June 23, 2014

10 CFR 50, Appendix E, Section V

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

Subject:

Docket Nos. 50-206, 50-361, 50-362, and 72-41

Emergency Plan Implementing Procedures

San Onofre Nuclear Generating Station (SONGS), Units 1, 2, 3, and

the Independent Spent Fuel Storage Installation

Dear Sir or Madam:

Pursuant to 10 CFR 50, Appendix E, Section V, Attachment 1 of this letter provides copies of the following revised Emergency Plan Implementing Procedures:

	<u>Procedure</u>	Rev.	Effective Date
SO123-VIII- Program (E	0.201, "Emergency Plan Equipment Surveillance PESP)"	28	6/4/2014
SO123-XXI Description	-1.11.3, "Emergency Plan Training Program '	31	6/4/2014

Attachment 2 of this letter provides an updated index listing titles, revisions, and editorial corrections (ECs) of the SONGS Emergency Plan Implementing Procedures, as of June 20, 2014. A bar in the right margin indicates items changed since our previous submittal.

Attachment 3 lists the current Emergency Plan Manuals, Orders, and Training Procedures that are referenced in the Emergency Plan. A bar in the right margin indicates items changed since our previous submittal.

Attachment 4 provides the reports and analysis summaries of the Emergency Plan Implementing Procedures changes.

There are no commitments contained in this letter or its attachments.

If you have any questions, please contact Ms. Kelli A. Gallion, Emergency Planning Manager, at (949) 368-7756.

Sincerek

P.O. Box 128 San Clemente, CA 92672 (949) 368-7418 PAX 87418 Fax: (949) 368-7575

John.Brabec@sce.com

AX45 FSME20 LIMS26 Attachments: 1. Revised Emergency Plan Implementing Procedures

- 2. SONGS Emergency Plan Implementing Procedures Index
- 3. Emergency Plan Manuals, Orders, and Training Procedures that are Referenced in the Emergency Plan
- 4. Reports and analysis summaries of the Emergency Plan Implementing Procedures changes.

cc: Emergency Response Coordinator, NRC Region IV (2 copies of Attachment 1)

- M. Dapas, Regional Administrator, NRC Region IV
- J. E. Whitten, NRC Region IV, Nuclear Material Safety Branch Chief
- C. Gratton, NRC Project Manager, SONGS Units 2 and 3
- J. C. Shepherd, NRC Project Manager, San Onofre Unit 1
- W. C. Allen, NRC Project Manager, San Onofre ISFSI
- G. G. Warnick, NRC Senior Resident Inspector, SONGS Units 2 and 3

Attachment 1

Revised Emergency Plan Implementing Procedures

SO123-VIII-0.201
Emergency Plan Equipment Surveillance

SO123-XXI-1.11.3
Emergency Plan Training Program Description



SO123-VIII-0.201 REV: 28

Page 1 of 47

	Procedure Usage Requirements	Sections
Information Use	 The user may complete the task from memory. However, the user is responsible for performing the activity according to the procedure. Information use documents that contain a specific process order are performed in the given order unless otherwise specified within the document. 	TOC and Summary of Changes
Reference Use	 Review and understand the procedure before performing any steps, including the prerequisite section. Have a copy or applicable pages/sections open at the work site. Use Placekeeping method according to SO123-XV-HU-3. If any portion of the document is performed from memory, do so in the sequence specified. Perform each step as written, except when an approved process specifically allows deviation. Refer to the procedure or instruction at least once to ensure completion of the task in accordance with the requirements. Review the document at the completion of the task to verify that all appropriate steps are performed and documented. 	All except for TOC and Summary of Changes

Color Usage	Location
This Document Does Not Contain Relevant Color	N/A

QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / 50.54(q) APPLIES

Procedure Type	Procedure Owner
EPIP	Kelli Gallion



SO123-VIII-0.201 REV: 28

Page 2 of 47

TABLE OF CONTENTS

Section	<u>ion</u>	<u>Page</u>
1.0	PURPOSE AND SCOPE	3
2.0	RESPONSIBILITIES	3
3.0	DEFINITIONS/ACRONYMS	4
4.0	PRECAUTIONS AND LIMITATIONS	4
5.0	PREREQUISITES	5
6.0	PROCEDURE	5
	6.2 Emergency Response Facilities (ERFs) and Equipment	
	6.4 Emergency Response Facility (ERF) Activation	11
	6.6 Evacuation Route Sign Inventory / South Evacuation Route	11
	6.7 Emergency Operations Facility (EOF) Support Systems	
	6.9 Emergency Response Data System (ERDS)	13
	6.10 EPESP Review	
7.0	ACCEPTANCE CRITERIA	16
8.0	RETENTION OF RECORDS	17
9.0	REFERENCES / COMMITMENTS	17
ATT /	ACHMENT	
1	Emergency Plan Equipment List	20
2	Emergency Response Facility (ERF) Inspection	23
3	Emergency Kit (EKIT) Inventory	
4 5	PAPA and ERTD SurveillanceERF Leaders' Notebook Inventory	
6	Emergency Response Organization Recall Surveillance	
7	EP Surveillance Scheduling	
8	Evacuation Route and Sign Inventory	
9	EPESP Review	38
10	Primary Emergency Recall System Functional Testing	
11	Emergency Response Organization Responder Remediation Testing	
12	Alternate Emergency Recall System Testing	
13	Summary of Changes	46



SO123-VIII-0.201 REV: 28

Page 3 of 47

1.0 PURPOSE AND SCOPE

- 1.1 To establish the Emergency Plan Equipment Surveillance Program (EPESP) to ensure equipment used during emergency response is properly surveilled and maintained.
- 1.2 To define the responsibilities for surveillance and maintenance of emergency response equipment and the reporting of equipment status.

2.0 **RESPONSIBILITIES**

- 2.1 Emergency Planning is responsible for:
 - 2.1.1 Surveillance of EPESP items not assigned to other divisions. These surveillances are specified in Sections 6.2, 6.3, 6.5 and 6.10.
 - 2.1.2 Notifying the affected Emergency Response Organization (ERO) personnel when emergency equipment will be unavailable for emergency response for greater than two days.
- 2.2 The Cognizant Engineer is responsible for ensuring equipment referenced in Sections 6.7, 6.8, and 6.9 is maintained in accordance with SO23-XVIII-10, Siren Community Alert Siren System System Description and Operation Guide.
- 2.3 The Cognizant Division listed in Attachment 1, Emergency Plant Equipment List, is responsible for following the Corrective Action Program (CAP) and using approved associated procedures in the scheduling, inspection, and maintenance of equipment contained in the EPESP.
- 2.4 The Cognizant Division is directed by procedure or written agreement, to notify EP and the Cognizant Engineer (Systems Engineering) via Nuclear Notification (NN) generation and/or Functional Assessment task assignment (N-TS-FA), or by e-mail, should maintenance and inspection activities reveal deficiencies resulting in equipment being out of service for other than routine maintenance.
- 2.5 The Shift Manager (SM) or designee is responsible for:
 - 2.5.1 Performing Initial Operability Determination (IOD) in accordance with SO123-XV-52, Operability Determinations and Functionality Assessments, when EPESP components qualify.
 - 2.5.2 Performing a review of the deficiency for applicability in meeting conditions that require notification to the United States Nuclear Regulatory Commission (USNRC).
- 2.6 The Cognizant Engineer is responsible for determining equipment and system availability when equipment deficiencies are identified.
- 2.7 The Cognizant Engineers for EOF HVAC / Vault Doors and EOF Diesel Generator are responsible for report of system availability upon request from EP.



SO123-VIII-0.201 REV: 28

Page 4 of 47

3.0 **DEFINITIONS/ACRONYMS**

3.1	<u>AEOF</u>	Alternate Emergency Operations Facility	
3.2	<u>AOSC</u>	Alternate Operations Support Center	
3.3	<u>ATSC</u>	Alternate Technical Support Center	
3.4	<u>EAL</u>	Emergency Action Level	
3.5	<u>EKIL</u>	Emergency Kit Inventory List	
3.6	EOF	Emergency Operations Facility	
3.7	<u>EPESP</u>	Emergency Plan Equipment Surveillance Program	
3.8	<u>EP</u>	Emergency Planning	
3.9	<u>EPP</u>	Emergency Preparedness Planning	-
3.10	<u>ERTD</u>	Emergency Response Telephone Directory	
3.11	<u>JIC</u>	Joint Information Center	
3.12	<u>OSC</u>	Operations Support Center	
3.13	<u>PAPA</u>	Protected Area Personnel Accountability	
3.14	<u>TSC</u>	Technical Support Center	
3.15	<u>SM</u>	Shift Manager	

4.0 PRECAUTIONS AND LIMITATIONS

- 4.1 The Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF) shall be maintained in a state of readiness by the Emergency Planning (EP) group.
- 4.2 Contact Irvine Operations Center Corporate Security to gain access to Alternate EOF (AEOF).



SO123-VIII-0.201 REV: 28

Page 5 of 47

5.0 **PREREQUISITES**

- 5.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.
- 5.2 **VERIFY** Level of Use requirements on the first page of this procedure.

6.0 **PROCEDURE**

6.1 **Program Administration**

- 6.1.1 Program Scope
- 6.1.1.1 The EPESP contains equipment important to implementation of the Emergency Plan. These components are considered important to safety and qualify as System, Structure or Component (SSC) (Reference SO123-XV-52, Operability Determinations and Functionality Assessments). The EPESP is an intrinsic part of overseeing and performing maintenance activities on SSC equipment supporting implementation of the Emergency Plan.
- 6.1.1.2 A list of equipment by noun name referred to in the Emergency Plan and how it relates to the EPESP is provided in Attachment 1, Emergency Plan Equipment List.
- In addition, the EPESP is supported by procedures referenced in Section 9.0 and includes other equipment not specified in the Emergency Plan that enhances emergency response or is used to declare Emergency Action Levels (EAL) at SONGS. A list of specific equipment applicable to the EPESP is provided in SO123-VIII-0.101, Attachment 1, SONGS Emergency Plan Equipment for EAL / Event Code Determinations, and Attachment 2, SONGS Emergency Plan / Emergency Response Facilities Equipment List.



SO123-VIII-0.201 REV: 28

Page 6 of 47

6.1.2 Equipment Outside the Scope of EPESP

- Records Management -controlled procedures and manuals
- Equipment whose surveillance or testing is covered by Technical Specifications or Licensee Controlled Specifications
- Equipment used by offsite agencies for emergency response
- Equipment used in the Joint Information Center
- Emergency Alert System
- Equipment that is routinely used, surveilled and maintained by Operations
- Fire Protection Systems
- Radiological equipment that is routinely operationally tested (calibrated) by established Radiation Protection (RP) procedures
- The Emergency Lighting and Power Supply System in accordance with SO23-3-3.36.4, Emergency Lighting System Functional Test, and SO23-I-9.22.1, Surveillance Requirement Annual Emergency Lighting System Test
- The Multi-Channel Analyzer (MCA) which is routinely surveilled by Chemistry & Environmental in accordance with SO123-III-4.5.3
- The Critical Functions Monitoring System (CFMS) and Dose Assessment Computer (DAC) which is periodically used in drills and routinely surveilled by Engineering using established procedures and Orders

6.2 Emergency Response Facilities (ERFs) and Equipment

- 6.2.1 ERF Inspection (TSC / OSC / EOF / AEOF / Alternate Technical Support Center [ATSC] / Alternate Operations Support Center [AOSC])
- 6.2.1.1 EP staff or designated personnel shall **PERFORM** visual inspection to check for safety, cleanliness and general usability (e.g., furniture, lighting, equipment layout) of the EOF, TSC, OSC, ATSC, AOSC and AEOF quarterly, or within 7 days following facility activation.
- 6.2.1.2 Document the audit using Attachment 2, Emergency Response Facility (ERF) Inspection, Step 1.2.



SO123-VIII-0.201 REV: 28

Page 7 of 47

6.2.2	EOF Specific Items
6.2.2.1	EP staff or designated personnel shall PERFORM a visual inspection of items listed in Attachment 2 to check for usability quarterly, or within 7 days following facility activation.
6.2.2.2	Document the audit using Attachment 2, Step 1.2.
6.2.3	Site Assembly Areas (K-50 / W-48 / AWS)
6.2.3.1	EP staff or designated personnel shall PERFORM a visual inspection to check for cleanliness and general usability of the Site Assembly Areas quarterly, or within 7 days following facility activation.
6.2.3.2	NOTIFY site personnel of changes in Site Assembly Area locations or availability.
6.2.3.3	Document the inspection using Attachment 2, Step 1.3.
6.2.4	Maintenance Tool Boxes
6.2.4.1	EP shall NOTIFY via e-mail, the Work Control Supervisor to generate Orders to perform Tool Box inventories quarterly or within 7 days following OSC facility activation.
6.2.4.2	EP shall REQUEST a list of Order numbers to verify inventory completion and document the Order numbers and dates on Attachment 2, Step 1.4.
6.2.5	Emergency Kit (EKIT) Inventory
6.2.5.1	EP staff or designated personnel shall ENSURE that EKIT inventory is performed with the approved EKIT List (EKIL) quarterly, or within 7 days following utilization of EKIT(s). [NN 201507385]
6.2.5.2	<u>IF</u> EKIL inventory discrepancies are not corrected when found, <u>THEN</u> EP shall GENERATE an NN to document the discrepancy(ies).
6.2.5.3	Completed inventories shall be kept on file for one year.
6.2.5.4	Document the EKIT inventory using Attachment 3, Emergency Kit (EKIT) Inventory, Step 1.1.



SO123-VIII-0.201 REV: 28

Page 8 of 47

6.2.6	Assembly Area Supplies Inventory and Event Signage
6.2.6.1	EP staff or designated personnel shall PERFORM and DOCUMENT on Attachment 3, Step 1.2, supply inventories annually, or within 7 days following activation.
6.2.6.2	Inventory should include:
	a bullhorn speaker
	 a set of assembly area coordinator instructions
	an adequate supply of information packets
6.2.6.3	EP staff or designated personnel shall PERFORM and DOCUMENT in Attachment 3, Step 1.3, usability and inventory of Emergency Event Signage for oncoming ERO event status annually or within 7 days following activation (ReferenceSO123-VIII-OSC).
6.2.7	Emergency Kit Inventory List (EKIL)
6.2.7.1	EP staff or designated personnel shall REVIEW the EKIL for possible changes quarterly during EKIT inventories. [NN 201507385]
6.2.7.2	The EKIL shall be updated annually or for significant changes.
6.2.7.3	OBTAIN the Manager, Emergency Preparedness Planning (EPP) review signature on the revised EKIL prior to distribution.
6.2.7.4	The revised EKIL shall be posted in each EKIT with the original kept on file in EP until replaced.
6.2.7.5	PROVIDE an updated EKIL to Radiation Protection (RP) Supervision. Any discrepancies noted with RP instruments, respirators, or dosimetry shall be addressed to the cognizant RP supervisor for resolution.
6.2.7.6	Document the review in Attachment 3, Step 1.4.
6.2.8	Protected Area Personnel Accountability (PAPA)
6.2.8.1	EP staff or designated personnel shall PERFORM a quarterly surveillance of PAPA, obtain a printout, and document the surveillance in Attachment 4, PAPA and ERTD Surveillance.



