtain EC Approved By initials on VNF authorizing transmission of verbal notifications.

6.3.2 Perform **Blue Phone** and **Yellow Phone** verbal notifications. Notifications must be started within 15 minutes of EDT, document time first notification was initiated on VNF, Section 1.0 and on Notifications Status Board.

.1 If an offsite agency does not respond to notification as expected at time of transmission, then contact them immediately after completing notification process using Step 6.9.

.2 Report status of 15-minute Verbal Notification to EAN/EC.

6.3.3 If the Communicator **has not** started to read the verbal message and any of the following occurs:

- Increase in classification
- Upgrade in PAR
- Start of radiological release
- Stop of radiological release

and

If reading of updated verbal message can start within 15 minutes of initial event

then provide notification for the updated condition only.

.1 Include previous classification, PARs or time when radiological release started/stopped on the 30-minute ENF.

6.3.4 If the Communicator **has** started to read the verbal message and any of the following occurs:

- Increase in classification
- Upgrade in PAR
- Start of radiological release
- Stop of radiological release

then inform Communicator to complete notification skipping the roll call portion of the verbal notification form, and report to start new set of notifications.

.1 Include time when radiological release started/stopped on the 30-minute ENF.

6.4 30-Minute Printed Message

6.4.1 EAN/EC - Shall complete hand-drafted ENF and deliver it to communicator promptly after verbal notifications are complete. (See Attachment 3 for ENF Key Points).

.1 Verify printed message information matches verbal notification form information in Sections 2 and 3.

.2 If any information has changed; especially upgrading the PAR and if applicable, addition of affected PAZ(s); or release information, then inform EAN/EC to re-verify data.

.3 Verify EC has initialed hand-drafted form.

.4 Begin YPS data entry approximately 10 minutes prior to time it is due for transmission to allow review time.

6.4.2 Ensure data is entered correctly into YPS Computer, then perform the following actions:

.1 Save data, retrieve a Print Local (F4) copy of message and compare it with hand-drafted ENF.

.2 Modify text, if required to correct errors or to eliminate acronyms and numbers.

.3 Ensure EAN/EC reviews and initials YPS printed hard copy prior to transmitting it to offsite agencies.

.4 Save data immediately prior to transmitting.

.5 FAX ENF message to OES after it is transmitted to the offsite agencies and record time on VNF.

.6 If no ENF is transmitted, then enter "N/A" in FAX time blank.

.7 If message does not print properly, then retrieve a Print Local (F4) copy of ENF message to FAX to OES.

6.4.3 If an offsite agency does not receive YPS printed message, then FAX message to that station.

6.4.4 Report status of 30-minute Printed Message notification to EAN/EC.

6.5 Turnover of Notification Duties

6.5.1 Contact your counterpart for turnover when notified that EC turnover is complete and then continue to assist EPC.
Communicator: (TSC 86396 or EOF 83307)
EA Notifications: (TSC 86590 or EOF 83323)

6.5.2 Transfer responsibility for notifications.

.1 Notify SED/CED that turnover of emergency notification duty responsibilities is complete.

6.6 Event Reclassification/PAR Upgrade/Radiological Release

NOTE: A change in Classification, a start or stop of radiological release, or upgrading a PAR, which includes addition of affected PAZ(s), requires notification within 15 minutes of change.

6.6.1 If Emergency Coordinator (EC) reclassifies the event, upgrades PAR, a start or stop of radiological release occurs, then start a new notification per Step 6.3 and Step 6.4.

.1 If reclassification of event, a change in radiological release status, or PAR upgrade affects response of ERO, then start a new ERO Recall per Steps 6.2.2 and/or 6.2.3.

.2 Mark printed messages not transmitted as "Superseded" in a clear manner and file them for documentation purposes.

6.7 Follow-Up Notifications

6.7.1 Transmit an ENF within 90 minutes of initial Classification and then continue transmitting a new ENF approximately 60 minutes from the time the last ENF was transmitted.

.1 If significant changes in radiological release conditions or plant status occur but do not result in a new classification or an upgraded PAR, then EC should consider issuing a follow-up notification within approximately 15 minutes.

.2 Continue Follow-up Notifications until event is reclassified, PAR is upgraded, start or stop of radiological release occurs, EC reduces the follow-up frequency, or event is closed out.

