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 9
Hatch Justification Matrix

This enclosure contains 251 pages.

HATCH NUCLEAR POWER PLANT

JUSTIFICATION MATRIX

Purpose

The purpose of this attachment is to identify the commitments in the current Hatch Nuclear Power Plant Emergency Plan Revision 36, identify the equivalent or modified commitment in the integrated Fleet Emergency Plan and Hatch Site Annex, and justify on a commitment-by-commitment basis the proposed License Amendment.

CHANGE MATRIX

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Hatch Nuclear Plant (HNP) is a two-unit boiling water reactor operated by Southern Nuclear Operating Company (SNC) (hereafter referred to as the licensee). The plant is on a 2100-acre site located in Appling County, Georgia, approximately 11 miles north of Baxley, Georgia, on U.S. Highway 1 (Figure i).	**Annex 1.1** Facility Description The Hatch Nuclear Plant (HNP) is a two-unit boiling water reactor. The plant is on a 2,100-acre site located in Appling County, Georgia, approximately 11 miles north of Baxley, Georgia, on U.S. Highway 1.	The words were standardized and relocated to the Site Annex.
Figure ii shows the site and locations of the buildings onsite.	**Annex Figure 1.1.B**	The figure was maintained with a new figure designation without change.
The locations of the HNP emergency facilities and rally points are shown on Figure ii.	**Annex Figure 1.1.B**	The figure was maintained with a new figure designation without change.
This Emergency Plan is applicable to HNP, Units 1 and 2, and to its environs as specified by the emergency planning zones (EPZs): a plume exposure pathway EPZs, which nominally consists of the area within approximately 10 miles of the plant, and an ingestion exposure pathway EPZ, which extends to approximately 50 miles. These distances are taken from the plant stack. The two EPZs are shown in Figures iii and iv.	**Annex 1 Introduction** This document serves as the Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2 Annex and contains information and guidance that is unique to HNP. This includes Emergency Action Levels (EALs) and facility geography. **Annex Figures 1.2.A and 1.2.B**	The words were standardized and relocated to the Site Annex

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The geographical boundaries of the plume exposure pathway EPZ are shown on Figure iii. These evacuation zones are further detailed in the State Base Plan, Annex A, Table D-1, of each county section (Toombs, Appling, Jeff Davis, and Tattnall). These zones are presented in Tables i through iv.	**Annex 1.2.1** Plume Exposure Pathway (SEP J.7) The 10-mile Emergency Planning Zone (EPZ) for HNP approximates a 10-mile radius around the plant site and is depicted in Figure 1.2.A. Located within the EPZ are the Georgia counties of Appling, Jeff Davis, Tattnall, and Toombs. **Annex Figure 1.2.A**	The words were standardized and relocated to the Site Annex
The EPZ for ingestion exposure includes an area within 50 miles of the plant stack, except for portions of Brantley and McIntosh Counties which were excluded to prevent crossing any additional jurisdictional boundaries. Planning for the ingestion exposure pathway is a responsibility of the State of Georgia. More information about the ingestion exposure pathway EPZ can be obtained from the State's Radiological Emergency Plan.	**Annex 1.2.2** Ingestion Pathway (SEP J.7) The area between the 10-mile and 50-mile radius is considered the Ingestion Pathway Zone (IPZ). The 50-mile IPZ is depicted in Figure 1.2.B. Planning for the ingestion exposure pathway is a responsibility of the state of Georgia. More information about the IPZ can be obtained from the state's Radiological Emergency Plan. **Annex Figure 1.2.B**	The words were standardized and relocated to the Site Annex
The order of the presentation provided herein follows that of the 16 standards delineated in Title 10 Code of Federal Regulations (CFR) Part 50, Section 50.47(b). Appropriate criteria from NUREG-0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans (RERPs) and Preparedness in Support of Nuclear Power Plants," are addressed approximately in the sequence presented in that document.	**EP 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.	The words were standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Although this Plan is designed to stand on its own, additional plans expand on matters mentioned here, as identified in Section C. It is to be recognized that this is only a plan and not a prescriptive document. Each incident is a unique event; therefore, this Plan is designed to incorporate the flexibility to tailor the response and meet the emergency.	**EP Scope** There are supporting and complementing emergency plans, including those of federal agencies, the states of Alabama, Georgia, and South Carolina, and individual counties. The SNC Emergency Plan describes the organization, facilities, training, and maintenance of both onsite and off-site 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.	The words were standardized and relocated to the SNC Standard Emergency Plan
This Plan is supported by a set of implementing procedures. A typical list of these procedures is included as Appendix 6.	**EP 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. **Annex Appendix C**	The words were standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A. ASSIGNMENT OF RESPONSIBILITIES In the event of a situation at the HNP which requires activation of the emergency response organizations, various Federal, State, local, and private sector organizations may be required to contribute to the emergency response. This section describes the responsibilities of these organizations.	**EP Section A** **Annex 1.3 State of Georgia** **Annex 1.4 Local Organizations**	The words were standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Table A-1 lists primary response organizations and the emergency title of the individual in charge.	No Equivalent Plan/Annex Table	The primary response organizations are described in the SNC Standard Emergency Plan and Site Annex. No agencies responding to a Classified Event were impacted by this change.
Section A: The licensee accepts the responsibility of developing and maintaining an effective emergency plan and of maintaining proper preparedness through the development of formal procedures for implementing the Plan as identified in Appendix 6, the training of personnel in accordance with Section O, the procurement of necessary equipment, and the development of relationships with various governmental agencies and private organizations as identified in this section and in Appendix 2.	**EP Introduction:** Detailed procedures concerning the implementation of the SNC EP are in the Emergency Plan Implementing Procedures (EPIPs). SNC has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company	The commitment wording was standardized within the SNC system. The commitment assuming overall responsibility for maintaining the state of readiness for emergency preparedness is unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section A: The following tasks are part of the licensee's responsibility: 1. Recognize and declare the existence of an emergency condition. 2. Take corrective actions to mitigate the severity of the accident. 3. Classify the event in accordance with the methodology described in Section D of this Plan. 4. Notify appropriate plant and corporate personnel and offsite authorities. 5. Request additional support, as deemed necessary. 6. Establish and maintain effective communications within HNP and with offsite response groups, as described in Section F. 7. Continuously assess the status of the accident and periodically communicate the status information to the appropriate response groups. This includes the collection and evaluation of onsite and offsite radiological monitoring data. 8. Take protective measures onsite and recommend protective measures to offsite authorities. 9. Monitor and control radiation exposures of all personnel responding to the emergency, under the direction of the licensee. 10. Provide timely and accurate emergency information to the public through press briefings in conjunction with State and local officials.	**EP Introduction**: SNC has overall responsibility for maintaining a state of readiness to implement emergency plans for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The SNC EP describes the organization, facilities, training, and maintenance of both onsite and off-site 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.	The Introduction was standardized and modified. The existing Plan wording stating the performance of the Planning Standards from the current Plan is addressed in the appropriate sections of the SNC Standard Emergency Plan and Annex. The intent to maintain the program consistent with the Planning Standards was maintained in the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section A: The following tasks are part of the licensee's responsibility: (cont)	Extracted from SNC Standard Emergency Plan TABLE OF CONTENTS SECTION A: ASSIGNMENT OF RESPONSIBILITY SECTION B: ONSITE EMERGENCY RESPONSE ORGANIZATION (ERO) SECTION C: EMERGENCY RESPONSE SUPPORT AND RESOURCES SECTION D: EMERGENCY CLASSIFICATION SYSTEM SECTION E: NOTIFICATION METHODS AND PROCEDURES SECTION F: EMERGENCY COMMUNICATIONS SECTION G: PUBLIC EDUCATION AND INFORMATION SECTION H: EMERGENCY FACILITIES AND EQUIPMENT SECTION I: ACCIDENT ASSESSMENT SECTION J: PROTECTIVE RESPONSE SECTION K: RADIOLOGICAL EXPOSURE CONTROL SECTION L: MEDICAL AND PUBLIC HEALTH SUPPORT SECTION M: RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS SECTION N: EXERCISES AND DRILLS SECTION O: RADIOLOGICAL EMERGENCY RESPONSE TRAINING SECTION P: RESPONSIBILITY FOR THE PLANNING EFFORT	The SNC Standard Emergency Plan introduction was standardized. The organization of the Plan was aligned to the Planning Standards/NUREG-0654 Revision 1. The commitment to perform in accordance with the standards was maintained unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The licensee emergency response is carried out under the control of the Emergency Director (ED).	**EP 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 position of the Emergency Director (ED) and takes necessary actions to identify and respond to the emergency until relieved by another qualified ED.	The commitment wording was standardized for the SNC sites. The intent of the commitment was maintained.
