

COMANCHE PEAK STEAM ELECTRIC STATION  
EMERGENCY PLAN MANUAL

**MAINTAINING EMERGENCY PREPAREDNESS**

PROCEDURE NO. EPP-100

REVISION NO. 7

EFFECTIVE DATE: 10-24-2007

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**EMERGENCY PLANNING MANAGER**

<b>CPSES EMERGENCY PLAN MANUAL</b>		<b>PROCEDURE NO. EPP-100</b>
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**1.0 PURPOSE (C-01882)**

This procedure identifies tasks required to maintain Emergency Preparedness at the Comanche Peak Steam Electric Station (CPSES).

**2.0 APPLICABILITY**

- 2.1 This procedure applies to members of the CPSES Emergency Planning Staff.
- 2.2 Other CPSES personnel may be called on to assist Emergency Planning Staff members on an "as needed" basis to help complete specific tasks.

**3.0 DEFINITIONS/ACRONYMS**

3.1 **Emergency preparedness (EP) requirement** - a statement made in the emergency plan, which is a mandated licensing basis document or lower tier document (such as an emergency planning implementing procedure (EPIP)) that addresses how a particular regulatory requirement will be met. All EP requirements are subject to the 10 CFR 50.54(q) change process.

3.2 **Decrease in effectiveness (DIE)** - a change in an emergency preparedness requirement that results in the degradation or loss of the capability to perform a function or perform a function in a timely manner, as contained in the emergency plan.

- a. A change in an emergency preparedness requirement based on capability, means that the emergency plan, as changed, would result in the loss or degradation of the capability to meet the regulatory requirements of an emergency plan. ("Capability" is verified through a demonstration that the function(s) can be performed). Consequently, the capability to perform a function(s) as previously stated in the emergency plan no longer exists or is degraded.
- b. A change in an emergency preparedness requirement based on timeliness means that the requirements to perform a function in a timely manner as set forth in 10 CFR 50.47(b) and Appendix E to 10 CFR Part 50, and as defined in the licensee's emergency plan, are not met or are relaxed. This would include functions such as notification, classification, and Emergency Response Organization (ERO) augmentation.

3.3 **Emergency Plan Implementing Procedure (EPIP)** - Includes all Emergency Plan Procedures (EPPs), as well as TRA-105.

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**4.0 INSTRUCTIONS**

**4.1 Responsibilities**

4.1.1 The Emergency Planning Manager is responsible for:

- Coordinating Emergency Preparedness at CPSES
- Maintaining this procedure current
- Ensuring tasks identified in this procedure are accomplished within the appropriate time frame.
- Maintaining the proficiency of the Emergency Planning staff by scheduling their participation in training courses, drills and exercises, seminars, workshops, plant outages, and assistance visits to other nuclear facilities. [C-05789]

4.1.2 The Emergency Planning Staff is responsible for completing tasks in accordance with this procedure and approved EP Staff Guidelines.

**4.2 General Instructions**

- 4.2.1 The attachments included with this procedure identify the routine required tasks necessary to maintain emergency preparedness at CPSES.
- 4.2.2 Some tasks identified in the attachments do not require additional instructions; those that do, refer the user to other documents which contain specific task instructions.
- 4.2.3 The attachments may be performed independently of each other and in any order preferred.
- 4.2.4 Separate tasks identified in a single attachment may be performed independently.



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<p><b>5.0    <u>REFERENCES</u></b></p> <p><b>5.1    <u>Development References</u></b></p> <p>5.1.1    MSE-PO-9328, "Emergency Alerting System Inspection"</p> <p>5.1.2    NUREG-1022, "Licensee Event Report System, Supp.1"</p> <p>5.1.3    CPSES Emergency Plan</p> <p>5.1.4    "CPSES Site Specific Offsite Radiological Emergency Preparedness Alert and Notification System Quality Assurance Verification, FEMA"</p> <p>5.1.5    Title 10, Code of Federal Regulations, Part 50.47 and 50.54(q)</p> <p>5.1.6    Title 10, Code of Federal Regulations, Appendix E</p> <p>5.1.7    CPSES/FSAR, II.B</p> <p>5.1.8    NUREG-0654/FEMA-REP 1</p> <p>5.1.9    NRC REGULATORY ISSUE SUMMARY 2005-02, "Clarifying the Process for Making Emergency Plan Changes"</p>		

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5.2 Performance References

- 5.2.1 STA-106, "Nuclear Training Records"
- 5.2.2 STA-116, "Changes to CPSES Operating License Prerequisite Documents(LBDS), Operating Conditions, and Technical Specifications"
- 5.2.3 STA-202, "Nuclear Generation Procedure Change Process"
- 5.2.4 STA-302, "Station Records"
- 5.2.5 STA-307, "Nuclear Operations Forms Control"
- 5.2.6 STA-501, "Non-Routine Reporting"
- 5.2.7 TRA-104, "Fire Protection Training"
- 5.2.8 TRA-105, "Emergency Preparedness Training"
- 5.2.9 CHM-111, "Primary Chemistry Accident Assessment Sampling Program"