6.7.2 Prepare ENF Follow-Up Notification as follows:

.1 Check box "**is in progress**" and ensure Event Classification and EDT are the same as previous ENF.

.2 Provide updated plant status information, and obtain EC approval on ENF.

NOTE: No EC approval or roll call is required for a follow-up verbal notification.

6.7.3 Prepare VNF as follows:

.1 Enter Message No. from ENF.

.2 Complete Sections 2.0 and 5.0 with information from prepared ENF.

.3 Perform a Verbal Notification (Reference Sections 2.0 and 5.0).

6.7.4 Transmit Follow-up ENF message.

.1 Fax ENF message to OES and record time on VNF.

6.8 Close-Out Notifications

6.8.1 Prepare ENF Close-out Notification as follows:

.1 Check box "**has been closed out**" and enter time event was closed out in Section 2.0 time blank on VNF.

.2 Provide status of current conditions on ENF for close-out, and obtain EC approval on ENF.

NOTE: SM should ensure plant status is included for close-outs performed from the Control Room to provide updated information to offsite agencies. Duty EPC may complete close-out ENF for SM approval and transmission.

6.8.2 Prepare VNF as follows:

.1 Enter Message No. on VNF from ENF.

.2 Complete VNF Sections 2.0 and 5.0 with information from prepared ENF.

.3 Perform a Verbal Notification (Reference Sections 2.0 and 5.0).

6.8.3 Transmit Close-out ENF message.

.1 Fax ENF message to OES and record time on VNF.

6.9 Non-Responding Stations

6.9.1 Dial the station's individual YPS number from the phone or computer keypad to make contact.

.1 If no contact can be made, then use alternate numbers listed on VNF or ERTD, to contact individual Stations.

.2 If assistance in offsite notifications is needed, then request it from other facility Communicator.

6.9.2 Perform the following steps for initial verbal message, whenever offsite response centers are not yet staffed, or when emergency notifications are initiated during an off-hours time (weekends, holidays, night).

.1 IF Dana Point, San Juan Capistrano or San Clemente do not answer, THEN request Orange County to initiate emergency recall and notification for those cities.

.1.1 Record Orange County contact's name in the city contact box until that city's Emergency Operations Center (EOC) is staffed.

.2 If State Parks does not answer, then request San Diego California Highway Patrol (CHP) to initiate recall and notification for State Parks.

.2.1 Record CHP contact's name in State Park contact box until EOC staffed.

6.9.3 If Yellow Phone **Voice Circuit** is completely inoperable, then call stations *27, *46, *22, *32, and *42 using alternate numbers on VNF or ERTD.

.1 Read message from VNF and inform them the Yellow Phone is inoperable.

.2 Request Orange County *27 to notify Dana Point, San Juan Capistrano and San Clemente.

.3 Request San Diego CHP *32 to notify State Parks.

.4 Request assistance for offsite notifications if needed from other facility Communicator when available or from Edison Generation Operations *42.

6.10 Yellow Phone System Problems

6.10.1 Report all phone problems to EOF Telecom Supervisor and to facility EPC.

6.10.2 If all stations report no message receipt, then transmit printed message by FAX.

6.10.3 If YPS Data Circuit is completely out of service, then FAX hand-drafted ENF to offsite agencies.

NOTE: The following steps will tie an outside phone call directly into YPS. The station must maintain an open line.

6.10.4 If a YPS voice circuit fails, then contact affected station and direct them to dial (949) 368-3880 followed by Access Code 0852 to reconnect to YPS verbal circuit.

.1 If more than three backup lines are needed, then contact affected station and direct them to dial(949) 368-3800 followed by Access Code 0852 to reconnect to YPS verbal circuit.

.2 Immediately inform EOF Telecom Supervisor of circuit problem.

6.10.5 If nearest YPS is not working or is inaccessible (i.e., equipment malfunction or uninhabitable atmosphere), then emergency notifications could be completed using the YPS at other Emergency Response Facilities, or from a safe location using the alternate telephone and fax numbers.

.1 Refer to Form EP(123)11, as necessary.

6.11 Message Receipt Verification

6.11.1 Verify offsite agency acknowledgment of printed message receipt on YPS Status Screen approximately 5 minutes after message was sent, if time permits. (Do not let this verification interfere with ongoing or pending notifications).

