

**Southern Nuclear Operating Company
Joseph M. Farley Nuclear Plant Units 1 and 2;
Edwin I. Hatch Nuclear Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 1 and 2;
Vogtle Electric Generating Plant Units 3 and 4**

**Enclosure 2
SNC Standard Emergency Plan**

This enclosure contains 86 pages.

Southern Nuclear Operating Company

Standard Emergency Plan

Revision 0

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INTRODUCTION

Purpose

The Southern Nuclear Operating Company's (SNC) Emergency Plan provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to nuclear power plants operated by SNC, and plant employees. SNC operates the Hatch Nuclear Plant (HNP), Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP).

Background

The SNC Emergency Plan was developed with the guidance of NUREG-0654, FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." The SNC Emergency Plan meets the emergency planning standards of 10 CFR 50.47(b), the requirements of Appendix E, and the intent of NUREG 0654 Revision 1. The SNC Emergency Plan is organized using the structure of NUREG-0654 Revision 1, and that structure provides the cross-reference to the base document.

Scope

Detailed procedures concerning the implementation of the SNC Emergency Plan are in the Emergency Plan Implementing Procedures (EPIPs). Those documents describe the duties of individuals and groups in the event of emergencies, and also serve as the interface between the SNC Emergency Plan, plant operations, security, and radiological control programs. SNC also has procedures in place that implement onsite protective actions and personnel accountability during hostile action threats or events that are appropriate for plant and environmental conditions. These procedures are available for use at the plants. There are supporting and complementing emergency plans, including those of federal agencies, the states of Alabama, Georgia, South Carolina, and individual counties.

SNC has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The authority for planning, developing, and coordinating emergency control measures is derived from being the Nuclear Regulatory Commission (NRC) license holder for the nuclear power plants operated by SNC.

The SNC Emergency Plan describes the organization, facilities, training, and maintenance of both onsite and offsite facilities and equipment that will be used to address a wide spectrum of accidents ranging from minor onsite incidents to those that could affect the general public.

Three phases of responsive action are described in the SNC Emergency Plan. The first phase includes initial actions to protect personnel and eliminate the potential for further exposure to the hazard. The second phase includes immediate and planned action to terminate the condition, contain any effluent, establish incident boundaries, establish control, channel information, and protect the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively using these phases, emergencies are classified according to increasing severity: Unusual Event, Alert, Site Area Emergency, or General Emergency.

DEFINITIONS

The following are definitions of terms commonly used in this Emergency Plan and each site specific Annex:

Area Radiation Monitoring System (ARMS)

An instrumentation system designed to detect abnormal area radiation levels and activate corresponding station alarms.

Committed Dose Equivalent (CDE)

CDE is the dose equivalent to organs or tissues of reference that will be received from an intake of radioactive material by an individual during the 50-year period following the intake.

Committed Effective Dose Equivalent (CEDE)

CEDE is the sum of the products of the weighting factors applicable to each of the body organs or tissues that are irradiated and the CDE to these organs or tissues.

Deep-Dose Equivalent (DDE)

DDE is the dose equivalent at a tissue depth of 1 cm (1000 mg/cm²), which applies to external whole-body exposure.

Dose Equivalent (DE)

DE is the product of the absorbed dose in tissue, quality factor and all other necessary modifying factors at the location of interest. The units of dose equivalent are the rem and sievert (Sv).

Effective Dose Equivalent (EDE)

EDE is the sum of the products of the dose equivalent to each organ or tissue and a weighting factor applicable to each of the body organs or tissues that are irradiated.

Emergency Action Levels (EALs)

Parameters used to designate a particular classification of emergency. These parameters may include radiological dose rates, levels of airborne or waterborne activity, or instrument indications/plant parameter values.

Exclusion Area Boundary

An area surrounding the reactor in which the reactor licensee has the authority to determine all activities, including exclusion or removal of personnel and property from the area.

Hostile Action

An act towards a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee to achieve an end. This includes attack by air, land, or water using guns, explosives, projectiles, vehicles, or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the nuclear power plant. Non-terrorist based EALs should be used to address such activities, (e.g., violent acts between individuals in the owner controlled area).

Independent Spent Fuel Storage Installation (ISFSI)

A complex designed and constructed for the interim storage of spent nuclear fuel and other radioactive materials associated with spent fuel storage.

Ingestion Exposure Pathway Emergency Planning Zone (IPZ)

The IPZ is the fifty-mile radius area around an SNC-operated plant site for which protective actions are planned for the general population, farmers, dairy farmers, ranchers, food processors and distributors.

Inplant

The area located within the confines of the SNC Plant Power Block Protected Area.

Letters of Agreement (LOA)

Letters of agreement include contracts, letters or other formal agreements between Southern Company and/or SNC-operated plants and certain off site resources who provide assistance during emergency events, including a Hostile Action, at SNC-operated plants.

Nuclear Administrative and Technical Manual (NATM)

The collection of onsite programs and procedures that prescribes how SNC-operated plants are controlled, operated, maintained, and tested to meet the requirements of applicable licenses, standards, codes, and guides. It establishes effective management practices.

Offsite

Any position or area not located within the confines of the Site Boundary.

Onsite

Any position or area located within the confines of the Site Boundary.

Owner Controlled Area

The area owned by the licensee and located within the confines of the Site Boundary.

Plume Exposure Pathway Emergency Planning Zone (EPZ)

The Plume Exposure Pathway EPZ is the ten-mile radius area around an SNC-operated plant site for which protective actions are planned.

Protected Area(s) (PA)

An area, located within the Site Exclusion Area Boundary, encompassed by physical barriers and to which access is controlled per 10 CFR 73.55. The SNC Power Block Protected Area and the ISFSI Protected Area are two Protected Areas located within the Site Owner Controlled Area.

Protective Actions

Emergency measures taken to avoid or reduce radiation dose. These commonly include sheltering, evacuation, and prophylaxis.

Protective Action Recommendations (PARs)

Protective actions recommended by an SNC-operated plant to governmental authorities to protect the health and safety of the public within the plume exposure pathway during an emergency event at an SNC-operated plant.

Protective Action Guides (PAGs)

The projected dose to individuals that would warrant consideration of protective action against an accidental release of radioactive material.

Sabotage

Deliberate damage, misalignment, or misoperation of plant equipment with the intent to render the equipment inoperable. Equipment found tampered with or damaged due to malicious mischief may not meet the definition of sabotage until this determination is made by security supervision.

Security Condition

Any security event as listed in the approved security contingency plan that constitutes a threat/compromise to site security, threat/risk to site personnel, or a potential degradation to the level of safety of the plant. A security condition does not involve a hostile action.

Site Boundary

The boundary of a reactor site beyond which the land or property is not owned, leased, or otherwise controlled by the licensee.

Total Effective Dose Equivalent (TEDE)

TEDE is the sum of the Deep-Dose Equivalent (for external exposures) and the CEDE (for internal exposures).

Vital Areas

Areas within the protected area that contain equipment vital to the operations of the plant.

SECTION A: ASSIGNMENT OF RESPONSIBILITY

A.1 Primary Federal Organizations

A.1.1 Nuclear Regulatory Commission (NRC)

The NRC acts as the lead federal agency for technical matters during a nuclear incident, with the Chairman of the Commission as the senior NRC authority for response. The Chairman can transfer control of emergency response activities when deemed appropriate.

Incident Response Centers have been established at the NRC regional offices and NRC headquarters, to centralize and coordinate NRC's emergency response. Provision is made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.

A.1.2 Department of Homeland Security (DHS)

In accordance with the National Response Framework (NRF), DHS is responsible for the overall coordination of a multi-agency Federal response to a significant radiological incident.

A.1.3 Federal Emergency Management Agency (FEMA)

The primary role of FEMA is to support the states by coordinating the delivery of federal non-technical assistance. FEMA coordinates state requests for federal assistance, identifying which federal agency can best address specific needs. If deemed necessary, FEMA will establish a nearby Joint Field Office from which it will manage its assistance activities.

A.1.4 Department of Energy (DOE)

The DOE provides radiological assistance on request, and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The Radiological Assistance Team can be expected to respond to SNC-operated sites as directed by the Savannah River Operations Office of DOE.

A.1.5 Federal Bureau of Investigation (FBI)

Support from the FBI is available through its statutory responsibility, based in public law and the US code, and through a memorandum of understanding for cooperation with the NRC. Notification to the FBI of emergencies in which they would have an interest will be through the provisions of a plant security plan, or by the NRC.

A.1.6 National Weather Service (NWS)

NWS provides meteorological information during emergency situations, if required. Data available will include existing and forecasted wind directions, wind speeds, and ambient air temperatures.

A.1.7 Environmental Protection Agency (EPA)

The EPA can assist with field radiological monitoring, sampling, and non-plant related recovery and reentry guidance.

A.2 State and Local Organizations

A.2.1 State of Alabama

A.2.1.1 Alabama Emergency Management Agency (AEMA)

The Alabama Emergency Management Agency coordinates the Radiological Emergency Plans and offsite operations of affected state agencies and local governments including notification of state and local agencies of a nuclear incident at a nuclear power plant impacting the state of Alabama, direction of activities at the state Emergency Operations Center, coordination of non-radiological operations with utility and federal authorities, and coordination of news information.

A.2.1.2 Alabama Department of Public Health Office of Radiation Control

Through the Alabama Department of Public Health, the Alabama Office of Radiation Control is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. The state plan provides a detailed description of the notification procedures and the responsibilities and duties of the local and state agencies involved. The Alabama Office of Radiation Control has primary responsibility and authority for handling the offsite aspects of an emergency in Alabama with primary focus on the welfare and safety of the general public.

A.2.1.3 Other Alabama State Agencies

Responsibilities of other state agencies are described in the Alabama Radiological Response Plan for Nuclear Power Plants.

A.2.2 State of Georgia

A.2.2.1 Georgia Emergency Management Agency (GEMA)

GEMA is responsible for general state emergency planning and overall direction and control of emergency or disaster operations as assigned by executive order and in accordance with the Georgia Emergency Operations Plan (GEOP). GEMA has responsibilities for coordinating the state of Georgia response to emergencies at nuclear power plants.

A.2.2.2 Department of Natural Resources Environmental Protection Division (DNR-EPD)

The DNR-EPD has primary responsibility for implementation and administration of the state radiological emergency response function.

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A.2.2.3 Other Georgia State Agencies

Responsibilities of other state agencies are described in the Georgia Emergency Operations Plan (GEOP).

A.2.3 State of South Carolina

A.2.3.1 Emergency Management Division (EMD)

The EMD is assigned the responsibility for coordinating the emergency planning efforts of state, county, and municipal agencies in accordance with the South Carolina Radiological Emergency Response Plan (SCORERP); conducting a preparedness program to assure capability of the government to execute the plan; establishing and maintaining a State EOC and providing support of the State emergency staff and work force; and establishing an effective system for reporting, analyzing, and disseminating emergency information.

A.2.3.2 Department of Health and Environmental Control (DHEC), Nuclear Emergency Planning Section

The Department of Health and Environmental Control (DHEC) maintains a radiological hazard assessment capability and provides technical support, coordination, and guidance for the State and local governments. It will conduct and/or coordinate radiological surveillance and monitoring in coordination with DOE-Savannah River Site (SRS) and nuclear power plants. DHEC will obtain and coordinate radiological assistance resources from the Federal Government, other states, and the nuclear industry as required.

A.2.3.3 Other South Carolina State Agencies

Responsibilities of the other state agencies are described in the South Carolina Radiological Emergency Response Plan (SCORERP).

A.2.4 Emergency Planning Zone (EPZ) Counties

The Emergency Management Agencies representing the counties of Aiken, Allendale, Appling, Barnwell, Burke, Early, Henry, Houston, Jeff Davis, Tattall, and Toombs have the responsibility for notification and providing direction to residents in the event of an emergency that affects their respective jurisdiction. The 24-hour notification points have the responsibility to notify necessary local civil support groups in the event of an accident. The County is responsible for protection of the public and can provide personnel and equipment for evacuation, relocation and isolation.

A.3 Contractor and Private Organizations

A.3.1 Southern Nuclear

Southern Nuclear Operating Company (SNC) serves as the architect-engineer.

A.3.2. Bechtel Power Corporation

SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.

A.3.3 Westinghouse

SNC has established an agreement with Westinghouse to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. Westinghouse provides the capability to respond on a 24-hour-a-day basis.

A.3.4 General Electric Company (GE)

The licensee has established an agreement with GE to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. GE provides a capability to respond on a 24-hour-a-day basis.

A.3.5 Radiological Monitoring Assistance

Radiological monitoring in the plant and in the environs, both onsite and offsite, will be augmented by outside vendors as necessary. Initial radiological monitoring will be performed by available Southern Company resources (e.g., Georgia Power Company (GPC) Central Laboratory).

A.3.6 Contract Laboratories

SNC-operated plants maintain contracts with offsite laboratories to assist with emergency analytical services. Copies of these contracts are maintained in accordance with Emergency Plan procedures.

A.4 Other Utilities

The Institute of Nuclear Power Operations (INPO) aids nuclear utilities in obtaining resources beyond their usual capabilities during recovery from an emergency. As one of its roles, INPO will assist affected utilities by applying the resources of the nuclear industry to meet the needs of an emergency.

A.5 Agreements

Letters of Agreement (LOAs) are not necessary with federal and state agencies that are legally required to respond to an emergency; however, agreements are necessary if an agency is expected to provide assistance not required by law. Written agreements have been developed which establish the extent of operations between SNC-operated plants and other support organizations that have an emergency response role consistent with this plan. These agreements identify the emergency measures to be provided, the mutually accepted criteria for implementation, and the arrangements for exchange of information.

The respective nuclear power plants have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOAs are referenced in the site-specific plant Annexes and the actual letters are maintained in accordance with 10 CFR 50, Appendix E, IV.A.7.

SECTION B: EMERGENCY RESPONSE ORGANIZATION (ERO)

B.1 Normal Plant Organization

The normal onsite organization of an SNC-operated nuclear power plant provides a staff capable of providing the initial response to an emergency event. The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. Organizational structures for each of the sites and the On-Shift staffing tables are provided in the Site-Specific Annex. The number and ERO position titles of personnel available within 75 minutes following declaration of an Alert or higher classification are shown in Tables 1, 2, 3, and 4.

SNC plants maintain 24-hour emergency response capability. The normal on-shift complement provides the initial response to an emergency. This group is trained to respond to emergency situations until the augmented Emergency Response Organization (ERO) arrives. The ERO is composed of personnel with specialties in operations, maintenance, engineering, radiochemistry, radiation protection, fire protection, and security.

B.1.1 The Shift Manager (SM) is in direct charge of shift plant operations and is directly responsible for the actions of the on-shift crew. In an emergency, the SM assumes the responsibility of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED. The ED has the responsibility and authority to immediately and unilaterally initiate emergency actions, including providing notification of Protective Action Recommendations (PAR) to state and local government organizations responsible for implementing off site emergency measures. The ED, at their discretion or when procedurally required, activates the ERO.

The Emergency Director's non-delegable duties include:

- Event classification in accordance with the emergency classification system.
- Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination.
- Notifications of offsite agencies and approval of state, local, and NRC notifications.
- Authorization of emergency exposures in excess of federal limits.
- Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent.
- Request federal assistance as needed.

After being relieved as Emergency Director, the Shift Manager directs the activities of the operating crew and is responsible for the safe operation of the plant. The Shift Manager, after relinquishing duties and responsibilities of the Emergency Director, functionally reports to the Operations Supervisor in the Technical Support Center (TSC).

B.1.2 Shift Supervisors, who hold Senior Reactor Operator (SRO) licenses, supervise operation of the unit and may assume the duties of the ED in the absence of the Shift Manager. Additional details of the normal on-shift organization are contained in the site specific annexes to this Plan.

B.2 On Site Emergency Response Organization (ERO)

Augmentation of on-shift staffing will occur within 75 minutes of the declaration of an Alert or higher classification by the Emergency Response Organization (ERO). ERO positions for the TSC, Operations Support Center (OSC), Emergency Operations Facility (EOF) and JIC are detailed below. A sufficient number of personnel are qualified to ensure that positions listed in this section can be staffed on a 24-hour-a-day basis for an extended event. On-shift as well as offsite state and local government interfaces are detailed in the site-specific Annexes.