**6.0 ATTACHMENTS/FORMS**

**6.1 Attachments**

- 6.1.1 Attachment 1, "Maintenance of the CPSES Emergency Plan and Associated Procedures"
- 6.1.2 Attachment 2, "Administrative Requirements"
- 6.1.3 Attachment 3, "Maintenance and Inventory of Emergency Equipment and Supplies"
- 6.1.4 Attachment 4, "Communications Systems Testing and Maintenance"
- 6.1.5 Attachment 5, "Emergency Drill Program"
- 6.1.6 Attachment 6, "Emergency Exercise Program"
- 6.1.7 Attachment 7, "Public Information Activities to Support Emergency Preparedness"
- 6.1.8 Attachment 8, "Alert and Notification System Surveillance and Reports"
- 6.1.9 Attachment 9, "10CFR50.54(q) Evaluation Guidance"

**6.2 Forms**

- 6.2.1 EPP-100-1, "10 CFR 50.54(q) Evaluation"
- 6.2.2 EPP-100-2, "Activity Summary"
- 6.2.3 EPP-100-3, "Quarterly Alert and Notification System Operability Summary"

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**7.0 RECORDS**

When completed, the following forms generated in response to this procedure should be dispositioned in accordance with STA-302, "Station Records."

7.1 EPP-100-1, "10 CFR 50.54(q) Evaluation"

7.2 EPP-100-2, "Activity Summary"



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**ATTACHMENT 1**  
**MAINTENANCE OF THE CPSES EMERGENCY PLAN**  
**AND ASSOCIATED PROCEDURES**

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**1. PURPOSE**

This attachment identifies the requirements for preparation and maintenance of the CPSES Emergency Plan, Letters of Agreement, Emergency Plan Procedures (EPPs), Position Assistance Documents (PADs), Severe Accident Management Guidelines (SAMGs), and the EP (Emergency Planning) Staff Guidelines.

**2. The Emergency Planning Manager is responsible for:**

- Annual review and maintenance of the CPSES Emergency Plan. [C-03192]
- Annual review and maintenance of the Letters of Agreement; [C-27153]
- Preparation and maintenance of the Emergency Plan Procedures; [C-03192]
- Ensuring proposed changes to the Emergency Plan do not decrease the effectiveness of the Plan, unless they are approved by the Nuclear Regulatory Commission prior to implementation;
- Preparing, reviewing, revising, approving, controlling, and distributing the Position Assistance Documents (PADs);
- Preparing, reviewing, revising, approving, controlling, and distributing EP Staff Guidelines; and
- Preparing, reviewing, revising, approving, controlling, and distributing Severe Accident Management Guidelines.
- Preparation and maintenance of the Squaw Creek Park (SCP) Emergency Plan.

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3. The CPSES Emergency Plan shall be reviewed, revised, submitted, and approved in accordance with STA-116. [C-05657]
- Revisions to the CPSES Emergency Plan shall be evaluated to determine if the revision has decreased the effectiveness of the Emergency Plan.
    - The evaluation should be conducted using Form EPP-100-1; Attachment 9 provides guidance in completing EPP-100-1.
    - Any revision which is evaluated to decrease the effectiveness of the Emergency Plan shall be approved by the NRC prior to implementation.
  - Approved revisions to the Emergency Plan should be controlled and distributed by Luminant Oversight and Regulatory Affairs in accordance with their procedures.
  - CPSES Emergency Plan shall be distributed as authorized by the Emergency Planning Manager. Distribution should be to those organizations or individuals responsible for implementing or overseeing the Emergency Preparedness Program.
4. Emergency Plan Procedures shall be prepared, reviewed, revised, submitted, and approved in accordance with STA-202. [C-05657]
- Comments, suggestions, recommendations, etc. should be solicited from the Emergency Response Organization, reviewed for applicability, and included in the current procedure revisions, when applicable;
  - Include commitment numbers in the procedure, using the following format: [C-XXXX] (see examples in this procedure);
  - Revisions to the CPSES Emergency Plan Procedures (EPPs) shall be evaluated to determine if the revision has decreased the effectiveness of the overall Emergency Plan.
    - The evaluation should be conducted using Form EPP-100-1; Attachment 9 provides guidance in completing EPP-100-1.
  - Forms, associated with Emergency Plan Procedures, should be prepared and controlled in accordance with STA-307;