SO123-VIII-0.201 REV: 28

Page 9 of 47

6.2.9	Emergency Response Telephone Directory (ERTD)
6.2.9.1	EP staff or designated personnel shall REVIEW and update the ERTD quarterly.
6.2.9.2	CHECK the operability of listed PAX phones for the TSC, OSC, EOF, and AEOF at the rate of one facility per quarter.
6.2.9.3	Outdated ERTDs shall be replaced per the distribution list on or about the first of the month of the new quarter.
6.2.9.4	Document the review and distribution in Attachment 4.
6.2.10	ERF Leaders Notebooks
6.2.10.1	EP staff or designated personnel shall INVENTORY the ERF Leaders Notebooks quarterly, or within 7 days following facility activation. [NN 201507385]
6.2.10.2	REPLACE used or missing items per the table of contents and ensure all materials are current.
6.2.10.3	Document the review in Attachment 5, ERF Leaders' Notebooks Inventory.
6.2.10.4	The Table of Contents shall be updated when changes occur for notebooks listed in Attachment 5, Section 1.0. Changes shall be reviewed and approved by the cognizant Emergency Planning Staff and the Manager, Emergency Preparedness Planning.
6.2.11	Emergency Response Computers
6.2.11.1	EP staff or designated personnel shall ENSURE network updates are loaded by booting Emergency Response Computers quarterly.
6.2.11.1.1	Document the network updates using Attachment 2, Step 1.5.
6.2.11.2	EP staff or designated personnel shall VERIFY Laptop (portable) computers stored within emergency kits are charged, functional and inventoried quarterly.
6.2.11.2.1	Document stored laptops status at Alternate EOF and TSC in Attachment 2, Step 1.7.
6.2.11.3	EP staff or designated personnel shall VERIFY functional the meteorological display system at the EOF. ENSURE it operates and is ready for use within 7 days of facility activation or quarterly.
6.2.11.3.1	Document results in Attachment 2, Step 1.8.



6.3

EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM (EPESP)

SO123-VIII-0.201 REV: 28

Page 10 of 47

6.2.12	Emergency Response Vehicles
6.2.12.1	EP staff or designated personnel shall VERIFY Emergency Response Vehicles quarterly, or within 7 days following use.
6.2.12.1.1	Document the audit in Attachment 2, Step 1.6.
Emergen	cy Recall System
6.3.1	EP staff or designated personnel shall Test the ERO and Primary Recall System per Attachment 6 at least quarterly or in accordance with SO123-XV-54. [NN 201507385 and NN 201635671]
6.3.2	EP staff or designated personnel shall PERFORM functional testing of the Primary Recall System per Attachment 10 following software or hardware changes or repairs, or upon notification of interfacing system deficiencies
6.3.2.1	<u>IF</u> the primary Recall System is found inoperable, <u>THEN</u> NOTIFY SMs and Shift Communicators (per SO123-0-A7). EP shall INITIATE actions to return the system to service, including generation of NNs.
6.3.2.2	EP shall SCHEDULE daily system verification of readiness testing to verify interfacing system connectivity remains functional.
6.3.2.3	EP shall PERFORM the daily functional test following system maintenance and reboot of the Emergency Recall System.
6.3.2.4	At a minimum, EP shall PERFORM the daily functional test upon notification of potential interfacing system transients (less than loss of the interfacing system) upon identification.
6.3.3	EP staff or designated personnel shall PERFORM ERO remediation testing in accordance with Attachment 11.

EP staff or designated personnel shall Test the ERO alternate activation method per Attachment 12 at least biannually.

6.3.4



SO123-VIII-0.201 REV: 28

Page 11 of 47

6.4 Emergency Response Facility (ERF) Activation

- 6.4.1 <u>IF</u> an ERF fails to activate within the 90-minute timeline due to equipment failure, <u>THEN</u> generate an NN for the equipment and retest equipment in accordance with normal return to service procedures. [NN 202346444-CA0001, Reference 9.2.4.4]
- 6.4.2 <u>IF</u> an ERF fails to activate within the 90-minute timeline due to a process failure, <u>THEN</u> generate an NN to evaluate the failure. [NN 202346444-CA0001, Reference 9.2.4.4]
- 6.4.2.1 <u>IF</u> the process is changed, <u>THEN</u> retest the process to demonstrate the performance deficiency has been corrected.

6.5 EP Surveillance Scheduling

- 6.5.1 EP staff or designated personnel shall **PREPARE** next year's surveillance tracking form during the 4th quarter of the year.
- 6.5.2 The surveillance tracking form shall assign EP Staff responsibilities for completion.
- 6.5.3 The Tracking Form shall include all surveillances required by this procedure and by the following EPIPs:
- 6.5.3.1 Surveillances related to control of documents per SO123-VIII-0.100.
- 6.5.3.2 Surveillances related to telecommunications equipment per SO123-VIII-0.301.
- 6.5.3.3 Surveillances related to the onsite siren system per SO123-VIII-0.302.
- 6.5.3.4 The perimeter PA surveillance test per SO123-VIII-0.303.
- 6.5.4 Document completion of EP surveillance review and tracking form using Attachment 7.

6.6 <u>Evacuation Route Sign Inventory / South Evacuation Route</u>

- 6.6.1 EP staff or designated personnel shall **AUDIT** the Site Evacuation Routes signs during the 4th quarter every two years.
- 6.6.1.1 Verify all signs listed on Attachment 8 are in place and in good condition.
- 6.6.1.2 EP staff or designated personnel shall **COORDINATE** replacement of missing or defaced signs.
- Verification that both south evacuation routes are passable for passenger vehicles is supported by the Environmental Specialist in accordance with SO123-IX-1.3.
- 6.6.3 Document the sign audit and routes using Attachment 8.



SO123-VIII-0.201 REV: 28

Page 12 of 47

6.7 Emergency Operations Facility (EOF) Support Systems

- 6.7.1 Maintenance or designee shall **PERFORM** preventive maintenance on the following three EOF support systems in accordance with associated procedures and Maintenance Plans:
 - The EOF Ventilation System (Reference SO123-XVIII-30.2, EOF Pressure and Isolation Test)
 - The EOF Emergency Diesel Generator (Reference SO123-XVIII-30.1, EOF Diesel Generator Maintenance)
 - The EOF / Medical Decontamination Tanks
- 6.7.2 Maintenance or designee shall **INFORM** Engineering (via e-mail or in writing) of any impairment that cannot be repaired or restored under the expected scope of the Order.
- 6.7.3 Engineering shall **INFORM** EP (via e-mail or in writing) of any impairment that significantly impacts system availability for emergency response (>24hrs) including impairments due to periodic maintenance or upon discovery of deficiencies resulting in a non-functioning assessment. (Reference SO123-XV-52)
- 6.7.4 EP shall **NOTIFY** the appropriate EOF and TSC Team Leaders after determining the equipment will be unavailable for emergency response for greater than two days.



SO123-VIII-0.201 REV: 28

Page 13 of 47

6.8 <u>Meteorological Equipment</u>

- 6.8.1 Maintenance shall **PERFORM** the Meteorological Equipment surveillance in accordance with associated procedures (Reference SO123-II-8.17, SO23-II-8.12.1 and SO23-II-8.12) and Maintenance Plan.
- 6.8.2 Maintenance shall **INFORM** Engineering (via email or in writing) of any impairment that cannot be repaired or restored under the expected scope of the Order.
- 6.8.3 Engineering shall **INFORM** EP (via email or in writing) of any impairment that significantly impacts system availability for emergency response (>24hrs) including impairments due to periodic maintenance or upon discovery of deficiencies resulting in a non-functioning assessment. (Reference SO123-XV-52)
- 6.8.4 EP shall **NOTIFY** the appropriate EOF and TSC Team Leaders after determining the equipment will be unavailable for emergency response for greater than two days.

6.9 Emergency Response Data System (ERDS)

- 6.9.1 Engineering shall **INFORM** EP (via email or in writing) of any impairment that significantly impacts system availability for emergency response (>24hrs) including impairments due to periodic maintenance or upon discovery of deficiencies resulting in a non-functioning assessment. (Reference SO123-XV-52)
- 6.9.2 Engineering shall **INFORM** the SM or designee verbally upon discovery and in writing via NN of any loss or impairment or deficiency impacting ERDS ability to transmit real time data.
- 6.9.2.1 A major loss of ERDS is defined as the inability to transmit (via loss of the NRC Virtual Private Network (VPN), and/or associated Power Supply real time data as displayed within CFMS on pages 1 and 2 of ERDS (see both Units Main Menus and associated ERDS screens / pages.
- 6.9.2.1.1 The SM or designee should **NOTIFY** the NRC resident (courtesy) and implement requirements of SO123-0-A7. Clear concise information as to the affected unit and loss should be disseminated.
- 6.9.2.1.2 Temporary power should be considered for priority implementation by Engineering, Maintenance, and Operations, restoring system availability during planned or unplanned bus outages which impact ERDS transmission.
- 6.9.2.1.3 **NOTIFY** EP to implement compensatory actions if any impairment significantly impacts system availability for emergency response (>24hrs) including impairments due to periodic maintenance or upon discovery of deficiencies resulting in a non-functioning assessment.



SO123-VIII-0.201 REV: 28

Page 14 of 47

- 6.9.2.1.4 <u>IF</u> the impairment has ONLY affected R-Time LAN Server SOPRTD01 (NRC VPN), <u>THEN</u> **NOTIFY** EP to implement compensatory actions if the impairment of the ERDS NRC VPN is (>72hrs).
- 6.9.2.2 **NOTIFY** EP to implement compensatory action if any impairment significantly impacts system availability for emergency response (>24hrs) including impairments due to periodic maintenance or upon discovery of deficiencies resulting in a non-functioning assessment excluding where identified above in Step 6.9.2.1.4.
- 6.9.3 EP shall **NOTIFY** the appropriate EOF and TSC Team Leaders after determining the equipment will be unavailable for emergency response for greater than two days.

6.10 **EPESP Review**

6.10.1 EP staff or designated personnel shall **REVIEW** the EPESP annually as follows: 6.10.1.1 REVIEW Attachment 1 (SONGS Emergency Plan Equipment for EAL / Event Code Determinations) for accuracy and completeness. 6.10.1.1.1 Generate an NN for revision and update. 6.10.1.1.2 **RECORD** the NN number and brief description of the proposed change for Attachment 1. 6.10.1.2 **REVIEW** Attachment 1 (SONGS Emergency Plan / Emergency Response Facilities Equipment List) for accuracy and completeness. 6.10.1.2.1 Generate an NN for revision and update. 6.10.1.2.2 **RECORD** the NN number and brief description of the proposed change for Attachment 1. 6.10.1.3 Document in the comments section of Attachment 9 any specific findings and actions

required to resolve program discrepancies.

COMPLETE the annual EPESP review in Attachment 9.

6.10.1.4



SO123-VIII-0.201 REV: 28

Page 15 of 47

6.11 Community Alert Siren System (Alert and Notification System [ANS]) [RCE 200501125 CAPR NMO 800405272-0010]

- 6.11.1 Emergency Planning retains ownership and overall responsibility for the Community Alert Siren System / ANS. Organizations performing maintenance; testing, troubleshooting, and compliance determination have the following responsibilities:
- 6.11.1.1 Emergency Planning is responsible for maintaining a liaison position with the local municipalities and ensuring ANS is maintained. (CA 202847725-0001)
- 6.11.1.2 IT is directly responsible for maintenance and testing and is the Initial Point of Contact for trouble shooting issues associated with ANS. IT is solely responsible for functionality and/or operability determinations. IT is responsible for coordinating field activities ensuring SONGS Work Management and CAP is maintained.
- 6.11.1.3 Engineering is responsible for IT Hardware management of ANS and the Rapid Alert Management System (RAMS) ensuring the systems are maintained to appropriate design and configuration requirements. Engineering will fill the functions of the Engineering Programs for the Community Alert Siren System / ANS. Engineering is ultimately responsible for maintaining all software, and associated hardware, within ANS and RAMS; as the Single Point of Contact for all NECP, temporary modifications, impact reviews, SPI evaluations, and processing required documentation controls. Engineering shall **PROVIDE** support to IT upon request for assistance and troubleshooting ensuring the SONGS Work Management and CAP is maintained.
- 6.11.1.4 Engineering is responsible for implementing computer hardware modifications, performing hardware maintenance and preventive maintenance / surveillance of the ANS and RAMS. Engineering are also responsible for assisting IT with troubleshooting ANS or RAMS and ensuring the SONGS Work Management and CAP is maintained.
- 6.11.1.5 Maintenance/Facilities is responsible for power / electrical supply, mechanical / construction activities, civil infrastructure modifications, landscape maintenance and preventive maintenance on structures associated with the Community Alert Siren System / ANS. Maintenance/Facilities is also responsible for assisting Engineering and/or IT with maintenance activities of the Community Alert Siren System / ANS, complying with and ensuring the SONGS Work Management and CAP is maintained.



SO123-VIII-0.201 REV: 28

Page 16 of 47

- 6.11.1.6 Work Control is responsible for scheduling, prioritization, and classification of Nuclear Maintenance Orders (NMOs) and associated Orders (Nuclear Repetitive Maintenance Expense (NRME), Nuclear Surveillance Order (NSVO), Nuclear Engineering Change Package [NECP]) involving ANS.
- 6.11.1.7 IT is responsible for notifying the SM upon any inoperability determination by IT when associated with Community Alert Siren System / ANS. IT is expected to generate an NN and keep a running total of siren unavailability.
- 6.11.1.8 The SM is expected to be the first to be contacted regarding community alert siren failures The SM is responsible for logging and tracking individual Siren and ANS status.
- 6.11.1.9 The SM and/or designee is responsible for operability and reportability determination of the Community Alert Siren System / ANS upon reaching individual siren out of service (inoperability*) thresholds based on the following criteria: (SO123-0-A7)
 - Sixteen (16) or more sirens for greater than one hour
 Five or more sirens for greater than 48 hours
 - *Inoperability (T-Zero) starts when IT receives confirmation that a 16th or 5th siren is inoperable.
- 6.11.2 <u>IF</u> notified from the SONGS Control Room of inoperable Offsite Siren(s) or Siren System, THEN Emergency Planning Specialist should **PERFORM** the following:
- 6.11.2.1 **NOTIFY** Emergency Planning representative of the problem and request the appropriate Offsite Agencies be notified.
- 6.11.2.2 No later than 8 hours after being notified, create an NN addressing the problem if an NN is not already in the system.
- 6.11.2.3 **NOTIFY** the Manager, Emergency Preparedness Planning within 8 hours of being notified of the problem.