Command and Control normally shifts from the Control Room to the TSC and subsequently to the EOF. Command and Control may move in either direction, depending on conditions that would warrant passing such authority. Command and Control may be completed sequentially or in parallel, based on the discretion of the EDs. A qualified ED in either facility can relieve the other facility of the Command and Control authority and responsibilities. Figure B.2.A depicts the transition of Command and Control responsibilities between facilities. Alternative Facilities have been identified to ensure timely ERO response during a hostile action event. Details on the Alternative Facilities are included in Section H.

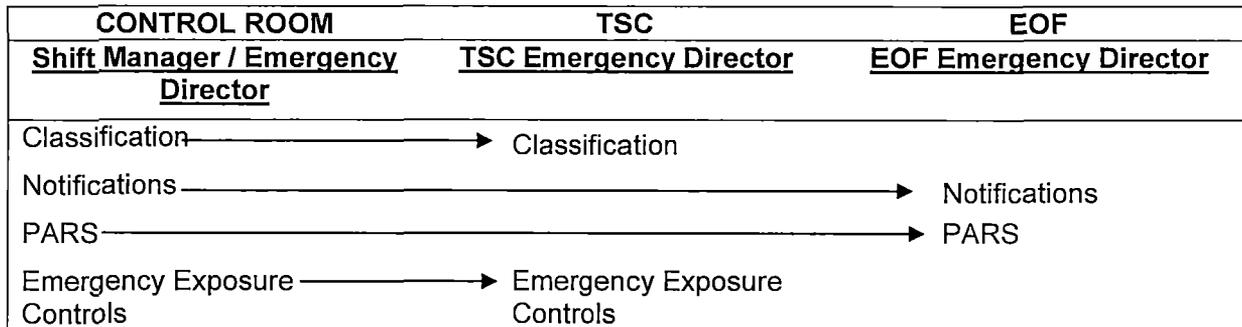


Figure B.2.A Transition of Command and Control Functions

B.2.1 Technical Support Center (TSC)

See Figure B.2.1.A at the end of Section B.

B.2.1.1 TSC Emergency Director (ED)

The TSC ED has the authority and responsibility to immediately initiate any emergency actions. Once Command and Control has been completed, the TSC ED assumes the non-delegable duties of event Classification, on-site Emergency Exposure Authorization, and on-site protective actions.

B.2.1.2 TSC Manager

The TSC Manager reports to the TSC ED and is responsible for coordinating activities between the TSC and other emergency response facilities, directing the activities of the TSC staff, and ensuring communications are established with applicable offsite agencies.

B.2.1.3 TSC Operations Supervisor

The Operations Supervisor reports to the TSC Manager. Major position functions include evaluating plant conditions and initiating mitigation actions, coordinating TSC efforts in determining the nature and extent of plant conditions affecting plant equipment, actions to limit or contain the emergency, invoking the provisions of 10 CFR 50.54(x) if appropriate, assisting the OSC Manager in determining the priority assigned to OSC activities, and timely completing offsite notifications.

B.2.1.4 TSC Maintenance Supervisor

The Maintenance Supervisor reports to the TSC Manager and is responsible for planning and coordination of repair, damage control, and plant modification activities. The Maintenance Supervisor works closely with the Engineering Supervisor in planning for plant modifications and repairs.

B.2.1.5 TSC Radiation Protection (RP) Supervisor

The RP Supervisor reports to the TSC Manager and supervises the activities of the radiation protection staff and Health Physics Network (HPN) Communicator. The RP Supervisor assists the Radiation Protection/Chemistry Group Lead in the OSC in determining the extent and nature of radiological or hazardous conditions and coordinates offsite dose assessment and offsite Field Monitoring Teams prior to EOF activation.

B.2.1.6 TSC Dose Analyst

The Dose Analyst reports to the RP Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.

B.2.1.7 TSC Engineering Supervisor

The Engineering Supervisor reports to the TSC Manager. The TSC Engineering Supervisor is responsible for the overall direction of Engineering Group activities and assessment. The Engineering Supervisor also directs the analysis of plant problems and core damage, and provides recommendations for plant modifications to mitigate the effects of the accident.

B.2.1.8 TSC Reactor Engineer

The Reactor Engineer reports to the Engineering Supervisor in the TSC. The Reactor Engineer is responsible for monitoring core conditions and providing recommendations to maintain the viability of the core. The Reactor Engineer relieves the Shift Technical Advisor (STA) of Core Thermal Analysis responsibilities.

B.2.1.9 TSC Engineering Support

The TSC Engineering Support reports to the Engineering Supervisor in the TSC. The TSC Engineering Support is responsible for monitoring the plant systems and planning corrective actions as appropriate.

B.2.1.10 TSC Chemistry Support

The TSC Chemistry Support reports to the RP Supervisor. The TSC Chemistry Support is responsible for directing and evaluating in-plant chemistry and analyses, directing and evaluating post-accident sampling, and assisting in core damage assessment.

B.2.1.11 TSC Emergency Notification System (ENS) Communicator

The ENS Communicator reports to the Operations Supervisor and is responsible for ensuring NRC notifications are completed in accordance with the requirements of 10 CFR 50.72 and 73.

B.2.1.12 TSC Health Physics Network (HPN) Communicator

The HPN Communicator reports to the RP Supervisor and is responsible for providing radiological and environmental information to the NRC on the HPN Line.

B.2.1.13 TSC Emergency Response Facility (ERF) Communicator

The ERF Communicator reports to the TSC ED. The ERF communicator is responsible for staffing continuous communications links with their CR, OSC, EOF and JIC counterparts.

B.2.1.14 TSC Security Supervisor

The Security Supervisor reports to the TSC Manager. The TSC Security Supervisor is responsible for carrying out the plant security and Access Control program, maintaining personnel accountability onsite, and assisting in evacuation of onsite areas.

B.2.1.15 TSC Support Coordinator

The Support Coordinator reports to the TSC Manager and directs the clerical and logistic activities in the TSC, ensures support staff, including clerks, status board keepers, and communicators, are available in sufficient numbers, and ensures office supplies, drawings, and other documents are available to TSC and OSC personnel.

B.2.2 Operations Support Center (OSC)

See Figure B.2.2.A at end of Section B.

B.2.2.1 OSC Manager

The OSC Manager reports to the TSC Manager and directs a staff in providing labor, tools, protective equipment, and parts needed for emergency repair, damage control, firefighting, search and rescue, first aid, and recovery.

B.2.2.2 OSC Mechanical Maintenance Group Lead

The Mechanical Maintenance Group Lead reports to the OSC Manager and provides oversight for Mechanical Maintenance personnel. Their responsibilities include planning the activities, briefing and debriefing the teams, tracking job progress, and maintaining periodic communication with the teams.

B.2.2.3 OSC Electrical Group Lead

The Electrical Group Lead reports to the OSC Manager and provides oversight for Electrical Maintenance personnel. Their responsibilities include planning work activities, team member selection and briefing, tracking job progress, and maintaining communication.

B.2.2.4 OSC RP/Chemistry Group Lead

The RP/Chemistry Group Lead reports to the OSC Manager and provides oversight for RP and Chemistry Technicians. Their responsibilities include onsite radiological surveys, access control, personnel monitoring and decontamination, dosimetry issuance and monitoring, and onsite habitability surveys.

B.2.2.5 OSC I&C Group Lead

The I&C Group Lead reports to the OSC Manager and provides oversight for I&C Maintenance personnel. Their responsibilities include planning work activities, team member selection and briefing, tracking job progress, and maintaining communication.

B.2.2.6 OSC ERF Communicator

The ERF Communicator reports to the OSC Manager and is responsible for maintaining communications with their counterpart in the Control Room, TSC, EOF, and JIC.

B.2.2.7 OSC Personnel

Selected personnel report to the OSC as directed. Emergency personnel from the Maintenance, Operations, and RP/Chemistry Departments are directed to report to the OSC. OSC teams are headed by a designated team leader, who maintains communication with the OSC. The following emergency teams may be formed by OSC personnel, as necessary:

- Search and rescue.
- Repair.
- Post-accident sampling.
- Internal survey.
- Field monitoring.

B.3 Offsite Emergency Response Organization (ERO)

The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company corporate offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.1.D and B.1.E. The EOF and JIC Organizations may also include state and local personnel.

B.3.1 EOF Organization

The EOF Organization consists of selected management and staff members located in the SNC Corporate Office. This organization is responsible for providing offsite emergency response support and resources, as needed. The EOF Organization is displayed on Figure B.1.D. When the EOF is activated, EOF staff electronic devices are activated, and EOF personnel are expected to report to the EOF. Personnel who are not needed to augment positions are briefed and dismissed with a standby status.

See Figure B.3.1.A at end of Section B.

B.3.1.1 EOF Emergency Director

The EOF ED has overall coordinating authority for Southern Nuclear Company resources. Upon EOF activation, the EOF ED accepts responsibility for Notification and Protective Action Recommendation functions from the Control Room. The EOF ED is also responsible for keeping SNC corporate management informed regarding the emergency response and Classification upgrades.

B.3.1.2 EOF Manager

The EOF Manager reports to the EOF ED and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment, as necessary, coordination with offsite agencies and approving news releases.

B.3.1.3 EOF Support Coordinator

The Support Coordinator reports to the EOF Manager. The duties and responsibilities of the Support Coordinator in the EOF include providing oversight of the News Writer, providing assistance to the Support Coordinator in the TSC for ordering equipment and materials, and logistics arrangements for support personnel called in to assist in the emergency, including communications hardware, transportation, food, and lodging.

B.3.1.4 EOF Dose Assessment Supervisor

The Dose Assessment Supervisor reports to the EOF Manager and provides oversight of dose assessment, field team control, and protective action recommendation activities in the EOF; and coordinates communication of results with offsite agencies.

B.3.1.5 EOF Dose Analyst

The Dose Analyst reports to the Dose Assessment Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.

B.3.1.6 EOF Field Team Coordinator

The Field Team Coordinator reports to the Dose Assessment Supervisor. The Field Team Coordinator develops the environmental sampling strategy in response to potential radiological releases and advises the Dose Assessment Supervisor and Dose Analyst of measured radiological values in the environment.

B.3.1.7 EOF Field Team Communicator

The Field Team Communicator reports to the Field Team Coordinator. The Field Team Communicator is responsible for communications with the Environmental Teams, providing them sampling direction and plant status with respect to team safety.

B.3.1.8 EOF Emergency Notification Network (ENN) Communicator

The ENN Communicator in the EOF reports to the Emergency Communication Coordinator and is responsible for providing offsite agency notifications and periodic updates.

B.3.1.9 EOF Emergency Notification System (ENS) Communicator

The ENS Communicator reports to the Emergency Communication Coordinator and is responsible for ensuring NRC notifications applicable to EOF operations are completed in accordance with the requirements of 10 CFR 50.72 and 73.

B.3.1.10 EOF Emergency Communications Coordinator

The Emergency Communications Coordinator reports to the EOF Manager. The Emergency Communications Coordinator is responsible for assisting with the coordination and facilitation of communications both within the facility as well as with external agencies.

B.3.1.11 EOF Security Coordinator

The Security Coordinator reports to the EOF Manager. The duties and responsibilities of the Security Coordinator will be assumed by SNC corporate personnel. Responsibilities include supporting the plant security manager, keeping the EOF Manager informed of any security events or issues, communication of Security Related information to the NRC using the security bridge line, and as establishing and maintaining access control for the EOF.

B.3.1.12 EOF Offsite Response Coordinator

The Offsite Response Coordinator reports to the EOF Manager. The duties and responsibilities of the Offsite Response Coordinator include coordination of activities for the dispatch and update of technical liaisons to state and local authorities and monitoring EOF functional areas to facilitate coordination between the licensee and state and local agencies.

B.3.1.13 EOF Health Physics Network (HPN) Communicator

The HPN Communicator reports to the Dose Assessment Supervisor and is responsible for providing radiological and environmental information to the NRC using the HPN Line.

B.3.1.14 EOF Administrative Support Staff

The Administrative Support Staff report to the EOF Support Coordinator. The administrative support staff is responsible for providing clerical and administrative

support to the Emergency organization, making entries to and retrieving data from the Nuclear Network, retrieval of file documents, and updating status boards using information provided from the sites.

B.3.1.15 EOF Liaisons

Liaisons report to the Offsite Response Coordinator and respond to the applicable state and county Emergency Operations Centers (EOCs) as required by the type and source of the event. Liaisons are assigned to Georgia, Alabama, and/or South Carolina state EOCs depending on which SNC site declared the initiating event.

B.3.1.16 EOF Emergency Response Facility (ERF) Communicator

The ERF Communicator reports to the EOF Emergency Director and is responsible for maintaining communications with their counterpart in the Control Room, TSC, OSC, and JIC.

B.3.1.17 EOF Nuclear Spokesperson

The Nuclear Spokesperson speaks on behalf of the company, providing plant status updates during news briefings. The Spokesperson also may do one-on-one media interviews. The position works with the Technical Assistant in keeping abreast of the event status and keeps the Public Information Director (PID) posted on that status.

B.3.1.18 EOF Technical Assistant

The Technical Assistant reports to the Nuclear Spokesperson and is responsible for gathering accurate and timely information about the event and the plant's status from displays, the ERF Communicator, ENN Forms and direct contact with the EOF Manager.

B.3.1.19 EOF Technical Supervisor

The Technical Supervisor reports to the EOF Manager and is responsible for providing engineering expertise during an emergency event at an SNC-operated plant. This may include interacting with non-SNC response groups, developing mitigation and recovery plans, and coordinating work performed by SNC and non-SNC engineering groups.

B.3.1.20 EOF News Writer

The News Writer reports to the EOF Manager, gathers information, and prepares news bulletins verified for distribution. The News Writer coordinates technical approval with the EOF Manager and Nuclear Spokesperson.

B.3.2 Joint Information Center (JIC)

See Figure B.3.2.A at end of Section B.

B.3.2.1 JIC Public Information Director (PID)

The PID is responsible for coordination of emergency information between the utility and responding offsite organizations participating in the Joint Information Center (JIC). Additional duties include managing approval and dissemination of utility news bulletins, facilitating news briefings, overseeing public response, serving as liaison to

the media and coordinating offsite agencies. The PID is responsible for evaluating the emergency's severity in terms of public interest and safety.

B.3.2.2 JIC Manager

The JIC Manager reports to the PID and supervises the activities of the technical and communications advisors, technical communicator and an administrative staff. The JIC Manager responsibilities include:

- Providing the EOF Manager with an overview of the public and media impacts of plant and governmental activities.
- Advising the Nuclear Spokesperson regarding information to be released to the public.
- Maintaining up-to-date knowledge of conditions of the plant and environment, and the actions of SNC and governmental support personnel.
- Coordinating with the state to review and access media coverage of the emergency event.

B.3.2.3 JIC Assistant

The JIC Assistant reports to the JIC Manager and is responsible for supervision and direction of clerical staff in the facility; verification, approval, and distribution of news bulletins; direction of support staff activities; and maintenance of an accurate record of facility activities.

B.3.2.4 JIC Facility Coordinator

The Facility Coordinator reports to the JIC Manager and is responsible for setting up the facility and ensuring ongoing operability, as well as providing oversight for facility Security personnel.

B.3.2.5 JIC Public Response Coordinator

The Public Response Coordinator reports to the PID and is responsible for directing the facility's public response activities, keeping staff informed of the most current plant status, and obtaining responses for rumors and public inquiries.

B.3.2.6 JIC Public Response Staff

The Public Response Staff reports to the Public Response Coordinator and is responsible for coordinating and developing responses to rumors and public inquiry.

B.3.2.7 JIC Media Relations Representative

The Media Relations Representative reports to the JIC Manager and is responsible for implementing utility media response and supervision of AV staff. This position may assume emergency communications approval authority at the discretion of the PID.

B.3.2.8 JIC ERF Communicator

The ERF Communicator reports to the PID and is responsible for maintaining communications with their counterpart in the Control Room, TSC, OSC, and EOF.

B.4 Contractor and Private Organizations

B.4.1 Vendors and Contractors

Major equipment providers or Architect-Engineers include Westinghouse Electric Corporation, General Electric Corporation, and Bechtel Power Corporation, which can provide the following assistance in an emergency:

- Trained personnel.
- Technical analysis.
- Operational analysis.
- Accident and transient analysis.