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- CPSES Emergency Plan Procedures shall be distributed as authorized by the Emergency Planning Manager. Distribution should be to those organizations or individuals responsible for implementing or overseeing the Emergency Preparedness Program.
5. Position Assistance Documents (PADs) should be made available to provide the Emergency Response Organization position holders with the materials necessary to perform the tasks assigned to the position.
    - PADs should be prepared, reviewed, revised, approved, and distributed in accordance with EP Staff Guidelines;
    - EP Staff Guidelines should direct personnel preparing PADs to review the PAD to ensure human factors engineering has been considered, including such items as tabbing, color coding, different font styles, and the length and layout of the material.
  6. EP Staff Guidelines should be used, when required, to accomplish specific emergency preparedness tasks.
    - EP Staff Guidelines should be prepared, reviewed, revised, approved, and distributed in accordance with EP Staff Guidelines.
  7. Severe Accident Management Guidelines should be prepared, reviewed, revised, approved, and distributed in accordance with EP staff guidelines.
  8. Approved revisions to the Squaw Creek Park (SCP) Emergency Plan should be controlled and distributed by Luminant Oversight and Regulatory Affairs in accordance with their procedures.

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ATTACHMENT 2  
ADMINISTRATIVE REQUIREMENTS

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**1. PURPOSE**

This attachment identifies the requirements for emergency preparedness administrative tasks. Included are:

- Selection and assignment of Emergency Response Organization personnel;
- Notification of changes made to Emergency Response Organization personnel;
- Maintenance of the Emergency Facility Telephone Directory;
- Independent reviews of the Emergency Preparedness Program;
- The Emergency Planning Master Calendar/Schedule.
- Review of Emergency Action Levels.

**2. The Emergency Planning Manager is responsible for:**

- Reviewing the Emergency Response Organization Roster and selecting qualified replacement personnel, as needed, at least once per calendar quarter;
- Providing notification of changes to the CPSES Emergency Plan and associated procedures to applicable Emergency Response Organization members;
- Ensuring that the Emergency Facility Telephone Directory is reviewed, and revised as necessary, on a quarterly basis;
- Coordinating independent reviews of the Emergency Preparedness Program;
- Maintaining the Emergency Planning Master Calendar/Schedule.
- Coordinating review of Emergency Action Levels (EALs).

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3. Review of the Emergency Response Organization Roster and selection and assignment of personnel to the roster shall be accomplished in accordance with approved EP Staff Guidelines. [C-05228]
  
4. In addition to notifications made during retraining and through the drill program, Emergency Response Organization members should be notified of revisions to the CPSES Emergency Plan and associated procedures.
  - Notifications should be made prior to the revision's effective date.
  - The notification should include, as a minimum, the document title, the document number, the revision number, the effective date, and a brief synopsis of the changes.
  - A copy of the notification should be retained in the Emergency Planning files until the end of the next calendar year.
  
5. The Emergency Facility Telephone Directory, which lists telephone numbers for onsite emergency response facilities, local, State, and federal emergency response agencies and other emergency response related agencies such as the National Weather Service (NWS) is reviewed each calendar quarter, and revised, if necessary, in accordance with an approved EP Staff Guideline. [C-27168]

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6. An independent review of the Emergency Preparedness Program shall be conducted at least every 24 months. An independent review shall be conducted as necessary based on assessment by Luminant Power against performance indicators or after identifying a program change occurring that potentially could adversely affect emergency preparedness. In the latter case, the review shall be conducted as soon as practical but no later than 12 months after the change occurs. Independent reviews are reported to the appropriate company management personnel and governmental organizations. [C-03194]
  - The annual review should involve discussion with personnel and inspection of equipment, as well as a review of emergency preparedness documentation.
  - If possible, the review should include observation of an emergency exercise or drill, separate from normally required controllers and observers.
  - Document the review, including recommendations for improvement.
  - Implement management controls for evaluation and correction of each review's findings.
  - Report the findings to Plant Management, Regulatory Affairs, and involved Federal, State and local organizations.
  - Retain the findings for at least five (5) years.
7. The Emergency Planning Master Calendar/Schedule should be maintained in accordance with approved EP Staff Guidelines.
8. Review the Emergency Action Levels (EALs) annually with state and local authorities. [C-27152]
9. Annually review Letters of Agreement that are maintained in Emergency Planning. [C-27153]

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ATTACHMENT 3  
MAINTENANCE AND INVENTORY OF  
EMERGENCY EQUIPMENT AND SUPPLIES

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**1. PURPOSE**

This attachment identifies the requirements for maintenance, inventory, and control of emergency equipment and supplies.

**2. The Emergency Planning Manager is responsible for:**

- Determining equipment and supplies to be pre-positioned in designated facilities and storage locations;
- Approving removal of emergency equipment or supplies from storage locations for an extended period of time;
- Identifying an individual to be responsible for overall management of emergency equipment and supply inventory and functional check activities; and
- Maintaining dedicated emergency response vehicles and controlling their daily use.