State of Georgia Georgia has developed a RERP on a statewide basis as an integral part of the Georgia Emergency Operations Plan. The Georgia Emergency Operations Plan is an emergency operations plan for all natural disasters, accidents, and incidents, including radiological emergencies at fixed nuclear facilities. It is a plan of action developed for use by State and local government officials in preparing for, responding to, and dealing with situations throughout the State.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment wording was standardized for the SNC sites and relocated to the Site Annex for those responders applicable to the site. No change in the overall expectations of response from the state of Georgia was made as a result of this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
In accordance with Annex No. 12 of the Governor's Executive Order dated June 3, 1983, the Georgia Department of Natural Resources (DNR) has the lead agency responsibility for responding to all peacetime radiological emergency situations throughout Georgia. Under the procedure established by the Georgia Emergency Operations Plan, which was developed pursuant to the Governor's Executive Order, the DNR radiological emergency response team assesses the radiological conditions of an incident at the site and confirms or determines whether a state of emergency exists.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment wording was standardized for the SNC sites and relocated to the Site Annex for those responders applicable to the site.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Upon being advised that a radiological emergency exists, the Governor declares an emergency condition, which then activates the Georgia Emergency Management Agency (GEMA) authorities to deal with the situation. Under the statutory authority granted to the GEMA, the pre-established plans and procedures of all State agencies and applicable local government organizations are automatically activated and coordinated by the GEMA State Emergency Operations Center (EOC) in Atlanta. In the event of a radiological emergency, GEMA has broad legal authority to take whatever actions are deemed necessary to protect the health and safety of Georgia citizens. This authority includes, but is not limited to, evacuation of people from private property, control of public and private transportation corridors, and utilization of all public facilities in support of efforts to protect life and property.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment wording was standardized for the SNC sites and relocated to the Site Annex for those responders applicable to the site.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The fundamental legislation providing the basis for emergency response by civil authorities is the Georgia Emergency Management Act of 1981, as amended. This Act in part creates a State Emergency Management Agency (EMA); authorizes the creation of local organizations for emergency management; confers upon the Governor and the executive heads of governing bodies of the State certain emergency powers; and provides the rendering of mutual aid among the political subdivisions of the State, and with other states, and with the Federal Government.	No equivalent Plan/Annex statement.	The paragraph in the current Plan is historic in nature and provides no specific direction to response to the current Plan. The Site Annex clearly specifies the responsibilities of the respective OROs.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Other documents providing bases for emergency response are: 1. Governor's Executive Order, August 25, 1981: Recognizes the Georgia Emergency Management Act of 1981, which redesignates the State Civil Defense Agency as the GEMA. 2. Georgia Emergency Disaster Operations Plan: Contains the rules and regulations for operations, should an emergency or disaster occur in the State. The Plan is binding on all local governments authorized or directed to conduct emergency management operations and on all State departments or agencies. 3. Radiation Control Act, Georgia Code Annex 88-1301 et seq.: Delegates emergency powers during radiation emergencies to the DNR, Division of Environmental Protection. 4. Georgia Water Quality Control Act of 1974, as amended, Act No. 870. 5. Georgia Air Quality Control Act of 1978, as amended, Act No. 794. 6. Georgia Transportation of Hazardous Materials Act of 1979, Act No. 487.	No equivalent Plan/Annex statement.	The paragraph in the current Plan is historic in nature and provides no specific direction to response to the current Plan. The Site Annex clearly specifies the responsibilities of the respective OROs.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The duties and responsibilities of the principal and support agencies of the State of Georgia are summarized below. A detailed discussion of the State's response is contained in the Georgia RERP. Principal Agencies of the State of Georgia The following State agencies are assigned lead responsibility for radiological emergencies and for overall State preparedness, respectively:	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. GEMA a. GEMA is responsible for general State emergency planning and exercises, and overall direction and control of emergency or disaster operations as assigned by Executive Order. b. The Director of Emergency Management as the State Disaster Coordinator coordinates DNR emergency activities with overall State response efforts. c. On behalf of the Governor, activate all or portions of the Georgia Emergency Operations Plan to provide the necessary overall coordinated response. d. Provide communications for the State EOC, as required, through the 24-hour radio net, commercial telephone, National Warning System (NAWAS), teletype, or other communications systems. Communication links will be established, in accordance with existing procedures, with the State EOC, as well as with additional State and local emergency response personnel within the plume exposure pathway and 50-mile radius EPZs. These functions will initially be handled from the State EOC in Atlanta and once activated will be transferred to the Forward Emergency Operations Center (FEOC) in Vidalia. e. Maintain liaison with the DNR Radiation Emergency Coordinator (REC).	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the State of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
GEMA (cont) f. Activate public emergency warning and/or evacuation procedures, as needed, pursuant to the Georgia Emergency Operations Plan. g. Assist in performing radiological monitoring and provide radiological monitoring instrumentation. h. Provide radiological monitoring training assistance. i. In accordance with the Georgia Emergency Operations Plan, coordinate public information releases in cooperation with State and local agencies. j. Contact the Governor for National Guard assistance.		The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
DNR a. DNR is assigned primary responsibility by Executive Order for implementation and administration of the State radiological emergency response function. b. An REC in the Environmental Protection Division (EPD) interacts with appropriate State, local, and Federal agencies and private organizations to direct all necessary radiation control actions. The REC is on call 24 hours a day and will be notified by the GEMA Duty Officer. c. In situations beyond local government control, DNR provides program assistance in the application of available personnel, equipment, and technical expertise, as required. d. DNR requests State support agency(s) and Federal assistance pursuant to the Georgia Emergency Operations Plan, as required. e. DNR will escort media personnel within the plume exposure pathway EPZ as conditions allow, if access controls have been established. f. Dispatch radiation emergency teams, as needed. g. Perform radiation survey and monitoring, and provide protective equipment, as necessary. h. Provide technical advice and assist in substance identification.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
State Support Agencies The following State agencies are prepared to provide related support of this function as indicated pursuant to the Georgia Emergency Operations Plan: 1. Department of Human Resources Coordinate emergency health and social assistance pursuant to the Georgia Emergency Operations Plan.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Public Safety a. As applicable, assume control over the situation until the arrival of radiation safety personnel. b. Maintain liaison with the DNR REC. c. Provide communication linkage, as required. d. Provide land or air transportation, or escort, as available, for radiation safety personnel, other necessary personnel, or equipment. e. Assist in radiological monitoring, as required. f. Provide law enforcement assistance for area security or recovery of lost or stolen radioactive material. g. Coordinate with DNR law enforcement and local police. h. Assist in public warning or evacuation, as required, including ground and airborne means as available. i. Assist in area security and control. j. Provide land or air transportation, as requested, for radiation safety personnel, other necessary personnel, or equipment.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

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Department of Agriculture a. Collect samples of food products, livestock, produce, and dairy products, as necessary. b. Restrict the sale, production, distribution, and warehousing of livestock, produce, dairy, and processed food products contaminated beyond safe consumption. c. Assist in disposal of contaminated products. d. Coordinate these activities with United States Department of Agriculture (USDA) personnel. e. Maintain liaison with the DNR REC for assessing degree of contamination.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Transportation a. Assist in traffic control and routing, accident assessment, and recovery operations in transportation incidents. b. As requested, provide land, air, or water transportation for radiation safety personnel, other necessary personnel, or equipment. c. Provide communications linkage, as required. d. Assist State Patrol and DNR law enforcement in security and radioactive material escort, as requested. e. Provide heavy equipment and personnel, as required.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Forestry Commission a. Provide land or air transportation, as requested, for radiation safety personnel, other necessary personnel, or equipment. b. Provide personnel and heavy equipment, as required, to assist in recovery operations. c. Provide communication linkage, as necessary. d. Assist with public warning or evacuation, as required, including ground and air operations.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Department of Administrative Services a. Provide for expedient approval and purchase of equipment and supplies essential to emergency operations. b. Provide land transportation vehicles for emergency personnel. c. Provide emergency communications equipment and repair.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording describing the responsibilities of the agencies responding within the overall scope of the state of Georgia were described in the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
County Emergency Response The area within the plume exposure pathway in the State of Georgia falls within Appling, Jeff Davis, Tattnall, and Toombs Counties. The responsibility for radiological emergency response planning rests with each Chairman of the County Board of Commissioners or the Mayor of his respective jurisdiction. It is this individual's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within each county which have a primary role in radiological emergency planning and response include the EMA, and local law enforcement agencies.	**Annex 1.4.1** Georgia Counties (SEP A.2) The area in the plume exposure pathway in the state of Georgia falls within Appling, Jeff Davis, Tattnall, and Toombs Counties. The responsibility for radiological emergency response planning rests with the Chairman of each County Board of Commissioners, or the Mayor of a respective jurisdiction. It is this individual's responsibility to initiate actions and provide direction and control at a level consistent with the specific incident. Agencies within each county that have a primary role in radiological emergency planning and response include the EMA and local law enforcement agencies.	The wording was relocated to the Site Annex.
Local Emergency Management Agencies (LEMAs) Principal activities include the following: 1. Receive notification from HNP and GEMA. 2. Activate county resources, as necessary, to respond to the emergency. 3. Maintain communications with HNP on emergency situation status. 4. Provide information to other county response elements, the media, and the public. 5. Activate the public notification system, if required. 6. Activate the county EOC. 7. Coordinate the county emergency response activities. 8. Activate and direct operations at the designated reception and care facility.	**Annex 1.4.1** Principal activities of the LEMAs include the following; • Receive notification from HNP and GEMA. • Activate county resources, as necessary, to respond to the emergency. • Maintain communications with HNP on emergency situation status. • Provide information to other county response elements, the media, and the public. • Activate the public notification system, if required. • Activate the county EOC. • Coordinate the county emergency response activities. • Activate and direct operations at the designated reception and care facility.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Local Law Enforcement Agencies Principal activities include the following: 1. Control access to the plume exposure pathway EPZ. 2. Provide traffic control and law enforcement measures in the event of an evacuation. 3. Act as receiver of notification from HNP and GEMA.	**EP 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 1.4** Local Organizations (SEP A.2, B.6.1) Principal activities of Local Emergency Management Agencies (LEMA) and Local Law Enforcement Agencies (LLEA) in Georgia are described in the respective Emergency Operations Plans.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Others Other county resources, including the Fire Department, Health Department, and Public Works Department, may be mobilized as described in Annex A to the Georgia RERP.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Medical Support Plant Hatch has established agreements with the Appling Ambulance Service and the Meadows Regional Medical Center for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Agreements with the Appling General Hospital in Baxley, the Meadows Regional Medical Center in Vidalia, and a contract with a medical consulting group have also been established for treatment of injured and contaminated/irradiated individuals. Support provided includes, but is not limited to, emergency medical services, ambulances, and emergency medical technicians.	**EP B.6.2**: Agreements with ambulance services are in place to transport injured personnel from the plants to the designated medical facility. **Annex Section 2.3.3**: Plant Hatch has established agreements with the Appling County EMS and Toombs-Montgomery County EMS for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Request for medical support will be made by the control room or site security to the Appling County 911 center, Toombs County 911, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The commitment was relocated to the SNC Standard Emergency Plan and Annex unchanged.
Request for medical support will be made by the control room or site security to the Appling County 911 center, Appling or Toombs County EOCs, or the Incident Command Post, as applicable, based on the nature and timing of the event. Copies of these agreements are maintained in the SNC document management system and are included by reference in Appendix 2.	**Annex 2.3.3** Plant Hatch has established agreements with the Appling County EMS and Toombs-Montgomery County EMS for the transportation of injured personnel, including people who may be radioactively contaminated, to hospital facilities for treatment. Request for medical support will be made by the control room or site security to the Appling County 911 center, Toombs County 911, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Fire Support Plant Hatch has established an agreement with the Appling County EMA to provide, upon request, offsite fire support to the HNP Fire Brigade. Support provided includes, but is not limited to, firefighters and firefighting equipment. Request for fire support will be made by the control room or site security to the Appling County 911 center, Appling County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event. A copy of this agreement is maintained in the SNC document management system and is included by reference in Appendix 2.	**Annex 2.3.1** Fire Fighting (SEP B.6.4) Plant Hatch has established an agreement with the Appling County EMA to provide, upon request, offsite fire support to the HNP Fire Brigade. Support provided includes, but is not limited to, firefighters and firefighting equipment. Request for fire support will be made by the control room or site security to the Appling County 911 center, Appling County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex. No change in principal activities of the Local Agencies was made by this submittal.