7.0 ACCEPTANCE CRITERIA

7.1 None



SO123-VIII-0.201 REV: 28

Page 17 of 47

8.0 **RETENTION OF RECORDS**

- 8.1 Completed Attachments shall be sent to Records Management on a quarterly basis prior to the end of the following calendar quarter.
- 8.2 Copies of completed Attachments shall be kept on file at EP for one year.

9.0 **REFERENCES / COMMITMENTS**

Procedures

9.1 <u>Implementing References</u>

9.1.1

	5.1.1	11000dd103
	9.1.1.1	SO123-XV-ERO-1, Emergency Response Organization (ERO) Standards and Expectations
	9.1.1.2	SO123-XV-HU-3, Written Instruction Use and Adherence
	9.1.1.3	SO123-0-A7, Notification and Reporting of Significant Events
	9.1.1.4	SO123-XVIII-30.2, EOF Pressure and Isolation Test
	9.1.1.5	SO123-XVIII-30.1, EOF Diesel Generator Maintenance
9.2	Developm	nental References
	9.2.1	Commitments
	9.2.1 9.2.1.1	Commitments Emergency Plan for San Onofre Nuclear Generating Station (SONGS), Units 1, 2 and 3
		Emergency Plan for San Onofre Nuclear Generating Station (SONGS),
	9.2.1.1	Emergency Plan for San Onofre Nuclear Generating Station (SONGS), Units 1, 2 and 3
	9.2.1.1	Emergency Plan for San Onofre Nuclear Generating Station (SONGS), Units 1, 2 and 3 Technical Specifications
	9.2.1.1	Emergency Plan for San Onofre Nuclear Generating Station (SONGS), Units 1, 2 and 3 Technical Specifications



SO123-VIII-0.201 REV: 28

Page 18 of 47

9.2.3	<u>Procedures</u>
9.2.3.1	SO123-II-8.17, EOF Meteorological Instrumentation Calibration and Functional Test
9.2.3.2	SO123-III-2, Closed Cooling Water System Chemistry Control Program
9.2.3.3	SO123-III-4.5.3, Chemistry Gamma Spectrometer Operation
9.2.3.4	SO123-V-19, SONGS Preventive Maintenance (PM) Program
9.2.3.5	SO123-VI-28.1, Records Management Controlled and Reference Files Distribution, Updating, and Auditing
9.2.3.6	SO123-VIII-0.100, Maintenance and Control of Emergency Planning Documents
9.2.3.7	SO123-VIII-0.101, Emergency Response Equipment Management
9.2.3.8	SO123-VIII-0.301, Emergency Telecommunications Testing
9.2.3.9	SO123-VIII-0.302, Onsite Emergency Siren System Test
9.2.3.10	SO123-VIII-0.303, Perimeter Public Address System (PPAS) Routine Test
9.2.3.11	SO123-VIII-OSC, Emergency Response Organization (ERO) Operations Support Center Position Checklists
9.2.3.12	SO123-IX-1.3, Environmental TLD Exchange
9.2.3.13	SO123-XV-50.CAP-4, Implementing Corrective Actions
9.2.3.14	SO123-XV-52, Operability Determinations and Functionality Assessments
9.2.3.15	SO123-XV-54, SONGS NRC Threat Advisory and Protective Measures System
9.2.3.16	SO123-XV-77, SONGS Process Software Quality Assurance
9.2.3.17	SO123-XV-109, Procedure and Instruction Format and Content
9.2.3.18	SO123-XVIII-10, Siren - Community Alert Siren System - System Description and Operational Guide
9.2.3.19	SO23-I-9.22.1, Surveillance Requirement Annual Emergency Lighting System Test
9.2.3.20	SO23-II-8.12, Surveillance Requirement 10 and 40 Meter Meteorological Instrumentation Channel Calibration
9.2.3.21	SO23-II-8.12.1, 10 Meter Backup Meteorological Instrumentation Calibration



SO123-VIII-0.201 REV: 28

Page 19 of 47

9.2.3.22	SO23-3-2.32, Critical Functions Monitoring System
9.2.3.23	SO23-3-3.36.4, Emergency Lighting System Functional Test
9.2.4	<u>Other</u>
9.2.4.1	SOG-AD-0023, Fire Department SOG Revisions EP B.5.b Mitigating Strategies Books
9.2.4.2	NN 201305221-CA0002, Inadequate and Inaccurate Report of the Emergency Response Data System to the NRC – identify the functional requirements of ERDS as defined in SO123-VIII-0.201
9.2.4.3	NN 201809145-CA0003, INPO IER 11-39 Establish Retest Criteria for Failure to Augment the ERO
9.2.4.4	NN 202346444-CA0001, INPO IER 11-39 Establish Retest Criteria for Failure to Augment the ERO
9.2.4.5	NN 201507385, NRC Safety Evaluation Report, dated July 26, 2007 [Steps 6.2.5.1, 6.2.7.1, 6.2.10.1, and 6.3.1]
9.2.4.6	CA 202847725-0001, NN to change CAPR 800405272 (Step 6.11.1.1)



SO123-VIII-0.201 REV: 28

Page 20 of 47

Emergency Plan Equipment List

Attachment 1

EQUIPMENT	COG DIV	REFERENCE
Accountability (PAPA)	EP	EPlan 6.3.1.3
Air Monitors, Continuous	RP	EPlan 7.3.1.1
Air Sampling Equipment	RP	EPlan 7.3.1.2
Area Rad Monitors	RP	EPlan 6.3.1.1, 7.3.1.1
Assembly Areas	EP	EPlan 6.3.1.2, 7.4
Community Alert Siren Sys	M/F	EPlan 6.3.2.3
Controlled Drawings, TSC	RM	EPlan 7.1.2
Critical Funct Monitor Sys*	Eng	EPlan 7.3.5
Decon Sinks and Showers	RP	EPlan 6.4.2
Decon Tanks, EOF / MED	M/F	EPlan 7.1.4
Diesel Generator, EOF	M/F	SCE Letter to NRC, dated 7/1/81, Sched Commitment for Emerg Upgrades NRC Letter to SCE, dated 7/9/84, Emerg Response Facilities Appraisal
Dose Asmt. Computer (DAC)	Eng	EPlan 7.3.1.1
Dosimeters, Luminescent [*]	RP	EPlan 7.3.1.4
Dosimetry Equipment	RP	EPlan 6.3.1.6
Effluent Monitor Equipt	RP	EPlan 6.2.4, 6.2.6.2
Effluent Monitors*	RP	EPlan 6.2.4, 7.3.1.1
Emergency Alert System	EP	EPlan 6.3.2.3
Emerg Ops Center Supplies	EP	EPlan 7.2
Emerg Ops Facility	EP	EPlan 7.1.4
Emergency Kits	EP	EPlan 7.1.6, 8.3
Emergency Lighting	Ops	EPlan 7.1.1
Emerg Response Data System	Eng	NRC Generic Letter 89-15
AEOF	EP	EPlan 7.1.4
Fire Alarms	Ops	EPlan5.1.5, 7.3.3
Fire Detection Systems	Ops	EPlan 7.3.3



SO123-VIII-0.201 REV: 28

Page 21 of 47

Emergency Plan Equipment List

Attachment 1

EQUIPMENT	COG DIV	REFERENCE
First Aid Kits	EP	EPlan 7.6
Hospital Contamination Control	EP	EPlan 7.1.6, 8.1.3.3
Joint Information Center*	EP	EPlan 6.5, 7.1.5
Magneto System, SCE / SDGE"	M/F	EPlan 8.5.3
Maint Tool Boxes, OSC	Maint	EPlan 7.7
Met Tower, Backup	Eng	EPlan 6.2.5, 7.3.4.1
Met Tower, EOF	Eng	EPlan 6.2.5, 7.3.4.1
Met Tower, Primary	Eng	EPlan 7.3.4.1, LCS 3.3.105
Multi-Channel Analyzer	CHEM	EPlan Table 7-5, 7.3.1.3
Onsite Emerg Sirens	EP	EPlan 6.1.2.1, 6.1.3.1, 7.5
Ops Support Center	EP	EPlan 5.2.9, 5.2.14, 7.1.3
Paging System, UHF ^{**}	IT	EPlan 8.5.5
PAX System**	IT	EPlan 8.5.2
Perimeter Public Address Sys	EP	EPlan 6.3.2.2, SONGS 2/3 UFSAR 9.5.2
Portable Radiation Meters	RP	EPlan 6.3.1.5, 6.3.1.6, 7.3.1.2
Potassium Iodine (KI)	EP	EPlan 6.3.1.7
Process Monitors	RP	EPlan 7.3.1.1
Protective Clothing	EP	EPlan 6.3.1.5, 6.4.2
Public Address System	IT	EPlan 8.5.4
Rad Counting Instrument	RP	EPlan 7.3.1.3
Rad Monitoring, Offsite *	EP	EPlan 7.3.2
Rad Mon., Containment	RP	EPlan 7.3.1.1
Rad Monitors, Local Area	RP	EPlan 6.3.1.1
Rad Survey Equipment	RP	EPlan 6.2.6.1
Recall System	EP	EPlan 6.1.2.1, 6.1.3.1
Respiratory Equipment	RP	EPlan 6.3.1, 6.3.1.7



SO123-VIII-0.201 REV: 28

Page 22 of 47

Emergency Plan Equipment List

Attachment 1

EQUIPMENT	COG DIV	REFERENCE
Sample Collection Devices	RP	EPlan 6.3.1.4
Seismic Equipment	Maint	EPlan 7.3.4.2, LCS 3.3.104
Telecom, Emerg. Comm. & Radios	EP & IT***	EPlan 7.5, 8.5.6, 8.5.8
Telephone Systems	IT	EPlan 7.5, 8.5.1
Ventilation System, C/R	Maint	EPlan 7.1.1, 7.1.1.2, Tech Spec 3.3.9
Ventilation System, EOF	Maint	EPlan 7.1.4, U3 License Condition No.2.C(24), SCE Letter to NRC, dated 5/20/83, EOF HVAC System Design, SCE Letter to NRC, dated 7/22/83 & 1/9/84, EOF Ventilation System
Yellow Phone System	EP	EPlan 3.2.2, 3.3.1, 6.1.5, 7.5

Equipment not within the scope of the Emergency Plan Equipment Surveillance Program in accordance with Step 6.1.2.

Equipment does not require surveillance per Emergency Plan Section 8.5.

*** Emergency Communications testing will be performed by Emergency Planning and IT will perform equipment repairs.

COGNIZANT DIVISION(S):

EP	Emergency Planning
Maint	Maintenance
RP	Radiation Protection
Eng	Engineering
RM	Records Management
CHEM	Chemistry & Environmental
Ops	Operations
IT	Information Technology
M/F	Maintenance/Facilities



SO123-VIII-0.201 REV: 28

Page 23 of 47

Attachment 2

1.0 ERF INSPECTION

1.1 These ERFs have been inspected for safety, cleanliness and general usability per Section 6.2.1.

FACILITY	DATE	PERFORMED BY: INITIALS
EOF		
AEOF		
TSC		
OSC		,
ATSC		
AOSC		

1.2 Visually inspect these specific EOF items as appearing usable per Section 6.2.2.

FACILITY	DATE	PERFORMED BY: INITIALS
MEDICAL ROOM		
DECON SHOWER		
EOF DIESEL		

1.3 The Site Assembly Areas listed below have passed an inspection for cleanliness and general usability per Section 6.2.3.

FACILITY	DATE	PERFORMED BY: INITIALS
W-48 BLDG		
AWS MPR		
K-50 BLDG		

1.4 Verify the maintenance tool boxes have been inventoried per Section 6.2.4. Record Order numbers below.

INVENTORY	ORDER NUMBER	DATE COMPLETED	PERFORMED BY: INITIALS
TOOL BOX #1			
TOOL BOX #2			
TOOL BOX #3			



SO123-VIII-0.201
REV: 28

Page 24 of 47

Emergency Response Facility (ERF) Inspection Attachment 2		Attachment 2
------------------------------------------------------------	--	--------------

1.5 Verify Emergency Response Computers have uploaded network updates per Section 6.2.11.

FACILITY	DATE	PERFORMED BY: INITIALS
EOF		
TSC		
OSC		

1.6 Verify Emergency Response Vehicles and keys are staged for OSC and EOF field teams, per Section 6.2.12.

FACILITY	VEHICLE STAGED / LOCATION	KEY STAGED IN EKIT / LOCK BOX	PERFORMED BY: INITIALS
EOF	#		
	#		
osc	#		

1.6.1	In the table above, enter vehicle Edison ID number, vehicle location, and key(s) ID
	numbers. Key number(s) and vehicle number should match. If key number(s) and
	vehicle number do not match, then generate an NN to correct deficiency.
	NN number

1.7 Verify Emergency Kit store laptops per Section 6.2.11. Ensure laptops are charged and operating systems function. Generate an NN for missing or non-functional devices requiring replacement.

FACILITY	DATE / INT	VERIFY	QUANTITY	NN NUMBER
TSC		2		
ALT EOF	Ł	2		

.8	EOF Me	teorological display system boots up and is fu	unctional, per Sectio	n 6.2.11.
		SAT U	INSAT	Date / Initial
	1.8.1	Generate an NN if display system is non-fu	unctional or LINSAT	



SO123-VIII-0.201 REV: 28

Page 25 of 47

Emerg	gency Response Facility (EF	RF) Inspection	Attachment 2
1.9	The ERF Inventory and Ins been corrected or an NN g	spection has been satisfactorily completed. Defi generated.	ciencies identified have
COM	MENTS:		
		The second secon	
	·		
		•	
	PERFORMED BY	:Emergency Preparedness Planning Staff	 Date
			54.0
1.10	The ERF Inspection has b	een satisfactorily completed.	
	REVIEWED BY:	Manager, Emergency Preparedness Planning	 Date
		ivialitage, Emergency Preparedness Planning	Date



SO123-VIII-0.201 REV: 28

Page 26 of 47

Emergency Kit (EKIT) Inventory

Attachment 3

1.0 EKIT INVENTORY

1.1 Inventory the EKITs listed below using the current Emergency Kit Inventory List (EKIL) maintained in the EP shared Drive dated per Section 6.2.5.