6.11.2 If a participating station has not pressed "Report Acknowledge Button," then initiate a call to the station(s) and read the following:

"This is San Onofre Nuclear Generating Station.
We are verifying your receipt of a printed message."

"Please press your 'Report Acknowledge Button' to confirm printed message receipt."

"This notification is complete, San Onofre is clear."

6.12 EOF Administrative Actions

6.12.1 Perform the following actions upon transmission of an approved ENF to offsite agencies:

.1 Deliver one copy to EOF Administrative Coordinator for distribution.

.2 Maintain a log of decisions and actions required by EPIPs.

.3 Provide documentation of conditions, events, and communications wherever appropriate to ensure a complete and adequate record, to minimize misunderstanding, and to identify items requiring followup actions.

7.0 RECORDS

7.1 Forward all completed procedures, logs, and forms to the EPC upon event close-out.

SAMPLE - VERBAL NOTIFICATION FORM and KEY POINTS

REF: SO123-VIII-30.7

VERBAL NOTIFICATION FORM

Message # (1) Prepared by: (2) Independently Verified by: (3) EC Approved by: (4)

1.0 Log Notifications:

.1 [ ] Notify ERO OR [ ] Recall ERO (5) (Enter Time or N/A)
(Enter Time or "N/A" if Recall Completed)

.2 Initiate offsite Verbal Message (6) (Enter Start Time)
(OES Blue Phone or Alt Number 916-845-8911)
(YPS *91 all call or YPS Computer Terminal)

2.0 Read for ALL Messages:

(7) "This is [ ] a Drill [ ] an Emergency Event Notification"
"This is San Onofre Nuclear Generating Station,

A(n) [ ] Unusual Event (8) [ ] has been declared at
[ ] Alert [ ] is in progress since
[ ] Site Area Emergency [ ] has been closed out at:
[ ] General Emergency (9) (Enter Declare Time)

3.0 Read for Classification/PAR/Release Status Change:

"Consult Event Code (10) (Enter EAL Tab) in your Manual of Emergency Events.

(11) "The wind is from: ____ Degrees at: ____ MPH."
(Use 10m Met Data if available)

(12) "The Protective Action Recommendation (PAR)
[ ] is as follows: [ ] was upgraded at ____ (Enter Time) to:

(EAN: Review SO123-VIII-10.3 for PARs. Multiple choices are allowed.)
[ ] None Required
[ ] Evacuate State Beach
[ ] Shelter PAZ(s) [ ]1 [ ]2 [ ]3 [ ]4 [ ]5
[ ] Evacuate PAZ(s) [ ]1 [ ]2 [ ]3 [ ]4 [ ]5
[ ] Ingest KI PAZ(s) [ ]1 [ ]2 [ ]3 [ ]4 [ ]5

(13) "There [ ] has not been a radioactive release
[ ] has been associated with this event"
[ ] was

[ ] "SONGS (14) [ ] is activating the [ ] EOF."
[ ] has activated [ ] Alt EOF."

4.0 Read only on YPS for Class/PAR/Release Status Changes:

"When I announce your station number and agency name, please respond with your first initial and last name."

(Log time (15) (Enter YPS Done Time) then, Log Responders Name →)

5.0 Read for ALL Messages:

(16)
"Prepare to receive printed message # ____ in a few minutes", Acknowledge printed message receipt by pressing the Report Acknowledge Button.

(17)
[ ] "Printed message # ____ will not be transmitted.

"This message is complete, San Onofre is Clear."

6.0 FAX Printed Message to OES:

OES FAX Number 916-845-8910 (18) (Enter Start Time)

[M] *27 O/C CONN CTR	(714)
[U] *28 O/C EOC	
[D] *26 San Juan Cap.	(949)
[U] *57 San Juan EOC	
[D] *34 Dana Pt EOC	(949)
[D] *25 San Clemente EOC	(949)
[M] *46 SD COUNTY EOC	(858)
[M] *22 USMC CMD D/O	(760)
[D] *23 USMC Command Center	
[M] *32 SAN DIEGO CHP	(858)
[D] *48 San Diego CHP ERC	
[D] *24 St Parks EOC	(949)
[M] *42 EDISON GEN OPS	(626)

[M]=24 HR, [D]=DAY, [U]=UNOCCUPIED

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SAMPLE

Verbal Notification Form Key Points
(Continued)

NOTE: Items identified with an asterisk (*) are used to determine the accuracy of the notification.