**3. The EP Staff Guideline for inventory and maintenance of emergency equipment and supplies should provide instructions for conducting inventory and, if applicable, functional checks of emergency response equipment.**

- Emergency equipment and supplies shall be inventoried and functionally checked quarterly and after use. [C-05722]
- Checklists shall be used to identify forms, references, supplies, and equipment which are inventoried and functionally checked.[C-00377, 05722. 27127]
- Changes to facility equipment checklists should be accomplished in accordance with instructions provided in the EP Staff Guideline and approved by the EP Manager.
- Sufficient reserves of equipment shall be available for temporary replacement of equipment removed for calibration and repair, as well as replenishing supplies. [C-05722]
- Documentation of inventories and functional checks are done using Form EPP-100-2.
- Deficiencies noted during inventories shall be corrected. [C-05722]

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4. Storage locations, used to stage emergency equipment and supplies, such as cabinets, lockers, rooms, etc., should be secured by lock or seal and should be posted to identify their contents.
5. Batteries shall be identified with the manufacturer's expiration dates. [C-23687]
  - Batteries contained in sealed packages should show the expiration date on the exterior of the package or in such a way as to be visible without opening the package.
  - Individual batteries should show the expiration date on the battery.
6. Day-to-day use of designated emergency vehicles is in accordance with EP Staff Guidelines.
7. The following Organizations may be called upon to assist Emergency Planning in their inventory and functional check efforts:
  - Instrument and Control (I&C) - to maintain emergency equipment in current calibration and to identify equipment due for calibration.
  - Radiation Protection - Provide and maintain electronic dosimeters, thermoluminescent dosimeters (TLDs) and facility habitability monitoring equipment.
  - Chemistry - Provide and maintain radionuclide analysis equipment.
  - Safety Services - Provide and maintain respiratory equipment.



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ATTACHMENT 4  
COMMUNICATIONS SYSTEMS TESTING AND MAINTENANCE

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**1. PURPOSE**

This attachment identifies the testing and maintenance requirements for various communications systems and equipment used for emergency response.

2. The Emergency Planning Manager is responsible for ensuring that communications systems and equipment are tested and maintained in accordance with appropriate EP Staff Guidelines.

3. The systems and equipment included in this attachment are:

- Telephones, including point-to-point telephones, State and county ringdown lines, normal PBX telephones, and the Federal Telecommunications System (FTS);
- Public address systems (excluding Gaitronics);
- Radio equipment, including base stations, vehicle radios, and hand-held radios;
- Telecopiers;
- Automatic call-out machine;
- Emergency Response Organization pagers; and
- Emergency Response Data System (ERDS).

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4. Telephone equipment used for emergency notifications shall be functionally checked as follows and in accordance with EP Staff Guidelines. [C-23564]
 

A test of communication links, the dedicated telephone between CPSES, the Department of Public Safety (DPS) Waco, Somervell County Sheriff (Somervell County Emergency Operations Center, Hood County Sheriff Hood County Emergency Operations Center), and NRC Federal Telecommunications System (FTS) between CPSES (Control Room, Technical Support Center, Emergency Operations Facility) and the NRC is conducted MONTHLY. This test satisfies the quarterly requirement to test communication links between CPSES, federal agencies, and the State. [C-05774; 05775]

A test of communication links between CPSES, the Department of Public Safety (DPS) Waco, Somervell County Sheriff (Somervell County Emergency Operations Center, Hood County Sheriff (Hood County Emergency Operations Center), and radiological monitoring teams is conducted ANNUALLY. This test is conducted during periodic drills and exercises. [C-05776]

Other, non-notification telephones, used within the emergency facilities, shall be functionally checked quarterly in accordance with EP Staff Guidelines. [C-23685]
5. Public Address systems used by the Emergency Response Organization for communications should be functionally checked quarterly in accordance with EP Staff Guidelines. This does not include the Plant Page-Party System (Gaitronics).
6. Radio equipment used by the Emergency Response Organization should be functionally checked quarterly in accordance with EP Staff Guidelines.

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COMMUNICATIONS SYSTEMS TESTING AND MAINTENANCE

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7. Telecopiers

- Telecopiers should be programmed in accordance with EP Staff Guidelines.
- Programming should be verified current on a quarterly basis.

8. Automatic Call-out Machine

- The most current approved Emergency Response Organization Roster should be used for the call-out machine programming. The call list shall be reviewed at least quarterly and updated as necessary.
- Testing of the automatic call-out machine should be conducted in accordance with EP Staff Guidelines.
- The automatic call-out machine should be tested at a frequency determined by the Emergency Planning Manager.

