O Emergency Preparedness

This section of the Plan describes the actions required for Plan development and review and for distribution and maintenance of the Station Emergency Plan to maintain a state of emergency preparedness at the South Texas Project Electric Generating Station.

O.1 Maintaining Emergency Preparedness

Maintaining emergency preparedness is the responsibility of the President and Chief Executive Officer. It is important that a current state of emergency preparedness be maintained at all times at the Station. To ensure the state of readiness, the emergency preparedness program has been designed to provide each of the following objectives:

- *Formal designation of management personnel responsible for the emergency preparedness program;*
- *Establishment of an emergency preparedness training program;*
- *Planning and conducting periodic drills and exercises;*
- *Annual audit of the Plan and procedures;*
- *Routine calibration, maintenance, and inventory of emergency equipment and, supplies;*
- *Establishment of a public information and education program;*
- *Training of the individuals responsible for the emergency planning effort in the Emergency Response Division. This training, conducted on an annual basis, will consist of onsite training and/or participation in offsite seminars and training courses, industry workshops, and peer reviews of other emergency response programs.*

Needed changes from audits, recommendations, and review findings shall be incorporated into the Station Emergency Plan and appropriate procedures. Revisions to the Station Emergency Plan will be dated and marked to indicate where changes have been made. Revised material will be distributed to key members of the Station Emergency Response Organization and to other holders of the Emergency Plan in accordance with Station Records Management System Procedures. This will require that all manuals and copies of the Plan and procedures are numbered and the distribution be recorded and maintained. Revisions will be distributed to these holders with instructions stating any removal/replacement actions that are to be accomplished by the document holder.

Letters of Agreement will be reviewed and certified annually and updated as needed.

The telephone listing of the Station Emergency Response Organization and the Emergency Communications Directory will be verified and *updated on a quarterly basis as needed.*

O.2 State/County Review of Emergency Plan

The Station's emergency action levels used for classification of emergencies, ~~0ERP01-ZV-IN01, Emergency Classification,~~ shall be submitted to the state and county authorities on an annual basis for review.

- *Comments from this review shall be discussed between the various organizations and incorporated into the procedure, if applicable.*

O.3 Title 10, Code of Federal Regulations, Part 50.54(t) Independent Review

At the frequency specified in Title 10, Code of Federal Regulations, Part 50.54(t)(1), Emergency Preparedness Program elements are reviewed by persons which have no direct responsibility for the implementation of the Emergency Preparedness Program, in accordance with Title 10, Code of Federal Regulations, Part 50.54(t). The review shall include the elements of the program required by 10CFR50.54(t)(2). The review may be in the form of a Quality Audit.

The Quality Review results, along with recommendations for improvements, are documented and reported to the Supervisor, Emergency Response, the senior management and the President and Chief Executive Officer. All records generated by the review shall be retained as Quality Records for the retention period specified in 10CFR50.54(t)(2). Portions of the review are made available to state and local governments as specified in 10CFR50.54(t)(2).

The Quality Review findings shall be reviewed per the independent review requirements for Quality Audits specified in the station's Operations Quality Assurance Program (OQAP) Chapter 19.0, "Administrative Controls". Records of the independent review activities shall be prepared, approved, and distributed as identified in the OQAP. Records of the independent review shall be retained for at least the minimum period specified in 10CFR50.54(t)(2).

O.4 Emergency Equipment and Supplies

Emergency equipment and supplies shall be inspected, inventoried, and maintained as described in Procedure 0PGP05-ZV-0009, Emergency Facility Inventories and Inspections. Radiological instruments are maintained and calibrated in accordance with Station procedures.