VERBAL NOTIFICATION AUTHORIZATION:

(1) Initial Verbal Notification for a given event is Message No. 1. Each subsequent notification is sequentially numbered until event close-out. Sequence numbers on VNF and associated ENF (Attachment 3) shall be the same.

(2) Preparer shall initial "Prepared by" box to document who entered message content.

(3) VNF shall be given an independent verification by an individual who is trained in classification process (e.g., Control Room Supervisor, Shift Technical Advisor, Emergency Advisor Operations, Emergency Advisor Offsite, SRO Briefer). This individual shall not be the EC or involved in the notification process. Reviewer shall initial "Independently Verified By" box to acknowledge agreement the message content is correct.

(4) Acting EC shall initial "EC Approved By" box when peer review is completed to authorize Verbal Notification transmission.

ACTIONS REQUIRED IN 15 MINUTES:

(5) SC shall enter time Recall System is initiated or enter N/A if no pager message is to be sent with this notification.

(6) * Communicators shall enter time they start to read verbal message. The interval between this time and declaration time (item 9 below) must be 15 minutes or less. Blue Phone notification should be completed first, as notification of this single agency is typically faster than notification of multiple agencies via the Yellow Phone. If difficulties are encountered with the Blue Phone, immediately begin notification process on Yellow Phone to meet 15-minute requirement.

KEY PERFORMANCE INDICATOR DATA:

(7) * The box for a Drill or an Emergency shall be checked.

(8) * The box for current classification level shall be checked. The second column of boxes should be checked as follows:

- "has been declared at" for each new or changed classification;
- "is in progress since" each time a Verbal Notification is initiated but the classification remains the same;
- "has been closed out" any time the emergency is being closed out in accordance with SO123-VIII-1 or SO123-VIII-10.5. This would be the last Verbal Notification given to state and local agencies.

(9) * The time EC declares emergency or reclassifies event.

Verbal Notification Form Key Points
(Continued)

KEY PERFORMANCE INDICATOR DATA: (Continued)

(10) * Enter Event Code that consists of the Event Category (A, B, C, D, E, F, or G) and Emergency Class (1= UE, 2=Alert, 3=SAE and 4=GE), and the Emergency Action Level (1, 2, 3, etc.).

(11) * Enter wind direction in degrees from (use 10 meter Met Data if available) and the wind speed in mph. The wind direction from is used to determine affected PAZ(s).

(12) * Check box labeled:

- "is as follows:" if PAR is being made at the same time event classification is being declared, if there is no change in PAR in this notification, or if there is no PAR required;
- "was upgraded at" and enter time PAR upgrade was made on the following line when there is an upgrade in PAR but classification has not changed;

and

- select appropriate boxes to indicate the PAR.

(13) * Check the following radioactive release box as appropriate:

- "There **has not been** a radioactive release associated with this event" if there **is not** an increase in measurable quantities of radioactive material related to event which are in a pathway to the environment, or already in the environment (as measured by field monitoring);
- "There **has been** a radioactive release associated with this event" if there **is** an increase in measurable quantities of radioactive material related to event which are in a pathway to the environment, or already in the environment (as measured by field monitoring);
- "There **was** a radioactive release associated with this event" if there **was** an increase in measurable quantities of radioactive material related to the event which were in a pathway to the environment, or already in the environment (as measured by field monitoring), **but** this release was stopped.

(14) If event requires EOF activation, check "is activating" or "has activated" as appropriate. Then check "EOF" if normal EOF is accessible, or check "Alt EOF" if normal EOF access is impaired for any reason. Leave everything blank if the event does not require EOF activation.

(15) Communicator should enter time when verbal message was completed (before roll call is initiated).

PRINTED MESSAGE ITEMS:

(16) Record number of current printed message as indicated at the top of associated verbal message form.

(17) Read this line in verbal message only if previous printed message is superseded by a PAR change, reclassification of event or start/stop of a radiological release. Enter the number of voided printed message.

(18) Enter time Yellow Phone printed message is faxed to State OES. Enter "N/A" if ENF was superseded by a new verbal message.

EMERGENCY RECALL ACTIVATION

SECTION A Locate applicable Scenario ID Number in the list below.