B.4.2 Other Utilities

- Other nuclear power plant organizations may provide personnel and equipment. Prior written agreements frequently exist in these situations.
- The unaffected SNC plants provide mutual support;
- Assistance from any nuclear power plant may be requested through an existing INPO link;
- Voluntary Assistance Groups.

B.4.3 Other Organizations

B.4.3.1 Contract laboratories can provide assistance in environmental monitoring and sampling.

B.4.3.2 National Weather Service (NWS) provides up to date meteorological information to the individual nuclear power plants.

B.4.3.3 Local Organizations

Other local organizations are detailed in the site-specific Annexes.

B.5 Letters of Agreement (LOAs)

The respective nuclear power plants have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOA's are referenced in the site-specific plant Annex and the actual letters are maintained in accordance with Emergency Plan procedures.

B.6 Local Emergency Support Organizations

B.6.1 Local Law Enforcement Agencies

Local law enforcement agencies may be called upon to lend assistance during the response to emergencies at any of the SNC-operated nuclear power plants. Details on the services offered are in the SNC plant's site-specific Annex.

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B.6.2 Ambulance Services

Agreements for ambulance services are in place to transport injured personnel from the plants to the designated medical facility. Training is provided for the transport of contaminated personnel, and qualified utility personnel may accompany the ambulance. Details on the services offered are in the SNC plant's site-specific Annex.

B.6.3 Medical Services

Prior arrangements have been made for medical treatment at a variety of facilities. SNC-operated nuclear power plants are supported, and sites offer training to the medical staff in dealing with contaminated injured personnel. Details on the services offered are the SNC plant's site-specific Annex.

B.6.4 Fire Fighting

To supplement the Fire Brigade on-site, agreements are made with local fire departments. Details on the services offered may be found in the SNC plant's site-specific Annex.

TSC 75 Minute Augmentation ERO		
Major Functional Area	Major Task	Position Title
Emergency Direction and Control		Emergency Director
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator
		Health Physics Network (HPN) Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Radiation Protection (RP) Supervisor
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue first aid, & firefighting	
	Personnel monitoring	
	Dosimetry	
Total		13
Note: Site Annexes contain any additional site specific staffing.		
* Security Supervisor is filled by on shift Security Supervisor		
** Support Coordinator does not have a 75-minute Augmentation Time.		

Table 1

OSC 75 Minute Augmentation ERO		
Major Functional Area	Major Tasks	Position Title
Emergency Direction and Control		OSC Manager
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	Not applicable for this facility
	Intra-facility communications	ERF Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Not applicable for this facility
	Offsite surveys	Field Monitoring Team Personnel (2)
	Onsite and in-plant surveys	RP Technicians (2)
	Chemistry/Radio Chemistry	Chemistry Technician
Plant System Engineering, Repair and Corrective Actions	Technical Support	Not applicable for this facility
	Repair and corrective actions	Mechanical Maintenance Group Lead
		Electrical Maintenance Group Lead
		I&C Maintenance Group Lead
Protective Actions	Access Control	RP /Chemistry Group Lead
	<ul style="list-style-type: none"> • RP coverage for repair, corrective actions, search and rescue first aid, & firefighting • Personnel monitoring • Dosimetry 	RP Technicians (2)
Total		13

Table 2

EOF 75 Minute Augmentation ERO		
Major Functional Area	Major Task	Position Title
Emergency Direction and Control	Emergency Operations Facility (EOF) Director	Emergency Director (ED)
		EOF Manager
		Support Coordinator**
		Emergency Communication Coordinator
		Security Coordinator
		Offsite Response Coordinator
		Administrative Support Staff **
		Liaisons (at EOCs)** - GA - AL - SC
Notification / Communication	Notify licensee, state, local and federal personnel & maintain communication	ENN Communicator
		ENS Communicator
		HPN Communicator
	Intra-facility Communications	ERF Communicator
		Nuclear Spokesperson
		Technical Assistant
		News Writer
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite dose assessment	Dose Assessment Supervisor
		Dose Analyst
	Offsite surveys	Field Team Coordinator
	Onsite and in-plant surveys	Not required in this facility
Chemistry/Radio Chemistry	Not required in this facility	
Plant System Engineering, Repair and Corrective Actions	Technical Support	Technical Supervisor
	Repair and corrective actions	Not required in this facility
Protective Actions	Access Control	Not required in this facility
	RP coverage for repair, corrective actions, search and rescue first aid, & firefighting	
	Personnel monitoring	
	Dosimetry	
Total		17

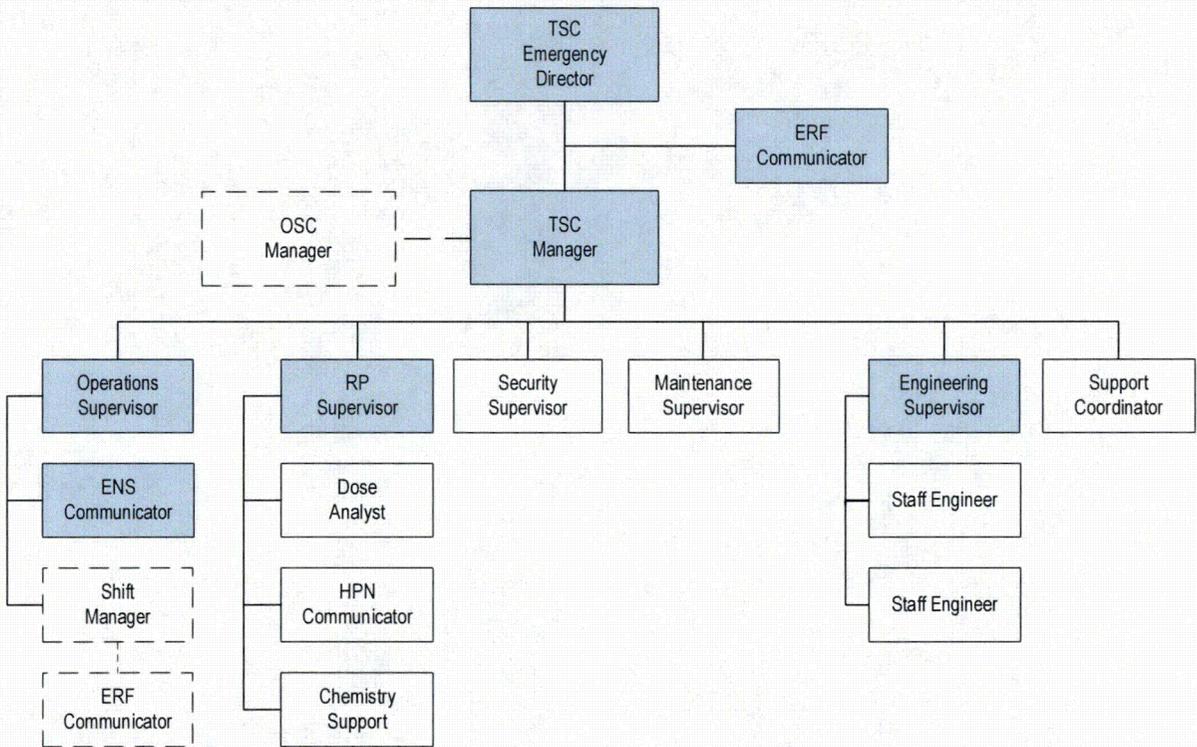
Table 3

**Support Coordinator, Administrative Support Staff, Liaisons (at EOCs) GA, AL, SC do not have a 75 minute Augmentation Time.

JIC 75 Minute Augmentation ERO		
Functional Area	Major Task	Position Title
Media Response	Media Response	Public Information Director
		ERF Communicator
		JIC Manager
		JIC Assistant*
		Facility Coordinator*
		Clerical Staff*
		Security*
		Public Response Coordinator
		Public Response Staff*
		Media Relations Representative
Total		5
Note: * JIC Assistant, Facility Coordinator, Clerical Staff, Security and Public Response Staff do not have a 75-minute Augmentation Time.		

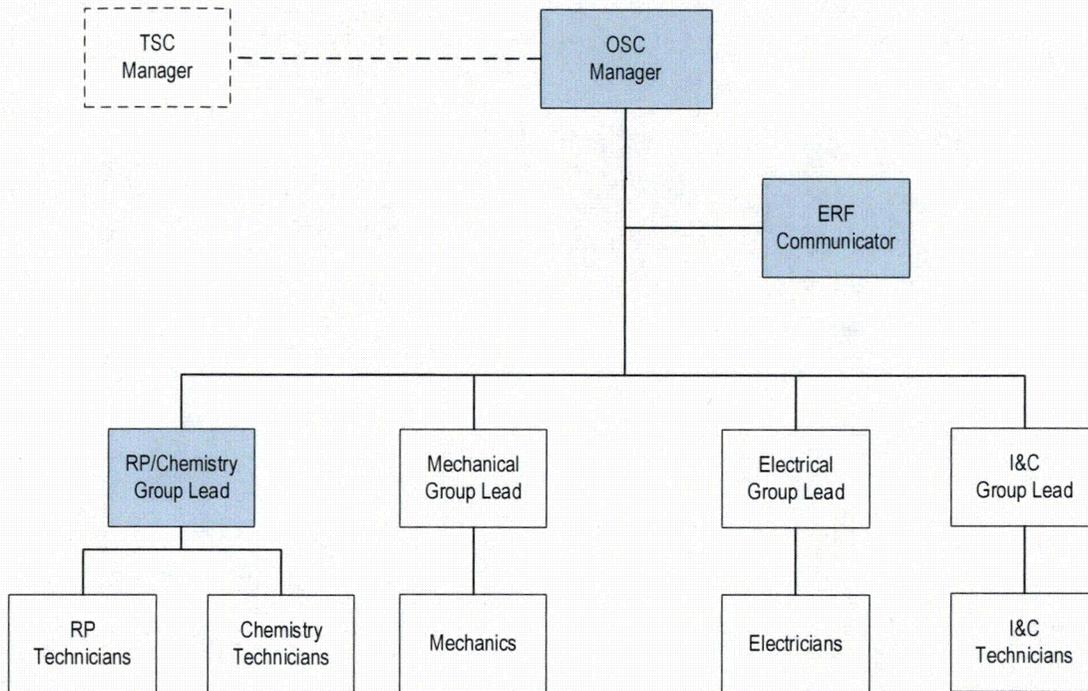
Table 4

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Minimum Staff positions are shaded boxes

Figure B.2.1.A – Technical Support Center Organization



Minimum Staff positions are shaded boxes

Figure B.2.2.A – Operational Support Center Organization

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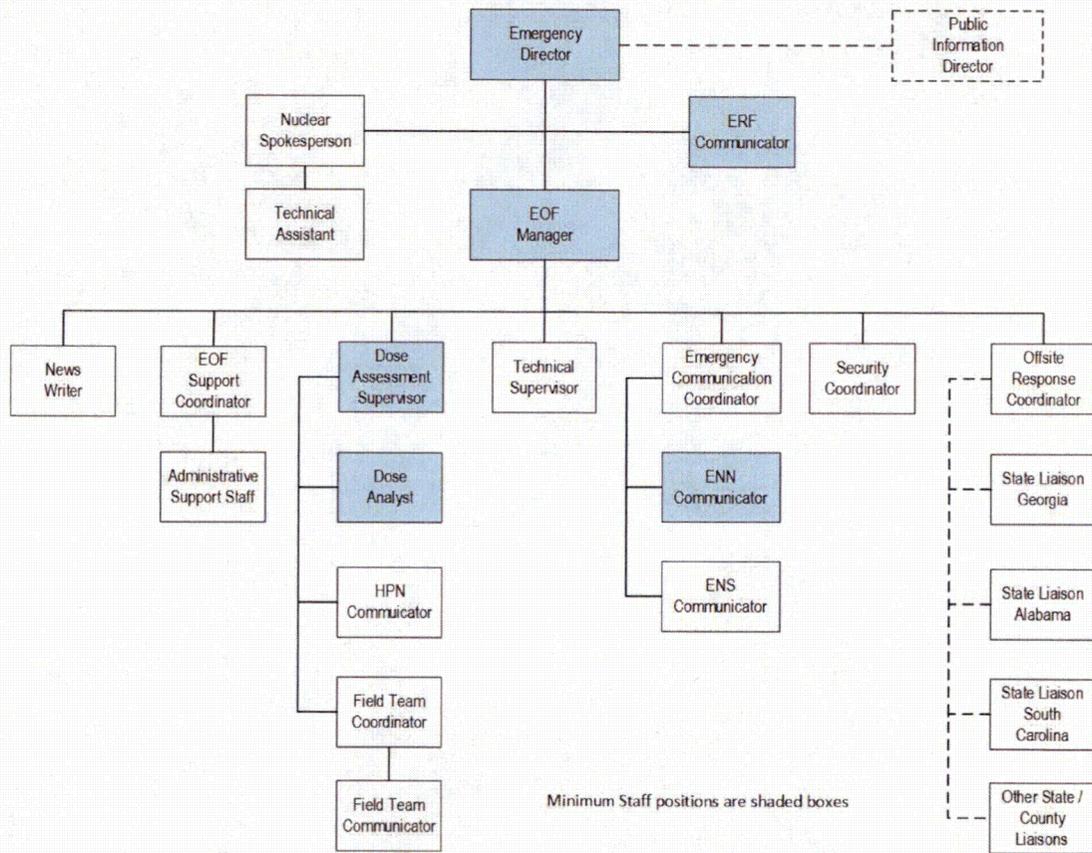
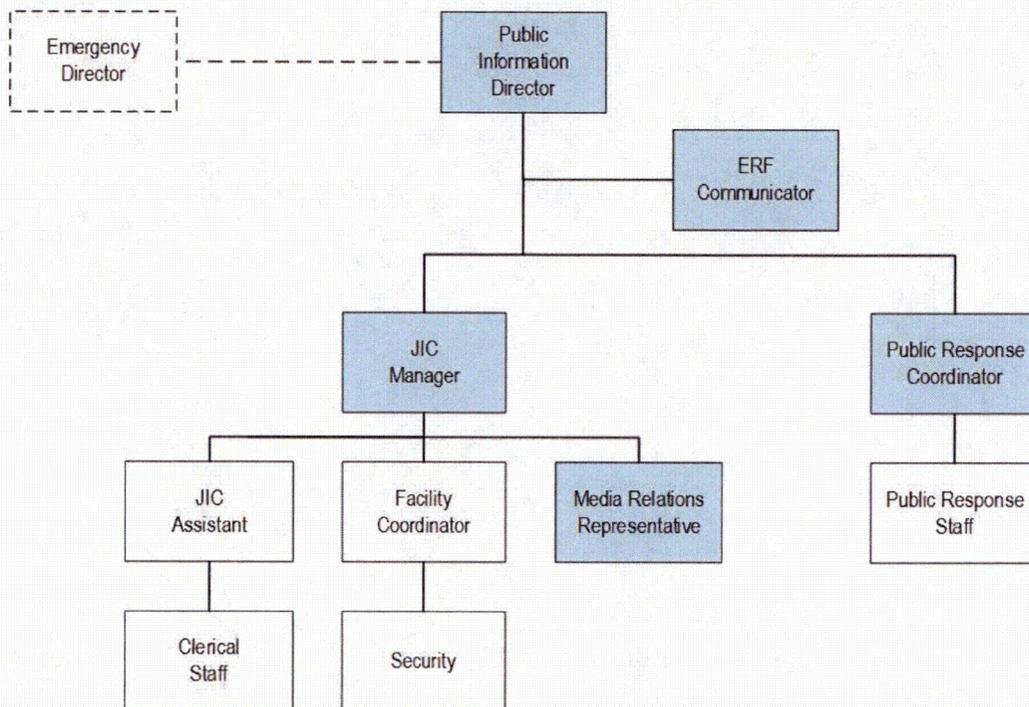


Figure B.3.1.A – Emergency Operations Facility Organization



Minimum Staff Positions are shaded boxes

Figure B.3.2.A – Joint Information Center Organization

SECTION C: EMERGENCY RESPONSE SUPPORT AND RESOURCES

Once an emergency has been declared, the Emergency Director (ED) has the authority and responsibility to request aid from offsite organizations, whether they are other SNC-operated nuclear power plants, federal, state, local, or private organizations.

C.1 Federal Assistance

Federal agencies that may provide assistance in direct support of SNC in the event of an accident are identified in Section A of this plan. If needed, federal resources are expected to be made available to SNC.