Private Sector Organizations 1. Bechtel Power Corporation The licensee has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident. Bechtel's assistance will not be required during the early stages of the emergency response but is more likely to be requested during recovery activities.	**EP A.3.2**: SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.	The commitment was relocated to the SNC Standard Emergency Plan unchanged.
2. 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.	**EP A.3.4**: 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.	The commitment was relocated to the SNC Standard Emergency Plan unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
3. Voluntary Assistance Group The licensee is a signatory to two comprehensive agreements among electric utility companies: the Nuclear Power Plant Emergency Response Voluntary Assistance Agreement and the Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials.	**EP 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.	The SNC Standard Emergency Plan updated wording related to industry support from the Institute of Nuclear Power Operations. The intent of the commitment is unchanged.
Federal Government Support The resources of the Federal agencies appropriate to the emergency condition will be made available in accordance with national response plans. The ED is specifically authorized to request Federal assistance on behalf of the licensee under the provisions of this Plan. In addition to the Nuclear Regulatory Commission (NRC), other agencies which may become involved are the Department of Energy (DOE), the Federal Emergency Management Agency (FEMA), the Environmental Protection Agency (EPA), the Department of Health and Human Services, the Department of Transportation, and the Department of Agriculture.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Request federal assistance as needed	The SNC Standard Emergency Plan was standardized and the commitment moved without change in intent to the responsibilities section or the ED.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Concept of Operations The emergency preparedness (EP) program for HNP requires the coordinated response of several organizations. The emergency organization for HNP is described in detail in Section B of this Plan. The ED is the key individual in the HNP emergency organization; one of his nondelegable responsibilities is the decision to notify the NRC and those authorities responsible for offsite emergency measures.	**EP B.1.1**: The Emergency Director's non-delegable duties include: • Notification of offsite agencies and approval of state, local, and NRC notifications.	The SNC Standard Emergency Plan was standardized and the commitment moved without change in intent to the responsibilities section or the ED.
The interfaces among the emergency organizations are shown on Figure A-1.	No equivalent Plan/Annex figure	The responsibilities of the agencies were described in the SNC Standard Emergency Plan and Site Annex. The Figure was no longer informative in the organization of the Plan/Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Continuous Communication Capability The ED initiates the activation of various emergency response organizations by contacting the State of Georgia, county EMAs, and the NRC. All of these organizations can be contacted 24 hours a day. The State of Georgia and counties surrounding HNP have a continuously manned communication link, the Emergency Notification Network (ENN), for the purpose of receiving notification of a radiological emergency. The preferred contact for the county is the EMA Director. In the event of inability to contact the EMA Director, the designated 24-hour point of contact for each county will be contacted so the county officials can be notified.	**EP 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. 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. **EP 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 Communication, of this plan.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Federal agencies which may be requested by HNP to provide assistance can be notified by contacting the NRC on a dedicated communication link, the Emergency Notification System (ENS).	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The capability for 24-hour-per-day alerting and notification of offsite response organizations and plant emergency personnel is further described in Section E.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
State and County Operations The State and County responses are conducted in accordance with the following framework, as presented in the Georgia RERP: 1. As the lead radiation emergency response agency, the DNR is involved in virtually all peacetime radiation emergencies, regardless of severity, due to its assigned responsibility and the probable requirements for special techniques, equipment, and expert personnel. 2. As the designated agency to administer NRC Agreement State Programs, the Department of Natural Resources is the principal radiation emergency response support agency due to the probable requirements for special techniques, equipment, and expert personnel. 3. As the overall State coordinating agency, GEMA coordinates the DNR emergency response activities with State, County, and municipal agencies and departments, as stated in the Georgia Emergency Operations Plan. 4. To the extent available, local resources, personnel authority, and emergency plans are employed in response to radiation emergencies.	**EP A.2.2** State of Georgia **EP 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. **EP 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. **EP A.2.2.3** Other Georgia State Agencies Responsibilities of other state agencies are described in the Georgia Emergency Operations Plan (GEOP).	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
State and County Operations (cont) 5. When requested to assist in response and recovery efforts to radiation emergencies, personnel from local and other State agencies are normally expected to perform functions and activities in which they have expertise but may perform limited radiation safety functions under the guidance of the DNR REC. 6. In the case of occurrences of limited severity and complexity, direction and control of response and recovery operations will be assumed by the DNR REC; GEMA will be kept informed of conditions in order to facilitate GEMA response and Georgia Emergency Operations Plan activation, as deemed necessary. 7. When necessitated by the magnitude and severity of an occurrence, GEMA will activate the Georgia Emergency Operations Plan and coordinate overall response and recovery operations, with the DNR REC coordinating radiation protection activities through the State Disaster Coordinator.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The organizational structures for State and County operations are illustrated on Figures A-2 and A-3, respectively. The Georgia RERP and Annex A to the Plan provide the bases for a 24-hour-a-day radiological emergency response capability for extended periods.	No equivalent Plan/Annex figures **EP 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.	The specific organizational structures for state and county operations are in their respective Plans. The SNC Standard Emergency Plan and Site Annex contain the description of support expected of the agencies.
TABLE A-1 RESPONSIBLE INDIVIDUALS OF PRIMARY RESPONSE ORGANIZATIONS	No equivalent Plan/Annex figure	The specific organizational structures for state and county operations are in their respective Plans. The SNC Standard Emergency Plan and Site Annex contain the description of support expected of the agencies.
B. ONSITE EMERGENCY ORGANIZATION Initial staffing of the onsite HNP emergency organization is provided from personnel normally stationed at the site.	**EP B.1** 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 commitment was revised in the SNC Standard Emergency Plan to allow qualified personnel from other nuclear sites to be integrated into the site ERO should their skills be needed.
For reference throughout this section, the organizational chart for the HNP staff is presented in Figure B-1	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.
If the need arises, this staff is augmented substantially by the addition of other licensee personnel and by personnel from other organizations.	**EP 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). **EP Tables 1-4**	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
This section includes a description of the emergency duties of the normal shift complement, a discussion of the manner in which emergency assignments are to be made, a listing of additional support personnel upon whom the licensee can rely, and a description of the relationships between onsite and offsite response activities.	**EP Section B.1** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
Normal Plant Organization The organizational structure shown on Figure B-1 represents the pool of personnel normally available, approximately 900 people.	**EP 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. **Annex Table 2.2.A**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The operating crew for each unit includes one Shift Supervisor (SS), two Nuclear Plant Operators (NPOs), and two System Operators (SOs). A Shift Manager (SM) and a Shift Technical Advisor (STA) are also on shift during operation.	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.
In addition, personnel from the Health Physics (HP) Chemistry, Maintenance, and Security Departments are continuously onsite.	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section B: Once an emergency condition is determined and initial mitigating actions are underway, the ED has the responsibility to classify the event in accordance with the emergency classification system (described in Section D). Classification of an event into one of the four emergency categories [Notification of Unusual Event (NUE), Alert, Site Area Emergency, or General Emergency]	**EP B.1.1:** The Emergency Director's non-delegable duties include: • Event classification in accordance with the emergency classification system.	The commitment wording was standardized in the SNC system and the commitment relocated to the SNC Standard Emergency Plan description of responsibilities for the Emergency Director.
The extent to which the onsite HNP emergency organization is activated depends upon the severity of the situation.	**EP B.1** 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. **EP B.2** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Section B: Table B-1 provides a summary of personnel available on shift and those who would be available within approximately 60 min. of notification.	**EP Tables 1-4** **Annex Table 2.2.A**	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A copy of this On-Shift Staffing Analysis, which forms the technical basis for Table B-1, Minimum Shift Staffing, is maintained in the SNC document management system. Reference OSA-HNP-001.	**EP B.1** The On-Shift staff was validated by performing a detailed staffing analysis as required by Part 50 Appendix E, IV.A.9. **Annex 2.2** An On-Shift Staffing Analysis was completed in accordance with the *requirements of 10 CFR 50 Appendix E IV.A.9.* This analysis forms the basis for the on-shift staff as described in Table 2.2.A. A copy of the analysis is maintained in the SNC document management system.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
For an NUE, the ED assigns responsibility for making the appropriate notifications and directing the proper response; but no further activation of the emergency organization is required.	**EP 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 commitment wording was standardized. The SM acting as Emergency Director maintains the authority for all actions of Section B.
If the event is classified as an Alert, the Technical Support Center (TSC) and the Operations Support Center (OSC) are activated.	**EP H.1:** 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..	The commitment wording was standardized within SNC and the activation at Alert or higher transferred to the SNC Standard Emergency Plan unchanged. This License Amendment Requests includes the request to modify augmentation times to 75 minutes and is justified in the technical analysis section of this LAR

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Figure B-2 shows the emergency organization when fully activated.	**EP Figure B.2.B, B.2.C, B.2.D, and B.2.E:** Illustrates the standard Emergency Organization at all three sites.	The Emergency Response Organization was standardized within the three SNC sites. This License Amendment Requests includes approval of the standardized ERO. The ERO re-organization is justified in the technical analysis section of this LAR
Corporate personnel who may report to the plant site are provided the necessary training and are integrated into the HNP emergency organization, as necessary.	**EP O.4.1**: ERO members will receive Emergency Plan training on an annual basis. **EP O.4**: 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.	The commitment wording was standardized in the SNC Standard Emergency Plan. The SNC Standard Emergency Plan provides the equivalent commitment for Corporate personnel participating in the ERO to receive initial and annual retraining.
Relationships among the HNP emergency organization and other elements of emergency response are shown on Figure A-1.	No equivalent Plan/Annex figure	The SNC Standard Emergency Plan and Annex describe the elements of response. The Figure is no longer needed in the Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
During hostile action, ERO members would likely not have access to the onsite emergency response facilities. A security related emergency may delay the ordering of facility activation in order to protect plant personnel from the security threat. The decision to delay activation of the facilities will be made by the Emergency Director. In such cases, offsite ERO personnel will be directed to an alternative facility to minimize delays in overall site response by permitting ERO assembly without exposing responders to the danger of hostile action.	**Annex 5.1.4** Alternative Facility (SEP H.1.4) During a security-related event or other event that precludes onsite access, the TSC and OSC ERO will be directed to an alternative facility. This facility is located adjacent to the Georgia Power Company operating headquarters in Vidalia, Georgia and is approximately 22 miles from HNP. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, and to work planning resources for performing engineering assessment activities including damage control team planning, and preparation for return to the site. Guidance for use of the facility is in site procedures.	The wording was standardized and relocated to the Site Annex.