See Section F for displayed pager message for the F Tab Security scenarios.

	Scenario ID Number
NRC Threat Advisory Level V - no Site Specific Threat: F5-1	9
Unusual Event Non-Security - no response required	17
Unusual Event Non-Security - response required	18
Unusual Event Security	19
Alert Non-Security	28
Alert Security	29
Site Area Emergency Non-Security	38
Site Area Emergency Security	39
General Emergency Non-Security	48
General Emergency Security	49

EMERGENCY RECALL ACTIVATION (Continued)

Section B Enter **Scenario ID Number** in Steps 1 and 2 as required, then perform the following:

1. Enter **Scenario ID Number** to be activated _____ (See Section A)
2. If necessary, enter **Scenario ID Number** to be stopped _____ (See Section A)
3. **Dial 83747** using a touch-tone telephone.
4. Enter your Activation **Password** then press "#" key.
5. Follow system prompts to activate or stop selected scenario.

   CAUTION: Do NOT enter more than one valid Scenario ID Number.

6. Record time recall was initiated on VNF, Step 1.0.
7. If recall system fails, or to transmit additional instructions by pager, then develop message in Section C and enter message for pager activation using Intranet Method in Section D.
8. If recall system and Intranet are both unavailable, then activate pagers using Telephone Method in Section E.
9. Contact Emergency Services at 86655 to verify recall activation page went out with correct information, as time permits.

Section C If a modified Approach Message OR other ERO notification is required due to changing plant conditions, freeway closures, or security concerns, then create an alternate message as directed by EC.

Record this message on the recall system only during initial scenario activation, otherwise transmit pager text messages at any time using Section D.

Record alternate message here:

_____

_____

_____

_____

_____

_____

_____

EMERGENCY RECALL ACTIVATION (Continued)

Section D Intranet Method: If required, then use this method to transmit an alphanumeric text message to **Group Pagers** as follows:

NOTE: Both Minimum Staff and Non-Minimum Staff ERO members are normally recalled during an emergency.

1. Open the Edison International Portal.
2. Enter a Shift Manager's last name and click on "Employee Search."
3. Click on the "Page" icon for the Shift Manager.
4. Notify ERO as follows:
   a. Click on "Show/Hide Group Paging" (below "Recalculate" button). A new box will appear under the "To" box.
   b. Enter "6266510723@wmg.sce.com, 6266510623@wmg.sce.com" in this new box.
   c. Delete all data in the "To" box and leave it blank.
   d. Delete all data in the "From (E-mail ID):" box and enter "RECALL" in this box.
   e. Type an appropriate message (see examples below):
      (1) "A(n) (UE, Alert SAE, GE) was declared at San Onofre at (hh:mm). This event is due to: Release, Loss of Coolant, Seismic Event, etc.)"
      (2) "Disregard inadvertent pager activation, no response is required."
      (3) "Report to alternate location and wait further instructions."
      (4) "Report to the EOF/E-50."
   f. Click on "Send Page."
   g. A Message Sent window confirmation will appear.

EMERGENCY RECALL ACTIVATION (Continued)

Section E Telephone Method: If required, then activate **Group Pagers** with a numeric message as follows:

NOTE: Both Minimum Staff and Non-Minimum Staff ERO members are normally recalled during an emergency.

1. Notify the ERO Minimum Staff by:
   a. Dial 9-1-626-651-0723 from a phone with access to outside phone lines.
   b. When connected to pager vendor as indicated by a series of three (3) beeps, enter 911911911 followed by the pound (#) key.
   c. Wait for confirmation beeps, then hang up.
2. Notify ERO Non-Minimum Staff by:
   a. Dial 9-1-626-651-0623 from a phone with access to outside phone lines.
   b. When connected to pager vendor as indicated by a series of three (3) beeps, enter 911911911 followed by the pound (#) key.
   c. Wait for confirmation beeps, then hang up.

EMERGENCY RECALL ACTIVATION (Continued)

SECTION F Security Recall System Scenario Messages:

Unusual Event F1-1:

An Unusual Event based on security events has been declared at SONGS. ERO personnel report to a staging area.

Alert F2-1:

An ALERT based on security events has been declared at SONGS. ERO personnel report to a staging area.

Site Area Emergency F3-1:

A Site Area Emergency based on security events has been declared at SONGS. ERO personnel report to a staging area.