RESP ORG	LOCATION	DATE / INIT	RESP ORG	LOCATION	DATE / INIT
EP	SOUTH SPF		EP	NORTH SPF	
EP	OSC CAB 1		RP	OSC CAB 2	
RP	OSC CAB 3		RP	OSC CAB 4	
EP	OSC CAB 5		EP	OSC CAB 6	
EP	TSC CAB 1		RP	C/R CAB 3 & 2 30' LOBBY	
EP	C/R CAB 1, 4, 5		RP	K50 SAA	
RP	AWS, OCA MONITOR TEAM		RP	W-48 SAA	
RP	T20, OCA MONITOR TEAM		RP	AWS SAA	
EP	EOF COORD CTR		RP	EMER RESP KITS	
EP	AEOF IRVINE		RP	W41, HAZMAT RIG	-
RP	C/R SCBAs BEHIND BOARDS		RP	EOF MEDICAL RM CAB 1, 2, 3, 4	

SAA = Site Assembly Area



SO123-VIII-0.201 REV: 28

Page 27 of 47

Emergency K	it (EKIT) Inventory
--------------------	----------	-------------

Attachment 3

1.2 Inventory supplies for Assembly Areas listed below per Section 6.2.6.

LOCATION	DATE / INIT	LOCATION	DATE / INIT
D-3 LAA		AWS MEZ	
D-4 LAA		T-20 LAA	
AWS SAA		E-50 LAA	
W-48 SAA		K-50 SAA	
D-1N LAA			

LAA = Local Assembly Area

MEZ = Mezzanine

SAA = Site Assembly Area

1.3 Inspect for usability and inventory signage used for oncoming ERO event information per Section 6.2.6. If signage is missing or damaged, then generate an NN for replacement. Document inventory and NNs generated below.

LOCATION	DATE / INIT	NN NUMBER
Mesa access gate		
North access gate		
North SPF		
South SPF		hr _ r nd + 1 Wearnstonkhalten

1.4	The Emergency Kit Inventory List (EKIL) has been reviewed or updated per
	Section 6.2.7.

•				
	Ir	nit	is	al



SO123-VIII-0.201 REV: 28

Page 28 of 47

Emergency Kit (EKIT) Inventory			Attachment 3
A CONTRACTOR OF THE CONTRACTOR		- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	
COMMENTS:			
			1
1.5 EKIT Inventory and Inspectio or an NN generated.	n has been satisfactorily completed.	Deficienci	es have been corrected
PERFORMED BY:			
FLIN ONWED DT.	Emergency Preparedness Planning	g Staff	Date
1.6 The EKIT Inventory has been	n satisfactorily completed.		
REVIEWED BY:			
	Manager, Emergency Preparedness I	Planning	Date



SO123-VIII-0.201 REV: 28

Page 29 of 47

PAPA	and ERTD Surveillance		Attachment 4			
1.0	PAPA SURVEILLANCE					
1.1	PAPA has passed the quarterly inspection for operability and general usability, per Section 6.2.8.					
1.1	TALA has passed the qualterly	inspection for operability and general usable	ity, per dection 6.2.6.			
	YES NO					
	If NO, explain in Comments	section.				
COM	MENTS:					
1.2	The PAPA System surveillance been corrected or an NN genera	has been satisfactorily completed. Deficiented.	cies identified have			
	PERFORMED BY:					
		Emergency Preparedness Planning Staff	Date			
1.3	The PAPA Surveillance has bee	n satisfactorily completed.				
	REVIEWED BY:					
		Manager, Emergency Preparedness Planning	Date			
2.0	ERTD SURVEILLANCE					
2.1		phone Directory (ERTD) has been updated where the listed PAX phones were checked cle One)				
	PERFORMED BY:					
		Emergency Preparedness Planning Staff	Date			
2.2	The ERTD Surveillance has bee	n satisfactorily completed.				
	REVIEWED BY:					
		Manager, Emergency Preparedness Planning	Date			



Chemistry Coordinator

EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM (EPESP)

SO123-VIII-0.201 REV: 28

Page 30 of 47

Attachment 5

1.0 Inventory and update the ERF Leaders Notebooks per Section 6.2.10.

	PERF. BY	A CONTRACT OF THE CONTRACT OF	PERF. BY
TSC NOTEBOOKS	DATE / INIT EOF NOTEBOOK		DATE / INIT
Station Emerg. Director		Corp. Emerg. Director	
Emergency Advisor Ops		EOF Manager	
Emergency Advisor Notif.		Emergency Advisor Notif.	-
TSC Manager			
Red Phone Communicator			
Technical Leader		Emerg. Planning Coordinator	
Radiation Protection Leader		Security Director	
Security Leader			
Mitigator			
		Offsite Field Monitoring Team 2	
OSC NOTEROOKS	PERF. BY	C / D NOTEDOOKS	PERF. BY
OSC NOTEBOOKS	DATE / INIT	C / R NOTEBOOKS	DATE / INIT
Emergency Group Leader		Shift Manager /	
Operations Coordinator	- West -	Emergency Coordinator	
Radiation Protection Coordinator		Operations Leader	
Maintenance Coordinator		Shift Communicator	
Emergency Planning Coord.		Dose Assessment	
Emergency Services Coord.			
Security Coordinator		_	



SO123-VIII-0.201 REV: 28

Page 31 of 47

ERF Leaders' Notebook Inventory

Attachment 5

	PERF. BY		PERF. BY
ALT TSC NOTEBOOKS	DATE / INIT	ALT EOF NOTEBOOK	DATE / INIT
Station Emerg. Director Emergency Advisor Ops Emergency Advisor Notif. TSC Manager Red Phone Communicator Technical Leader Radiation Protection Leader Security Leader Mitigator		Corp. Emerg. Director EOF Manager Emergency Advisor Notif. Technical Leader Radiation Protection Leader Emerg. Planning Coordinator Security Director Administrative Leader Offsite Field Monitoring Team 1 Offsite Field Monitoring Team 2	
ALT OSC NOTEBOOKS			PERF. BY DATE / INIT
Emergency Group Leader Operations Coordinator Radiation Protection Coordinator Maintenance Coordinator Emergency Planning Coordinator Emergency Services Coordinator Security Coordinator Chemistry Coordinator			



SO123-VIII-0.201 REV: 28

Page 32 of 47

ERF Leaders' Notebook Inventory	Attachment 5			
COMMENTS:				
	UUL-III-III-III-II-II-II-II-II-II-II-II-II			
1 The ERF Leaders' Notebooks have been inventoried and updated. Deficiencies identified have been corrected or an NN generated.				
PERFORMED BY:				
Emergency Preparedness Planning Staff	Date			
1.2 The ERF Leaders' Notebooks Inventory has been satisfactorily completed.				
REVIEWED BY:				
Manager, Emergency Preparedness Planning	Date			



Emergency Response Organization Recall Surveillance

EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM (EPESP)

SO123-VIII-0.201 REV: 28

Page 33 of 47

Attachment 6

1.0	Perform Emergency Response Organization (ERO) Recall testing per Section 6.3 as follows:								
1.1	Inform the Shift Communicator that the test will be performed and provide scenario ID for deactivation in case of an emergency.								
1.2	Dial the Remote Activation Module 83747 using a touch-tone telephone, enter your Password then press "#" when prompted.								
1.3	Enter the Scenario ID to be activated (e.g., 9999) and press "3" to start the scenario.								
	1.3.1	Document: Dut	Document: Duty Team Test Date			T	Test Time		
1.4	Verify the	e system accepted	all input commar	nds.	SAT		UNSAT		
1.5	Verify ex	pected pager activ	ation and messa	ge.		_			
1.6	•	oound and outbour ate voice message	•	d and	SAT		UNSAT		
					SAT		UNSAT		
1.7		e NN(s) for UNSA ⁻ 1.6. NN Number:							
2.0	Perform	these steps follow	ing ERO Recall T	esting:					
2.1	Within 5 working days, generate a summary report with estimated EOF, TSC, OSC, and Joint Information Center (JIC) activation times based on minimum staffing.								
2.2	Verify minimum staffing was achieved within 90 minutes of system activation, otherwise, inform Manager, Emergency Preparedness Planning. Generate an NN and inform the position's cognizant manager.								
2.3	(Test Sta	art time + Minimum Roster)	ı Staff EȚA <90 m	nin as reporte	d by phor	ne in re	esponse or	facility	
	Ū	·			SAT		UNSAT		
2.4		e NN(s) for failed s ncy Response Fac			MANUSUMAN, A JULIER, J				
	2.4.1	Provide the test	summary to cogi	nizant manag	ers as re	queste	d.		
	2.4.2 Ensure at least one SAT test is performed during the guarter.								



SO123-VIII-0.201	l
REV: 28	

Page 34 of 47

=mer	gency Response Organization Recall Surveillance	}	Attachment 6
	Varify Data Taran Ministra 2015	4. Fallin, Astron	-00 Min. do
3.0	Verify Duty Team Minimum Staff response meet	ts Facility Activation of	<90 Minutes:
3.1	(Test Start time + Duty Team Minimum Staff ET as reported by phone in response or facility sign		
		SAT 🗆	UNSAT 🗆
3.2	Generate NN(s) for failure of Minimum Staff Dut	y Team to respond:	
	Fit for Duty		
	No Alcohol Consumption		
	Able To Respond		
	 With an ETA meeting facility activation com the NN numbers in the following table: 	mitment of <90 minutes	from test activation. Enter
	ERO POSITION	Employee PERNR	Nuclear Notification
			4
3.3	Generate and assign remediation and retest tas SO123-XV-ERO-1.	k for each NN within Ta	ble 3.2 as directed by
3.4	Perform Individual Responder Testing per Attac	hment 11.	
4.0	The Emergency Response Organization and ProStep 6.3.1, and identified problems have been experienced by the state of the control of the contr		
	PERFORMED BY:		
	Emergency Pre	paredness Planning Staff	Date
5.0	The Emergency Response Organization and Pr completed.	imary Recall System te	st has been satisfactorily
	REVIEWED BY:		
	Manager, Emergen	cy Preparedness Planning	Date Date



SO123-VIII-0.201 REV: 28

Page 35 of 47

EP Surveillance Scheduling	Attachment 7

- **1.0** Perform the EP Surveillance Scheduling per Section 6.5.
- 1.1 Post a surveillance tracking form for all surveillances related to this procedure, and the following referenced EPIPs:

Date / Initials (Perf. By)

- SO123-VIII-0.100, Maintenance and Control of Emergency Planning Documents
- SO123-VIII-0.301, Emergency Telecommunications Testing
- SO123-VIII-0.302, Onsite Emergency Siren System Test
- SO123-VIII-0.303, Perimeter Public Address System (PPAS) Routine Test

COM	MENTS:				_
					-
					-
					-
					_
		And the same of th			_
					_
					-
1.2	The EP Surveillance tracking	form has been updated per Section 6.5.			
	PERFORMED BY:				
		Emergency Preparedness Planning Staff	Date		-
4.0	The ED Conseillence treation	. farm has been reviewed			
1.3	The EP Surveillance tracking	norm has been reviewed.			
	REVIEWED BY:			_	
		Manager, Emergency Preparedness Planning	Date		1



2.

EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM (EPESP)

SO123-VIII-0.201 REV: 28

Page 36 of 47

Attachment 8

1.1 S	SITE OUTSIDE P	//A	1.2	SITE INSIDE P/A	
	PERF BY INIT	DESCRIPTION OF LOCATION		PERF BY INIT	DESCRIPTION OF LOCATION
1.		T-20	1.		Main SPF Entrance/Lobby
2.		Top of Stairs to PL #2	2.		Elevator Lobby on 30' Leve
3.		Top of Stairs to PL #3	3.		U-2/3 30' Cont. Bldg. Lobby
4.		Top of Stairs to PL #4	4.		K-10 East Double Doors
5.		SW Corner of PL #4	5.	<u> </u>	K-10 West Double Doors
6.		Stairs to AWS Lobby	6.		South SPF Hold Down Area
7.		L-50 inside building			
8.		Outside AWS Cafeteria			
9.		Outside D1N.1			
10.		D-3A Restrooms AWS Roof			
11.		South Gate Guard House			
12.		South SPF Wall at Exit			
.3 1	MESA FACILITIE	ES			
	PERF BY INIT	DESCRIPTION OF LOCATION			
1.		Mesa Gate Guard House			
2.		E-50 EOF Main Lobby			
3.		E-50 EOF Lunch Room			
4.		E-50 EOF Security Office			
5.		W-50 Outside Main Lobby			
.4 F	PUBLIC NOTIFIC	CATION SIGNS (NN 202264775-CA	(0002)		
	PERF BY INIT	DESCRIPTION OF LOCATION			
1					
1.		State Beach North			

State Beach South



SO123-VIII-0.201 REV: 28

Page 37 of 47

Evac	uation Route and Sign Inventory		Attachment 8
COM	IMENTS:		
.5	The evacuation route sign inventor corrected or tracked.	ry has been completed and identified pro	blems have been
	PERFORMED BY:		
		Emergency Preparedness Planning Staff	Date
.6	Both south evacuation routes have	e been verified passable for passenger ve	ehicles.
	NOTIFIED BY:	Environmental Specialist	Date
.7	The evacuation route sign inventor	ry has been reviewed.	
	REVIEWED BY:	nger Emergency Proparedness Planning	Data
	ivian.	ager, Emergency Preparedness Planning	Date



SO123-VIII-0.201 REV: 28

Page 38 of 47

EPES	P Review	Attachment 9	
			Perf By Initials
1.0	Perform an EPESP review per Section 6.10.	_	
2.0	Verify references listed in Attachment 1 are correct and apply to program soc Emergency Plan.	ope and —	
3.0	Verify the copy of Title 10 of the Code of Federal Regulations in the TSC, OS EOF, and AEOF is current.	SC,	
4.0	Verify the Tech Team Notebook is the current revision.	_	
5.0	EP should ensure ERF pull down maps (e.g., Thomas Brothers) and Common Alert Siren System maps (e.g., Veneklasen Associates) are current revisions		
СОМ	MENTS:		
6.0	The EPESP has been reviewed and discrepancies have been corrected or a	n NN generated.	
	PERFORMED BY: Emergency Preparedness Planning Staff	Date	
7.0	The Emergency Plan Equipment Surveillance Program has been reviewed.		
	REVIEWED BY: Manager, Emergency Preparedness Planning	Date	



SO123-VIII-0.201 REV: 28

Page 39 of 47

Prima	ry Emergency Recall System Functional Testing			Attachr	nent 10			
1.0	EP shall perform a full system load test following hardware		vare ch	anges with	in the Primai	гу		
	Recall System in accordance with Section 3.0 of this attack	hment.						
2.0	EP shall perform a full system load test upon design chang systems connected to the Primary Recall System in accord					ent.		
2.1	Interfacing systems (Power, Telco, or Pager Vendor) outages, major system repairs beyond the component level, operating software changes, or design changes requires a full load test of the primary Recall System.							
2.2	Interfacing system transient interruptions or suspected degassociated systems shall be tested for impact to the primarin Section 4.0 of this attachment.							
3.0	Perform Emergency Recall System full load testing as followed by Document associated NN if test is being perform Assessment Determination or N/A if none exist.	med as						
3.1	Inform the Shift Communicator that the test will be perform deactivation in case of an emergency.	ed and	provide	scenario II	D for			
	3.1.1 Test Date Test Time	_						
3.2	Dial the Remote Activation Module 83747 using a touch-to press "#" when prompted or activate the test scenario from					∍n		
3.3	Enter the Scenario ID to be activated and press "3" to start connection. N/A	t the sce	enario.	N/A if activ	ation is via L	.AN		
3.4	Verify the system accepted all input commands.	SAT		UNSAT				
3.5	Verify expected pager activation and message.	SAT		UNSAT				
3.6	Verify inbound and outbound calls processed and appropriate voice message was activated.	SAT		UNSAT				
3.7	Review Voice Server performance for verification of full functionality and loading.	SAT		UNSAT				
3.8	Generate NN(s) for UNSAT results in Steps 3.4 thru 3.7 N	N numb	er					



SO123-VIII-0.201 REV: 28

Page 40 of 47

Priman	y Emergency	Recall	System	Functional	Testing

Attachment 10

- **4.0** Perform these steps as a guideline for investigatory testing of the primary Recall System when interfacing systems are suspected of being degraded or experience momentary interruptions.
- 4.1 Dial the Remote Activation Module 83747 using a touch-tone telephone, enter your Password then press "#" when prompted or activate the test scenario from LAN connection via client PC.
- 4.2 Enter the Scenario ID to be activated and press "3" to start the scenario. This step is not applicable if activation is via LAN connection.
- 4.3 Pager activation or calling into the system as a responder satisfies system is available for recall in the event of an emergency.
- 4.4 Generate NN for UNSAT results and perform Section 6.3.2.1 of this procedure.
- 5.0 The primary Emergency Recall System has been tested per Step 6.3.2 and identified problems have been entered into the Corrective Action Program.