Emergency Organization Responsibilities Following an Alert or higher emergency declaration, the positions shown on Figure B-2 will be filled by emergency response personnel as discussed below.	**EP Figure B.2.B, B.2.C, B.2.D, and B.2.E:** Illustrates the standard Emergency Organization at all three sites. **EP H.1**: 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..	The Emergency Response Organization was standardized within the three SNC sites. The intent to activate facilities at an Alert or higher was relocated without change to the SNC Standard Emergency Plan. This License Amendment Requests includes approval of the standardized ERO. The ERO re-organization is justified in the technical analysis section of this LAR.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. ED The ED has the authority, management ability, and knowledge to assume the overall responsibility for directing HNP staff in an emergency situation.	**EP 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 commitment wording is standardized and relocated to the SNC Standard Emergency Plan without change in intent.
Initially this position is filled by the SM or any ED qualified SS.	**EP 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 commitment wording is standardized and relocated to the SNC Standard Emergency Plan without change in intent.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section B.1: Any of these persons will assume the ED position until the Plant Manager, the Site Support Manager, the Operations Manager, the Engineering Director, the Maintenance Manager, the Vice President-Hatch, or other qualified EDs can arrive onsite and receive an adequate turnover.	**EP O.1** 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 commitment wording was standardized with the SNC Standard Emergency Plan. Specific titles were modified to allow flexibility in assignment of management resources. The intent of the commitment is maintained unchanged.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED manages the following activities for the duration of the emergency: • Notification and communication: directs the notification of HNP and licensee personnel and communications with offsite authorities regarding all aspects of emergency response. • Emergency response facilities (ERF): oversees the activation and staffing and requests additional assistance, as needed. • Emergency operations: has authority over those actions taken to mitigate the emergency condition or reduce the threat to the safety of plant personnel or the public, including the recommendation of protective actions to offsite authorities. • Emergency services: provides overall direction for management of procurement of site-needed materials, equipment, and supplies; documentation; accountability; and security functions. • Emergency operations planning: provides overall direction for the management of planning for procedure, equipment, and system development to support emergency operations. • Discretionary authority: may tailor the emergency organization to fit the specific staffing needs on a case-by-case basis.	**EP B.1.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED may not delegate the following responsibilities: • The decision to notify offsite emergency response agencies. • The decision to recommend protective actions to offsite authorities. • Declaration of emergency classifications. • Authorization for plant personnel to exceed 10 CFR 20 radiation exposure limits. • The decision to terminate the emergency. • The decision to request Federal assistance. • The decision to dismiss nonessential personnel from the site at an Alert classification level or higher. • Authorization of the use of potassium iodide.	**EP B.1.1** *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.	*The wording was standardized and relocated* to the SNC Standard Emergency Plan.
The ED may operate from the Control Room or the TSC at his discretion. He may act as the TSC Manager during the early phases of emergency response, as needed. It is the intent of SNC that the ED will be transferred from the Control Room as soon as practicable.	**EP 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. EP Figure B.2.A	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
It is the intent of SNC that the ED will be transferred from the Control Room as soon as practicable.	**EP 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. EP Figure B.2.A	The wording was standardized and relocated to the SNC Standard Emergency Plan.
TSC Staff a. TSC Manager The TSC Manager performs the following activities: • Coordinates inputs and recommendations from technical and corrective action advisors. • Directs onsite HNP emergency personnel involved in restoration of the plant to a safe condition. • Provides technical assistance and operations guidance to Control Room personnel. • Directs TSC staff in analysis of problems, design and planning for temporary modifications, and development of temporary emergency operating procedures (EOP). • Recommends protective actions to the ED based on plant conditions. • Provides the ED recommendations on emergency classifications.	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
b. Support Coordinator (TSC) The Support Coordinator in the TSC directs the clerical and logistic activities in the TSC. He ensures support staff, including Clerks and Communicators/Recorders, are available in sufficient numbers and that office supplies, drawings, and other documents are available to TSC personnel. He ensures transportation and communication needs are satisfied. When the EOF is activated, the Support	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
c. Engineering Supervisor The Engineering Supervisor directs a staff of engineers with expertise in reactor engineering, thermal and hydraulic analysis, instrumentation and control, and mechanical and electrical systems. He directs the analysis of plant problems and provides recommendations for plant modifications to mitigate the effects of the accident.	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
d. Maintenance Supervisor The Maintenance Supervisor manages the planning and coordination of repair, damage control, and plant modification activities. He works closely with the Engineering Supervisor in planning for plant modifications and repairs.	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
e. Operations Supervisor The Operations Supervisor analyzes problems associated with systems operations and provides recommendations for procedures for mitigating the emergency situation.	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
f. HP/Chem Supervisor The HP/Chem Supervisor makes radiological accident assessments and provides support for analyzing radiological changes during the event.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The title was changed to reflect current site terminology.
g. Security Supervisor The Security Supervisor has the following responsibilities: • Processing of personnel who require authorization to enter the site. • Requesting assistance through the ED from civic law enforcement authorities, if required. • Ensuring site accountability and access control are maintained.	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
OSC Staff a. OSC Manager The OSC Manager receives direction from the TSC to dispatch emergency teams (e.g., firefighting, rescue, first aid, repair, etc.) to prescribed areas of the plant or site. The OSC Manager directs composition of the teams to ensure appropriately qualified personnel are assigned. In particular, he ensures proper HP coverage is provided. The OSC Manager ensures specific instructions are provided to the team leaders and maintains communications with the teams to monitor the status of their activities.	**EP 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.	The SNC Standard Emergency Plan provides standardized description of the position responsibilities. The intent of the position was not changed.
b. OSC Personnel Selected personnel report to the OSC, as directed. Emergency personnel from the Maintenance, the Operations, and the HP/Chemistry Departments are directed to report to the OSC. The following emergency teams are formed, as necessary: • Fire brigade. • Search and rescue. • Repair. • Post-accident sampling. • Internal survey. • Field monitoring. • Rally point.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The fire brigade is identified as part of the on-shift functional capabilities subsequently supported by offsite response.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Each OSC team is headed by a designated team leader, who maintains communication with the OSC.	**EP 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
The field monitoring teams are dispatched to the Simulator Building to prepare for field monitoring activities.	**EP I.7** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
These teams are under the control of the on-shift HP/Chem Foreman until relieved by the HP/Chem Supervisor in the TSC or the Dose Assessment Supervisor in the EOF.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The title was changed to reflect current site terminology.
EOF Staff The description of the EOF staff positions is contained in Appendix 7.	**EP B.3.1** EOF Organization	The SNC Standard Emergency Plan integrates the EOF organization into the overall ERO. See Appendix 7 section of the Justification Matrix for the detailed evaluation of the EOF positions.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Emergency Organization Assignments Table B-2 identifies by title the individuals who will fill the key emergency positions. No individual listed in Table B-2 is identified as the primary candidate for more than one emergency position. Some primary candidates are identified as alternates for other emergency positions. It is expected that one person may occupy up to two emergency positions within the same emergency.	**EP B.2:** 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. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
During the first 6 hours of an emergency, the emergency response positions will be manned by qualified available personnel. A sufficient number of people are identified to ensure that all emergency positions listed on Table B-2 will be filled on a 24-hour-a-day basis.	**EP B.2**: 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. Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Alternative Facility Staff The ERO staff will be directed to report to the Alternative Facility during a security related event or other events that preclude onsite access. This facility functions as a staging area for augmentation of emergency response staff and provides the capability for communication with the EOF, control room, and plant security. From this facility the ERO will support event response by performing engineering assessment activities, including damage control team planning and preparation for return to the site. The command and control function will remain with the ED in the control room until relieved by another onsite ED. Dose assessments and offsite notifications will be performed by the EOF.	**Annex 5.1.4** Alternative Facility (SEP H.1.4) During a security-related event or other event that precludes onsite access, the TSC and OSC ERO will be directed to an alternative facility. This facility is located adjacent to the Georgia Power Company operating headquarters in Vidalia, Georgia and is approximately 22 miles from HNP. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, and to work planning resources for performing engineering assessment activities including damage control team planning and preparation for return to the site. *Guidance for use of the facility is in site* procedures.	The wording was standardized and relocated to the Site Annex.
Other Support Services 1. Contractor Support Arrangements have been made to obtain support services from Bechtel Power Corporation, and GE, if required.	**EP A.3.2**: SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Support capability has been available through the joint efforts of the SNC corporate office staff and Southern Company Services (SCS) architect-engineering and service company. As a result of the consolidation of SCS and SNC nuclear expertise, and in addition to being the licensee, SNC also serves as its own architect/engineer and performs the functions previously performed by SCS.	**EP A.3.1** Southern Nuclear Operating Company (SNC) Southern Nuclear Operating Company (SNC) serves as the architect-engineer. **EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The EOF Support Coordinator initially contacts these organizations to arrange for the required assistance.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The title was changed to better describe the expected responsibilities.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
2. Medical Assistance Agreements are in place with the Appling General Hospital, the Meadows Regional Medical Center, and the Appling and Toombs Counties Ambulance Services (Appendix 2) and a contract with a medical consulting group to provide assistance for injured personnel, including cases involving radioactive contamination. This assistance is requested whenever necessary in accordance with plant procedures.	**EP 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 in the SNC plant's site-specific Annex. **Annex 5.8.1** Hospital and Medical Support (SEP B.6.3, L.1) Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site, and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex. Each area contains facilities and equipment for emergency surgery, personnel dosimetry, decontamination, radioactive waste recovery, and portable shields for attendant exposure control. These facilities enable the emergency treatment and the handling of contaminated individuals. Non-contamination injuries will be handled by the hospital with its routine facilities.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
3. Offsite Fire Assistance Agreements are in place with the Appling County EMA to provide onsite HNP Fire Brigade in the unlikely event of a fire requiring offsite assistance. This assistance is requested according to plant procedures.	**Annex 2.3.1** Fire Fighting (SEP B.6.4) Plant Hatch has established an agreement with the Appling County EMA to provide, upon request, offsite fire support to the HNP Fire Brigade. Support provided includes, but is not limited to, firefighters and firefighting equipment. Request for fire support will be made by the control room or site security to the Appling County 911 center, Appling County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.
4. Agency Support Assistance may be requested from the State of Georgia or the Federal agencies. Section A of this Plan describes the assistance that may be requested. Any requests for aid are made by the ED.	**EP Section C** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Interfaces Among Response Groups Section A, Figure A-1, illustrates the integrated organization for response to an emergency at HNP.	No equivalent Plan/Annex figure	The SNC Standard Emergency Plan and Annex now specifically describe the responsibilities of the various response groups. Figure A-1 is no longer required.