C.2 State Interfaces

Designated SNC personnel are assigned to the state or county Emergency Operations Centers (EOCs). Locations have been provided in the EOF for liaisons from the state and county.

C.3 Radiological Laboratories

C.3.1 Onsite Laboratory

The onsite laboratory/counting rooms at SNC-operated nuclear power plants are the primary facility for radiation monitoring and analysis efforts. The onsite laboratory is the central point for receipt and analysis of onsite samples and includes equipment for chemical and radiological analyses. The plant laboratories have the capability of quantitative analysis of marine and air samples, and qualitative analysis of terrestrial samples.

Additional facilities for counting and analyzing samples are available at the other SNC-operated nuclear plants or state and federal laboratory services. These laboratories can act as backup facilities in the event that the affected nuclear power plant's counting room and laboratory become unusable or the capacity or capability of the plant's laboratory is exceeded.

C.3.2 Contract Laboratories

Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.

C.4 Assistance Agreements

C.4.1 Nuclear Industry

The nuclear industry provides a reservoir of personnel with a wide range of technical expertise and knowledge. A nuclear industry national inventory of personnel who may be called upon to supplement company personnel has been developed through the Institute of Nuclear Power Operations (INPO). In addition, a number of utilities have entered into an INPO coordinated Voluntary Assistance Agreement program. This provides a mechanism to draw on industry resources during an emergency. Support may also be requested from neighboring utilities for the following:

- Personnel and equipment to assist with in-plant and emergency field monitoring.

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- Engineering, design, and technical expertise to assist in determining the cause of the accident and to support recovery.
- Personnel and equipment to assist in maintenance and repairs to the facility.

SNC-operated plants are a signatory to two comprehensive agreements among electric utility companies:

- Nuclear Power Plant Emergency Response Voluntary Assistance Agreement.
- Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials.

C.4.2 Offsite resources

SNC supports the sharing of personnel and resources among SNC-operated nuclear power plants, providing a large personnel and equipment base.

C.4.2.1 American Nuclear Insurers (ANI)

ANI provides insurance to cover SNC legal liability up to the limits imposed by the Price-Anderson Act, for bodily injury and/or property damage caused by the nuclear energy hazard resulting from an accident at a nuclear power plant.

C.4.2.2 Civil/Structural Engineers

Plants have an Architect-Engineer that could be called on to provide engineering expertise in dealing with a nuclear power plant accident.

C.4.2.3 Nuclear Steam Supply System Vendor

Under established contracts, the following will supply available engineering expertise, specialized equipment, and other services identified as needed and deemed appropriate to provide in an emergency situation:

- General Electric (GE) Nuclear Energy.
- Westinghouse Electric Company.

C.4.2.4 Supplemental Emergency Assistance to the ERO

SNC-operated nuclear power plants maintain agreements with outside support agencies that do not take part in the organizational control of the emergency, but provide assistance when called on during an emergency or during the recovery phase. These agreements identify the emergency measures to be provided, the mutually accepted criteria for implementation, and the arrangements for exchange of information. These support agencies provide services of:

- Law enforcement.
- Fire protection.
- Ambulance services.
- Medical and hospital support.
- DOE Radiological Assistance Program (RAP).

C.4.2.5 Local Response Organizations

In many cases, local groups provide for emergency communications and other services, such as transportation and medical assistance. References to these groups are contained in the site-specific Annexes.

SECTION D: EMERGENCY CLASSIFICATION SYSTEM

D.1 Classification of Emergencies

D.1.1 Emergency Conditions

D.1.1.1 Emergency classification is divided into four classification levels described in 10 CFR 50 Appendix E and NUREG 0654 and based on NEI 99-01 and 07-01 methodologies.

Emergency Action Levels (EALs), based on indications available in the control room and correlated to the emergency classifications, are provided to the operator.

SNC has and maintains the capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL threshold has been met or exceeded. Upon identification of the appropriate emergency classification level, the emergency condition will be promptly declared.

The classification scheme is provided to and discussed by Southern Nuclear Company, agreed upon by state and county governmental authorities and approved by the NRC. The classification scheme and specific Emergency Action Levels are reviewed with the State and local governmental authorities on an annual basis.

D.1.1.2 Emergency Classification Level Descriptions

There are three considerations related to emergency classification levels. These are:

- (1) The potential impact on radiological safety, either as known now or as can be reasonably projected.
- (2) How far the plant is beyond its predefined design, safety, and operating envelopes.
- (3) Whether or not conditions that threaten health are expected to be confined to within the site boundary.

The Initiating Conditions (ICs) deal explicitly with radiological safety impact by escalating from levels corresponding to releases within regulatory limits to releases beyond EPA Protective Action Guideline (PAG) plume exposure levels.

The four emergency classification levels are described as follows:

UNUSUAL EVENT (UE)

Events are in progress or have occurred which indicate a potential degradation of the level of safety of the plant or indicate a security threat to facility protection has been initiated. No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs.

ALERT

Events are in progress or have occurred which involve an actual or potential substantial degradation of the level of safety of the plant or a security event that involves probable life threatening risk to site personnel or damage to site equipment

because of hostile action. Any releases are expected to be limited to small fractions of the EPA PAG exposure levels.

SITE AREA EMERGENCY (SAE)

Events are in progress or have occurred which involve actual or likely major failures of plant functions needed for protection of the public or hostile action that results in intentional damage or malicious acts toward site personnel or equipment that could 1) lead to the likely failure of, or 2) prevent effective access to, equipment needed for the protection of the public. Any releases are not expected to result in exposure levels that exceed EPA PAG exposure levels beyond the site boundary.

GENERAL EMERGENCY (GE)

Events are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.

D.2 Basis for Emergency Classification Criteria

D.2.1 Emergency Action Levels.

Planned evolutions involve preplanning to address the limitations imposed by the condition, the performance of required surveillance testing, and the implementation of specific controls prior to knowingly entering the condition, in accordance with the specific requirements of Technical Specifications. Planned or unplanned activities that cause the plant to operate beyond the limits allowed by Technical Specifications may result in an EAL threshold being met or exceeded. Planned evolutions to test, manipulate, repair, or perform maintenance or modifications to systems and equipment that result in an EAL value being met or exceeded are not subject to classification as long as the evolution proceeds as planned and is within the operational limitations imposed by the operating license.

Classifications are based on evaluation of the applicable Unit. Classifications are based on valid indications, reports, or conditions. Thresholds assume valid indications. Reports or conditions are considered valid when they are verified by 1) an instrument channel check, or 2) indications on related or redundant indications, or 3) by direct observation by plant personnel, in such a way that any doubt as to the indication's operability, the condition's existence, or the report's accuracy is removed. Implicit in this definition is the need for timely assessment.

Although the majority of the EALs provide very specific thresholds, the Emergency Director must remain alert to events or conditions that lead to the conclusion that exceeding the EAL is imminent. If, in the judgment of the Emergency Director, an imminent situation is at hand, the classification should be made as if the threshold has been exceeded.

An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant

conditions. The ICs are segregated into Recognition Categories. The Recognition Categories are:

- **R** – Abnormal Radiological Levels/Radiological Effluent.
- **C** – Cold Shutdown/Refueling System Malfunctions.
- **E** – Independent Spent Fuel Storage Installations (ISFSI).
- **F** – Fission Product Barrier.
- **H** – Hazards and Other Conditions Affecting Plant Safety.
- **S** – System Malfunction.

With each IC are Threshold Values (TV) that provide the criteria for classification associated with the appropriate classification level. When the IC is observed to exist, the TV must also be met, exceeded or in some cases imminent to become a classifiable Emergency Action Level.

The Fission Product Barrier and System Malfunction criteria are only applicable when in the hot operating modes. The Cold Shutdown/Refueling System malfunctions are only applicable in cold shutdown and Defueled modes or as specifically designated in each EAL. The EALs associated with the Radiological, ISFSI, and Hazards categories are applicable in all modes of operation.

D.2.2 Initiating Conditions have symptom-based, event-based, or barrier-based criteria.

Symptom-based ICs refer to those indicators that are measurable over some continuous spectrum, such as core temperature, coolant levels, or containment pressure. When one or more of these indicators begin to show off-normal readings, reactor operators are trained to identify the probable causes and potential consequences of these "symptoms" and take corrective action. The level of seriousness that these symptoms indicate depends on the degree to which they have exceeded technical specifications, the other symptoms, or events that are occurring contemporaneously, and the capability of the licensed operators to gain control and bring the indicator back to safe levels.

Event-based ICs refer to occurrences with potential safety significance, such as the failure of a safety valve or a loss of electric power to some part of the plant. The range of seriousness of these "events" is dependent on the location, number of contemporaneous events, remaining plant safety margin, and so forth.

Barrier-based ICs refer to the level of challenge to the principal barriers that ensure containment of radioactive materials contained within a nuclear power plant. For radioactive materials that are contained within the reactor core, these barriers are: fuel cladding, reactor coolant system pressure boundary, and containment. The level of challenge to these barriers encompasses the extent of damage (loss or potential loss) and the number of barriers concurrently under challenge. In general, challenge to one or more barriers is initially identified through instrument readings and periodic sampling. Deterioration of the reactor coolant system pressure boundary or the fuel clad barrier usually indicates an Alert condition, two barriers under challenge a Site Area Emergency, and loss of two barriers with the third barrier under challenge is a General Emergency. The fission product barrier criteria

recognize that some events may represent a challenge to more than one barrier, and that the containment barrier is weighted less than the reactor coolant system pressure boundary and the fuel clad barriers.

D.2.3 Emergency Action Level Threshold Values

The most common bases for establishing Threshold Values are the Technical Specifications, Operating Procedures, the Offsite Dose Calculation Manual (ODCM), and setpoints that have been developed in the design basis calculations for the Final Safety Analysis Report (FSAR).

Another critical element of the analysis to arrive at Threshold Value conditions is the time that the plant might stay in that condition before moving to a higher emergency classification level. The time dimension is critical to the EAL, since the purpose of the emergency classification level for state and local officials is to notify them of the level of mobilization that may be necessary to address the emergency. This is particularly true when a Site Area Emergency or General Emergency is imminent. A time variable is used to allow for correction of the condition before a classification is made.

Site-specific Threshold Values for Emergency Action Level Initiating Conditions are maintained in the station's Emergency Action Level Technical Basis document.

D.2.4 Treatment of Multiple events and Classification Level Upgrading

When multiple simultaneous events occur, the emergency classification level is based on the highest EAL reached. Emergency classification level upgrading considers the potential for radioactive release from the entire site due to the event or simultaneous events.

D.2.5 Emergency Classification Level Downgrading and Termination

The SNC policy is that once an emergency classification is made, it cannot be downgraded to a lower classification. Termination criteria contained in the Emergency Plan Implementing Procedures shall be completed for an event to be terminated. At termination, on an event specific basis, the site can either enter normal operating conditions or enter a recovery condition with a recovery organization established for turnover from the ERO.

D.2.6 Classifying Transient Events

Many of the Initiating Conditions and/or EALs described in this document employ time-based threshold criteria. These criteria will require that the threshold conditions be present for a defined period of time before an emergency classification is warranted. In cases where no time-based criteria are specified, it is recognized that some transient events may cause an EAL threshold to be met for a few seconds to a few minutes. The following guidance should be applied to the classification of these events.

EAL threshold momentarily met during expected plant response - There may be instances where an EAL threshold is briefly met during an expected plant response. In these cases, an emergency declaration is not warranted, provided that systems

and components are operating as expected, and associated operator actions are appropriate.

EAL threshold met but the condition clears or is corrected prior to emergency declaration - The key consideration is to determine if any plant damage occurred as a result of the transient event.

- If plant damage is readily apparent, or if further assessment is necessary to confirm or rule out such damage, then the EAL threshold should be considered met and the appropriate emergency declaration made. Terminate the emergency if the assessment determines that there was no plant damage from the event and when other termination criteria are met.
- If no plant damage is readily apparent and no further damage assessment is warranted, no emergency declaration is required; however, the event should be reported to the NRC per 10 CFR 50.72 within one hour, and notification of the state and local emergency response organizations should be made in accordance with the arrangements made between the site and offsite organizations.

EAL threshold met but classification was not made at the time of the event. - This situation occurs when personnel discover that a condition existed which met an EAL threshold but no emergency was declared and the condition no longer exists at the time of this discovery. This may be due to the emergency condition not being recognized at the time, or an error was made in the emergency classification process. In these cases, the guidance contained in NUREG-1022, section 3.1.1 is applicable. Specifically, the event should be reported to the NRC per 10 CFR 50.72 within one hour of the discovery of the undeclared event, and notification of the state and local emergency response organizations should be made in accordance with the arrangements made between the site and offsite organizations.

D.2.7 Operating Mode Applicability

The plant operating mode that existed at the time that the event occurred, prior to any protective system or operator action initiated in response to the condition, is compared to the mode applicability of the EALs. If an event occurs, and a lower or higher plant operating mode is reached before the emergency classification level can be declared, the emergency classification level shall be based on the mode that existed at the time the event occurred.

SECTION E: NOTIFICATION METHODS AND PROCEDURES

E.1 Notification Methodology

E.1.1 SNC, in cooperation with state and county authorities, has established methods and procedures for notification of offsite response organizations consistent with the emergency classification and emergency action level scheme. These notifications include a means of verification or authentication. The methods used for authentication are developed and mutually agreed to by the utility and offsite authorities. The primary notification method will be by a dedicated communications system.

SNC-operated plants maintain the capability of notifying state and local agencies within 15 minutes of a declared emergency as required by 10CFR50 Appendix E, IV.D.3. The methods and forms used for notifying state and county authorities are site-specific, and detailed in plant specific Emergency Plan Implementing Procedures (EPIPs).

NRC will be notified by the Headquarters Operations Officer immediately following state and local notifications, but within an hour of an emergency classification.

When multiple units of a multi-unit site are affected by an emergency, the classification shall be reported as applicable to all affected units. In situations where multiple units of a multi-unit site are affected by emergency events, but the events are not related and the classification for each unit is different, notification will be made for the highest classification.

An accelerated call to the NRC Headquarters Operations Officer will be made following discovery of an imminent threat or attack against a plant. During a plant transient or an imminent threat situation requiring physical security response, plant personnel are primarily responsible for stabilizing the plant and keeping it safe. An accelerated notification will not interfere with plant or personnel safety or physical security response.

The accelerated notification will be completed after or concurrent with notification of local law enforcement agencies. The goal will be to initiate the notification within 15 minutes of discovery of an imminent threat or attack against a plant. The information provided in the accelerated notification will be limited to the following:

- Site name.
- Emergency classification if determined prior to the accelerated notification.
- Nature of the threat and the attack status.

E.2 Notification of Personnel

E.2.1 Notification of Onsite Personnel

The Emergency Director is responsible for classifying an event into the appropriate emergency classification and then notifying on-site personnel of the emergency declaration in accordance with procedures. This notification may consist of the use of the plant emergency alarm, announcements over the plant public address system, or activation of the recall system.

Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level. In the event of a Design Basis Threat, personnel may be directed to respond to alternative facilities.

Notification of persons who are in the public access areas, on or passing through the site, or within the controlled area, will be performed by the Security Department. Such notifications will be in accordance with the Emergency Plan Implementing Procedures (EPIPs).

Visitors within the protected area are escorted by a permanently badged individual. This individual is responsible for informing the visitors of emergencies when they occur and for taking action to evacuate the visitors from the site, as necessary.

Notification procedures include notification of Emergency Response Organization Personnel (ERO) not on site or during backshift hours. ERO members will be notified by means of an automated callout system activated by on-shift personnel.

E.2.2 Notification of State and local Authorities

A dedicated ENN will normally be used to accomplish state and local notifications. Backup means of communication are described in Section F, Emergency Communications, of this plan.

E.2.2.1 State and Local Agencies

State and local agencies listed in the site specific Annexes shall be notified within fifteen (15) minutes of:

- The initial emergency classification.
- Classification change.
- The issuance of, or change to, a Protective Action Recommendation (PAR).

E.2.2.2 Initial Notification Message Form

In conjunction with state and county authorities, SNC-operated plants have established the contents of the initial and subsequent state notification message forms to be used during an emergency. These forms are described in EPIPs. The content of the forms has been reviewed and agreed on by the respective Offsite Response Organizations.