	PERFORMED BY:		
		Emergency Preparedness Planning Staff	Date
6.0	The primary Emergency Rec	call System has been tested and reviewed.	
	REVIEWED BY:		
		Manager, Emergency Preparedness Planning	Date



SO123-VIII-0.201 REV: 28

Page 41 of 47

Eme	rgency Resp	oonse Organizatio	on Responder Remedia	tion Testing		do , i	Attachr	nent 11	
1.0	Perform F	Remediation testi	ng per Section 6.3.3 as	follows:					
1.1	Test Date	Test Date Test Start Time (Obtained from the Primary Recall System)							
	1.1.1	1.1.1 List Employee ID Numbers, ERO Position, NNs, and Task associated with this remediation test in the following table.							
	1.1.2	Responder beir (unannounced	ng tested shall be in the test)	ir duty week	or d	uring an	establish	trade for duty.	
	1.1.3	List the Duty Te	eam						
	1.1 EMPL	OYEE PERNR	ERO POSITIO	N	1.2	NN NU	MBER	NN TASK	
						· · · · · · · · · · · · · · · · · · ·			
				:			t-#		

1.2	Within the remediati		System add the Individu	ual Respond	ers to	the Sc	enario bei	ng activated for	
1.3		e Shift Communio ion in case of an	cator that the test will be emergency.	e performed	and p	provide	scenario I	D for	
1.4			n Module 83747 using a or activate the remediat						
1.5		Scenario ID to bnection. N/A	e activated and press "3 ——	3" to start the	e sce	nario. N	N/A if activ	ation is via	
1.6	Verify the	system accepted	d all input commands.	S	AT		UNSAT		
1.7	Verify exp	pected pager acti	vation and message.	S	SAT		UNSAT		
1.8	-		nd calls processed ssage was activated.	S	SAT		UNSAT		
1.9	Generate	NN(s) for UNSA	T results in Steps 1.6 th	rough 1.9.	NN n	umber_			



SO123-VIII-0.201 REV: 28

Page 42 of 47

Emergency Response Organization Responder Remediation Testing

Attachment 11

2.0	Perform these steps following completion of the Remediation Scenario's duration.					
2.1	2.1 Transfer the remediation test files to EPP's proprietary drive and review the test results of each responder being tested within Table 1.1.3.					
	2.1.1	Each Responder being tested answered affirmative (pressed 9) for Fitness for Duty.	SAT		UNSAT	
	2.1.2	Each Responder being tested answered affirmative (pressed 9) for NOT having consumed alcohol.	SAT		UNSAT	
	2.1.3	Each Responder being tested answered affirmative (pressed 9) for Able to Respond.	SAT		UNSAT	
	2.1.4	Each Responder being tested provided an ETA meeting the commitment time from test start for facility activation of less than 90 minutes.	SAT		UNSAT	
2.2 Generate a new NN for any responder in Table Steps 2.1.1 thru 2.1.4.		e a new NN for any responder in Table 1.1.3 that 1.1 thru 2.1.4.	did <u>NOT</u>	obtain	all SAT res	sults in
	2.2.1	Document NN number(s)		_		
2.3	Generate and assign a remediation and retest task for each NN created and documented in Step 2.2.1 as directed by SO123-XV-ERO-1.					
2.4	Document the results of the remediation test within the task identified in Table 1.1.3 and close each task. For failed results enter the new NN being generated into the task closure text.					
СОМІ	MENTS:		,			
						
-						



SO123-VIII-0.201 REV: 28

Page 43 of 47

Emergency Response Organization Responder Remediation Testing

Attachment 11

3.0	Attachment 6 and per Section	is been completed per Nuclear Notification and 6.3.3 of this procedure. UNSAT results from the to the Corrective Action Program.	
	PERFORMED BY:	Emergency Preparedness Planning Staff	Date
4.0	Remediation Recall Testing ha	s been reviewed.	
	REVIEWED BY:	Manager, Emergency Preparedness Planning	 Date



SO123-VIII-0.201 REV: 28

Page 44 of 47

Alterna	ernate Emergency Recall System Testing Attachment 12			
1.0	Perform the following steps for testing the alternate Emergency Recall activation method of calling out the Emergency Response Organization (ERO):			
1.1	Inform the Shift Communicator that the test will be performed and provide so deactivation in case of an emergency.	enario ID for		
1.2	Activate the Primary Recall System Recording scenario from LAN connection	n via client PC.		
1.3	Open and monitor the Voice Server within the primary Recall System for con System is activating ERO pagers.	firmation of the Backup		
1.4	Compose Pager Message supporting the test and directed response of the Emergency Response Organization within the Edison Portal Paging Icon.			
1.5	Activate the backup paging groups used as a backup to the loss of the primary Recall System using Edison Portal Group Paging.			
1.6	Verify pager activation and message was sent.			
1.7	Verify ERO response using the Voice Server mimics SAT □ Loading seen during quarterly ERO testing.	JNSAT 🗆		
1.8	Generate an NN to document the biannual test completion per Step 6.3.4.			
	1.8.1 Document NN number(s)			
2.0	Within 5 working days, generate a summary report with estimated EOF, TSC activation times based on minimum staffing.	C, OSC, and JIC		
2.1	List all positions that had no responders and provide general test statistics o page.	n the test report cover		
2.2	Verify that minimum staffing was achieved within 90 minutes of system active Manager, Emergency Preparedness Planning.	ation. Otherwise, inform		
2.3	(Test Start time + Minimum Staff ETA <90 min as reported by Phone in response or facility Sign In Roster.) SAT ☐ UNSAT ☐ CAN CONTROL OF THE PROPERTY OF THE P			



SO123-VIII-0.201 REV: 28

\L\v. 20

Page 45 of 47

Alternate Emergency Recall System Testing

Attachment 12

2.4	Generate NN for failed staffing or activation of any Emergency Response Facility(ies) (N/A if SAT results reported in Step 2.3 of this attachment) NN number		
2.5	Provide the test summary to co	ognizant managers as requested.	
COM	MENTS:		

		, , , , , , , , , , , , , , , , , , ,	· · · · · · · · · · · · · · · · · · ·
3.0	The Alternate Method of Recal have been entered into the Cor	ling the ERO has been tested per Step 6.3, and rective Action Program.	d identified problems
	PERFORMED BY:		
		Emergency Preparedness Planning Staff	Date
4.0	The Alternate Method of Recal	ling the Emergency Response Organization ha	as been reviewed.
	REVIEWED BY:		
		Manager, Emergency Preparedness Planning	Date



SO123-VIII-0.201 REV: 28

Page 46 of 47

Summary of Changes

Attachment 13

Author: Karina Vergara/Steve Seward

NN, Order, or Other Action	Description of Change	Reviewer	Step, Section, Attachment or Page
	Upgrade the procedure to the standards outlined in SO123-XV-109		All
NN 200807629	Move Program Responsibility section to Responsibilities.		Sect 2.0
	Include acronyms.		Sect 3.0
Business Transformation	Change Procedure Owner		Cover Page
	Delete references to CTS/ITS	Alvarado Seward Sischo	Step 1.3, 6.1.2, 9.2.1.4, Att 1
	Update Division titles and responsibilities		Throughout
Decommissioning	Allow EP designees to perform procedure-related tasks.		Throughout
	Update references		Steps 6.1.1.3, 6.2.6.3, Sect 9.0
Editorial	Delete NOTE.		NOTE Prior to Step 6.1
NN 202484253	Responsibilities for the Shift Technical Advisor are removed to the Shift Manager (SM) and/or designee; add as Acronym	Ops Alvarado Seward Sischo	Steps 2.5, 3.5, 6.3.2.1, 6.9.2, 6.9.2.1.1, Sect 6.11, Att 1
NN 202484253	Removed non-min staff	Alvarado Seward Sischo	Att 5



SO123-VIII-0.201 REV: 28

Page 47 of 47

Summary of Changes Attachment 13

NN, Order, or Other Action	Description of Change	Reviewer	Step, Section, Attachment or Page
	Revise titles and responsibilities due to organization changes.	Reitzler	Step 6.2.4, Sect 6.7 & 6.8
		Cook	Step 6.6.2
Organizational Change		Stephenson	Steps 2.2, 2.6, 6.1.2, 6.7.3, Sections 6.8, 6.9, 6.11, & Att 1
		Maben	Section 6.11, Att 1
		IT	Section 6.11, Att 1
		Ops	Step 2.5, Step 6.1.2, Section 6.9, 6.11, Att 1
NN 202617882	Remove Building B-66 and some Mesa Facilities from evacuation route sign inventory as they no longer exist. Update location ID near area previously known as Fire Dispatch.	Alvarado Seward Sischo	Att 8
NN 202743593	Delete steps regarding forklift for bollard removal.	Alvarado Seward Sischo Beabout	Step 6.6.4, 6.6.4.1 & Att 8
NN 202607278	Correct typo of EPlan references; remove asterisks that are no longer applicable.		Att 1
	Remove non-min staff Notebooks	Alvarado	Att 5
NN 202608283	Revise Mesa Site Assembly Area to W-48	Seward Sischo	Step 6.2.3, Att 2, Att 3
NN 202626109	Remove reference to LCS 3.3.104 for Seismic Equipment (credited in EPlan)		Att 1
	Remove verification of reactivity computer availability to evaluate SAMG.		Att 9
Comments	Remove inventory supplies to non-existent assembly areas.	Sischo	Att 3 Step 1.2
Comments	Update OSC and AOSC Notebook titles to match.	Janke	Att 5 page 1
Comments	Make IT responsible for repairs and EP responsible for testing telecom, Emergency Comm, and radios. IT is responsible for testing and repairs of ANS system.	Sischo Curry	Att 1

SO123-XXI-1.11.3, Revision 31

SONGS

EMERGENCY PLAN TRAINING PROGRAM DESCRIPTION

	Procedure Requirements	Sections
Information Use	 The performer reviews the procedure before using it to perform the task. The user may complete the task from memory. However, the user is responsible for performing the activity according to the procedure. Information use documents that contain a specific process order are performed in the given order unless otherwise specified within the document. 	All

Color Usage	Location
"This Document Contains Relevant Color"	Attachment 2

Level 1 – QA PROGRAM AFFECTING

50.59 DNA / 72.48 DNA / 50.54(q) APPLIES

Procedure Owner

Kelli Gallion

EMERGENCY PLAN TRAINING PROGRAM DESCRIPTION

TABLE OF CONTENTS

<u>Sectio</u>	<u>n</u> <u>Page</u>		
1.0	PURPOSE4		
2.0	SCOPE4		
3.0	RESPONSIBILITIES4		
4.0	PRECAUTIONS / LIMITATIONS		
5.0	PREREQUISITES / INITIAL CONDITIONS6		
6.0	PROCEDURE6.1Maintaining the Emergency Plan Training Program76.2Determining Emergency Response Personnel (ERP) Codes / Training Curriculum76.3Assignment of Emergency Response Personnel76.4Emergency Planning Staff Professional Development Training86.5Emergency Response Organization Standards and Expectations9		
7.0	ACCEPTANCE / FUNCTIONAL CRITERIA10		
8.0	RETENTION / RECORDS10		
9.0	ACRONYMS / DEFINITIONS10		
10.0	REFERENCES / COMMITMENTS 11		

EMERGENCY PLAN TRAINING PROGRAM DESCRIPTION

TABLE OF CONTENTS (Continued)

Section	<u>1</u>	<u>age</u>
ATTAC	CHMENT	
1	Training Program Description And Administration a. PROGRAM OVERVIEW b. TRAINING REQUIREMENTS c. TARGET AUDIENCE d. PROGRAM ENTRY SELECTION e. INITIAL TRAINING COURSE	. 13 . 13 . 13 . 13
	f. QUALIFICATION WALK THROUGH (QWT) g. CONTINUING TRAINING h. B.5.b MITIGATION STRATEGIES i. SOURCE TERM AND DOSE ASSESSMENT j. STATE AND LOCAL OFFSITE LIAISON QUALIFICATIONS	. 14 . 15 . 15 . 15
·	k. ASSESSMENTS I. REMEDIATION m. EXEMPTIONS n. UNESCORTED PROTECTED AREA ACCESS AND ERP TRAINING o. NON-ATTAINMENT TRAINING	. 15 . 16 . 16 . 16
2 3 4	p. NON-ATTAINMENT CODES	. 16 . 17 . 19

EMERGENCY PLAN TRAINING PROGRAM DESCRIPTION

1.0 PURPOSE

1.1 To describe the San Onofre Nuclear Generating Station (SONGS) Emergency Plan Training Program which implements the requirements contained in References 10.1.1.1 through 10.1.4.9.

2.0 SCOPE

2.1 The Emergency Response Organization (ERO) Training Program is a non-accredited training program designed to train ERO personnel to perform response duties as described in initial and continuing training. The initial training program ensures that personnel have the required knowledge and skills to perform the duties as Emergency Responders. Continuing training ensures the incumbents maintain and improve job performance through development of job-related knowledge and skills. This program is designed to protect the health and safety of the public and our workers.

3.0 **RESPONSIBILITIES**

NOTE

Some program elements are implemented by other Divisional programs with EP oversight. Reference Attachment 3, Ownership of ERO Training Elements, to identify the Program Owner for specific instruction modules listed in the EPTPD.