9. Emergency Response Organization Pagers

- Pagers should be distributed to members of the Emergency Response Organization as designated by the Emergency Planning Manager.
- Pager testing should be conducted in accordance with EP Staff Guidelines.
- Pagers should be tested at a frequency determined by the Emergency Planning Manager.

10. Emergency Response Data Systems (ERDS)

- The ERDS is tested in accordance with instructions furnished by the Nuclear Regulatory Commission (Generic Letter GL-93-01), and contained in an EP Staff Guideline. [C-26489]

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**ATTACHMENT 5**  
**EMERGENCY DRILL PROGRAM**

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**1. PURPOSE**

This attachment identifies drills designed to test, develop, and maintain emergency response skills of Emergency Response Organization (ERO) members. This attachment gives general requirements for conduct of drills, identifies drills by name, and provides guidance for conducting, evaluating, and documenting drills.

2. The Emergency Planning Manager shall ensure drills are conducted in accordance with NRC and FEMA rules. [C-23602]
3. The Lead Drill Controller should submit complete drill packages in accordance with STA-106.
4. General Requirements

**CAUTION**

IF

Key ERO members are being EVALUATED relative to pre-determined NRC Performance Indicator OPPORTUNITIES

THEN

1. The scenario should be protected.
2. The Exercise Lead Controller should use Emergency Planning Staff Guideline 020 NRC PERFORMANCE INDICATOR, Attachment 1 to identify predetermined Drill/Exercise Performance (DEP) opportunities and provide a basis for each DEP opportunity.
3. Controllers/Evaluators should be directed to NOT assist participants nor do on-the-spot corrections nor engage in non-drill discussions.
4. Controllers/Evaluators should use Emergency Planning Staff Guideline 020, Attachment 1 to record their evaluation of Key ERO members.

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**EMERGENCY DRILL PROGRAM**

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- The Drill scenario should provide stimuli to prompt demonstration of all interactions expected in an actual event.
- Drills should be held at a frequency which ensures adequate maintenance of skills required to respond to particular emergency situations.
- Drill packages should be designed to allow free play in decision making and should include the following:
  - Objectives;
  - Date, time period, location, and participating organizations;
  - Time schedule of real and simulated initiating events; and
  - Narrative summary describing the conduct of the drill.
- Drills should follow preplanned scenarios developed to determine the response capability of personnel. [C-08734]
- During drills, if appropriate, on-the-spot correction of incorrect or inappropriate performance should be made and correct performance should be demonstrated. [C-08734]
- The State of Texas, Bureau of Radiation Control, should periodically participate in radiological monitoring and health physics drills. [C-08734]
- Scenarios developed for drills requiring NRC or FEMA evaluation shall be submitted to the NRC or FEMA, as applicable, for evaluation and approval. [C-05650]

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5. As a minimum, the following Emergency Plan required drills should be conducted at the frequencies indicated. These drills may be conducted as a single entity or conducted as an integral part of an activity such as an exercise or facility tabletop or walkdown.
- Communication Drills  
MONTHLY, demonstrate transmittal of a notification from CPSES to DPS Waco, Hood County EOC, Somervell County EOC and the NRC. Additionally, determine whether recipients understand notification content. [C-05774]
  - Fire Drills  
  
Fire drills should be conducted in accordance with requirements of TRA-104.
  - Emergency Medical Drills  
  
Offsite ambulance and medial support services participate in an annual drill, and may participate in conjunction with a CPSES exercise.
  - Radiological Monitoring Drills  
  
CPSES Emergency Response Organization (ERO) members, assigned to radiological monitoring teams, shall participate in an ANNUAL onsite and offsite drill that involves direct radiation measurements and air sampling for particulates and radioiodines. These drills shall include collection and analysis of all sample media (e.g., soil, water, vegetation and air). These samples should be submitted to the Texas Department of Health for analysis. Participants in onsite and offsite drills shall demonstrate record keeping and transmittal of radiological data. [C-05778]
  - Health Physics Drills  
  
SEMI-ANNUAL Health Physics drills, involving response to and analysis of simulated elevated airborne and liquid samples and direct radiation measurements in the environment shall be conducted and should include Emergency Response Organization (ERO) members assigned tasks related to this activity. [C-03269]

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6. The following additional drills should be conducted at the frequencies indicated:

- EP/Control Room Mini-Drill

ANNUALLY: Demonstrate Control Room Personnel's ability to perform emergency classification, protective action recommendations, dose projections, and emergency notifications.

- Facility Activation Drills

ANNUALLY: Demonstrate proficiency in activating the Technical Support Center and the Emergency Operations Facility.