TABLE B-1 MINIMUM STAFFING CAPACITY FOR EMERGENCIES	**Annex Table 2.2.A**	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
TABLE B-2 EMERGENCY ORGANIZATION ASSIGNMENTS	**EP O.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE B-1 TYPICAL HNP ORGANIZATION CHAR	**EP Figure P.1**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE B-2 TYPICAL ALERT, SITE AREA OR GENERAL EMERGENCY RESPONSE ORGANIZATION	**EP B.2:** Figures B.2.B through B.2.E illustrate the overall augmented emergency response organization.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
C. EMERGENCY RESPONSE SUPPORT AND RESOURCES State and Local Governmental Support The State of Georgia through the GEMA has the lead agency responsibility for responding to emergency situations throughout Georgia. Under the procedure established by the Natural Disaster Operation Plan, which was developed pursuant to the Governor's Executive Order, the DNR radiological emergency response team, under the direction of GEMA, assesses the radiological conditions at the site of an incident and determines whether a state of emergency exists. Upon GEMA's advising the Governor of the State of Georgia that a radiological emergency exists, the Governor declares an emergency condition which activates the GEMA. The LEMAs may activate independently or prior to the Governor's declaration of a state of emergency. However, the LEMA must be activated in conjunction with the GEMA activation. [(Reference the State of Georgia RERP).]	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The concept of operations for which the State of Georgia discharges this responsibility, together with a discussion of action responsibilities assigned to various State/County governmental agencies is contained in the State of Georgia REP, and Annex A to the REP, HNP. For a complete discussion of authority, assigned responsibilities, capabilities, and activation and communication arrangements, refer to these plans.	**Annex 1.3** State of Georgia (SEP A.2.2) Upon notification of an emergency condition, the Georgia Emergency Management Agency will implement the "State of Georgia Radiological Emergency Plan." The Georgia Emergency Management Agency has the authority and responsibility for coordinating the efforts of local and state agencies in Georgia to provide for the health and safety of the general public in the event of a radiological incident. An agreement is in place with the state of Georgia to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, fire fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Burke County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Agreements are in place with the State of Georgia, Appling County, Toombs County, Tattnall County, and Jeff Davis County to provide available resources and equipment to support the mitigation and response to an emergency at Plant Hatch to include Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, Fire Fighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room to the Appling County 911 center, the county EOCs, or through the Incident Command Post, as applicable, based on the nature and timing of the event. Copies of these agreements are maintained in the SNC document management system and are included by reference in Appendix 2	**Annex 1.5** Hostile Action Based Events (SEP H.1.4) Agreements are in place with the state of Georgia and counties of Appling, Jeff Davis, Tattnall, and Toombs to provide available resources and equipment to support mitigation and response to an emergency at Edwin I. Hatch Nuclear Plant, including Hostile Action Based events. These resources include, but are not limited to, Local Law Enforcement Agency (LLEA) assets, firefighting assets, medical support resources (including transportation), and coordination through an Incident Command Post. Requests for offsite resources and equipment will be communicated from the control room or site security to Appling County 911 Center, the county EOCs, or through the Incident Command Post as applicable based on the nature of the event. Copies of these agreements are maintained in accordance with Emergency Plan procedures.	The wording was standardized and relocated to the Site Annex.
It is expected that a few State representatives, including one skilled in making dose calculations and radiological assessments, will be dispatched to the EOF. The licensee will send a technical representative to the offsite governmental centers, as needed or as requested.	**EP 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. **EP H.2.1** SNC will maintain space for members of an NRC Site Team.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Federal Governmental Support In addition to coordination with State/County governmental entities in an emergency situation, the licensee may require assistance from certain Federal agencies in the areas of communications, radiological monitoring and laboratory analysis, transportation, and disaster relief.	No direct statement in Plan/Annex. **EP A.1** Primary Federal Organizations **EP 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). **EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Requests for Federal assistance are directed, as needed, by the ED, and usually these requests are channeled through GEMA. The exceptions to this procedure are direct contacts between the licensee Emergency Organization and the NRC.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Request federal assistance as needed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
In the event of an incident in which Federal assistance is needed to supplement State/County emergency response capabilities, principal points of contact for State government are as follows: • The FEMA, Region Headquarters in Atlanta. • The DOE, Region Operations Office in Aiken, South Carolina. • The EPA, Region Headquarters in Atlanta.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Request federal assistance as needed.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The FEMA is assigned lead responsibility for Federal offsite nuclear emergency planning and response (per Title 44 CFR 351). FEMA is also delegated responsibility for development and promulgation of the Federal Radiological Emergency Response Plan (FRERP) which assumes states will be responsible for overall management of offsite emergency response. The Federal government's role consists of providing technical and/or logistical resource support at the request of State emergency management.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Federal emergency response consists of technical and nontechnical components. The NRC and FEMA jointly coordinate federal emergency response actions.	No direct statement in Plan/Annex. **EP 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. **EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The NRC coordinates technical aspects, and FEMA coordinates nontechnical aspects of Federal response.	No direct statement in Plan/Annex. **EP 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. **EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The NRC and FEMA have stated that they each expect to have a representative at HNP within approximately 3 hours after receiving notification. DOE can give assistance within approximately 2 hours.	No equivalent Plan/Annex statement.	Section H of the SNC Standard Emergency Plan and Site Annex describe the space made available to federal responders.
Airfields within the plant vicinity that may be used to support the Federal response, as well as that of other response groups, include a commercial airport with scheduled service and nearby municipal airports that can accommodate small aircraft. The approximate distance and direction to these airfields are as follows: (List of Airfields and distance from site not included for simplicity)	No equivalent Plan/Annex statement.	Section H of the SNC Standard Emergency Plan and site annex describe the space made available to federal responders.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Licensee Support The licensee provides space, telephone communications, and administrative services for up to five NRC personnel at the TSC.	**EP H.1.2**: SNC operated nuclear power plants have established a TSC for use during emergency situations by plant management, technical, and engineering support personnel. **Annex 5.1.2**: The TSC provides plant management and technical support personnel, including NRC personnel, with adequate space to assist plant operating personnel located in the Control Room during an emergency. **Annex Figure 5.1.A**: TSC Layout	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Accommodations for the NRC, State of Georgia, and FEMA representatives in the EOF are described in Appendix 7.	**EP H.2.1** 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).	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Other Support The licensee expects services to be available from qualified organizations to provide radiochemical laboratory analysis, environmental monitoring assistance, and medical support services should a serious emergency occur.	**EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services **EP C.4.1** 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. • 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Other private organizations that supply engineering, HP, and general emergency support are as follows: • GE, Wilmington, NC and San Jose, California.	**EP 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,	The wording was standardized and relocated to the SNC Standard Emergency Plan.
• Institute of Nuclear Power Operations (INPO), Atlanta, Georgia.	**EP C.4.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The NSSSs for the plant were purchased from GE, who continues to provide operations support to the company in plant modifications, licensing, and engineering.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
As a member of INPO, the licensee is provided with INPO's Emergency Response Manual. This manual identifies the various organizations (utilities, service companies, and reactor vendor) that could be expected to provide resources in response to a request for emergency support.	**EP C.4.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
As referenced throughout this Plan, a number of offsite licensee departments and the Southern Company companies may be involved in the emergency response effort. These departments have, where appropriate, developed separate nuclear emergency response plans and procedures governing their emergency functions. Coordination of these plans to ensure a consistent integrated response is the responsibility of the SNC.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
These specific plans include: • HNP Emergency Communication Plan, controlled by the GPC Corporate Communications Department. • HNP Security Plan, controlled by the Security Department. • HNP Fire Hazards Analysis and Fire Protection Plan, controlled by Engineering Support.	**Annex Appendix C** - Supporting Plans & Implementing Procedures (SEP P.3) Supporting Plans • State of Georgia Radiological Emergency Response Plan • HNP Security Plan • HNP Fire Protection Plan	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
D. ASSESSMENT ACTIONS Classification of Emergencies The classification system is based on the four emergency classes described in 10 CFR 50 Appendix E and NUREG 0654, established by the NRC, for grouping off-normal nuclear power plant conditions according to (1) their relative radiological seriousness and (2) the time-sensitive onsite and offsite radiological emergency preparedness actions necessary to respond to such conditions.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan unchanged.
The existing radiological emergency classes, in ascending order of seriousness, are called: • Notification of Unusual Event (NUE) • Alert • Site Area Emergency (SAE) • General Emergency (GE)	**EP D.1.1.2** The four emergency classification levels are described as follows: Unusual Event Alert Site Area Emergency General Emergency	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan unchanged.
The classes, therefore, determine initial steps to be taken by onsite and corporate emergency response personnel. The emergency classes are used by offsite authorities to determine which of the preplanned actions are to be taken by their emergency organizations.	**EP D.1.1.2** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
An emergency classification is indicative of the status of the plant. Inputs to the emergency classification system include the status of various plant systems, radiation levels in and around plant areas, and the rate of release of radioactivity from the plant. These are termed Initiating Conditions (ICs) , which are a predetermined subset of nuclear power plant conditions where either the potential exists for a radiological emergency or such an emergency has occurred.	**EP D.1.1.2** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
The SNC classification scheme is based on NEI 99-01, Revision 4, Methodology for Development of Emergency Action Levels, January 2003, endorsed by Reg. Guide 1.101, Revision 4, Emergency Planning and Preparedness for Nuclear Power Reactors. The ICs lead each plant to a classification implementing procedure which contains the Threshold Values (TVs) for each IC.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. This submittal does not change the existing approved EAL scheme.