- 3.1 **EP Manager** is responsible for:
 - 3.1.1 The Emergency Plan Training Program.
 - 3.1.2 Drills and Table-Top Training
 - 3.1.3 Develop Drill and Critique reports
 - 3.1.4 Oversee and Implement EP Surveillance Program

3.1.5	Managing and maintaining the on-site and offsite emergency response plan/program
3.1.6	Interfacing with off-site agencies
3.1.7	Reviewing and responding to Regulatory issues
3.1.8	Planning and conducting the Annual NRC Program Inspection
3.1.9	EP / ERO Initial/Continuing Training Program
3.1.10	Qualification Walkthrough (QWT) documents
3.1.11	Alternate Methods of Training
3.1.12	ERO Attainment Requirements per Attachment 2
3.1.13	Table-Top Training

- 3.2 Radiation Protection Supervisor or designeeis responsible for:
 - 3.2.1 Dose Assessment
 - 3.2.2 Ensuring VISION is updated.
- 3.3 **ERO members** are responsible for:
 - 3.3.1 Reviewing SO123-XV-ERO-1 annually.

4.0 PRECAUTIONS / LIMITATIONS

4.1 <u>Precautions</u>

- 4.1.1 Notify Nuclear Regulatory Affairs and Emergency Planning upon issuance of any Revisions/ECs to this document for submittal to the NRC (Reference 10.1.1.7).
- 4.1.2 Precaution related to changing this procedure:
- 4.1.2.1 10CFR50.54(q) screening/evaluation is required for all revisions, including editorial changes, in accordance with (IAW) SO123-VIII-0.100.

4.2 <u>Limitations</u>

4.2.1 None

5.0 PREREQUISITES / INITIAL CONDITIONS

5.1 Prerequisites

- 5.1.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.
- 5.1.2 **VERIFY** Level of Use requirements on the first page of this procedure.
- 5.1.3 In order to designate an individual as a member of the Emergency Response Organization, reference SO123-VIII-0.202 and complete Form EP(123) 100 using the Emergency Response Personnel (ERP) Code found in Attachment 2.

5.2 Initial Conditions

5.2.1 None

6.0 **PROCEDURE**

6.1 Maintaining the Emergency Plan Training Program

6.1.1 The Emergency Planning Manager will maintain the Emergency Plan Training Program described in Attachments 1 and 2 of this procedure.

6.2 <u>Determining Emergency Response Personnel (ERP) Codes / Training Curriculum</u>

6.2.1 Emergency Response Organization (ERO) positions, ERP Codes, Training encodes required for Initial and Continuing ERP qualification are identified in Attachment 2.

6.3 Assignment of Emergency Response Personnel

6.3.1 Responsibilities for assigning personnel, reviewing and maintaining qualifications are established in References 10.1.3.2 and 10.1.4.7.

6.4 Emergency Planning Staff Professional Development Training

6.4.1 The Emergency Planning (EP) Manager (or designee), shall ensure Emergency Planning Staff receive initial and continuing professional development training commensurate with their assigned duties and responsibilities.

6.4.2 Initial Training

- The EP Manager (or designee) shall use the Emergency Planning Staff Training Qualification Manual (EPSTQM) to select tasks for completion and/or exemption.
- 6.4.2.2 The Emergency Planning Staff Training Initial Qualification section (EPSTQ1) is required training for Emergency Planning personnel assigned to permanent positions and is a prerequisite to subsequent Qualification Guide Sections.

NOTE

If an industry sponsored training program cannot be scheduled and attended, the EPManager (or designee) may select an alternate training method (e.g., Inhouse training, OJT/TPE, etc.) if in the Managers judgment it is a reasonable equivalent in content to the established industry emergency planning training.

- 6.4.2.2.1 Section EPSTQ1 requires assigned Emergency Planning Staff members to attend Emergency Planning training provided by the nuclear industry. This section is to be completed within one year of the staff assignment date.
- 6.4.2.3 Additional assigned sections of the EPSTQM are to be completed within two years of the staff assignment date.
- 6.4.2.4 Personnel preparing or reviewing EP Licensing Document Impact Screenings and 10CFR50.54(q) Evaluations shall have completed training per 5054SE, "Performing Effective 50.54(q) Evaluations", and 54QQWT, "Emergency Plan and Procedure 50.54(q) Revision Qualification Walkthrough".
- 6.4.2.4.1 54QQWT requires a retraining frequency of every two calendar years to maintain qualification. <u>IF</u> 54QQWT training expires, <u>THEN</u> initial training must be repeated using 5054SE and 54QQWT to requalify as a 50.54(q) Screener / Evaluator.
- 6.4.2.4.2 Waivers / exemptions may be granted to contractors or SONGS staff that possess the necessary experience to complete the 10CFR50.54(q) Screening and Evaluations.

6.4.3 <u>Continuing Training</u>

6.4.3.1 Continuing training course work selection and professional development for EP personnel is to be reviewed and updated annually by the EP Manager (or designee). Additional staff training and development activities will be performed following completion of the assigned sections of the EPSTQM.

6.5 <u>Emergency Response Organization Standards and Expectations</u>

6.5.1 Performance standards and expectations for ERO trainees and qualified ERO members is contained in SO123-XV-ERO-1, Emergency Response Organization (ERO) Standards and Expectations.

7.0 ACCEPTANCE / FUNCTIONAL CRITERIA

7.1 Acceptance Criteria

7.1.1 None

7.2 Functional Criteria

7.2.1 None

8.0 RETENTION / RECORDS

- 8.1 The records of individuals participating in the Emergency Plan Training Program shall be maintained in T2000 and archived by Records Management.
- The 50.54(q) Evaluator qualification record (54QQWT) of personnel will be maintained in T2000 and archived by Records Management under RPA# 04-0033.

9.0 ACRONYMS / DEFINITIONS

9.1	<u>CDE</u>	Committed Dose Equivalent

- 9.2 <u>EP</u>: Emergency Planning
- 9.3 <u>ERO</u>: Emergency Response Organization
- 9.4 <u>SRO</u>: Senior Reactor Operator
- 9.5 <u>TEDE</u> Total Effective Dose Equivalent
- 9.6 <u>TPD</u>: Training Program Description

SO123-XXI-1.11.3 SO123-XXI-1.11.3 Rev 31 Page 11 of 20

10.0 REFERENCES / COMMITMENTS

10.1 <u>Implementing Reference</u>

10.1.1	Commitments
10.1.1.1	Unit 1 Permanently Defueled Technical Specification, Section D6.8.1.e
10.1.1.2	Licensee Controlled Specification, Section 5.0.103.1.1.b
10.1.1.3	10CFR50.47, Emergency Plans
10.1.1.4	10CFR55.45, Operating Tests
10.1.1.5	10CFR55.49, Integrity of Examinations and Tests
10.1.1.6	10CFR50, Appendix E, Emergency Planning and Preparedness for production and Utilization Facilities, Section IV.F, Training
10.1.1.7	10CFR50, Appendix E, Emergency Planning and Preparedness for production and Utilization Facilities, Section V, Implementing Procedures
10.1.1.8	10CFR50.54(q), Conditions of Licenses
10.1.1.9	10CFR50.120, Training and Qualification of Nuclear Power Plant Personnel
10.1.1.10	NN 201507385, NRC Safety Evaluation Report, dated July 26, 2007 [Attachment 1, Paragraph K]
10.1.2	Corrective Actions to Prevent Recurrence (CAPR)
10.1.2.1	None
10.1.3	Procedures
10.1.3.1	SO123-VIII-0.100, Maintenance and Control of Emergency Planning Documents
10.1.3.2	SO123-VIII-0.202, Assignment of Emergency Response Personnel
10.1.3.3	SO123-VIII-0.401, Emergency Preparedness Performance Indicators
10.1.3.4	SO123-VIII-40.100, Dose Assessment
10.1.3.5	SO123-XV-27.2, On The Job Training and Evaluation for Non-Accredited Training Programs
10.1.3.6	SO123-XV-HU-3, Written Instruction Use and Adherence

	10.1.3.7	SO123-XV-ERO-1, Emergency Response Organization (ERO) Standards and Expectations
	10.1.4	<u>Other</u>
	10.1.4.1	NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
	10.1.4.2	Topical Quality Assurance Manual (TQAM), Chapter 1-H
	10.1.4.3	San Onofre Nuclear Generating Station Emergency Plan
	10.1.4.4	San Onofre Nuclear Generating Station Manual of Emergency Events
	10.1.4.5	INPO 09-006, Guidelines for Training and Qualification of Emergency Response Organization Personnel
	10.1.4.6	Form TN(123) 412, Exemption or Waiver (Reference: SO23-XXI-REC)
	10.1.4.7	EPPG-SO23-G-2, Emergency Response Organization Fundamentals and Standards Guideline
	10.1.4.8	Form EP(123) 100, Emergency Response Personnel Assignment
	10.1.4.9	D-036, Emergency Plan Implementation
10.2	<u>Developm</u>	ental References
	10.2.1	Commitments
	10.2.1.1	None
	10.2.2	Corrective Actions to Prevent Recurrence (CAPR)
	10.2.2.1	None
	10.2.3	<u>Procedures</u>
	10.2.3.1	None

a. PROGRAM OVERVIEW

The Emergency Plan Training Program Description (EPTPD) identifies the appropriate training requirements for personnel assigned to the SCE Emergency Response Organization (ERO) to ensure they attain the necessary knowledge and skill to perform their assigned job functions in a competent, safe, and efficient manner during a declared emergency. The program applies to selected personnel at the San Onofre Nuclear Generating Station (SONGS) and other Corporate departments. It consists of Self-Study Guides, formative assessments, discussions, interviews, simulations, or Qualification Walk-Through (QWT) training. Self-Study Guides are developed by Emergency Planning (EP). All QWT, discussions, formative assessments, simulations, and interviews will be conducted by EP staff, the Line Organization or designee. These experts need not be certified instructors. However, they should be recognized as Subject Matter Experts by the Manager, EP or be a qualified incumbent for the position for which the training is applicable in order to help trainees master the material.

b. TRAINING REQUIREMENTS

INPO 09-006, Guidelines for Training and Qualification of Emergency Response Organization Personnel, provides guidelines on the knowledge and skills for both Initial and Continuing training. NUREG 0654 has specific evaluation criteria for measuring response to an emergency. A graded approach is used for the administration and documentation of emergency response training. The extent of training is based on the importance of the job to the health and safety of the plant, personnel, general public and the environment and on the complexity of the job performance requirements.

c. TARGET AUDIENCE

The target audience for the program, is designated in Reference 10.1.3.2, and consists of all Emergency Response Personnel. These personnel, as defined in Reference 10.1.4.7, may be called upon during an emergency to perform duties to mitigate plant accident conditions.

Emergency Response Facility (ERF) staffing is provided by on-shift SONGS personnel and Minimum Staff Personnel, SCE Corporate personnel, SCE Contract personnel, and offsite emergency response organizations. Each position in the ERO is identified by an Emergency Response Personnel (ERP) Code. ERP Codes are comprised of one or more Encode Numbers specific to each ERO position.

Attachment 2 lists the ERP Code, Position Title, and Facility Location along with the Encodes required for qualification.

d. PROGRAM ENTRY SELECTION

Personnel are enrolled in the Emergency Plan Training Program in accordance with SO123-VIII-0.100. Upon receipt of the approved Form EP(123) 100, the ERP Code shall be entered in T2000 by the EP Staff ERO Administrator. All required ERO training, is scheduled as specified in Attachment 2.

e. INITIAL TRAINING COURSE

The purpose of Initial Training is to provide new Emergency Response Personnel (ERP) with a self-study, training overview of the SONGS Emergency Plan, Organization, and Facilities. Experienced personnel who shift to a new Emergency Response Facility (ERF) may complete portions of the orientation Self-Study Guide for the new position.

The Initial Training Course curriculum is listed in Attachment 2. Supplemental training provided by the Line Organization may satisfy Initial Training Course requirements for qualification of newly assigned Emergency Response Personnel.

f. QUALIFICATION WALK THROUGH (QWT)

Some ERP Codes also require completion of a Qualification Walk Through (QWT). For these positions, the QWT will be identified in Attachment 2. QWT Trainers and Evaluators shall be incumbents in the position for which the training is being given or designated EP staff.

The QWT Trainer shall ensure that all prerequisite training listed on the QWT cover page is complete by documenting the date completed. Enter the ERP Code assignment date, Trainee's Printed Name and PERNR on the top of page 1. The Trainer and the Evaluator shall sign and date the Completion Record section(s) upon demonstrated proficiency of listed knowledge requirements and applicable task performance activities. The task performance section can be accomplished by demonstration, walk through, or simulation in a non-evaluated scenario.

g. CONTINUING TRAINING

Participation in annual drills, exercises or tabletops/mini drills is the prescribed method for continuing training. In the event of non-participation, continuing training will consist of completion of Self-Study Guides required for a specific ERP position, per Attachment 2.

Continuing training can be achieved by demonstrating proficiency through Site-Wide drills, table-top /mini drills training sessions, or completed self-study guides. The retraining is periodically scheduled during drill preparation in accordance with established drill objectives required by SO123-VIII-0.200, Emergency Plan Drills and Exercises. Special focus sessions may be scheduled at the discretion of the Manager, EP.

All schedule changes related to ERO Team Training, Pre-Drill Training, Drills and Exercises will be coordinated through the assigned EP Training Coordinator to ensure training commitments are met. ERO requirements are delineated in Nuclear Organization Directive D-036, Emergency Plan Implementation and SO123-XV-ERO-1, Emergency Response Organization (ERO) Standards and Expectations.

h. **B.5.b MITIGATION STRATEGIES**

B.5.b Mitigation Strategies training provides the expected actions to be taken upon a large loss of the Protected Area. Determine the impact on normal plant operations, including loss of non 1E power and equipment, potential for significant personnel injury, and the need to mobilize a recovery team.

Licensed Operators receive detailed initial and continuing B.5.b Mitigation Strategies training using approved Operations Training Lesson Plans [NN201507385]. Fire Department personnel receive detailed initial and continuing training in accordance with Fire Department Training Program SO123-XIII-20, Attachment 1, B.5.b Mitigation Strategies [NN 201480055]. All other ERO positions designated in Attachment 2 receive computer based B.5.b training using Encode EPTB5B.

i. SOURCE TERM AND DOSE ASSESSMENT

Source Term and Dose Assessment training provides the ability to calculate Total Effective Dose Equivalent (TEDE) and thyroid Committed Dose Equivalent (CDE) projected dose that the public may receive due to an uncontrolled release of radioactive material.