General Emergency F4-1:

A General Emergency based on security events has been declared at SONGS. ERO personnel report to a staging area.

NRC Threat Advisory Level 5 - No Site-Specific Threat

PRECAUTIONARY - NRC Threat Advisory Level 5 has been issued. All On-Duty Minimum Staff ERO personnel report to Emergency Response Facilities in Building E-50.

EVENT NOTIFICATION FORM KEY POINTS

SAN ONOFRE NUCLEAR GENERATING STATION

EVENT NOTIFICATION FORM

This is ☐ a Drill. ☐ an Emergency.

Date _____ Message No. _____

Emergency Classification:

(1) ☐ An Unusual Event
☐ An Alert
☐ A Site Area Emergency
☐ A General Emergency

(2) ☐ has been declared
☐ is in progress
☐ has been closed out

Time: (3) Unit(s): (4) Event Code: (5)
(Declaration/Reclassification/Close-out)

Meteorological Data:

(6) Wind Direction (From) _____ Degrees at _____ mph ... *(Use CFMS page 256)*

Protective Action Recommendations:

There (7) ☐ is ☐ is not a need for protective action beyond the Exclusion Area Boundary (EAB).

Recommended Action: ... *(Multiple choice allowed.) (Reference SO123-VIII-10.3)*

(8) ☐ None
☐ Evacuate State Beach
☐ Shelter PAZ(s) [ ]1 [ ]3 [ ]4 [ ]5
☐ Evacuate PAZ(s) [ ]1 [ ]2 [ ]3 [ ]4 [ ]5
☐ Ingest KI PAZ(s) [ ]1 [ ]2 [ ]3 [ ]4 [ ]5

Release Information: (9)

☐ There **has not been** a radioactive release to the environment associated with this event.
[Planned radioactive releases per an approved Liquid or Gaseous Effluent Release Permit remain within Federally approved operating limits]

☐ There **was** an event-related radioactive release that has been stopped.

☐ There **is** an ongoing event-related radioactive release to the environment.

The radioactive release is ☐ **above** ☐ **below** Federally approved operating limits.

The event-related radiation dose ☐ **is** ☐ **is not** measurable at the Exclusion Area Boundary.

The radioactive release ☐ **is** ☐ **was** to the ☐ land. ☐ atmosphere. *(Multiple choice allowed)* ☐ ocean.

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EVENT NOTIFICATION FORM KEY POINTS (Continued)

This is ☐ a Drill. ☐ an Emergency. Message No. _____

Dose Rate Projections/Measurements: ...(Use when information is available and EOF ODAC is not staffed.)

Expected Release Duration: (10) (hrs) Calculation Time:		Projected Dose (mrem)	Calculated Plume Arrival Time	Field Measured Dose Rate (mr/hr)	Field Measured Dose Rate at time
Exclusion Area Boundary	TEDE				
	Thyroid CDE				
1 Mile	TEDE				
	Thyroid CDE				
2 Miles	TEDE				
	Thyroid CDE				
5 Miles	TEDE				
	Thyroid CDE				
10 Miles	TEDE				
	Thyroid CDE				

TEDE: Total Effective Dose Equivalent CDE: Committed Dose Equivalent

Current Plant Conditions: (11)

Prognosis of Emergency: (12)

Emergency Response Actions Underway Onsite: (13)

Request for Offsite Support: (14)

PREPARED BY: (15) APPROVED BY: (16)

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EVENT NOTIFICATION FORM KEY POINTS (Continued)

EMERGENCY CLASSIFICATION INFORMATION: (matched to the verbal information)

(1) **Emergency Action Level**: Enter appropriate emergency class.

(2) **Status of Emergency**: Check appropriate block.

(3) **Time**: Enter time event was actually declared, reclassified, or closed out.

(4) **Unit**: Enter affected unit(s) based on the following criteria:

- "1" if there is an uncontrolled release of radioactivity from Unit 1 - Tab A, or a Miscellaneous event which is limited to Unit 1 - Tab G.
- "2" if there is an uncontrolled Release of Radioactivity - Tab A, Loss of RCS Inventory - Tab B, Core Degradation or Overheating - Tab C, Loss of Safety Equipment - Tab D at Unit 2, or a Miscellaneous event limited to Unit 2 - Tab G.
- "3" if there is an Uncontrolled Release of Radioactivity - Tab A, Loss of RCS Inventory - Tab B, Core Degradation or Overheating - Tab C, Loss of Safety Equipment - Tab D at Unit 3, or a Miscellaneous event limited to Unit 3 - Tab G.
- "1, 2, 3" if there is a Disaster - Tab E, Security Safeguards Contingency - Tab F, or Miscellaneous event - Tab G that is site-wide or common to all three units.