Each IC has specific conditions associated that are termed TVs. When an IC is observed and the criteria of its associated TVs are met, an Emergency Action Level (EAL) is met and the event is then classified and declared at the appropriate level.	**EP D.2.1** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The SNC classification procedures are written to classify events based on meeting the IC and a TV for an EAL considering each unit independently. During events, the ICs and TVs are monitored and, if conditions meet another higher IC and EAL, then the higher emergency classification is declared and appropriate notifications are made. Notifications are made on a site basis. If both units are in concurrent classifications, the highest classification will be used for the notification and the other unit's classification events are noted on the notification form.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
At all times, when conditions present themselves that are not explicitly provided in the EAL scheme, the ED has discretion to declare an emergency based on his knowledge of the emergency classes and judgment of the situation or condition.	No equivalent Plan/Annex statement.	The approved EAL scheme provides for Emergency Director judgment in Classification with specific Emergency Action Levels.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Classification Timeliness The emergency declaration process starts with information being available to plant operators to recognize an off-normal plant condition via indications on plant instrumentation, including alarms, or via reports from other plant personnel (e.g., reports of fire) or from persons outside of the plant (e.g., severe weather warnings). The plant operators assess the validity of these indications or reports by checking instruments, comparing indications on redundant instruments, or dispatching personnel to confirm reports. After validating the indication or report, the plant operators then compare the off-normal condition to the EAL thresholds in the emergency classification scheme. Not all off-normal conditions are immediately obvious, and not all indications are unambiguous. While some conditions can be classified upon recognition, others require further assessment.	**EP D.1.1.1** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
The capability to assess, classify, and declare an emergency condition within 15 minutes after the availability of indications to plant operators that an EAL has been exceeded has been established and is outlined in applicable procedures. Emergency conditions are classified promptly upon identification that an emergency action level (EAL) threshold has been exceeded.	**EP D.1.1.1** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The 15-minute period encompasses all assessment, classification, and declaration actions associated with making an emergency declaration from the first availability of a plant indication or receipt of a report of an off-normal condition by plant operators up to and including the declaration of the emergency. If classifications and declarations are performed away from the CR, all delays incurred in transferring information from the CR (where the alarms, indications, and reports are first received) to the ERF (at which declarations are made) are included within the 15-minute criterion.	**EP D.1.1.1** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
Once an emergency classification is made, it cannot be downgraded to a lower classification. Actions associated with the emergency classification level will normally be completed and then a termination of the event can be affected. 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.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The described emergency classes and the emergency action levels (EAL) which determine them are agreed on by SNC and State and local authorities. The EAL will be reviewed by these officials annually.	**EP D.1.1.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
1. Notification of Unusual Event (NUE) a. Description The classification of a NUE applies to situations in which events are in process 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.	**EP D.1.1.2** 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 off-site response or monitoring are expected unless further degradation of safety systems occurs.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
b. Response In the event of a NUE, the SM will assess the conditions, assume the ED duties, and implement the classification Emergency Implementing Procedure (EIP).	No direct equivalent Plan/Annex Statement	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Organization will perform the following: 1) Inform State and local offsite authorities of the nature of the unusual event within 15 min of classifying the emergency. Notify the NRC as soon as possible (ASAP), but no later than 1 hour following classification of the emergency. 2) Augment on-shift resources, as needed. 3) Assess and respond to the event. 4) Escalate to a more severe class, if appropriate, or close out with a verbal summary to offsite authorities followed by a written summary within 24 hours.	**EP E.1.1** 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, section IV(D)(3). NRC will be notified by the Headquarters Operations Officer, immediately following state and local notifications, but within an hour of an emergency classification. **EP E.2.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Alert a. Description The classification of Alert applies to situations in which events are in process *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 intentional malicious dedicated efforts of hostile action. Any releases of radioactive material for the Alert classification are expected to be limited to small fractions of the U.S. Environmental Protection Agency (EPA) Protective Action Guideline (PAG) exposure levels. The purpose of offsite notification is to assure that emergency personnel are readily available to respond if the situation becomes more serious or to perform confirmatory radiation monitoring if required and to provide offsite authorities current status information.	**EP D.1.1.2** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
b. Response In the event of an Alert, the SM will assess the conditions, assume the ED duties, and implement the classification EIP.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Organization will then perform the following: 1) Within 15 min. of classification, inform State and local offsite authorities of Alert and reasons for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) Augment resources and activate the emergency response facilities [e.g., Technical Support Center (TSC), Operational Support Center (OSC) and the Emergency Operations Facility (EOF)]. These actions may be delayed for security based events at the discretion of the ED. 3) Assess and respond to the emergency. 4) Mobilize, and dispatch if necessary, onsite survey teams. 5) Provide periodic plant status updates to offsite authorities. 6) Provide periodic meteorological assessments to offsite authorities and, if any emergency releases are occurring, field monitoring team readings or dose estimates for actual releases. 7) Activate the Emergency Response Data System (ERDS) for the affected unit within 1 hour following declaration of the Alert. 8) Escalate to a more severe class, if appropriate, or close out the emergency class by verbal summary to offsite authorities followed by written summary within 8 hours of closeout.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Emergency Organization. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Site Area Emergency (SAE) a. Description The classification of a SAE applies to those events which are in progress or have occurred that involve actual or likely major failures of plant functions needed for protection of the public from radiation or contamination or hostile action that results in intentional damage or malicious acts; (1) toward site personnel or equipment that could lead to the likely failure of or; (2) prevent effective access to, equipment needed for the protection of the public. Any releases of radioactive material for the SAE classification are not expected to exceed EPA PAG exposure levels except near the site boundary.	**EP D.1.1.2** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
b. Response In the event of a SAE, the SM will assess the conditions, assume the ED duties and implement the classification EIP.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Organization will perform the following: 1) Within 15 min of classification, inform State and local offsite authorities of SAE and reasons for emergency. Notify the NRC ASAP *but no later than 1 hour following classification* of the emergency. 2) If necessary, provide protective action recommendations to State and local authorities. 3) Augment resources and activate the emergency response facilities (e.g., TSC, OSC, and the EOF). These actions may be delayed for security based events at the discretion of the ED. 4) Assess and respond to the emergency. 5) Dispatch, as necessary, onsite and offsite survey teams. 6) Dedicate individuals for plant status updates to offsite authorities and periodic press briefings. 7) On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. 8) Provide meteorological information and dose estimates to offsite authorities for actual releases via a dedicated individual. 9) Provide release and dose projections based on available plant condition information and foreseeable contingencies. 10) Activate the ERDS for the affected unit within 1 hour following declaration of the SAE. 11) Escalate to GE, if appropriate, or close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Emergency Organization. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
General Emergency (GE) a. Description The classification of GE applies to those events which are in progress or have occurred which involve actual or imminent substantial core degradation or melting with potential loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Release of radioactive material for the GE classification can reasonably be expected to exceed EPA PAG exposure levels offsite for more than the immediate site area.	**EP D.1.1.2** GENERAL EMERGENCY 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 off-site for more than the immediate site area.	*The wording was standardized and relocated* to the SNC Standard Emergency Plan.
b. Response In the event of a GE the SM will assess the conditions, assume the ED duties and implement the classification EPIP.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Shift Manager/Interim ED. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Organization will then perform the following: 1) Within 15 min of classification, inform State and local offsite authorities of GE and reason for emergency. Notify the NRC ASAP but no later than 1 hour following classification of the emergency. 2) Provide protective action recommendations to State and local authorities based upon plant conditions and/or actual or projected releases of radioactive material. 3) Augment resources and activate the emergency response facilities (e.g. TSC, OSC, and the EOF). These actions may be delayed for security based events at the discretion of the ED. 4) Assess and respond to the emergency 5) Dispatch onsite and offsite survey teams. 6) Dedicate an individual for plant status updates to offsite authorities and periodic press briefings. 7) On a periodic basis, make senior technical and management staff available for consultation with the NRC and State officials. 8) Provide meteorological data and field monitoring team readings or dose estimates to offsite authorities for actual releases. 9) Provide release and dose projections based on plant condition and foreseeable contingencies. 10) Activate the ERDS for the affected unit within 1 hour following declaration of the GE. 11) Close out the emergency class by briefing offsite authorities, followed by a written summary within 8 hours of closeout.	No direct equivalent Plan/Annex Statement.	Section B of the SNC Standard Emergency Plan describes the overall responsibilities of the Emergency Organization. Repetition in this section was eliminated.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Classification Process The classification EIP is used to classify the emergency condition upon recognition of an off-normal condition relative to an IC.	No direct equivalent Plan/Annex statement	The site responsibility for Classification is described throughout Section D of the SNC Standard Emergency Plan and individually assigned in Section B.
To facilitate the expeditious classification of emergencies, the various ICs which may result in an emergency class are grouped into six recognition categories as follows: • Radiological (Hot and Cold – R series) • Fission product barriers (Hot – F series) • System malfunctions (Hot – S series) • System malfunctions (Cold – C series) • ISFSI (Hot and Cold – E series) • Hazards (Hot and Cold – H series)	**EP D.2.1**: 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Within each category, subcategories and specific ICs are identified. The EAL, ICs, TVs, and bases are provided in Appendix 8.	**Annex Appendix B**	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The 15-minute period encompasses all assessment, classification, and declaration actions associated with making an emergency declaration from the first availability of a plant indication or receipt of a report of an off-normal by plant operators up to and including the declaration of the emergency. If classification and declarations are performed away from the CR, all delays incurred in transferring information from the CR (where the alarms, indications, and reports are first received) to the ERF (at which declarations are made) are included within the 15-minute criterion.	**EP D.1.1.1** 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE D-1 – "HOT" INITIATING CONDITION MATRIX	**Annex Appendix B**	The approved EAL scheme is not impacted by this submittal.
FIGURE D-2 – "COLD" INITIATING CONDITION MATRIX	**Annex Appendix B**	The approved EAL scheme is not impacted by this submittal.
E. NOTIFICATION METHODS AND PROCEDURES This section describes the plan for notification of onsite and offsite licensee emergency response personnel for HNP, State, local, and NRC emergency response centers. Actual methods and sequencing of notifications are covered in appropriate implementing procedures. Table E-1 presents the initial notification concept for normal working hours and backshift hours.	**EP E.1.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Notification of HNP Personnel The ED is responsible for classifying an event (Section D) into the appropriate emergency class and ensuring onsite personnel are notified accordingly. This notification involves sounding the appropriate plant emergency alarm signal, making appropriate announcements over the plant public address (PA) system, and using the plant telephone system.	**EP E.2.1**: 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The primary means for notification of personnel within the controlled area is the PA system. Upon declaration of an Emergency, personnel will be notified by a page announcement. For declaration of an Alert, a Site Area Emergency, or a General Emergency, this notification will be preceded by a warning tone. Likewise, page announcements for a Fire will be preceded by a specific tone. During security related events, the ED may elect to not sound a warning tone and, in such cases, will provide event specific instructions for onsite personnel over the PA system as well as other available communications means as needed.	**EP E.2.1:** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
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. All such notifications would be accomplished in accordance with the Emergency Plan implementing procedures.	**EP E.2.1:** 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.	The commitment to warn plant personnel has been relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Visitors within the protected area are escorted by a permanently badged individual who is responsible for informing the visitors of emergencies when they occur and for taking action to evacuate the visitors from the site, as necessary.	**EP E.2.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The ED is responsible for notifying the Hatch Duty Manager (who is on call 24 hours a day). This Duty Manager contacts Corporate. These notifications may be made utilizing available communications systems.	No Equivalent Plan/Annex Statement.	The commitment to warn plant personnel has been relocated to the SNC Standard Emergency Plan.