The steps involved in determining a dose assessment are to obtain source term, collect meteorological data, and manually perform off-site dose calculations using Emergency Plan Procedure SO123-VIII-40.100, Dose Assessment. This lesson material is given for initial and continuing training using approved Radiation Protection Training Lesson Plans.

j. STATE AND LOCAL OFFSITE LIAISON QUALIFICATIONS

Members of State and Local Jurisdictions who respond as Offsite Dose Assessment Center (ODAC) receive training as designated and scheduled by the EP Manager. Offsite emergency responders are granted access by providing their agencies authorized identification card.

k. ASSESSMENTS

The passing criteria for all assessments are 80% or greater. If a student fails an assessment, then the student is required to review the training materials for self-remediation and a second assessment will be provided.

I. REMEDIATION

Upon failure of their first assessment, students should self-remediate. Self-remediation allows the student to review the training material and take a second assessment. A second assessment failure after self-remediation suggests the student should contact an SME (EP or ERP qualified in that position) for lesson review before taking another assessment.

m. EXEMPTIONS

Emergency Response Personnel may be exempted from specific Continuing Training requirements. A training exemption is a determination that the individual (SCE or contractor) has previously mastered the objectives of a training activity by virtue of past job-related experience or equivalent training/education. Exemption is viewed as a statement of qualification. Exemptions shall be entered in the person's training records using the Training Exemption form and shall be approved by that person's supervisor, and the Manager, EP.

n. <u>UNESCORTED PROTECTED AREA ACCESS AND ERP TRAINING</u>

All ERO personnel who are required to have unescorted access to the Protected Area or Emergency Operations Facility (EOF) must maintain their ERP Code training requirements as listed in Attachment 2. Failure to complete annual retraining requirements may result in loss of unescorted Protected Area access or EOF access. If this occurs, unescorted access privileges will be reestablished only upon completion of the required Emergency Plan training or a request for removal of their ERP Code by their Cognizant Functional Division Manager (CFDM) or 1410 Supervisor, point of contact or position owner.

o. NON-ATTAINMENT TRAINING

The non-attainment code "REDBADGE" requires an active Security Photo Identification Badge to maintain ERO qualification. This code is automatically posted once the ERO member has been issued a Security Photo Identification Badge (satisfying 10 CFR Part 26 requirements). If the ERO member's Security Photo Identification Badge becomes terminated, deactivated, or expired, they will become unqualified for any position in Attachment 2 that requires an active badge.

Self-Contained Breathing Apparatus (SCBAFIT) for onshift responders, and Scott Airpack (SCBASFIT) for Fire Brigade are associated with other qualifications grouped under EROSCBA and SCOTAP respectively. They include a Physical Exam, Training, Fit Test, and Practical Factors.

p. NON-ATTAINMENT CODES

If a non-attainment code is not maintained, or is terminated, the individual will become unqualified for any position requiring that code.

q. <u>LESSONS LEARNED FROM DRILLS AND EXERCISES</u>

Applicable lessons learned from previous drills, exercises, and industry events will be incorporated into table-top/mini drills, annual drills, and exercises.

[&]quot;REDBADGE" requires an active Security Photo Identification Badge for ERO qualification

[&]quot;SCBAFIT" required for general ERO respirator qualification

[&]quot;SCBASFIT" required for Firefighter qualification

Emergency Plan Training Program Curriculum

	FACILITY	ERP CODE	SONGS ERO POSITIONS	QWT/PQS	REDBADGE	7/10000	PAR101	EP4100	EPTENR	EPTDEC	EPTEAL	EPTB53 *	LOOTCR	HPLDAC	SCBAFIT	EROSCBA	SCOTAP
1	ONSHIFT	00	General Support Group		X	X											
2	ONSHIFT	01	General Maint Support		Х	Х											
3	ONSHIFT	02	ERO Mechanical Maint.		Х	X									X	Х	
4	ONSHIFT	2A	ERO Control Room Supervisor	72AQWT	X	X				Х		X			Х	Х	
5	ONSHIFT	2B	Shift Manager	72AQWT	X	X	Х			X		X			Х	X	
6	ONSHIFT	2C	Control Room Supervisor	72AQWT	Х	Х				X		X					
7	ONSHIFT	2E	Control Operator/ACO		X	X				X		X					
8	ONSHIFT	J2	O/S Operations Leader		X	X						X	X				
9	ONSHIFT	2F	ERO CO/ACO		X	X				X		X			X	X	
10	ONSHIFT	2K	PEO/NPEO		X	X											
11	ONSHIFT	2L	ERO NPEO		Х	X									X	X	
12	ONSHIFT	03	ERO Electrical Maint.		X	X									X	X	
13	ONSHIFT	06	Security Officer		Х	X											
14	ONSHIFT	8J	OSC Firefighter		Х	X									X		X
15	ONSHIFT	A1	OSC I&C Technician		X	X											
16	ONSHIFT	A2	ERO I&C Technician		Х	X									Х	X	
17	ONSHIFT	E1	Shift Communicator	7E1QWT	Х	X			X		X						
18	ONSHIFT	P2	OSC Emergency Group Leader	7P1QWT	Х	X											
19	ONSHIFT	V0	ERO RP Technicians	7V6QWT	X	X									X	X	
20	ONSHIFT	V6	CR/TSC/OSC RP Technicians	7V6QWT	X	X											
21	ONSHIFT	L7	RP Supervisor/Lead/Advisor	7V2QWT	Х	X		X			X						
22	ONSHIFT	J6	Shift Communicator/Ops Leader/CO	7E1QWT	X	X			X	X		Х	Х		Х	X	
23	ONSHIFT	9J	First Aid		Х	Х											
24	ONSHIFT	8K	Fire Brigade Leader/IC		Х	X									Х		X

<u>Legend</u>
Lifetime
Annual
Calendar Year – 1
Calendar Year - 2

NOTES

- 1. Encodes designated with an * may <u>NOT</u> be applicable due to progression of the decommissioning of SONGS.
- 2. Qualifications need to be obtained within 30 days of assignment.

Emergency Plan Training Program Curriculum

	FACILITY	ERP CODE	SONGS ERO POSITIONS	QWT/PQS	REDBADGE	7/10000	PAR101	EP4/100	EPTENR	EPTDEC	EPTEAL	EPT353 *	LODICR	HPLDAC
24	TSC	C1	Mitigator	7TTQWT	X	X					Х	Χ		
25	TSC	G1	Station Emergency Director	7G1QWT	X	X	X			X		X		
26	TSC	H1	TSC Manager	7H1QWT	X	X				X				
27	TSC	11	Emergency Advisor, Operations	7I1QWT	X	X				X		X		
28	TSC	12	Emergency Advisor, Notifications	7I2QWT	X	X			X		X			
29	TSC	J5	Red Phone Communicator		X	X								
30	TSC	L1	Radiation Protection Leader	7L1QWT	X	X		X			X			X
31	TSC	M1	Technical Leader	7TTQWT	X	X					X	X		
32	TSC	N1	Security Leader	7N1QWT	X	X					X			
33	OSC	H2	Emergency Planning Coordinator	7H2QWT	X	X								
34	OSC	J3	Operations Coordinator	7J3QWT	X	X								
35	OSC	N7	Security Coordinator	7N7QWT	X	X								
36	osc	P1	Emergency Group Leader	7P1QWT	X	X								
37	OSC	Q2	Maintenance Coordinator		X	X								
38	OSC	S1	Chemistry Coordinator	7S1QWT	X	X								
39	osc	T1	Emergency Services Coordinator		X	X								
40	OSC	V2	Radiation Protection Coordinator	7V2QWT	X	X		X			X			
41	EOF	G4	Corporate Emergency Director	7G4QWT	X	X	X			X		X		
42	EOF	H3	Emergency Planning Coordinator	7H3QWT	X	X								
43	EOF	H5	Emergency Advisor, Notifications	7H5QWT	X	X			X		X			
44	EOF	17	EOF Manager	7I7QWT	X	X	X				X			
45	EOF	L5	Radiation Protection Leader	7L5QWT	X	X		X			X			X
46	EOF	M6	Technical Leader	7TTQWT	X	X					X			
47	EOF	NO	EOF Security Director	7N0QWT	X	X					X			
48	EOF	R1	Administrative Leader	7R1QWT	X	X								
49	EOF	Y5	Radiation Protection Offsite Monitoring Team	7V6QWT 7Y5QWT	X	X								
50	JIC	СХ	JIC Director	SPTQWT ENCSPT	X									

Legend
Lifetime
Annual
Calendar Year – 1
Calendar Year - 2

NOTES

- 1. Encodes designated with an * may <u>NOT</u> be applicable due to progression of the decommissioning of SONGS.
- 2. Qualifications need to be obtained within 30 days of assignment.

Ownership of ERO Training Elements

NOTE

Program Owner responsibilities are found in Section 3.0 of this procedure.

ENCODE	DESCRIPTION	CYCLE	MULTIPLIER
PROGRAM	OWNER: OPERATIONS		
2EP101	NLO Emergency Response Training	LIFETIME	-
L001CR	Operations E-Plan Training (ORP194)	LIFETIME	-
EPTDEC	EP Emergency Classification (2RP542)	CALENDAR	2
RQ0832	B5b Mitigation Strategies (EPTB5B)	CALENDAR	2
EPTB5B	B5b Mitigation Strategies Overview (RQ0832)	CALENDAR	2

ENCODE	DESCRIPTION	CYCLE	MULTIPLIER					
PROGRAM OWNER: RADIATION PROTECTION								
HPLDAC	Dose Assessment Computer Software (ERP273)	LIFETIME	_					
EP4100	Dose Assessment	CALENDAR	2					

ENCODE	DESCRIPTION	CYCLE	MULTIPLIER					
PROGRAM OWNER: EMERGENCY PLANNING								
XXXQWT	ALL Qualification Walkthroughs	LIFETIME	-					
EPTENR	Emergency Notification Retraining	CALENDAR	1					
PAR101	Protective Action Recommendation Training	CALENDAR	1					
EPTEAL	Emergency Action level Overview	CALENDAR	2					
ENCSPT	ENC Spokespersons Training CALENDAR 2							
710000	General EP Overview	CALENDAR	2					

Summary of Changes

Author: Mayra Alvarado

NN, Order, or Other Action	Description of Change	Reviewer	Step, Section, Attachment or Page
	Revise terminology from Examination to Assessment		Table of Contents page 3 and Att 1 Section k
	Update Division title		Step 4.1.1
Betterment	Add Steps to identify 50.54(q) Evaluation training requirements		Steps 6.4.2.4, 6.4.2.4.1, and 6.4.2.4.2
betterment	Remove step regarding continuing training requirements	Alvarado	Step 6.4.3.2
	Delete timeframe associated with responder and update position title from firefighter to Fire Brigade	Sischo	Att 1 Section o., Non-Attainment Training
	Add ERP Codes J6 and 9J and associated training to separate out functions.		Attachment 2 page 1
202807668	Section regarding Simulator Drills and EP Assessments deleted.		Previous Section 6.6 page 9
202852359	Created separate ERP Code for On-Shift Fire Brigade Leader.		Attachment 2

Attachment 2

SONGS EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIPs) INDEX

SONGS EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIPs) INDEX

DOCUMENT	<u>REV. #</u>	<u>EC</u>	TITLE
SO123-VIII-0.100	17		MAINTENANCE AND CONTROL OF EMERGENCY PLANNING DOCUMENTS
SO123-VIII-0.101	0		EMERGENCY RESPONSE EQUIPMENT MANAGEMENT
SO123-VIII-0.200	18		EMERGENCY PLAN DRILLS AND EXERCISES
SO123-VIII-0.201	28		EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM (EPESP)
SO123-VIII-0.202	12		ASSIGNMENT OF EMERGENCY RESPONSE PERSONNEL
SO123-VIII-0.301	16		EMERGENCY TELECOMMUNICATIONS TESTING
SO123-VIII-0.302	7		ONSITE EMERGENCY SIREN SYSTEM TEST
SO123-VIII-0.303	5		PERIMETER PUBLIC ADDRESS SYSTEM (PPAS) ROUTINE TEST
SO123-VIII-1	37		RECOGNITION AND CLASSIFICATION OF EMERGENCIES
SO123-VIII-10	32	1	EMERGENCY COORDINATOR DUTIES
SO123-VIII-10.3	16		PROTECTIVE ACTION RECOMMENDATIONS
SO123-VIII-10.5	5		EVENT CLOSE OUT AND RECOVERY
SO123-VIII-10.6	7		EMERGENCY RESPONSE ACTIONS FOR A DECLARED SECURITY EVENT
SO123-VIII-30.7	18		EMERGENCY NOTIFICATIONS
SO123-VIII-40.100	19		DOSE ASSESSMENT
SO123-VIII-40.200	8		RADDOSE-V DOSE ASSESSMENT
SO23-VIII-50.3	11		CORE DAMAGE ASSESSMENT
SO123-VIII-CR	2		EMERGENCY RESPONSE ORGANIZATION

SONGS EMERGENCY PLAN IMPLEMENTING PROCEDURES (EPIPs) INDEX

DOCUMENT	<u>REV. #</u>	<u>EC</u>	TITLE
SO123-VIII-EOF	3		EMERGENCYRESPONSE ORGANIZATION (ERO) EMERGENCY OPERATIONS FACILITY POSITION CHECKLISTS
SO123-VIII-JIC	0		EMERGENCY RESPONSE ORGANIZATION (ERO) JOINT INFORMATION CENTER (JIC) POSITION CHECKLIST
SO123-VIII-OSC	0		EMERGENCY RESPONSE ORGANIZATION (ERO) OPERATIONS SUPPORT CENTER POSITION CHECKLISTS
SO123-VIII-TSC	1		EMERGENCY RESPONSE ORGANIZATION (ERO) TECHNICAL SUPPORT CENTER POSITION CHECKLISTS

Attachment 3

SONGS EMERGENCY PLAN REFERENCED MANUALS, ORDERS AND TRAINING PROCEDURES INDEX

DOCUMENT	<u>REV. #</u>	<u>TITLE</u>
SO123-EP-1	9	SONGS EMERGENCY PLAN IMPLEMENTATION
SO123-XXI-1.11.3	31	EMERGENCY PLAN TRAINING PROGRAM DESCRIPTION
EPSD-1	6	EMERGENCY ACTION LEVEL TECHNICAL BASES
EPSD-1 1.0	2	SECTION 1.0 - PURPOSE
EPSD-1 2.0	3	SECTION 2.0 - DISCUSSION
EPSD-1 3.0	3	SECTION 3.0 - REFERENCES
EPSD-1 4.0	5	SECTION 4.0 - DEFINITIONS, ACRONYMS AND ABBREVIATIONS
EPSD-1 5.0	2	SECTION 5.0 - EAL TECHNICAL BASES
EPSD-1 5.1	4	SECTION 5.1 - CATEGORY A -ABNORMAL RAD LEVELS / RADIOLOGICAL EFFLUENT
EPSD-1 5.2	4	SECTION 5.2 - CATEGORY C - COLD SHUTDOWN / REFUELING SYSTEM MALFUNCTION
EPSD-1 5.3	3	SECTION 5.3 - CATEGORY E - EVENTS RELATED TO INDEPENDENT SPENT FUEL STORAGE INSTALLATIONS
EPSD-1 5.4	5	SECTION 5.4 - CATEGORY F - FISSION PRODUCT BARRIER DEGRADATION
EPSD-1 5.5	5	SECTION 5.5 - CATEGORY H - HAZARDS AND OTHER CONDITIONS AFFECTING PLANT SAFETY
EPSD-1 5.6	6	SECTION 5.6 - CATEGORY S - SYSTEM MALFUNCTION

Attachment 4

Report and Analysis Summary of SONGS Emergency Plan Implementing Procedure Changes for procedures

SO123-VIII-0.201
Emergency Plan Equipment Surveillance Program (EPESP)

SO123-XXI-1.11.3
Emergency Plan Training Program Description

Reference: SO123-VIII-0.100

San Onofre Nuclear Generating Station Report and Analysis Summary 10 CFR 50.54(q)(iv)(5)

Document Number: SO123-VIII-0.201, Rev 28

Title: EMERGENCY PLAN EQUIPMENT SURVEILLANCE PROGRAM

SONGS Nuclear Notification (NN) #: 202608283 task 1

Section and Change Description

Change 1

Through the procedure, revised to update procedure format in accordance with standards outline in SO123-XV-109, Procedure and Instruction Format and Content.