E.2.2.3 Follow-up Emergency Message

The Emergency Director is responsible for the completion of a follow-up emergency message. The appropriate ERO personnel will ensure the emergency communicator(s) periodically provide follow-up messages to the appropriate offsite federal, state, and local authorities.

E.2.3 Notification of the Nuclear Regulatory Commission (NRC)

The NRC is notified via the ENS. If the ENS is inoperative, the required notification will be made using alternate means in accordance with regulatory requirements. The Emergency Response Data System (ERDS), will be initiated within one hour of the declaration of an Alert or higher classification.

Specific information on the notifications to the NRC for emergency events is detailed in the reporting requirements of 10 CFR 50.72.

E.2.4 Notification of Other Federal Agencies

Notification of other Federal Agencies will be made in accordance with site specific Procedures.

E.2.5 Notification of the Public

Prompt alerting and notification of the public within the plume exposure pathway EPZ is the obligation of state and local government or other responsible authority. The responsibility for ensuring the means exist to carry out this purpose rests with Southern Nuclear Operating Company. An overview of these means excluding the Savannah River Site is listed in the site specific Annex of this Plan.

Initial notification of the public will occur in a manner consistent with assuring the public health and safety. The design objective for the system is to meet the acceptance criteria provided in a subsequent section of the FEMA approved design report for each SNC-operated plant. The design objective does not constitute a guarantee that prompt notification can be provided for everyone with 100 percent assurance, or that the system when tested under actual field conditions will meet the design objectives.

In the event of an emergency, the Emergency Director is responsible for notifying appropriate state and local response organizations, plant emergency response organization, and plant personnel.

E.2.5.1 Concept of Operations

In the event of a serious emergency at any SNC site, the primary means for alerting the public will be by the FEMA approved Alert and Notification System (ANS) referenced in the site specific Annex.

Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system. Details of the backup methods can be found in the site specific Annex.

Detailed information and instructions will be provided on local EAS radio and television stations. Commercial radio stations and television stations whose broadcasts are received in the plume exposure pathway EPZs have agreed to broadcast emergency instructions and information in cooperation with offsite officials.

These continuing instructions will provide more specific or detailed information of any protective actions advised for affected areas. Information on the nature of the accident, on any releases, and on the progress in ameliorating or terminating the emergency event, will also be provided periodically on the commercial stations, along with a prognosis for escalation or termination of the event.

E.2.5.2 Criteria for Acceptance

1. Within the plume exposure pathway EPZ, the prompt alerting and notification system will provide an alerting signal and notification by fixed sirens; further notification will be provided by local commercial radio and television stations activated by EAS.
2. The minimum acceptable design objectives for coverage by the system are:
 - a) Capability for both an alerting signal and an informational or instructional message to the population on an area-wide basis throughout the plume exposure pathway EPZ, within 15 minutes.
 - b) The initial notification system will assure direct coverage of essentially 100 percent of the population within five miles of the site.

These design objectives have been met by FEMA approved ANS Design report referenced in the site specific Annex.

3. Local and state agencies have the capability to provide information promptly over local commercial radio and television at the time of the activation of the alerting signal. Authority for activation of the EAS, which permits designated governmental officials to issue emergency information and instruction in threatened or actual emergencies, is given by 47CFR part 11, EAS Rules.

Information will be distributed on an annual basis to residents and businesses within the EPZ.

The testing and maintenance of the public alerting sirens are the responsibility of SNC. The maintenance program will consist of both periodic routine checks and, as required, corrective maintenance.

The periodic routine maintenance and test program will be based on the manufacturers' recommendations and experience gained with the installation.

Annually, the system will be activated in the normal mode. Advance notice of the test will be provided to the public. Activation of sirens will be verified by the system. Reports of siren failures will be investigated and repaired by the respective SNC site.

Unsatisfactory conditions detected by any means will be promptly repaired.

State and local emergency management will detail the Prompt Notification System (PNS) activation.

Activation of the alert and notification system (ANS) is discussed in the offsite agencies' specific emergency response plans.

E.2.6 Public Protective Action Messages

State and local authorities have developed procedures and messages to be provided to the public in the event of an emergency at an SNC-operated nuclear power plant. Details of these procedures and messages are in the appropriate state and local emergency plans.

E.2.7 Verification of Notification Messages

The SNC emergency notification form is transmitted electronically to the responsible state and local agencies using a secure data sharing system provided by SNC. Once transmitted to the OROs, the receipt of this information is confirmed using a dedicated communications link. In the event an agency is unable to obtain the emergency notification form electronically, the affected agency will be contacted using a dedicated communication link and the content of the form will be communicated verbally to the agency. As these systems are dedicated systems, no additional verification of the authenticity of the message is required for verification of messages with state and local agencies in the states of Alabama and Georgia. Communications with agencies in the state of South Carolina will be authenticated using the authentication system provided by the South Carolina Emergency Management Division. In the unlikely event both the electronic notification transmittal capability and dedicated communications links are lost then the emergency notification form will be communicated verbally using commercial telephone lines, and the receiving agency may verify authenticity of the message by calling the licensee back.

SECTION F: EMERGENCY COMMUNICATIONS

F.1 Communications

- F.1.1 At SNC-operated nuclear power plants, several modes of reliable communication are available, during both normal and emergency conditions, to transmit and receive information among the Control Room, TSC, OSC, EOF, and other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established.

The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.

- F.1.2 SNC-operated plants maintain the capability to make initial notifications to the designated offsite agencies 24 hours per day. Offsite notifications can be made to state and county warning points and Emergency Operations Centers from the Control Room, Technical Support Center, and Emergency Operations Facility using the ENN. Reliable backup methods have been written into procedures. State and county warning points are continuously staffed.

- F.1.3 Provisions exist for continuous communications with state and local governments within the Emergency Planning Zones, as detailed above. At least one on-site and one offsite communications system is maintained, each with a backup power source to ensure continuous communications.

- F.1.4 SNC has established communications systems to provide reliable communications with federal emergency response organizations. Communications with federal agencies is primarily by commercial telephone, with alternate systems being utilized as needed.

Communication with the Nuclear Regulatory Commission (NRC) is on the Federal Telephone System (FTS) telephone network, which connects the SNC plant site and EOF with the NRC Operations Center. Site extensions are located in the Control Room, TSC, and Site NRC Resident Inspector's Office. Site extensions include ENS, HPN, ERDS, and other designated counterpart links connecting to the NRC Operations Center.

Commercial telephone lines serve as the backup to the ENS and other FTS lines.

- F.1.4.1 NRC Emergency Notification System (ENS)

This communications line provides a communications link to the NRC Operations Center in Rockville, Maryland, and is used for continuous communications in a classified emergency.

- F.1.4.2 NRC Health Physics Network (HPN)

This communications line provides a communications link with the NRC to provide radiological information.

F.1.4.3 NRC Reactor Safety Counterpart Link (RSCL)

This communications line provides a communications link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.

F.1.4.4 Protective Measures Counterpart Link (PMCL)

This communications line provides a communications link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.

F.1.4.5 Management Counterpart Link (MCPL) (Executive Bridge Line)

This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.

F.1.4.6 Security Bridge Line

This communications line provides a communications link with the NRC to provide security-related information by the site team with access to the NRC Headquarters Operations Center LAN

F.1.4.7 Southern Company Network Access

This communications line provides the NRC site team with access to the NRC Operations Center's LAN. LAN connections are provided on the Southern Company network.

F.1.4.8 Emergency Response Data System (ERDS)

ERDS is a dedicated network and is a direct near real-time electronic data link between the plant's on-site computer system and the NRC Operations Center. It provides for the automated transmission of a limited data set of selected parameters.

F.1.5 SNC-operated nuclear power plants have reliable communications between the plants and the EOF, state and local emergency operations centers, and radiological monitoring teams, as detailed above.

F.1.6 SNC-operated nuclear power plants use an automated ERO Notification System to rapidly notify members of the ERO. The system is designed with redundant power, and with geographic separation.

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SNC Emergency Communications Matrix																				
	On Site						State					Counties								
	Control Room	TSC	OSC	EOF	JIC	Assembly Area	Alabama EOC	Georgia EOC	South Carolina EOC	Aiken	Allendale	Appling	Barnwell	Burke	Early	Henry	Houston	Jeff Davis	Tattnall	Toombs
SNC Phone System	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Commercial Phones	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Sound Powered Phones	X																			
Emergency Notification Network (ENN)	X	X		X			X	X	X	X	X	X	X	X	X	X	X	X	X	X
Radios	X	X	X	X																
Public Address (PA)	X	X	X			X														
NRC Line Access	X	X		X																
Emergency Response Data System (ERDS)	X	X						X												

Table 5

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F.2 Medical Emergency Communications

Communications have been established between the primary and backup medical hospitals and transportation services with SNC-operated plants.

F.3 Communications Tests

Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages in the test.

- Communications with state and local governments within the plume exposure pathway will be tested monthly.
- Communications with federal response organizations and state governments within the plume exposure pathway will be tested quarterly.
- Communications between SNC-operated nuclear power plants, state Emergency Operating Centers and local Emergency Operations Centers, and radiation monitoring teams will be tested annually.
- Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.
- The Emergency Response Data System (ERDS) will be tested on a quarterly basis.
- The fixed siren portion of the Alert and Notification System (ANS) will be tested and verified in accordance with existing FEMA approvals.

SECTION G: PUBLIC EDUCATION AND INFORMATION

G.1 Purpose

Southern Nuclear Company (SNC) will provide education and emergency information to the public consisting of the following:

- The release of information to the public through the dissemination of timely, accurate emergency communications.
- The orderly flow of emergency information during the recovery period.
- Providing public education and information for the distribution of emergency preparedness materials to residents and transient populations.

G.2 News Media Training

A program will be offered each calendar year to acquaint the news media with the methodology for obtaining information during an emergency and with overall emergency preparedness at APC/GPC nuclear plants, as appropriate. Training will include information about the plant, emergency response, and the role of the JIC, as well as opportunities to participate in drill activities.

G.3 News Releases

The Utility will issue news releases covering events, conditions, and actions at the Plant. News releases are designed to be a written confirmation of events and are public information.

The SNC News Writer will write news releases in the EOF and obtain SNC approval from the EOF Manager, then forward them to the JIC as appropriate. The Facility Manager at that location will obtain communications approval and direct distribution of the release.

G.4 Press Briefings

Press briefings will be conducted to keep the media informed of events and activities relating to the emergency. Briefings will provide the most current, up-to-date information about events and response to the incident. Public Information Officers (PIOs) from all offsite agencies responding to the emergency will be encouraged to participate in the briefings to discuss their particular activities.

G.5 Public Response

All appropriate information will be released as clearly, concisely, and quickly as possible. Public announcements will be made on a frequent and regular basis.

G.6 Resource Materials

Media guides are available on the Utility websites and are accessible from the JIC. These guides are updated regularly and are available to all news media.

An emergency web page will be activated and will replace the normal web page on the appropriate Utility's website at the PID's discretion.

Maps, photographs, and diagrams of the plant and its operations are stored and maintained at the JIC for use during news briefings

G.7 Public Information Plan For Recovery

The lead emergency communications representative in the Recovery Organization will be the Public Information Director. This person or designee will maintain close contact with the Recovery Manager. Emergency communications response will follow the guidelines and procedures described for accident response.

As conditions and public interest warrant, additional Public Information personnel will be assigned to support the flow of information concerning recovery operations.

Information for possible release will be cleared with the Recovery Manager and the Public Information Director and given to the media through established procedures.

All information will be released through established channels of communication to federal and state authorities, the utility industry, the public, and employees.

Advance notice will be given to the public through the media, of any Company action that will or may affect the health and safety of the plume exposure pathway EPZ residents. Information of this type will be followed up with a news release as soon as the results of any such action are known.

G.8 Public Information and Education Program

The goal of the public information program is to acquaint the general public with the emergency plans for the operation of APC/GPC nuclear plants, as appropriate, and actions they should take in the event of a plant emergency.

Emergency information is disseminated each calendar year for residents in the plume exposure pathway Emergency Planning Zone.

SECTION H: EMERGENCY FACILITIES AND EQUIPMENT

H.1 Onsite Emergency Response Facilities

SNC-operated nuclear power plants have established a TSC and an onsite OSC, which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. Emergency Response Facilities may be activated at an Unusual Event at the discretion of the Emergency Director. Until the TSC and OSC are activated, required functions of these facilities are performed in the Control Room.

H.1.1 Control Room

The Control Room is the centralized onsite location from which the plant's reactors and major plant systems are operated. The Control Room is equipped with instrumentation to supply detailed information on the reactors and major plant systems. The Control Room is continuously staffed with qualified, licensed operators, and is the first onsite facility to respond to emergency events. Control Room personnel evaluate and effect control over emergencies until support centers can be activated. As other Emergency Response Facilities (ERFs) become activated, they will support the Control Room, and overall Command and Control of the emergency will transfer to the TSC. Offsite Agency Notification and Protective Action Recommendation determination will transfer to the EOF. Control Room activities may include:

- Reactor and plant control.
- Initial direction of plant related operations.
- Accident recognition, classification, mitigation and initial corrective actions.
- Alerting of onsite personnel.
- Notification of appropriate individuals.
- Activation of emergency response facilities and ERO notification.
- Notification of offsite agencies.
- Notification and update of the NRC via ENS.
- Continuous evaluation of the magnitude and potential consequences of any incident.
- Recommendations for immediate protective actions for the public.
- Activation of the Emergency Response Data System (ERDS).

H.1.2 Technical Support Center (TSC)

SNC-operated nuclear power plants have established a TSC for use during emergency situations by plant management, technical, and engineering support personnel. The TSC is procedurally required to be activated within 75 minutes following the declaration of an Alert or higher classification. Activation for Unusual Events or unclassified incidents is optional. When activated, TSC functions include:

- Support for the Control Room's emergency response efforts.
- Performance of response management functions when in Command & Control.
- Continued evaluation of event classification.
- Assessment of the plant status and potential offsite impact.

- Coordination of emergency response actions.
- Notification of appropriate corporate and plant management.
- Notification and update of the NRC via the ENS.
- Notification and update of the NRC via Health Physics Network (HPN).

The TSC is the on-site location used to support the Control Room for assessment of plant status and for implementation of emergency actions. TSC personnel provide technical data and information to the EOF. Each TSC provides reliable voice and electronic communications to the Control Room, the OSC, the EOF, the NRC, and state Emergency Operations Centers.

The TSC is sized to accommodate ERO responders and NRC Representatives. State and county personnel are not expected to report to the TSC. Personnel in the TSC are protected from radiological hazards, including direct radiation and airborne contaminants under accident conditions, with similar radiological habitability standards as Control Room personnel.

To ensure adequate radiological protection, radiation monitoring equipment has been installed in the TSC, or periodic radiation surveys are conducted. These systems indicate radiation dose rates while in use. In addition, potassium iodide (KI) is available for use.

The TSC has access to a controlled set of drawings and other records, including general arrangement diagrams, piping and instrumentation diagrams (P&IDs), and electrical schematics. The TSC has the capability to display vital plant data, in real time, to be used by knowledgeable individuals responsible for engineering and management support of reactor operations, and for implementation of emergency procedures.

Details of the TSC configuration and location are in the site specific Annexes.

H.1.3 Operations Support Center (OSC)

The OSC has been established to provide an area for coordinating and planning activities and staging personnel and equipment. The OSC responders include groups such as Instrument and Control Technicians, Mechanics, Electricians, Nuclear Chemistry and RP Technicians, Operations personnel, and oncoming shift personnel. Additional space is available to accommodate personnel as required. If the OSC is deemed uninhabitable, the OSC may be moved to other locations as deemed appropriate by the OSC Manager.

Emergency supplies are maintained in the OSC. When an emergency condition exists at one SNC-operated nuclear power plant, additional supplies can be obtained from other unaffected plants and SNC resources upon request.

Details of the OSC configuration and location are in the site specific Annexes.

H.1.4 Alternative Facilities

An Alternative Facility for staging of ERO personnel has been designated at the sites. In the event of a Security or Hostile Action threat or event, the designated Alternative Facility may also serve as an evacuation location for TSC and OSC personnel. The Alternative Facility is designed to be accessible in the event of an onsite HAB event and has the capability to:

- Communicate with the Control Room, Security, and the EOF.

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- Conduct engineering assessment activities including damage control team planning and preparation.