Selected plant management can also be reached utilizing available communications systems.	No equivalent Plan/Annex statement.	The lack of specificity in the existing Plan statement provides no benefit to the Plan. Notification responsibilities for the ORO and ERO are specifically laid out. Additional notifications are an administrative decision and not needed in the Emergency Plan.
During normal working hours, emergency response personnel report to their assigned locations at the TSC and the OSC, as required by the specific emergency classification. Notification of EOF personnel will be accomplished utilizing available communications systems in accordance with Appendix 7.	**EP E.2.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
During backshift hours, the Operations SM is responsible for initiating the notification process to required emergency response personnel, directing them to report to their designated ERF. These notifications may be made utilizing available communications systems.	**EP E.2.1** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Notification of State and Local Response Personnel The ED is responsible for ensuring that the State and local counties surrounding HNP are notified in a timely and accurate manner of an emergency condition.	**EP E.2.1:** 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
This notification consists of the information on the Emergency Notification Form (Figure E-1) being given within approximately 15 min of declaring an emergency to the following agencies: Georgia EMA. The 24-hour warning points of Appling, Jeff Davis, Tattnall, and Toombs Counties.	**EP 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. **Annex 4.1.1**: State and local warning points are staffed 24 hours per day. State and county authorities to be notified within 15 minutes of the declaration of an emergency condition are: • Georgia Emergency Management Agency (GEMA). Georgia county authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
These agencies are responsible for notifying appropriate response personnel in accordance with their emergency plans and procedures. The ENN is a dedicated communications system that is normally used to accomplish these notifications. Commercial telephone, microwave, or land lines provide backup for the ENN.	**EP 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 Communication, of this plan.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Figure E-1 presents the sample Emergency Notification Form for making notifications to these response centers. This form has been developed in conjunction with appropriate agencies. The Emergency Notification Form may be revised upon receipt of State and utility approval. Any revisions to the Notification Form are incorporated into the applicable *implementing procedure are included in* the next revision to the Emergency Plan.	**EP 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. ***Annex 4.1.1**: State and local warning points* are staffed 24 hours per day. State county authorities to be notified within 15 minutes of the declaration of an emergency condition are: • Georgia Emergency Management Agency (GEMA). Georgia County Authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Verification of Notification Messages All ENN notification messages must be verified as being received by the State of Georgia and Appling, Jeff Davis, Tattnall, and Toombs Counties. Verification is normally accomplished by roll call.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Notification of Federal Agencies The ED is responsible for ensuring notification calls are made to the NRC Operations Center by the ENS or commercial telephone as backup within the prescribed time constraints from the declaration of an emergency. A sample of the form used to provide the notification to the NRC Operations Center is shown in Figure E-2.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Notification of the Public Administrative and physical means have been established for providing early notification and clear instruction to the populace within the plume exposure pathway EPZ. (See Appendix 3.) The prompt notification system has a capability to complete the initial notification within 15 min.	**EP 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. **Annex 4.2** The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations through EAS. Capability for activation of the calling system is provided for Appling County, Georgia, and for the state of Georgia.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The initial notification, when appropriate, of the affected population within the plume exposure pathway EPZ is to be completed by the State and/or local authorities in a manner consistent with assuring the public health and safety.	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The wording was standardized and relocated to the Site Annex.
The primary means for alerting and providing instructions to the public is by a siren system and Emergency Alert System (EAS). The prompt notification system (PNS) is described in Appendix 3.	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia	The wording was standardized and relocated to the SNC Standard Emergency Plan. See detailed description of the Siren System was relocated to the Site Annex. See the details of Justification in the Appendix 3 section of this document.
The licensee will provide offsite authorities with supporting information for their messages to the public. Such messages, consistent with the emergency classification scheme, will provide the public with instructions in regard to specific protective actions to be taken by occupants of affected areas.	**EP E.2.5.1** Detailed information and instructions will be provided on local EAS radio and television stations.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
F. EMERGENCY COMMUNICATIONS This section describes the provisions for communications among the principal response organizations and among the licensee ERF.	SECTION F: EMERGENCY COMMUNICATIONS	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Communications with the State of Georgia The primary means of communication between the HNP and the State of Georgia is the ENN, which is a dedicated communications system from the plant to the EOC at GEMA headquarters in Atlanta, Georgia and the FEOC in Vidalia, Georgia. Extensions for this system are located in the Control Room, the TSC, and the EOF. The ENN system is available and manned 24 hours per day. The ENN provides the licensee the capability to notify State and local authorities of an emergency within 15 min. of declaration. Commercial telephones, microwave, or land lines provide backup for the ENN.	**Annex 4.1.1** Notification Process (SEP E.2.2) State and local warning points are staffed 24 hours per day. State and county authorities to be notified within 15 minutes of the declaration of an emergency condition are: State of Georgia: • Georgia Emergency Management Agency (GEMA). Georgia County Authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point. **Annex 5.3.1** Communications with the State and Local Counties (SEP F.1.2) The primary means of communication between HNP, the State of Georgia, and the local counties (Appling, Jeff Davis, Tattnall, and Toombs) is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the state and local warning points, which are staffed 24 hours per day. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Communication with contiguous local governments in the Ingestion Planning Zone (IPZ) will be coordinated through the State of Georgia.	No equivalent Plan/Annex statement.	Communication requirements for the site are specified in the Site Plan and Annex. ORO communication is controlled by offsite plans and procedures.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Communications with Plume Exposure Pathway EPZ Counties The primary means of communication between HNP and each EPZ county is the ENN, which is a dedicated communications system from the plant to each county EOC and 24-hour point of contact. Commercial telephones, microwave or land lines discussed above provide backups for the ENN. Radio contact between the plant and the Appling County Sheriff's Office can also be established, if necessary.	**Annex 5.3.1** Communications with the State of and Local Counties (SEP F.1.2) The primary means of communication between HNP, the State of Georgia, and the local counties (Appling, Jeff Davis, Tattnall, and Toombs) is the Emergency Notification Network (ENN). The ENN is a dedicated communications system from the plant to the state and local warning points, which are staffed 24 hours per day. Extensions for this system are located in the Control Room, the TSC, and the EOF.	The wording was standardized and relocated to the Site Annex.
The ENN is available and manned 24 hours per day. At the plant, the ED is responsible for ensuring contact with each of the plume exposure pathway EPZ counties.	**Annex 4.1.1** Notification Process (SEP E.2.2.1) State and local warning points are staffed 24 hours per day. State and local county authorities to be notified within 15 minutes of the declaration of an emergency condition are: State of Georgia: • Georgia Emergency Management Agency (GEMA). Georgia County Authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point.	The wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Communications with NRC and Other Federal Agencies The primary means of communication between HNP and the NRC is the ENS, a dedicated communications system from the plant to the NRC Operations Center. The NRC Region II office in Atlanta, Georgia, may also be connected to the ENS through the NRC Operations Center. Additional dedicated telephone circuits [known as the Federal *Telecommunications System (FTS)*] are installed in the TSC and the EOF.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability.
The Emergency Response Data System (ERDS), which provides specific plant parameters to the NRC via internet connection, is installed in the Computer Room and the TSC.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The current operation of the FTS system allows any phone with long distance capability to call into the Headquarters Operations Center and be patched into any bridge. The specific listing becomes redundant to the expanded capability.
Commercial telephone lines and the microwave system serve as backups to the ENS. Communications with other Federal emergency response organizations would be by telephone; such communications would normally be completed by GEMA from the State EOC.	**EP F.1.4** Commercial telephone lines serve as the backup to the ENS and other FTS lines.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Communications Among HNP ERF Communications among the Control Room, the TSC, the OSC, and the EOF can be completed using various communications systems including dedicated telephone circuits, normal plant telephones, and radios.	**EP F Table 5**.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
A radio system is also used for communications with the radiological monitoring teams.	**Section F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Communications available at each ERF are as follows: 1. Control Room • Dedicated Voice Over Internet Protocol (VOIP) phones to the TSC, the OSC, and the EOF. • One extension to the ENN. • One extension to the NRC ENS. • ERDS to the NRC. • Normal plant phones (network or commercial). • Base station radio console (multiple frequencies). • Sound-powered phones (internal to Control Room only). • Plant PA system. • One facsimile line.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
TSC • Dedicated Voice Over Internet Protocol (VOIP) phones to the Control Room, the OSC, and the EOF. • One extension to the ENN. • One extension to the NRC ENS. • ERDS to the NRC. • One facsimile line. • Normal plant phones (network or commercial). • Base station radio console (multiple frequencies). • Plant PA system.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
OSC • Dedicated Voice Over Internet Protocol (VOIP) phones to the Control Room, the TSC, and the EOF. • Normal plant phones (network or commercial). • Base station radio console. • Plant PA system.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.
EOF • Dedicated Voice Over Internet Protocol (VOIP) phones to the Control Room, the TSC, and the OSC. • One extension to the ENN. • An extension to the NRC ENS. • Multiple facsimile lines. • Normal phones (network or commercial). • Southern LINC radio equipment.	**EP F Table 5**	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Medical Support Facility Communications Communication between HNP and the Appling General Hospital or the Meadows Regional Medical Center is by commercial telephone. The Appling Ambulance Service and the Meadows Regional Medical Center Ambulance Service are equipped with radio for communications with the hospitals. Normally, ambulance services and hospitals within the State are interconnected in a statewide hospital radio network.	**EP F.2** Medical Emergency Communications Communications have been established between the primary and backup medical hospitals and transportation services with SNC-operated plants.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Alerting Emergency Response Personnel As described in Section E, notification of onsite personnel at HNP is completed utilizing available communications systems. HNP personnel not onsite at the time of the emergency are also notified utilizing available communications systems.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Communications System Tests Communication channels with the State of Georgia, the plume exposure pathway EPZ counties, and the NRC (with the exception of ERDS) are tested each calendar month, using the extensions in the Control Room, the TSC, and the EOF.	**EP F.3** 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. • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
ERDS is tested each calendar quarter.	**EP F.3** The Emergency Response Data System (ERDS) will be tested on a quarterly basis.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
All communications procedures and systems are also tested each calendar year during a communications drill. This drill is normally conducted in an exercise each calendar year.	**Annex 5.4** Communications procedures and systems are also tested each calendar year.	The wording was standardized and relocated to the Site Annex.