Change 2

Step 1.3, Step 6.1.2, and Attachment 1, reworded or deleted text that referenced Current Technical Specifications (CTS) and Improved Technical Specifications (ITS).

Change 3

Section 2.0, added section for Responsibilities, instructions previously contained in Section 6.1.3 were moved into this section.

Change 4

Section 3.0, added Section for Definitions/Acronyms.

Change 5

Section 6.0, deleted note indicating Root Cause Evaluation Corrective Action to Prevent Recurrence is implemented in this section.

Change 6

Step 6.1.1.3 and step 9.2.3.7, revised to reference SO123-VIII-0.101 for SONGS Emergency Plan Equipment for EAL/Event Code Determinations, and SONGS Emergency Plan/Emergency Response Facilities Equipment list. These attachments were removed from SO123-VIII-0.201 under revision 27, and incorporated to SO123-VIII-0.101 under revision 0, but step 6.1.1.3 was not corrected appropriately at the time.

Change 7

Through the procedure, updated division titles and responsibilities due to organizational changes.

Change 8

Through the procedure, added designated personnel to allow them to perform procedure related tasks.

Change 9

Step 6.2.3, Attachment 2, and Attachment 3, changed site assembly area from G-50 to W-48.

Change 10

Step 6.2.6.3 and step 9.2.3.11, changed reference from SO123-VIII-60.1 to SO123-VIII-OSC. Procedure SO123-VIII-60.1 was voided and instructions placed on SO123-VIII-OSC Rev 0, but this reference was not corrected at the time.

Change 11

Steps 6.6.4, 6.6.4.1 and Attachment 8, removed instructions for forklift near parking Lot 2 availability inspections due to changes on site configuration that eliminates the need to stage a forklift.

Analysis Summary

Changes 1, 2, 3, 4, 5, 6, 10, 12, 15, and 19 are considered editorial as defined in SO123-XV-109.1, Attachment 5, and do not cause a Reduction in Effectiveness to the SONGS Emergency Plan.

Change 7 updates division titles and responsibilities related to the Emergency Plan Equipment Surveillance Program. These updates are the result of organization changes due to SONGS decommissioning. Change 7 supports the requirements to provide and maintain adequate emergency facilities and equipment to support the emergency response. The proposed changed would not reduce the effectiveness of the Emergency Plan because although the responsibilities have changed, designated divisions are accountable to provide and maintain the Emergency Facilities and Equipment.

Change 8 adds designated personnel to perform procedure related tasks. This change allows for additional personnel to perform tasks that were previously performed by EP personnel and provides additional resources to ensure tasks are completed adequately and on time. Change 8 supports the requirements to maintain adequate emergency facilities and equipment to support the emergency response and does not reduce the effectiveness of the Emergency Plan.

Change 9 changes a Site Assembly Area from Building G-50 to Building W-48. Building G-50 has been abandoned and will be demolished. Building W-48 contains the majority of workers located on the Mesa site and it has sufficient resources to serve as a Site Assembly Area. Incorporation of change 9 alters site assembly areas location, but it continues to support the requirement to maintain adequate emergency facilities and equipment to support the emergency response, including protection of non-essential workers and does not reduce the effectiveness of the Emergency Plan.

Change 11 removes instructions for availability inspection of a forklift near parking Lot 2. Plant security changes eliminate the bollards at that location, and maintaining a forklift nearby to lift them during an emergency is no longer needed. This change is not a reduction in effectiveness because evacuation through this location is still possible.

Change 13 removes the need to maintain the Alert and Notification System within the metrics of the ROP process. The Station is no longer under the purview of ROP process and those metrics are no longer applicable. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.

Change 14 removes reference to the Technical Requirement Manual. This reference had been added as part of the Improved Technical Specifications project that will not be completed. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.

Change 16 adds reference SO123-XV-50.CAP-4, Implementing Corrective Actions, because corrective actions have been added by change 18. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.

Change 12

Step $\bar{6}$.11, step 9.2.2.1, change references from RCE 200501272 to RCE 200501125. Incorrect RCE number was listed.

Change 13

Step 6.11.1.1, removed "within the metrics of the ROP process" and added (CA 202847725-0001) since the ROP process does not applied in the defueled condition.

Change 14

Step 9.2.1.4, removed reference to Technical Requirements Manual. This manual is part of the Improved Technical Specifications that will not be implemented.

Change 15

Step 9.2.3.1 and 9.2.3.4, update reference from SO123-I-1.9, Maintenance Plan Program to SO123-V-19, SONGS Preventive Maintenance (PM) program as the first procedure has been superseded.

Change 16

Step 9.2.3.13, added reference to SO123-XV-50.CAP-4, Implementing Corrective Actions.

Change 17

Step 9.2.3.21, removed reference to SO23-XXXIII-10, Equipment Reliability Process because this procedure has been voided

Change 18

Step 9.2.4.6, added reference CA 202847725-0001, NN to change CAPR 800405272.

Change 19

Attachment 1, revised to reflect correct references to Emergency Plan sections.

Change 20

Attachment 3, remove inventory of supplies for local assembly areas of buildings that have been abandoned or demolished.

Change 21

Attachment 5, updated Emergency Response Facility Leader Notebooks list to match current organization.

Change 22

Attachment 8, removed locations of evacuation signs for buildings that have been abandoned or demolished, and updated location description for evacuation sign near the area previously known as Fire Dispatch.

Change 23

Attachment 8, removed verification of reactivity computer to evaluate Severe Accident Management Guidelines. Procedure SO23-V-5, SONGS Severe Accident Management Guidelines has been voided.

PREPARED BY: Lucia Sischo

DATE: 6/16/14

Change 17 removes reference SO23-XXXIII-10, Equipment Reliability Process, because this procedure has been voided. The Equipment Reliability Procedure implemented INPO's AP-913 guidance document. SONGS is no longer a member of INPO and the guidance in the procedure is not needed for a decommissioned plant. Maintenance of equipment is being performed in accordance with other station procedures, including SO123-V-19, SONGS Preventive Maintenance (PM) program. This change is administrative and does not constitute a reduction of effectiveness.

Change 18 adds reference CA 202847725-0001, NN to change CAPR 800405272, since this corrective action has been implemented in the procedure. This change is administrative and does not constitute a reduction in effectiveness of the Emergency Plan.

Change 20 removes inventory of supplies for local assembly areas of buildings that have been abandoned or demolished. This change alters the assembly process and the locations of facilities needed for emergency response. The buildings removed are no longer occupied due to the reduction of plant personnel and relocation of most workers to the plant AWS building. The remaining assembly areas are sufficient for the remaining personnel. This change does not reduce the effectiveness of the Emergency Plan.

Change 21 updates Emergency Response Facility Leader Notebooks list to match current Emergency Response Organization as described in the Emergency Plan. This change aligns the procedure to the current requirements of the Emergency Plan, and it does not reduce its effectiveness.

Change 22 removes locations of evacuation signs for buildings that have been abandoned or demolished, and updated location description for evacuation sign near the area previously known as Fire Dispatch. This change alters inspection of evacuation signs used to inform personnel of evacuation routes and reception centers, but since buildings are abandoned or demolished the signs are not needed. This change does not reduce the effectiveness of the Emergency Plan.

Change 23 removes verification of reactivity computer to evaluate Severe Accident Management Guidelines. Procedure SO23-V-5, SONGS Severe Accident Management Guidelines has been voided because the instructions it provided are not applicable in the defueled condition. This change alters equipment for emergency response, but it is no longer needed and it does not does not reduce the effectiveness of the Emergency Plan.

Changes performed in this revision clarify and update instructions for Emergency Plan Equipment Surveillance Program. This program continues to ensure equipment used during emergency

response is properly surveilled and maintained, and to define the responsibilities for surveillance and maintenance of emergency response equipment and the reporting of equipment status. The ability to meet the standards of 10CFR50.47(b) and 10CFR50 Appendix E are not reduced.

This assessment determines that the changes to this procedure do not reduce the effectiveness of the SONGS Emergency Plan.

REVIEWED BY: Steve Seward

DATE: 6/17/14

Refer to SO123-XV-109.1, Processing Procedures and Instructions for the types of allowed editorial corrections.

Reference: SO123-VIII-0.100

San Onofre Nuclear Generating Station Report and Analysis Summary 10 CFR 50.54(q)(iv)(5)

Document Number: SO123-XXI-1.11.3, Rev 31
Title: Emergency Plan Training Program Description
SONGS Nuclear Notification (NN) #: 202807668 task 6

Section and Change Description

Change 1

Table of Contents, revised to reflect change in terminology, from examination to assessment, on Attachment 1, section k.

Change 2

Step 4.1.1, revised from "Compliance" to "Nuclear Regulatory Affairs" as one of the groups to notify upon issuance of any Revisions/ECs to this document for submittal to the NRC.

Change 3

Moved Step 6.4.3.2 to step 6.4.2.4, and added substep 6.4.2.4.1 to improve and clarify the training for personnel preparing or reviewing EP Licensing Document Impact Screenings. Personnel preparing 10CFR50.54(q) screenings will need the same training as personnel performing 10CFR50.54(q) evaluations. They shall have completed training per 5054SE, "Performing Effective 50.54(q) Evaluations", and 54QQWT, "Emergency Plan and Procedure 50.54(q) Revision Qualification Walkthrough". If 54QQWT training expires, THEN initial training must be repeated using 5054SE and 54QQWT to requalify as a 50.54(q) Screener / Evaluator.

Change 4

Removed Section 6.6 reference to simulator drills and EP assessments since simulator use has been discontinued and EP Performance Indicator assessments are not required for ROP Performance Indicators.

Change 5

Attachment 1, section k, changed title from examinations to assessments.

Change 6

Attachment 1, section o: removed wording regarding 30 minute responders as SONGS Emergency Plan does not have 30 minute responders, and changed text from firefighters to Fire Brigade to incorporate changes performed under Emergency Plan revision 36.

Change 7

Attachment 2, added ERP J6 qualification to combine Shift Communicator/Ops Leader/CO on-shift positions, added ERP 9J for first aid to incorporate changes performed under Emergency Plan revision 36, and added ERP 8K qualification to differentiate between the Fire Brigade Leader/Incident Commander and the OSC Emergency Services Coordinator.

Analysis Summary

Changes 1 and 2 are considered editorial as defined in SO123-XV-109.1, Attachment 5, and do not cause a Reduction in Effectiveness to the SONGS Emergency Plan.

Change 3 moves a step from the continuing training section to the initial training, as this step describes the training requirements for personnel preparing or reviewing EP Licensing Document Impact Screenings and Evaluations.

It increases current requirements for personnel preparing 10CFR50.54(q) screenings, as they will need the same training as personnel performing 10CFR50.54(q) evaluations. Change 3 supports the 10CFR50.47(b)(16) requirement for responsibilities for plan development and review, and for planners to be properly trained. The proposed changed would not reduce the effectiveness of the Emergency Plan because the training requirements are being increased for screeners.

Change 4 removes the section for simulator drills and their EP assessments. Simulator use has been discontinued by Operations Training (refer to DIA decision document 2013-008 and NN 202807668), and EP Performance Indicator assessments are no longer required for ROP PI. Currently, EP mini drills are performed using paper injects in the actual Emergency Response Facilities.

Change 4 supports the 10CFR50.47(b)(15) and Appendix E requirements to provide radiological emergency response training to those who may be called on to assist in an emergency, but the training includes practice in the actual control room with the use of controller injects instead of simulator use. This change is not considered a reduction in effectiveness as the training and exercising, by periodic drills, of emergency plans to ensure that employees of the licensee are familiar with their specific emergency response duties is being maintained.

Change 5 updated a title from examinations to assessments. Emergency Planning Training is a non-accredited program and examination was an incorrect term used for this section. This change is not a reduction in effectiveness as implementation of the Emergency Planning Training Program evaluations and assessments is not changing.

Change 6, removed wording regarding 30 minute responders as SONGS Emergency Plan do not have 30 minute responders, and changed text from firefighters to Fire Brigade to incorporate prior changes performed to the Emergency Plan. This change is not a reduction in effectiveness as it updates this procedure to prior changes made to the Emergency Plan.

Change 7 added ERP J6 qualification to combine Shift Communicator/Ops Leader/CO on-shift positions, and added ERP 9J for first aid to incorporate prior changes performed to the Emergency Plan. This change is not a reduction in effectiveness as it updates this procedure to prior changes made to the Emergency Plan.

	Change 7 also added ERP 8K qualification to differentiate between the Fire Brigade Leader/Incident Commander and the OSC Emergency Services Coordinator. This change is not a reduction in effectiveness as it updates the procedure to make a clear distinction between the onshift Fire Brigade Leader and the augmentation responder OSC Emergency Services Coordinator.
	Changes performed in this revision clarify and improve requirements for 10CFR50.54(q) screeners and evaluators, remove section for simulator assessments, correct inappropriate use of the word examination, and updates the procedure to match current Emergency Plan.
	SONGS Training Program continues to provide training to the ERO personnel and the EP staff without a degradation of its function capability or timeliness. The ability to meet the standards of 10CFR50.47(b) and 10CFR50 Appendix E are not decreased.
	This assessment determines that the changes to this procedure do not reduce the effectiveness of the SONGS Emergency Plan.
PREPARED BY: Lucia Sischo	REVIEWED BY: Steve Seward
DATE: 6/16/14	DATE: 6/17/14

Refer to SO123-XV-109.1, Processing Procedures and Instructions for the types of allowed editorial corrections.