The functions of Notification and PARs will be performed from the EOF should the Alternative Facility be activated. Details of Alternative Facilities can be found in the Site Specific Annex.

H.2 Offsite Emergency Facilities

H.2.1 Emergency Operations Facility

The EOF is the central location for management of the offsite emergency response, coordination of radiological assessment, and management of initial recovery operations. The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP). Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification. The EOF provides for:

- Management of overall emergency response.
- Coordination of radiological and environmental assessments.
- Protective Action Recommendations.
- Notification of Offsite Agencies.
- Management of recovery operations.
- Notification and update of the NRC via ENS.
- Notification and update of the NRC via Health Physics Network (HPN).
- Coordination of emergency response activities with federal, state, and local agencies.

The EOF is capable of accommodating designated SNC personnel and offsite local, state and federal responders including NRC and FEMA. It is anticipated that representatives from the state(s) of Georgia, South Carolina, Alabama, or Florida may be dispatched to the EOF for an event at specific SNC site(s). Responders from state and local agencies have access to plant parameters through the various data displays available in the EOF. See Figure H.2.A.

Based on the physical location of the EOF, specialized ventilation systems are not required. The EOF ventilation system is consistent in design with standard building codes. Similarly, EOF functions would not be interrupted by radiation releases from any SNC site.

Normal power to the EOF is from a reliable offsite source. Emergency lighting is provided by battery-operated lights. Backup power for the EOF is supplied by onsite diesel generation. Essential equipment is backed up by the diesel generation system.

The EOF is located at SNC Corporate Headquarters. The following records or information are available:

- Technical Specifications.
- Selected plant operating procedures.
- Emergency Plans.
- Emergency Plan Implementing Procedures.
- Final Safety Analysis Reports (FSARs).

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- System piping and instrumentation diagrams and HVAC flow diagrams.
- Electrical one-line, elementary, and wiring diagrams.

The above records are updated as necessary to ensure currency and completeness.

Access to the EOF is controlled through the use of electronic card readers.

SNC will maintain space for members of an NRC Site Team and federal, state and local responders at a location near the site that includes space for conducting briefings with emergency response personnel and communications with other licensee and offsite emergency responders.

Details on the near site location are in the site-specific Annexes.

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Figure H.2.A – Emergency Operations Facility Layout (Typical)

H.2.2 Joint Information Center (JIC)

The JIC, located at the Atlanta or Birmingham corporate headquarters building of Georgia Power Company or Alabama Power Company, as appropriate, is the official location for coordination and issuance of news announcements and responses to news media inquiries

The JIC is the point of contact with the news media during a declared emergency. The JIC facilities, which coordinate the dissemination of information to the media will be established to accommodate public information representatives from the licensee and federal, state, and local response agencies. News releases and media briefings are coordinated to the maximum extent possible. Following activation of the JIC in Atlanta or Birmingham, the Public Information Director will evaluate the nature of the event. If it is determined that the event will be prolonged, is likely to escalate, or is likely to result in significant media attention, the Public Information Director will direct that JIC operations move to a forward near site location. If the decision is made to move the JIC function to the near site location the existing Atlanta or Birmingham location will maintain media coordination until the JIC is operational at the near site location.

H.3 State and local Emergency Operations Centers (EOC)

EOCs operated by the state and by local communities allow direction and control of emergency response functions. The states' EOCs are capable of continuous (24-hour) operations for a protracted period.

The county EOCs serve as Command and Control headquarters for local emergency response activities as well as a center for the coordination of communications to field units and to the state EOCs. Additional details for state and county EOCs are in the state and county emergency plans.

H.4 Emergency Response Facility Staffing and Activation

SNC-operated nuclear power plants have plans and procedures to ensure timely activation of its emergency response facilities. The Shift Manager, as Emergency Director, will initiate a call-out in accordance with the implementing procedures. The ERO augmentation process identifies individuals who are capable of fulfilling the specific response functions listed in Tables 2 through 5.

Although the response time will vary due to factors such as weather and traffic conditions, a goal of 75 minutes for minimum staffing, following the declaration of an Alert or higher emergency classification, has been established for ERO personnel responding to plant emergency facilities including the TSC, OSC, EOF, and JIC.

The facility can be declared activated when the following conditions are met:

- Minimum staffing has been achieved.
- Personnel have been briefed on the situation and are ready to assume Command and Control functions.

H.5 Onsite Monitoring

SNC-operated nuclear power plants have installed monitoring instrumentation for seismic monitoring, radiation monitoring, fire protection and meteorological monitoring, in accordance with its Final Safety Analysis Report (FSAR) and plant Technical Specifications (TS), or commitments made to the NRC. Details of these systems differ from plant to plant, and are in the site specific Annexes.

H.5.1 Geophysical Monitors

- **Meteorological Instrumentation:** A permanent meteorological monitoring station is located near the plant for the acquisition and recording of wind speed, wind direction, and ambient and differential temperatures for use in making offsite dose projections. Meteorological information is displayed in the CR, TSC, and EOF. Additional information located in Section H.7.
- **Seismic Monitoring:** The seismic monitoring system measures and records the acceleration of the structure if activated by an earthquake of sufficient magnitude. It also provides signals for immediate remote indication that specific preset response accelerations have been exceeded.
- **Hydrological Monitors:** SNC-operated nuclear power plants have hydrological monitors as appropriate. The design basis flood, probable maximum precipitation, and other extremes in hydrologic natural phenomena are as detailed in the FSAR as appropriate.

H.5.2 Radiological Monitors and Sampling

H.5.2.1 Radiation Monitoring System (RMS)

Radiation monitoring instruments are located at selected areas within the plant to detect, measure, and record radiation levels. The monitors are comprised of area, airborne and air particulate monitors.

- Area monitors respond to gamma radiation.
- Airborne monitors detect and measure radioactive gaseous effluent concentrations.

Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.

H.5.2.2 Liquid and Gaseous Sampling Systems

The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Pre-designated monitoring and sampling points are listed in site procedures. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The system can provide information on post-accident plant conditions to allow operator actions to mitigate and control the course of an accident. Various chemical analyses and radiological measurements on these samples

can be performed, including the determination of radionuclide concentrations.

H.5.2.3 Laboratory Facility

SNC sites have a laboratory facility for analysis of radioactive samples.

H.5.2.4 Portable Radiation Monitoring Equipment

Portable radiation survey instruments are available for a wide variety of uses such as area, sample, personnel surveys, and continued accident assessment.

H.5.3 Process Monitors

The Control Room and redundant backup locations are equipped with extensive plant process monitors for use in both normal and emergency conditions. These indications include reactor coolant system pressure and temperatures, containment pressure and temperature, and various liquid levels, flow rates, status, or lineup of equipment components.

H.5.3.1 Plant Monitoring/Information System

A plant monitoring/information system provides the data acquisition and database capability for performing plant monitoring and functions. The system is designed to scan, convert to engineering units, make sensor range and alarm limit checks, apply required transformations, store for recall and analysis, and display the reading of transformed data from plant instrumentation. The system scans flows, pressures, temperatures, fluid levels, radiation levels, equipment, and valve status at required frequencies.

H.5.3.2 Safety Parameter Display System (SPDS)

The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.

H.5.4 Fire Detection System

The Fire Detection System is designed to detect products of combustion or heat in designated areas of the plant. The fire alarm communication systems and subsystems are located at strategic points throughout the plant to warn personnel of a fire or other emergency conditions. Additional description of the fire system is provided in the FSAR.

H.5.5 Fire Station

Firefighting equipment and supplies are available for damage control operations. The equipment is stored in various areas within the plant.

H.6 Offsite Monitoring

SNC-operated nuclear power plants have made provisions to access data from the following offsite sources of monitoring and analysis equipment:

H.6.1 Geophysical Monitors:

- In the event that the onsite meteorological tower or monitoring instrumentation becomes inoperative, meteorological data may be obtained directly from the National Weather Service.
- A central point of contact to obtain information about a seismic event is the National Earthquake Information Center.

H.6.2 Radiological Environmental Monitors, Sampling, and Monitoring Equipment

SNC-operated nuclear power plants maintain a sufficient supply of portable offsite radiological monitoring equipment. These supplies are located at each staging point for Field Monitoring Teams.

SNC-operated nuclear power plants have a Radiological Environmental Monitoring Program (REMP) consisting of locations with dose recording devices and air sampling equipment.

H.6.3 Laboratory Facilities

External facilities for counting and analyzing samples, and for dosimetry processing, can be provided by other SNC-operated plants including the GPC Central Laboratory, state, federal, or contracted laboratories. Outside analytical assistance may be requested from state and federal agencies, or through contracted vendors. The DOE, through the Radiological Assistance Program (RAP) has access to any national laboratory.

H.7 Meteorological Equipment

SNC-operated nuclear power plants have meteorological towers equipped with instrumentation for continuous reading of wind speed, wind direction, air temperature and differential air temperature. Meteorological tower details are in the site-specific Annexes. Additional capabilities are available to obtain representative current meteorological information from other sources, such as the National Weather Service.

H.8 Emergency Equipment Inventories and Checks

Emergency facilities and equipment are inspected and inventoried using appropriate administrative or department procedures. These procedures provide information on location and availability of emergency equipment and supplies.

Sufficient reserves of instruments and equipment are maintained to replace those removed from emergency kits or lockers for calibration or repair.

H.9 Emergency Kits

Emergency kits are available at SNC-operated nuclear power plants. Designated site or department procedures identify the equipment in the various emergency kits. Details as to kit locations are found in the plant-specific procedures.

H.10 Collection Point for Field Samples

SNC-operated nuclear power plants have designated a point as the location for receipt and analysis of field monitoring team environmental samples. Sampling and analysis equipment is available for quantitative activity determination of marine and air samples, and qualitative activity determination of terrestrial samples.

SECTION I: ACCIDENT ASSESSMENT

I.1 Systems and Parameters Monitored

SNC-operated nuclear power plants have a comprehensive set of plant system and effluent monitors, as required by the plants' Final Safety Analysis Report. Sites have identified values characteristic of off-normal values and accidents, and identified the plant parameter values that correspond to the example initiating conditions in the Nuclear Energy Institute (NEI) 99-01 and 07-01 Emergency Action Levels (EALs). These are described in Section D of this plan, and detailed in the site-specific Annexes.

Plant system and effluent parameter values are used to determine accident severity and subsequent emergency classification. Environmental and meteorological events are also determining factors in emergency classification. An emergency condition can be the result of just one parameter or condition change, or the combination of several. The specific symptoms, parameter values or events for emergency classification levels are detailed in the plant's site-specific Annex.

To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant.

Some of the key plant parameters monitored in the Control Room are assembled into a single display on the Safety Parameter Display System (SPDS). The SPDS monitors such parameters as reactor coolant system pressure, reactor or pressurizer water level, containment pressure, suppression pool water level and temperature, reactor power, safety system status, containment radiation level, and effluent monitor readings. The instrumentation and equipment capabilities available for emergency facilities are described in Section H. For Vogtle Unit 3 and Unit 4, the Safety Parameter Display System (SPDS) is integrated into the overall human interface design so that the SPDS parameters are available to Operators on workstation visual display units.

Select plant parameters are available to state and local authorities on a secure network dedicated to data distribution among the various offsite emergency response facilities.

I.2 Continuing and Post Accident Assessment

The resources available to provide initial and continuing information for accident assessment throughout the course of an event include plant parameter display systems, liquid and gaseous sampling system, area and process radiation monitoring systems, and Accident Radiation Monitoring Systems. Descriptions of these systems are given in Section H. Details on performing post-accident sampling are in the plant-specific procedures.

I.3 Offsite Dose Assessment

SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses.

The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies, and can be used to assist in making protective action determinations. The system supplements assessments based on plant conditions.

The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.

I.4 Effluent Monitor Readings and Exposures

The offsite dose assessment program addresses the relationship between effluent monitor readings, onsite and offsite exposures, and contamination for various meteorological conditions.

I.5 Meteorological Monitoring

SNC-operated nuclear power plants have a meteorological monitoring system sufficient to acquire and evaluate meteorological information for accident assessment. This information can be accessed in the Control Room, TSC, and EOF, and is transmitted by the Emergency Response Data System (ERDS) for NRC and offsite authorities use.

I.6 Unmonitored Release

Dose projections can be made during a release through use of sample data in situations where effluent monitors are either off-scale, inoperative, or the release occurs by an unmonitored flow path. In the absence of effluent sample data, a computerized offsite dose projection can be performed by specifying the accident category as a default.

I.7 Environs Surveys and Monitoring

In addition to the capabilities and resources described in Section H, SNC-operated nuclear power plants have the ability to take offsite air samples and to directly measure gamma dose rates from a radioactive material release. The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs).

The environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation, and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant.

Field Monitoring Teams are dispatched by SNC-operated plants to perform a variety of functions in situations potentially involving significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.

The initial environmental surveys involve measurements to confirm or modify the dose projections based on plant parameters. Subsequent environmental monitoring efforts will

be aimed at further defining the offsite consequences, including instituting an expanded monitoring program to enable prompt assessments of any subsequent releases from the plant.

I.8 Release Assessments

SNC-operated nuclear power plants have instrumentation, procedures, and trained personnel with the expertise to make rapid assessments of the actual or potential magnitude and location of any radiological hazards through liquid or gaseous release pathways.

I.9 Environmental Radioiodine Monitoring Capabilities

Field monitoring equipment has the capability to detect and measure airborne radioiodine in the presence of noble gases.

SECTION J: PROTECTIVE RESPONSE

Protective response consists of emergency actions, taken during or after an emergency situation, which are intended to minimize or eliminate hazards to the health and safety of the public and plant personnel. Protective actions have been developed for emergency workers and the general public located in the Plume Exposure Pathway Emergency Planning Zone. Guidelines consistent with federal guidance have been established to aid in choosing protective actions during an emergency. The responsibility for actions outside the owner-controlled area rests with state, county, and other offsite response agencies.

J.1 Alarm Responses

The actuation of alarms associated with fire and radiation levels are available to alert personnel of hazardous conditions and protective actions. Site communications methods may also be used as needed.

The site-specific procedures describe the assembly areas for personnel on-site.

For emergency classifications, personnel within the Protected Area are notified of the classification or escalation of an emergency.

Provisions are made to alert personnel in high noise areas and outbuildings within the Protected Area and within the Owner Controlled Area.

The primary protective measure for non-essential onsite personnel during a Site Area or General Emergency is assembly in a designated area, followed by accounting of site personnel and then determination of appropriate protective actions including Site Evacuation. The designated assembly areas are outside the Protected Area and inside the Owner Controlled Area.

J.2 Radiological Monitoring of Evacuated Personnel

Personnel evacuated from the site will be monitored for contamination, if needed by portal monitors as they exit the Protected Area, or with portable friskers in Assembly Areas, or sent to offsite monitoring locations.

J.3 Non-essential Personnel Evacuation and Decontamination

Requirements for radiological monitoring of personnel evacuated from the site for external radiation exposure are contained in Section K. Section K addresses appropriate actions for any known or suspected overexposures or contamination. Details on the decontamination of non-essential evacuees are in the Emergency Plan Implementing Procedures.

J.4 Onsite Protective Actions

Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. SNC-operated nuclear power plants maintain an inventory of respiratory protection equipment, anti-contamination clothing, and potassium iodide (KI) that is available to emergency workers remaining on site. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel.

Measures that would be taken are:

- On-shift and emergency response personnel use respiratory protection in any environment involving exposure to high level airborne activity or oxygen deficient atmosphere, or where air quality is in doubt. The criteria for issuance of respiratory protection are described in plant Radiation Protection procedures.
- Anti-contamination clothing is available for use by onsite personnel. The criteria for issuance of protective clothing are described in plant Radiation Protection procedures.
- The criteria for administering a thyroid-blocking agent (KI - Potassium Iodide) to emergency personnel depends on the projected absorbed dose to the thyroid based on the severity and magnitude of the accident.

SNC-operated nuclear power plants are responsible for maintaining a supply of KI at their respective site. The Emergency Director has the responsibility for approval of issuing KI to site emergency workers.

Onsite protection of employees during hostile action involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the hostile event and advance warning. Site-specific procedures provide specific actions to take during hostile action or severe weather events. During a hostile action or severe weather event, Assembly and Accountability actions may be delayed in favor of other onsite protective actions required to ensure the safety of the site and its personnel. In these cases, accountability will be completed once safe conditions have been established.