(5) **Event Code**: Write as shown in SO123-VIII-1 (e.g., B2-1).

METEOROLOGICAL DATA:

(6) **Wind**: Enter the "from" wind direction in degrees and the speed in miles per hour (use 10 meter Met Data if available).

PROTECTIVE ACTION RECOMMENDATIONS: (matched to the verbal information)

(7) **Protective Action Recommendations**: (Check appropriate box)
- (a) Enter "is" for PAR necessary beyond the site boundary. Remember, this is for Edison-recommended offsite PARs only.
- (b) If no PAR, then enter "is not" and skip directly to Release Information Section (9) on the bottom of ENF.

(8) **Recommended Action**: (Can be multiple choice) Enter appropriate PAR, and if applicable, affected PAZ(s) based on SO123-VIII-10.3, Protective Action Recommendations.

EVENT NOTIFICATION FORM KEY POINTS (Continued)

(9) **Release Information:**

Release Definition: There **is** an increase in measurable quantities of radioactive material related to event which are in a pathway to the environment, or already in the environment (as measured by field monitoring).

Measurable at the Exclusion Area Boundary (EAB) Definition: Dose **above background** measured either by field monitoring teams at the EAB or by the Pressurized Ion Chambers surrounding the site (ask HP Leader).

Federally Approved Operating Limits

a. If the following Gaseous Effluent Radiation Monitors are reading:

2(3)RE7870 $\geq$ 3.5E5 µCi/sec

OR

Sum of 2RE7865 and 3RE7865 $\geq$ 3.5E5 µCi/sec

OR

2(3)RE7874A1 or 2(3)RE7874B1 = Valid reading above background with a release to atmosphere from an affected Steam Generator.

Then check the box "above" Federally Approved Operating Limits.

b. If an Unmonitored release is detectable at the EAB, then check the box, "above" Federally Approved Operating Limits.

c. If an Unusual Event is declared in accordance with SO123-VIII-1, Tab A1-2, then check the box, "above" Federally Approved Operating Limits.

d. If there is no information confirming an unmonitored release, then check the box, "below" Federally Approved Operating Limits as specified in the Offsite Dose Calculation Manual(ODCM).

If there is no event-related radioactive release in progress, then check the first box. ("There has not been ....")

If an event-related radioactive release did occur but was stopped, then check the second box. ("There was ....")

If an event-related radioactive release is ongoing, then check the third box. ("There is ....")

If release is gaseous, then check Atmosphere box.

If release is liquid, then check Land or Ocean box, as applicable.

EVENT NOTIFICATION FORM KEY POINTS (Continued)

(10) **DOSE RATE PROJECTIONS/MEASUREMENTS:**
This information should be completed when the information is available and ODAC is not staffed. Otherwise, dose rate information should be provided to the ODAC Leader who will disseminate it to the agencies.

NARRATIVE INFORMATION:

(11) **Current Plant Conditions:**
Describe briefly current plant conditions that form the basis for the emergency classification and or PAR. If an increase in classification, an upgrade in PAR, a start or stop of radiological release occurred within 15 minutes of the previous classification or PAR, and verbal notification was only provided for the second condition, include information about previous classification, PARs, or radiological release. Include time when radiological release started/stopped on this section. Also, if there are other significant plant updates for any Unit and it is not related to the current Emergency, it should be described in this section.

(12) **Prognosis of Emergency:**
Describe briefly trends in current plant conditions.

(13) **Emergency Response Actions Underway Onsite:**
Describe briefly current mitigating activities such as activation of emergency response facilities, repair or surveillance team activities.

(14) **Request for Offsite Support:**
Describe briefly request for support required from Offsite Agencies or enter none.

(15) **Prepared By:** Initialed by the EAN or leave blank if completed by Shift Manager.

(16) **Approved By:** Initialed by the EC as authorization to send the message.