- Evacuation Drills

Evacuation drills shall be conducted when deemed appropriate by the Emergency Planning Manager. These drills shall be preceded by written notice, posted signs, or voice announcement. They shall not be conducted unannounced due to the risks involved. [C-06285]

7. Conducting the Drill

- The drill should be conducted per the drill package. Any deviation from the scenario should have the Lead Drill Controller approval.
- All controllers/evaluators should maintain a log of events observed.
- The Lead Drill Controller should terminate the drill when drill objectives have been completed or if drill activities jeopardize the safety of personnel or the plant.
- Upon termination of the drill, the controller and evaluator log sheets should be given to the Lead Drill Controller.

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EMERGENCY DRILL PROGRAM

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8. Evaluating the Drill

- A critique shall be conducted as soon as possible following the drill. The critique should identify the following: [C-05784]
  - Whether instructions given in the EPPs and the Position Assistance Documents could be followed to complete required actions.
  - Adequacy of emergency supplies, equipment, and facilities.
  - Ability of Emergency Response Organization personnel to perform their required functions.
  - Lessons learned as a result of the activity.
- Participants should be given the opportunity to provide player comments to Emergency Planning.
- The Lead Drill Controller shall prepare and submit a Drill Summary Report to the Emergency Planning Manager, including: a list of participants, controllers, evaluators, observers, and observed problem areas. [C-21716]
- Required corrective actions resulting from observed problem areas should be identified by the Emergency Planning Manager.
  - Following the drill, the Emergency Planning Manager should develop corrective actions for problems identified in the Drill Summary Report.



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ATTACHMENT 6  
EMERGENCY EXERCISE PROGRAM

PAGE 1 OF 4

**1. PURPOSE**

This attachment identifies the requirements for the CPSES Emergency Exercise Program.

**2. Field Exercise**

A biennial evaluated exercise to test the CPSES Emergency Plan. It is evaluated either annually or biennially by the Nuclear Regulatory Commission (NRC) and biennially by the Federal Emergency Management Agency (FEMA).

**3. The Plant Manager is responsible for: [C-23602, 09968]**

- Approving the date of and objectives for Field Exercises; and
- Ensuring compliance with NRC and FEMA requirements of emergency preparedness.

**4. The Emergency Planning Manager is responsible for:**

- Developing exercise scenarios; [C-05783]
- Selecting individuals to serve as exercise controllers;
- Ensuring exercises are conducted in accordance with NRC and FEMA rules; [C-23602]
- Conducting Field Exercises;
- Conducting annual exercises (or drills) to test integrated portions of emergency response capabilities. [C-05770]
- Conducting exercise critiques; and
- Preparing written summaries of exercise critiques. [C-05785]

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EMERGENCY EXERCISE PROGRAM

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5. A long-range plan should be developed which includes, at a minimum:
- Starting a Field Exercise between 6:00 p.m. and 4:00 a.m. once every six years;
  - Conducting an “unannounced” Field Exercise once every six years;
  - Once every two years conducting a Field Exercise involving full participation of local response organizations and at least partial participation of State organizations; [C-05770]
  - Ensuring that the State fully participates with CPSES at least once every four years; and [C-05770]
  - Scenarios developed for drills and exercises requiring NRC or FEMA evaluation shall be submitted to the NRC or FEMA, as applicable, for evaluation and approval. [C-05650]
  - Conducting a Field Exercise that demonstrates emergency response to a terrorist based event at least once every six years. [C-27362]

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**ATTACHMENT 6**  
**EMERGENCY EXERCISE PROGRAM**

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6. A scenario shall be developed which includes, as appropriate: [C-05782]

**CAUTION**

**IF**

Key ERO members are being EVALUATED relative to pre-determined NRC Performance Indicator OPPORTUNITIES

**THEN**

1. The scenario should be protected.
2. The Exercise Lead Controller should use Emergency Planning Staff Guideline 020 NRC PERFORMANCE INDICATOR, Attachment 1 to identify predetermined Drill/Exercise Performance (DEP) opportunities and provide a basis for each DEP opportunity.
3. Controllers/Evaluators should be directed to NOT assist participants nor do on-the-spot corrections nor engage in non-drill discussions.
4. Controllers/Evaluators should use Emergency Planning Staff Guideline 020, Attachment 1 to record their evaluation of Key ERO members.

- The Exercise scenario should provide stimuli to prompt demonstration of all interactions expected in an actual event.
- The basic objectives and evaluation criteria;
- The date, time period, location, and participating organizations;
- Simulated events;
- A time schedule of real and simulated events;
- A narrative summary; and
- A description of arrangements for, and advance materials to be provided to, official observers.

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EMERGENCY EXERCISE PROGRAM

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7. A critique shall be conducted as soon as possible following the exercise and should consider the following: [C-05784]
  - Whether instructions given in the CPSES Emergency Plan and its implementing documents were clear and adequate;
  - Adequacy of emergency equipment, supplies, and facilities;
  - Adequacy of Emergency Response Organization performance; and
  - Lessons learned as a result of the exercise.
  