J.4.1 Assembly

Assembly is mandatory following the declaration of a Site Area or General Emergency, or at the discretion of the Emergency Director. When Accountability of onsite personnel is determined to be necessary by the Emergency Director, personnel within the Protected Area will be accounted for and the names of missing individuals determined within 30 minutes of the emergency declaration.

J.4.2 Accountability

Personnel accountability is mandatory at the Site Area or General Emergency classification. Accountability may be initiated at other times at the discretion of the Emergency Director to support worker safety.

Accountability of personnel within the Protected Area is accomplished within 30 minutes of the declaration of Site Area Emergency or higher, and maintained continuously thereafter, using Protected Area(s) boundary access control as described in the Security Plan. If there are station personnel who are unaccounted for, the public address system or other suitable communication methods are used to locate the personnel, or, in extreme cases such as fire, toxic gas release, explosions, or structural damage, trained search and rescue personnel are deployed to search for and assist the missing personnel.

J.4.3 Site Evacuation

If a Site Evacuation is required, personnel are directed to either assemble within designated Assembly Areas or immediately leave the site. Personnel will be directed

to either proceed to their homes or reassemble at designated locations. Visitors to the plant will assemble with and follow the instructions of their escorts. Personal transportation will normally be used and established evacuation routes will be followed. Personnel without transportation will be identified and provided transportation as necessary.

Evacuation of personnel is usually conducted immediately after accountability if a Site Area Emergency or General Emergency has been declared and no impediments exist. Evacuation shall commence as directed by the Emergency Director.

J.5 Offsite Protective Action Recommendations (PARs)

Plant conditions, projected dose and dose rates, field monitoring data, and evacuation time estimates are evaluated to develop PARs for preventing or minimizing exposure to the public. PARs are provided to the offsite agencies responsible for implementing protective actions for the public within the 10-mile EPZ. The Emergency Director will approve PARs. The PAR decision-making flowcharts are site-specific in nature, and are provided in the site-specific implementing procedures. SNC-operated plants have the capability to provide state and local agencies a PAR for beyond the 10-mile EPZ.

There are various types of protective actions that can be recommended to the state and counties. They may include the following:

- Evacuation.
- Shelter in place.
- Monitor and prepare.
- Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy.

J.6 Evacuation Time Estimates (ETE)

An independent ETE report has been performed for SNC-operated nuclear power plants, which provides estimates of the time required to evacuate resident and transient populations surrounding the plant for various times of the year under favorable and adverse conditions. ETEs for evacuation of the plume exposure EPZ surrounding SNC-operated nuclear power plants are summarized in the site-specific Annex and detailed in the ETE report.

J.7 Protective Action Maps

SNC nuclear power plants have maps depicting local roads, primary evacuation travel routes, and the Emergency Planning Zone (EPZ). Maps are also available which show the population distribution within the plant EPZ, and are described in the site-specific Annexes.

SECTION K: RADIOLOGICAL EXPOSURE CONTROL

K.1 Emergency Workers and Lifesaving Protective Actions

SNC-operated nuclear power plant management will make every reasonable effort to minimize radiation exposure to emergency personnel. Plant management approval is required before emergency workers are allowed to exceed the maximum administrative radiation dose.

Under normal operating conditions, SNC-operated plants maintain personnel exposure control programs in accordance with 10 CFR 20. The Emergency Director has responsibility for authorizing personnel exposure levels under emergency conditions using the guidance in Environmental Protection Agency (EPA) 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents." In emergency situations, workers may receive exposure under a variety of circumstances in order to assure safety and protection of others and of valuable property.

If emergency operations demand life-saving or rescue actions and external radiation fields are minimal, individuals may be allowed exposures to airborne contamination of 10,000 Derived Air Concentration (DAC)-hours. If external radiation fields are not minimal, the sum of the external and internal doses should be limited to 25 rem Total Effective Dose Equivalent (TEDE). Exposures above 2,000 DAC-hours should be received only with the approval of the Emergency Director. These exposures will be justified if the reduced risks and costs to others outweigh the risks to which the workers are subjected.

Table K.1.A Emergency Worker Dose Limits

Dose (TEDE)	Applicability	Conditions
5 rem	All	--
10 rem	Protecting valuable property (or equipment)	Lower dose not practicable
25 rem	Lifesaving or protection of large populations	Lower dose not practicable
>25 rem	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved

K.1.1 Removal of Injured Persons

Injured persons will receive prompt first aid and decontamination, as practical, before transport by ambulance to a local hospital.

K.1.1.1 Transportation Services

Agreements have been made for ambulance services near the SNC-operated nuclear power plants. Training is offered to ambulance personnel, and they participate in drills or exercises simulating the transportation of a contaminated, injured individual.

K.1.2 Decontamination and First Aid

K.1.2.1 Onsite Responsive Action

Selected plant workers at SNC-operated plants have received first aid and decontamination training. If a plant employee cannot be easily decontaminated, the individual is treated as contaminated and measures are taken to prevent the spread of contamination during ambulance transportation and upon arrival at a local hospital.

K.1.3 Medical Treatment

Agreements have been made with local hospitals near SNC-operated nuclear power plants. Training is offered to medical staffs regarding the treatment of contaminated, injured individuals, and hospitals participate in periodic drills using simulated contaminated, injured individuals.

K.2 Emergency Exposure Authorization

SNC-operated plants have a Radiation Protection Program. The Emergency Director may authorize emergency workers to receive doses in excess of the administrative dose levels. In some situations, it is possible that certain activities or duties for the protection of persons or the substantial protection of property may result in doses in excess of 10 CFR 20.1201 limits. Decisions to accept doses in excess of occupational limits will be on a volunteer basis and prospective volunteers shall be made aware of the risks.

K.3 Exposure Controls

K.3.1 24-Hour Capabilities

Plant Radiological Protection Groups have the equipment and personnel to provide 24-hour capability to determine and control radiation exposures of emergency organization personnel. Equipment to perform the following functions:

- Radiation detection devices.
- Personnel monitoring.
- Record keeping equipment.

Contractor and vendor representatives may also be present to assist in exposure control and augment the Radiation Protection Group capabilities. In an emergency situation, onsite personnel, offsite support personnel and local government emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel who are issued dosimetry.

K.3.2 Personnel Monitoring Equipment

SNC-operated nuclear power plants have equipment for radiological monitoring of personnel, ranging from hand-held survey equipment to installed or portable portal monitors. Details of plant monitoring equipment are included in the site-specific Annexes.

K.3.3 Radiation Work Permit Procedures

Where possible, the normal radiation work permit procedure will be used to control exposures. Based on conditions and urgency Radiation Protection supervision may approve emergency radiological work permit controls.

K.4 Offsite Emergency Workers

The responsibility for authorizing offsite emergency workers to receive exposures in excess of the EPA General Public Protective Action Guides rests with the state.

K.5 Decontamination

The Radiation Protection Group will be responsible for controlling or minimizing direct or subsequent internal exposure from radioactive materials deposited on the ground or other surfaces, and for determining the extent of contamination in controlled and normally uncontrolled areas. During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.

Facilities and supplies for decontaminating personnel are available at various plant locations. Personnel leaving the Radiological Controlled Area (RCA) or leaving a contaminated area will be monitored for contamination. During emergencies, other onsite personnel will be checked for contamination as necessary.

Designated personnel, under the direction of the Radiation Protection Group, are responsible for performing material decontamination. Procedures and equipment for material decontamination are available at the plant, as specified in the site radiation protection program.

K.6 Contamination Controls

Contaminated areas are isolated as restricted areas with appropriate radiological protection and access control. Measures will be taken to control onsite access to potentially contaminated potable water and food supplies.

K.7 Offsite Decontamination

Nonessential on-site personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.

SECTION L: MEDICAL AND PUBLIC HEALTH SUPPORT

L.1 Hospital and Medical Services

In addition to the on-site first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses.

SNC-operated nuclear power plants have arranged for hospital and medical services having the capability to evaluate radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

The hospitals are equipped and hospital personnel trained to address contaminated injured individuals. Training of medical support personnel at the agreement hospitals includes basic training on the nature of radiological emergencies, diagnosis and treatment, and follow-up medical care.

Plant personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Arrangements, by letter of agreement or contract, are maintained by SNC-operated plants with a qualified hospital located in the vicinity of the nuclear power plant for receiving and treating contaminated persons with injuries requiring immediate hospital care.

L.2 First Aid

SNC-operated nuclear power plants maintain onsite first aid supplies and equipment necessary for the treatment of contaminated and/or injured persons.

L.3 State Emergency Medical Services

The states of Alabama and Georgia have developed lists of facilities that can provide medical support for treating injured, contaminated individuals. Details are found in the respective state emergency plan.

L.4 Medical Transport

Contaminated and injured persons are transported to a facility specified for SNC-operated nuclear power plants. Arrangements have been made by nuclear power plants for ambulance transport of persons with injuries involving radioactivity to designated hospitals. Such services are available on a 24-hour-per-day basis and are confirmed by letters of agreement. Radiation monitoring services are provided by SNC plant personnel whenever it becomes necessary to use an ambulance service for the transportation of contaminated persons.

SECTION M: RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS

M.1 Recovery

Guidance for determining the transition from Emergency to Recovery Organization is provided in the plant Emergency Plan Implementing Procedures. The composition of the Recovery Organization will depend on the nature of the accident and the conditions following the accident.

The SNC Emergency Plan addresses general principles that serve as guides for developing a Recovery Plan.

It is the responsibility of the Emergency Director (ED) to determine that the facility and surroundings are safe for reentry. The Emergency Director will designate a recovery manager to constitute the recovery organization.

The following guidelines, as applicable to the specific situation, will be addressed prior to terminating the emergency:

- The affected reactor is in a stable condition and can be maintained in that condition indefinitely.
- Plant radiation levels are stable or are decreasing with time.
- Releases of radioactive material to the environment have ceased or are being controlled within permissible limits.
- Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel.
- For a site area emergency or general emergency, discussions with plant management, applicable members of the SNC emergency organization, or offsite authorities do not result in identification of any valid reason for not terminating the emergency.

Upon termination of the emergency phase and at the discretion of the Emergency Director, following consultation with offsite authorities, the SNC Emergency Organization will shift to the Recovery Phase Organization.

The Recovery Manager will structure the recovery organization to accomplish the following general objectives:

- Maintain comprehensive radiation surveillance of the site until levels return to normal.
- Control access to the affected area of the plant and exposures to workers.
- Decontaminate affected areas and equipment.
- Conduct activities in radiation areas in accordance with the plant's standard radiation work practices.
- Isolate and repair damaged systems.
- Document proceedings of the accident and review the effectiveness of the emergency response organization in mitigating plant damage and reducing radiation exposures to the public.
- Provide offsite authorities with plant status reports and information concerning the plant recovery organization.

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- Provide assistance with recovery activities undertaken by state and county authorities, if requested.
- Provide public information on the status of recovery operations in releases to the media.

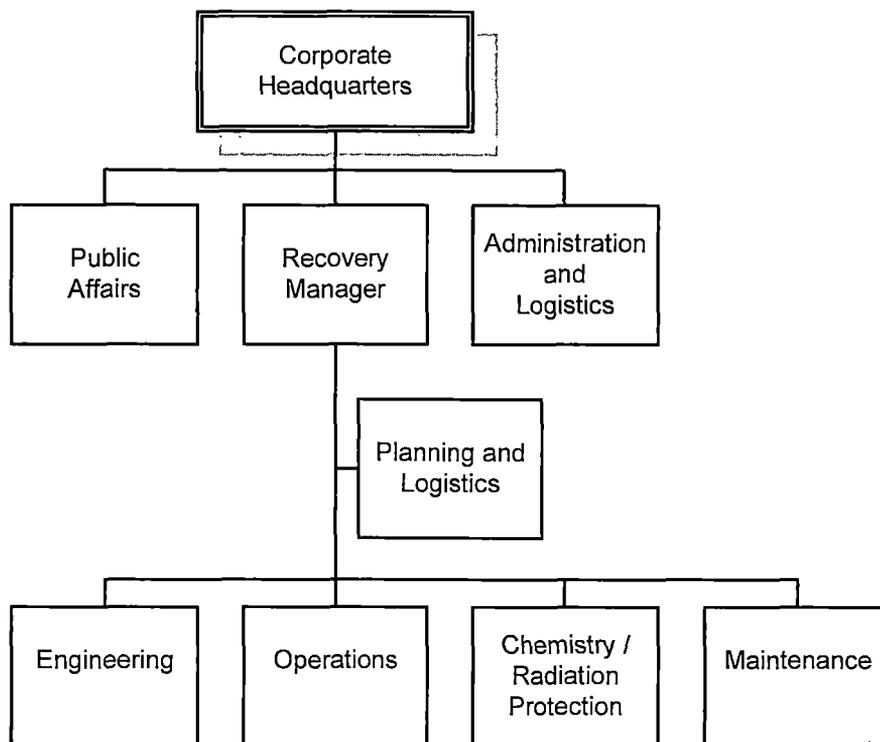
Other recovery operations will not be initiated until the area affected by the emergency has been defined. Particular attention will be directed toward isolating and tagging out components and systems as required for controlling or minimizing hazards. A systematic investigation will be conducted to determine the equipment damaged and the extent of the damage.

Investigation into the accident causes and consequences, both to the plant and to the environment, will be conducted. Test programs to confirm fitness for return to service will be developed and executed.

Recovery operations will be conducted in compliance with normal operational radiation exposure level limits as specified in 10 CFR 20. When possible, any necessary releases of radioactive materials or effluent during recovery will be planned, controlled, evaluated in advance for radiological impact, and appropriate offsite organizations and agencies informed of the scheduled releases and estimated impact.

M.2 Recovery Organization

Figure M.2 Typical Long Term Recovery Organization



M.2.1 Recovery Manager

The nature and extent of the emergency situation will determine what recovery operations are required. The Recovery Organization, shown above, will be established as directed by the Recovery Manager.

M.2.2 Plant Actions

Recovery actions will be preplanned. Specific actions will be developed in advance and discussed with responsible and knowledgeable personnel.

Reasonable efforts will be made to limit radiation exposure of personnel involved in the recovery to levels as low as reasonably achievable. Exposures should not exceed 10 CFR 20 limits. The Recovery Manager is responsible for evaluating the advisability and timing of authorizing personnel to reenter affected area(s).

The Recovery Manager is responsible for gathering available evidence on contributory factors to the accident, and reviewing the recovery operations to ensure that causal factors have been specifically identified. The Recovery Manager will provide a liaison for the NRC Accident Investigation Team, which will interview primary responders, review any documents generated during the accident, and inspect or test damaged equipment prior to its repair.

M.3 Recovery Notification

Members of the ERO will be informed when Recovery is initiated. The recovery organization may be structured like the emergency response organization, with additional modifications depending on the nature of the accident, post-accident conditions, and other factors.

The State EOC will be advised when the plant deems it safe to begin the reentry phase of the offsite recovery operation. If the Governor ordered an evacuation, the law requires the governor to officially rescind the order before any return can be made to evacuated areas. The states are responsible for coordinating reentry procedures for the offsite population.

M.4 Population Exposure Estimates

It is anticipated that the Federal Radiological Monitoring and Assessment Center (FRMAC) will make a total population exposure calculation, based on estimated dose rates and population representing exposed areas.

M.5 Termination of Recovery Phase

Following the completion of the Recovery Phase, the site will transition to an Outage Organization to complete necessary repairs.

SECTION N: EXERCISES AND DRILLS

N.1 Exercises

SNC-operated nuclear power plants will conduct a biennial exercise and additional periodic drills. An exercise is an event that tests integrated capability, and a major portion of the basic elements of emergency preparedness plans and organizations. Drills and exercises shall:

- Test the adequacy of timing and content of implementing procedures and methods.
- Test emergency equipment and communications networks.
- Test the public notification system.
- Ensure emergency organization personnel are familiar with their duties.

SNC-operated nuclear power plants conduct an emergency response exercise to demonstrate the effectiveness of the SNC Standard Emergency Plan on a frequency determined by the NRC. Exercises may include mobilization of state and local personnel and resources, and are intended to verify their capability to respond to an accident. Joint exercises shall be conducted on a frequency described in NRC/FEMA guidance.

A formal critique shall be conducted following the drill or exercise to evaluate the ability of organizations to respond as required in the SNC Standard Emergency Plan and site specific Emergency Plan Implementing Procedures. Critique items will be entered into the SNC corrective action program as appropriate.

Remedial exercises will be required if the emergency plan is not satisfactorily tested during the Biennial Exercise, and it is determined that reasonable assurance that adequate protective measures are not taken in the event of a radiological emergency or the ERO has not maintained key skills specific to emergency response.

N.1.1 Biennial Exercises

Federally prescribed Biennial Exercises are conducted at SNC-operated nuclear power plants. Exercises involving offsite agency participation, required under 10 CFR 50 Appendix E, are conducted at SNC-operated nuclear plants based on Federal Emergency Management Agency (FEMA) guidance and the respective state and local emergency response plans.

N.1.2 Participation

SNC-operated nuclear power plants exercise with offsite authorities to allow state(s) and local governments within the plume exposure pathway EPZ to exercise their emergency plans for operating nuclear power plants biennially, with full or partial participation.

Full and partial participation exercises are described as follows:

- Full participation exercises will include, as appropriate, offsite local and state authorities and SNC personnel actively participating in testing the integrated capability to assess and respond to an accident at a nuclear power plant. Additionally, full participation exercises will include, as appropriate, testing the major observable portions of the onsite and offsite emergency plans and

mobilization of state, local, and SNC personnel, and other resources in sufficient numbers to verify the capability to respond to the accident scenario.

- Partial participation means offsite authorities shall take part in the exercise sufficient to test direction and control functions, including protective action decision-making and communication capabilities among affected state and local authorities and SNC-operated plants. Where partial or full participation by offsite agencies occurs, the sequence of events simulates an emergency that results in the release of radioactivity to the offsite environs, sufficient in magnitude to warrant a response by offsite authorities.

At a minimum, state and local governments are expected to fully participate in accordance with the requirements of 10CFR50 Appendix E, section IV(F)(2)(c).

N.1.3 Ingestion Exposure Pathway Exercise

States within an ingestion exposure pathway EPZ are expected to exercise plans and preparedness related to ingestion exposure pathway measures at least once every 8 years. Opportunities are provided to any state or local government located within the plume exposure pathway EPZ to participate in annual drills and biennial exercises when requested by that state or local government.

N.1.4 Exercise Planning Cycle

The Exercise planning cycle will consist of eight (8) successive calendar years.

N.2 Drills

A drill in this context is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation

N.2.1 Off-Year Drills

SNC-operated nuclear power plants shall ensure adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The principal functional areas of emergency response include:

- Management and coordination of emergency response.
- Accident assessment.
- Event classification.
- Notification of offsite authorities.
- Assessment of the onsite and offsite impact of radiological releases.
- Protective action recommendation development.
- Protective action decision making.
- Plant system repair and corrective actions.

During these drills, activation of all of the licensee's emergency response facilities (TSC, OSC, and the EOF) would not be necessary. The ERO would have the opportunity to consider accident management strategies, supervised instruction

would be permitted, operating staff in participating facilities would have the opportunity to resolve problems (success paths) rather than have controllers intervene, and the drills may focus on the onsite exercise training objectives.

N.2.2 Hostile Action Based (HAB) Drills

Hostile Action Based (HAB) drills involving an air, land or water based attack scenario will be conducted at sites on a frequency of at least once every eight (8) years.

N.2.3 Fire Drills

Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.

N.2.4 Medical Emergency Drills

A medical emergency drill, involving a simulated contaminated individual, and containing provisions for participation by local support services organizations including ambulance response, are conducted annually at the nuclear plants. Local support service organizations that support more than one plant shall only be required to participate once each calendar year.

N.2.5 Environs Drills

Plant environs and radiological monitoring drills are conducted annually. These drills include collection and analysis of sample media and provisions for communications and record keeping. These drills also evaluate the response to, and analysis of, simulated airborne and direct radiation measurements in the environment.

N.2.6 Radiation Protection Drills

Radiation Protection Drills involving a response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements are conducted semi-annually. At least annually, these drills shall include a demonstration of the sampling system capabilities, as applicable.

N.2.7 Accountability Drills

Accountability drills are conducted annually.

N.2.8 Alternative Facility Drills

At least once per drill cycle, use of designated Alternative Facilities to stage Onsite ERO Responders to facilitate rapid activation following a hostile action.

N.2.9 Rapid Escalation

At least one per drill cycle, a scenario resulting in an initial classification of, or rapid escalation to, a Site Area or General Emergency, will be conducted.

N.2.10 Minimal/No Release Drill

At least once per drill cycle, a scenario resulting in no radiological release, or an unplanned minimal release resulting in a classification of a Site Area Emergency but not requiring declaration of a General Emergency, shall be conducted.

N.3 Scenarios

When a major drill or exercise is required, the Emergency Preparedness (EP) group will coordinate the preparation of a scenario. The EP group will also coordinate efforts with appropriate federal, state and local emergency organizations and agencies, schedule a date to conduct the drill or exercise, and assign qualified controllers.

The Emergency Preparedness group retains critique results for review prior to future drills or exercise and for guidance in properly modifying the site-specific Annexes, Emergency Plan Implementing Procedures (EPIPs), or other procedures as appropriate.

A scenario, prepared in advance, will govern the conduct of exercises and drills. Scenarios will include the following:

- Objectives of the drill or exercise; a measurable and observable objective must be specified for each major problem and solution.
- Dates, time period, places, personnel, and participating organizations.
- Simulated events.
- Time schedule of real and simulated initiating events.
- Narrative summary describing the conduct of the exercise or drill, including simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing and associated equipment, deployment of personnel and radiological teams, and public information activities.

During the exercise planning cycle described in Section N.1.4, SNC sites vary the content of exercise scenarios to provide ERO members the opportunity to demonstrate proficiency in key skills necessary to respond to several specific scenario elements including:

- Hostile Action directed at the plant site.
- No radiological release, or unplanned release that does not require public protective actions.
- An initial classification of, or rapid escalation to, a Site Area Emergency or General Emergency.
- Implementation of strategies, procedures, and guidance developed in 50.54(hh), (i.e., potential aircraft threat, explosion or large fire).
- Integration of offsite resources with onsite response.
- A drill initiated between the hours of 6 p.m. and 4 a.m.
- Drills using essentially 100 percent of Initiating Conditions in the 8-year cycle

Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations.

A record of exercises conducted during the 8-year exercise planning cycle that documents the contents of scenarios used during that cycle shall be maintained in accordance with Drill and Exercise procedure guidance.

SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.

N.4 Exercise Evaluation and Critique

A critique shall be conducted at the conclusion of the exercise, to evaluate the organization's ability to respond as called for in the SNC Standard Emergency Plan. Qualified personnel will observe and perform a critique of exercises and drills. Provisions will be made for federal, state, and local observers, as well as SNC personnel, to observe and critique required exercises.

Biennially, representatives from the NRC observe and evaluate the licensee's ability to conduct an adequate self-critical critique. For partial and full offsite participation exercises, the NRC and Federal Emergency Management Agency (FEMA), will observe, evaluate, and critique.

Drill and exercise performance objectives will be evaluated against measurable demonstration criteria. As soon as possible following the conclusion of the drill or exercise, a critique is conducted to evaluate the ability of the Emergency Response Organization (ERO) to implement the emergency plan and procedures, and a formal evaluation will result from the critique.

A written critique report is prepared by the Emergency Preparedness group following a drill or exercise involving the evaluation of designated objectives or following the final simulator set with ERO participation. The report will evaluate the ability of the ERO to respond to a simulated emergency situation. The report will also contain corrective actions and recommendations.

N.5 Exercise/Drill Corrective Actions

The critique and evaluation process is used to identify areas of the Emergency Preparedness Program that require improvement. The Emergency Preparedness group is responsible for evaluating recommendations and comments, determining which items will be incorporated into the program or require corrective actions, and for scheduling, tracking, and evaluating item resolution. Whenever exercises or drills indicate deficiencies in the SNC Standard Emergency Plan, site-specific Annexes, corresponding implementing procedures, or training lesson plans, such documents will be revised as necessary.

The results of exercise critiques, particularly comments on identified areas that require improvement or reevaluation, will be submitted to the Emergency Preparedness Supervisor or designee, for review. The Emergency Preparedness Supervisor or designee will consult with responsible department heads and assign corrective action activities, as appropriate.

SECTION O: RADIOLOGICAL EMERGENCY RESPONSE TRAINING

O.1 Training

To achieve and maintain an acceptable level of emergency preparedness, training will be conducted for members of the Emergency Response Organization (ERO) and those offsite organizations that may be called on to provide assistance in the event of an emergency.

The ERO Training Program ensures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency. Specific emergency response task training, prepared for response positions, is described in lesson plans and study guides. The lesson plans, study guides, and written tests are contained in the ERO Training Program. Responsibilities for implementing the training program are contained in plant procedures. Offsite training is provided to support organizations that may be called on to provide assistance in the event of an emergency.

Personnel from nuclear power plants annually offer to train those non-SNC organizations referenced in the Plant Annexes that may provide specialized services during a nuclear plant emergency. The training offered will acquaint the participants with the special problems potentially encountered during a nuclear plant emergency, notification procedures, and their expected roles. Organizations that must enter the site shall also receive site-specific emergency response training and be instructed as to the identity of those persons in the onsite organization who will control their support activities.

Training of state and local offsite emergency response organizations is described in their respective radiological emergency plans, with support provided by SNC if requested.

O.1.1 Training of Local Services Groups

A training opportunity will be offered annually for offsite organizations and agencies as specified in respective agreements and understandings. In addition, those offsite organizations and agencies that may provide onsite emergency assistance will be encouraged to become familiar with the general layout of SNC plants, and will be invited to attend applicable Emergency Plan training and orientation courses.

Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.

O.2 Performance Demonstration

In addition to general and specialized classroom training, members of the SNC ERO receive periodic performance-based emergency response training. Performance-based training is generally provided by participation in a performance drill or exercise.

A drill is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation. Drills described in Section N of this plan are a part of training. These drills allow individuals to demonstrate the ability to perform their assigned emergency functions. During drills, on-the-spot correction of erroneous performance may be made and a demonstration of the proper performance offered by the Controller.

O.3 First Aid Training

Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.

O.4 ERO Training

SNC ERO personnel who are responsible for implementing this plan receive specialized training. The training program for emergency response personnel is developed based on the requirements of 10 CFR 50, Appendix E, and position-specific responsibilities.

Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned to onsite emergency response positions will receive training specific to their position.

O.4.1 Emergency Response Organization (ERO)

ERO members will receive Emergency Plan training on an annual basis. Personnel identified receive training appropriate to their position in the areas of:

- Accident assessment.
- Accident mitigation.
- Notifications.
- Emergency Classifications.
- Protective Action Recommendations.
- Emergency Action Levels.
- Emergency Exposure Control.

O.4.2 Active Senior Licensed Control Room Personnel

Active Senior Licensed Control Room Personnel shall have training to maintain proficiency on the topics listed below. These subjects shall be covered, as a minimum, on an annual basis:

- Event Classification.
- Protective Action Recommendations.
- Radioactive Release Rate Determination.
- Offsite dose assessment.
- Notification form completion and communication.
- Federal, state, and local notification procedures as appropriate.
- Activating the onsite and offsite ERO.

O.4.3 Radiological Field Monitoring Teams

Radiological Field Monitoring Team personnel will receive classroom and hands-on training for the actions they will be expected to perform during an emergency. The following general topics will be included in the training:

- Equipment and Equipment Checks.

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- Communications.
- Plume Tracking Techniques.
- Personnel monitoring.
- Emergency exposure criteria.
- Locations and use of radiological emergency equipment.

O.4.4 Fire Brigade Training

Individuals assigned to Fire Brigade shall maintain fire brigade qualifications.

O.4.5 Operations, Maintenance, Chemistry and Radiation Protection Training

Operations, Maintenance, Chemistry and Radiation Protection personnel who would be assigned to Repair and Damage Control Teams are trained as part of their normal job-specific duties to respond to both normal and abnormal plant operations.

O.4.6 Medical Support

On-site medical personnel receive specialized training in the handling of contaminated victims and hospital interface. Offsite ambulance and hospital personnel are offered annual training as outlined in Section O.1.1.

O.4.7 News Media Training

Local news media personnel will be offered an annual training opportunity as described in Section G.

O.4.8 General Employee Training (GET)

GET will include general training in emergency preparedness for plant and other site personnel. GET will include classification, individual response, signals, accountability, and site evacuation procedures.

O.5 Emergency Preparedness Staff Training

Training for the Emergency Preparedness Staff at an SNC-operated plant consists of initial and continuing training process. Details can be found in site specific procedures and processes.

SECTION P: RESPONSIBILITY FOR THE PREPAREDNESS EFFORT

The President/Chief Executive Officer (CEO) Southern Nuclear Operating Company (SNC) has direct responsibility for the operation and maintenance of the SNC Plants. The president/CEO is also responsible for all technical and administrative support activities provided by SNC. The president/CEO directs the chief nuclear officer/executive vice president, Executive Vice President-Operational Readiness and Integration, and the vice president of regulatory affairs in fulfillment of their responsibilities.

Responsibility for the performance of Emergency Preparedness functions is assigned to various members of the SNC organization and coordinated as follows.

P.1 Fleet Emergency Preparedness

The Vice President - Regulatory Affairs is responsible for the overall coordination of the corporate emergency preparedness programs and Emergency Plans. Their direct report, the Fleet Emergency Preparedness Director, has governance and oversight responsibility for the SNC Fleet Emergency Preparedness functional area.

The Fleet Emergency Preparedness Director is responsible for the oversight of Emergency Preparedness activities and coordinating those activities with Licensee, federal, state, and local response organizations. The Fleet Emergency Preparedness organization in the SNC Corporate office provides oversight and support for site and corporate functions. Reporting to the Fleet Emergency Preparedness Director are the EP Programs Manager and the EP Planning Manager. EP Programs Manager responsibilities include Regulations, Projects, Procedures and Performance Improvement. EP Planning Manager responsibilities include offsite interface, Drill and Exercise Coordination and Training.

Strategic direction for the emergency preparedness program and maintenance of the SNC Emergency Plan(s) is provided by the SNC Fleet Emergency Preparedness Director. Emergency Preparedness Coordinator(s) coordinate functional elements of the emergency preparedness program for the SNC fleet under the direction of the Fleet Emergency Preparedness Director.

Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.

P.2 Site Emergency Preparedness

The Vice President-(Site) is responsible for the site Emergency Preparedness aspects of the program at each site. The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity. The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President-(Site) for Plants Hatch and Farley. During project construction for Vogtle 3 and 4, the Vogtle 1-2 Emergency Preparedness Supervisor reports to the Site Integration Director. The Vogtle 3-4 Emergency Preparedness Supervisor reports to the Emergency Preparedness/Security Project Manager, who reports to the Site Integration Director. The Site Integration Director reports to the Executive Vice President – Operational Readiness and Integration. The

Emergency Preparedness Supervisor is responsible for the implementation of emergency planning strategies provided by the Fleet Emergency Preparedness Director.

P.3 Coordination

The Fleet Emergency Preparedness Director coordinates site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor. The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and program maintenance activities. Figure P.1 shows the EP organization.

EIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.

Approved changes to the Emergency Plan are forwarded to key organizations and appropriate individuals who are responsible for implementing the Plan. The Emergency Plan, agreements, and the EIPs are reviewed once per calendar year and updated as needed. These updates take into account changes identified by drills and exercises, and the independent review described below.

An independent review of the EP program is conducted, as required by 10 CFR 50.54(t). The review includes the Emergency Plan, implementing procedures and practices, training, readiness testing, equipment, and interfaces with offsite agencies. The results of the review, along with recommendations for improvements, are documented and reported to plant management and to appropriate offsite agencies. Management controls are implemented for evaluation and correction of the review findings. Records of these audits and recommendations are maintained for at least 5 years.

In addition to this Plan, several other formal emergency plans have been developed to support the overall emergency response effort. Once per calendar year, the designated Emergency Planning staff performs a review of the emergency plans for Southern Nuclear. This review includes a comparison for consistency of emergency plans for a specific site including the Security Plan, and state and county plans as appropriate.

Figure P.1 - Typical Emergency Preparedness Organization