8. A summary of each exercise shall be written and should include, as a minimum: [C-05785]
  - The objectives of the exercise;
  - A list of participants, controllers, evaluators, and observers; and
  - A list of identified deficiencies.
  
9. Following the exercise, the Emergency Planning Manager shall develop corrective actions for each problem area identified in the Exercise Evaluation Report. [C-25003]

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**ATTACHMENT 7**  
**PUBLIC INFORMATION ACTIVITIES TO SUPPORT EMERGENCY PREPAREDNESS**

PAGE 1 OF 3

1. **PURPOSE**

This attachment identifies the requirements related to public information activities needed to support emergency preparedness at CPSES.

2. The Emergency Planning Manager is responsible for selecting personnel to maintain the public information program.

3. **Emergency Posters**

- Distributed to parks, county facilities, city halls, local post offices, and other similar locations.
- The posters contain information such as:
  - A 10-mile Emergency Planning Zone (EPZ) map;
  - Assistance telephone numbers;
  - Relocation Center locations; and
  - Evacuation routes.
- Poster information should be reviewed annually and updated as necessary.
- The posters should be inspected annually and replaced as necessary.

4. **Outdoor Signs**

- Outdoor signs providing information on what to do if the Alert and Notification System (sirens) is heard, should be located within the 10-mile EPZ at public gathering places such as boat launches, tourist attraction parking lots, and other appropriate locations.
- The signs should be inspected annually and repaired as necessary.

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ATTACHMENT 7  
PUBLIC INFORMATION ACTIVITIES TO SUPPORT EMERGENCY PREPAREDNESS

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5. Emergency Printed Media (e.g., local phone books or other printed media) [C-10951]
- The selected publications provide information to the public regarding actions that should be taken in the event of an emergency at CPSES.
  - The information should include, but not be limited to:
    - Educational information about radiation and a contact for additional information;
    - Protective actions, including a map showing evacuation zones, routes, and relocation center locations;
    - Sheltering and respiratory protection;
    - Special needs for the handicapped;
    - A listing of radio and television stations providing emergency information; and
    - Telephone numbers for obtaining information from State and local governments.
  - The selected publication shall be distributed annually to residents living within the 10-mile EPZ.
  - For persons requiring special assistance, a method is provided in distributed public information to inform the sheriff of the location of the individual and what special assistance is required. [C-10952]
6. Emergency Information for Visitors to Somervell and Hood Counties
- A publication containing emergency information for visitors to Somervell and Hood Counties is offered annually to motels, camps, and RV parks within the 10-mile EPZ. The publication contains information about the siren system, evacuation, and the Emergency Alert System (EAS).

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ATTACHMENT 7  
PUBLIC INFORMATION ACTIVITIES TO SUPPORT EMERGENCY PREPAREDNESS

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7. Annual News Media Orientation

- Luminant Power provides information and offers training annually to local and Dallas/Fort Worth area media. Topics include: plant operation; radiation; emergency plans; how the media is notified of an emergency; points of contact for emergency related public information; and media coverage of drills and exercises. [C-06303]

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**ATTACHMENT 8**  
**ALERT AND NOTIFICATION SYSTEM SURVEILLANCE AND REPORTS**

PAGE 1 OF 2

1. **PURPOSE**

This attachment identifies the requirements necessary to ensure the operability of the Alert portion of the Alert and Notification (Siren) System.

2. **Annual Inspection**

Preventative maintenance should be performed by Electrical Maintenance in accordance with approved Electrical Maintenance procedures.

3. **PRECAUTION**

Deficiencies (as referenced in the note in Section 4) in the Alert and Notification system are to be corrected within four (4) months as required in Title 10, Code of Federal Regulations, Part 50, Appendix E, Section IV.D.3.

4. The Test Coordinator, in accordance with EP Staff Guidelines should:

- Notify both Sheriff's Offices/Dispatchers and the Shift Manager of the scheduled test;
- Coordinate the test based on the surveillance schedule;
- Immediately notify the Shift Manager if eighteen (18) or more sirens of the Alert and Notification System fail;

**NOTE:** A report to the NRC is required when the capability to alert a large segment of the population is lost for a period of one hour. Within the CPSES Plume Emergency Planning Zone (EPZ), loss of eighteen (18) or more sirens requires reporting to the NRC. NUREG-1022, "Licensee Event Report System," Supplement No. 1, February 1984, clarified the requirements of 10 CFR 50.72(b) (1) (v). (See STA-501, "Non-Routine Reporting" for specific reporting requirements.)

- Notify the Sheriff of the affected County of all siren failures and of their return to service.
- Complete Form EPP-100-3 each quarter.



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**ATTACHMENT 8**  
**ALERT AND NOTIFICATION SYSTEM SURVEILLANCE AND REPORTS**

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5. Operability tests are scheduled for the first Monday of each month at 12:00 noon. When this day falls on a scheduled holiday, the test should not be conducted. "Growl testing" should be conducted in its place.

**NOTE:** Operability tests may be postponed or canceled by the Sheriff or the County Judge, for the County in which the sirens are located, for any reason. Normally, these tests will be canceled only if severe weather or other potential emergency exists.

6. The Test Coordinator should initiate a Smart Form to correct problems found while testing the system.
7. Each calendar quarter, the information from EPP-100-3 should be submitted to FEMA and the Texas Division of Emergency Management.

ATTACHMENT 9  
10CFR50.54(q) EVALUATION GUIDANCE  
Page 1 of 3

1. **Purpose**

This attachment provides guidance in performing a 10CFR50.54(q) evaluation, EPP-100-1.

2. EPP-100-1 Steps

**Step 1: Describe the proposed change(s) to the Emergency Plan or implementing procedure.**

The description should consist of a concise summary of the proposed change, and a brief statement that explains why the changes are being made. The description should also identify the section(s) of the emergency plan (or implementing procedure) that is (are) being revised as well as any references that are pertinent to the understanding and or acceptability of the screen or evaluation. For editorial changes it is acceptable to state in this section that the change is editorial in nature and will continue to meet the standards in Steps 2 & 3. To determine if the change is editorial in nature refer to STA-202.

**Step 2: Perform a review of the 50.47(b) planning standards.**

In order to determine if a proposed change has resulted in a decrease in effectiveness it is necessary to determine which planning standards are affected as defined in 10CFR50.47(b). Each planning standard should be reviewed and a decision made as to whether they are affected and continue to be met. Documentation to support both yes and no answers should be provided. More detailed documentation of yes answers should be provided. Several of the areas delineated in 10CFR50.47(b) have been identified as risk significant planning standards in NRC Inspection Manual MC 0609, Appendix B, "Emergency Preparedness Significance Determination Process".

**Step 3: Perform a review of Appendix E.**

Just as it is necessary to evaluate the proposed change against 10CFR50.47(b) to determine if a decrease in effectiveness has occurred (see Step 2), it is also necessary to evaluate the change against the criteria in 10CFR50 Appendix E and ensure they are met. Documentation to support both yes and no answers should be provided. More detailed documentation of yes answers should be supplied in the comments section.

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10CFR50.54(q) EVALUATION GUIDANCE  
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**Step 4: Describe the effect of the proposed change(s) on the effectiveness of the emergency plan.**

Steps 1 and 3 provide the foundation for Step 4. In this section the data documented in steps 2 and 3 are compared against criteria that will provide reasonable assurance that the effectiveness of the overall emergency plan has or has not been decreased.

If the affected section of the plan or lower tier document does not implement a planning standard or the requirements of Appendix E (refer to Step 3) then determine if the section was added to the plan based on a written commitment to the NRC.

If the section of the plan or lower tier document does not implement a planning standard or the requirements of Appendix E or is not a commitment to the NRC then state in this section that *“information in the section of the plan was provided as supplemental information for the purpose of providing clarification and therefore changes to the section do not decrease the effectiveness of the plan”*. In addition, provide a synopsis of the historical information relative to the proposed change.

If the section of the plan or lower tier document does implement a planning standard or the requirements of Appendix E to 10CFR50, determine if the change decreases the effectiveness of the plan by the following:

- 1) If the change still implements the planning standard utilizing a different method then document the new method and state why the change does not decrease the effectiveness of the plan.
- 2) Does the capability/timeliness still exist to conduct this function?
- 3) If a parameter was changed then state why changed and that the change is not a decrease in the effectiveness of the plan.
- 4) If an instrument/tool type was substituted and the instrument still performs the same function, then state why the instrument/tool still performs the same function And that the change does not alter the effectiveness of the plan.

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 10CFR50.54(q) EVALUATION GUIDANCE  
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**Step 5: Describe if and how the revised emergency plan will continue to meet the standards.**

Step 5 provides an opportunity to further establish whether the change continues to meet 10CFR50.47(b) and Appendix E through justification of the acceptability of the change (i.e., the how and why). A summary of the review performed to this point is established. Reasonable assurance that documentation, providing insight into the bases for the emergency plan, are also examined. Affected planning standards should be identified here and annotated if they are risk significant. If, in this step it is determined that the planning standards are not met, the change should either be altered to allow the standards to be met or NRC approval should be sought.

**Step 6: Conclusion and Approval**

The final step is to provide the overall conclusion that the change either does or does not decrease the effectiveness of the plan. In addition, Step 6 documents who performed and reviewed the evaluation.