G. PUBLIC EDUCATION AND INFORMATION The detailed planning for public information actions during an emergency, including rumor control, is contained in the GPC HNP Emergency Communication Plan.	No equivalent Plan/Annex statement.	The SNC Standard Emergency Plan and Site Annex in Section G outline the Public Education and Information responsibilities of SNC and the site.
A general description of the public education and information program follows. Each calendar year, information is provided to the public regarding how they will be notified and what their actions should be in an emergency. The means for disseminating this information includes, but is not limited to, information in local telephone books, posting in public areas, and/or publications distributed by mail.	**EP 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 and transients in the plume exposure pathway Emergency Planning Zone.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Each calendar year, information is distributed to residents in the plume exposure pathway EPZ through various publications. Information includes the following: • Instructions in response to the SNC siren system including the annual audible test. • How the emergency notification will take place. • Discussions of protective measures such as sheltering and evacuation and actions to take in either case. • Radio stations where additional information will be broadcast. • Evacuation routes and reception centers including a map and instructions. • Educational information on radiation. • Special needs and considerations for the handicapped. • Contacts to obtain additional information.	**Annex 2.3.4** Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated on providing information to the public by written material that is likely to be available in local residences and in locations frequented by transients. The information will also provide instructions on which local media will be providing additional information in the event of an emergency.	The commitment wording was standardized and relocated to the Site Annex.
A Visitors Center is operated onsite. The center is staffed with public information personnel who provide public education programs to the community and any other visitors. These programs typically focus on plant operational concepts, plant safety considerations, and radiation.	No equivalent Plan/Annex Statement.	Section G of the SNC Standard Emergency Plan and Site Annex provide the specific responsibilities for Public Education for implementation of the Emergency Plan. The educational aspects of the Visitor Center may be beneficial but are not germane to implementation of the Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Information for Transients Posted "Emergency Information" signs and a notice published in the local telephone books are used to provide the transient population with appropriate emergency information and instructions. The information/instructions advise the public on how they will be notified in the event of an emergency; indicate the actions to take if notified; and refer the public to designated broadcast stations for information in the event of a serious emergency.	**Annex 2.3.4** Several communications methods may be used to acquaint the public with plans for their protection during a Plant emergency. Effort will be concentrated on providing information to the public by written material that is likely to be available in local residences and in locations frequented by transients. The information will also provide instructions on which local media will be providing additional information in the event of an emergency.	The commitment wording was standardized and relocated to the Site Annex.
Method of Emergency Information Dissemination Any proposed change in the method of dissemination of emergency information to the public must be coordinated and discussed with, and agreed upon by appropriate State and local offsite emergency officials prior to implementation of the change. The Emergency Plan may be changed with regard to the manner in which the information is provided to the public under 10 CFR 50.54 (q) provided the requisite emergency information remains the same as currently approved by the NRC and FEMA as contained in the Hatch Emergency Plan and the FEMA-43 Report for the Edwin I. Hatch Nuclear Plant.	**EP 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 and transients in the plume exposure pathway Emergency Planning Zone.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Joint Information Center (JIC) Operations The JIC is the point of contact with the news media during an emergency. The JIC facilities used to coordinate the dissemination of information to the media will be established to accommodate public information representatives from the licensee, Federal, State, and local response agencies. News releases and media briefings are coordinated to the maximum extent possible.	**EP 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/ 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. **Annex 5.1.6** The JIC is the central location for the coordination and dissemination of information to news media, and responses to media inquiries. Details of the JIC for HNP are in section H of the Emergency Plan. If the decision is made to move the JIC function forward to a near site location from the Atlanta location, the Atlanta facility will maintain media coordination until the JIC is operational at the near site location. The near site location is in Vidalia, Georgia, adjacent to the Georgia Power Company. operating headquarters.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The licensee utilizes the GPC Corporate Headquarters Building located in Atlanta, Georgia, to serve as a temporary information center until the JIC located next to the GPC Operating Headquarters in Vidalia can be activated. The JIC is located approximately 22 miles from the plant and is large enough to accommodate a large number of reporters. Once activated, the JIC becomes the principal location for the dissemination of information relative to the emergency. News media who may arrive at the plant site during a declared emergency will be directed to the Joint Information Center to obtain approved news release information.	**EP H.2.2** Joint Information Center (JIC) The JIC, located at the Atlanta/Birmingham corporate headquarters building of Georgia Power Company/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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The principal licensee contacts for the media are the Public Information Director and the designated Company Spokesperson. The Company Spokesperson has access to the ED through the EOF Manager. The Company Spokesperson briefs the media on plant status and company emergency activities. In addition, technical briefers who can provide general and background information, as appropriate, to reporters at the JIC have been designated.	**EP 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. **EP 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 off-site agencies. The PID is responsible for evaluating the emergency's severity in terms of public interest and safety.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.
Further information relative to the public information organization and information flow to the public during an emergency is available in the HNP Emergency Communications Plan.	No equivalent Plan/Annex statement.	The REP requirements previously located in the Emergency Communications Plan have been incorporated in Section G of the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Offsite Agency Coordination Timely and accurate information is provided to Federal, State, and local agencies. The licensee seeks reciprocal information from these agencies. Efforts are made to coordinate periodic press briefings and to issue public statements in conjunction with these government agencies. A joint public information center operation at the JIC provides ample opportunity for all parties represented to review all information prior to public release.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific functioning of the Corporate JIC and optional local JIC are described separately.
Rumor Control Providing timely, accurate, and consistent information to the public is considered the most effective method of dispelling rumors. Rumors are controlled by having a single source of information. In an emergency, a rumor control network is activated. News media are monitored to detect and respond to misinformation. Offsite information is the responsibility of offsite agencies; however, rumor control is coordinated between the State and licensee.	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. .

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Media Education Information is provided and a program is offered each calendar year to acquaint the news media with the methodology for obtaining information during an emergency and background about overall EP at HNP. Included is information about the plant, radiation and the role of the JIC.	**EP 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
H. EMERGENCY FACILITIES AND EQUIPMENT Following the declaration of an emergency, response activities will be coordinated at a number of facilities. These facilities and the equipment which will be used for assessment and monitoring functions are described in this section.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The justification for augmentation of the ERO and activation of respective ERFs is provided separately.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Emergency Facilities 1. TSC The TSC, which is shared by both units, is located adjacent to the service building annex. The layout of the TSC is shown in Figure H-1. Walking time from the TSC to the Control Room is approximately 2 min. The TSC covers approximately 2620 ft2.	**Annex 5.1.2**: The TSC, which is shared by both units, is located adjacent to the service building annex. A sample layout of the TSC is shown in Figure 5.1.A. The TSC provides plant management and technical support personnel, including NRC personnel, with adequate space to assist plant operating personnel located in the Control Room during an emergency. The TSC is equipped with technical data displays and has ready access to plant records to allow TSC personnel to perform detailed analysis and diagnosis of abnormal plant conditions, including assessment of any release of radioactivity to the environment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
Section H.1: The TSC provides plant management and technical support personnel [including five NRC personnel] with adequate space to assist plant operating personnel located in the Control Room during an emergency.	**EP H.1.2**: The TSC is sized to accommodate ERO responders and NRC Representatives	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
The TSC is equipped with technical data displays and has ready access to plant records.	**Annex 5.1.2**: The TSC maintains access to drawings and records necessary for the response to an emergency event at HNP.	The commitment wording was standardized and relocated to the Site Annex.
The TSC structure and ventilation system are designed to ensure that TSC personnel are protected from radiological hazards similar to that of the Control Room.	**EP H.1.2**: 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. **Annex 5.1.2**: The TSC structure and ventilation system are designed to ensure that TSC personnel are protected from radiological hazards similar to that of the Control Room.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
An ARM which alarms on abnormal radiation levels is provided in the TSC.	**EP H.1.2**: 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. **Annex 5.1.2**: An area radiation monitor, which alarms on abnormal radiation levels, is provided in the TSC.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
Portable radiation monitors are available for personnel in transit from the TSC to other areas.	**Annex 5.1.2**: In addition, portable radiation monitors are available for personnel in transit from the TSC to other areas.	The commitment wording was standardized and relocated to the Site Annex.
Self-contained breathing apparatus (SCBA) are provided in the TSC.	**Annex 5.1.2**: Self Contained Breathing Apparatus (SCBA) are provided in the TSC.	The commitment wording was standardized and relocated to the Site Annex.
Anticontamination clothing is available at the nearby OSC.	**Annex 5.1.2**: Anticontamination clothing is available at the nearby OSC.	The commitment wording was standardized and relocated to the Site Annex.
The TSC normal lighting is supplied from normal site power through a motor control center backed up by the security DG.	**Annex 5.1.2**: The TSC normal lighting is supplied from normal site power through a motor control center backed up by the security DG.	The commitment wording was standardized and relocated to the Site Annex.
Power for the TSC vital equipment is provided from either the motor control center backed up by the security DG or from a battery-backed uninterruptible power supply system.	**Annex 5.1.2**: Power for the TSC vital equipment is provided from either the motor control center backed up by the security DG, or from a battery backed uninterruptible power supply system.	The commitment wording was standardized and relocated to the Site Annex.
Power to the dc system is provided via battery chargers, one of which is powered from this same motor control center.	**Annex 5.1.2**: Power to the DC system is provided by battery chargers, one of which is powered from this same motor control center.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The TSC records area maintains copies of the following documents: TS. Plant Operating Procedures. EOP. Final Safety Analysis Reports (FSARs). System piping and instrumentation diagrams and heating, ventilation, and air-conditioning (HVAC) flow diagrams. Piping area drawings. Electrical one-line, elementary, and wiring diagrams. Control logic and loop diagrams. Emergency Plan and implementing procedures.	**Annex 5.1.2**: The TSC records area maintains copies of the following documents: • Technical Specifications. • Plant Operating Procedures. • Final Safety Analysis Reports (FSARs). • Emergency Plan. • Emergency Plan Implementing Procedures. • Plant Operating Records. • System piping and instrumentation diagrams; heating, ventilation, and air-conditioning (HVAC) flow diagrams. • Electrical one line, elementary, and wiring diagrams. • Control logic and loop diagrams.	The commitment wording was standardized and relocated to the Site Annex.
Section H.1: The above records are available in current form and are updated, as necessary.	**Annex 5.1.2:** The above records are updated as necessary to ensure the content is accurate and complete.	The commitment wording was standardized and relocated to the Site Annex.
Section H.1: In the event the TSC becomes uninhabitable during an emergency, the Control Room will serve as an alternate location for TSC management.	No equivalent Plan Statement.	Relocation of the TSC will be controlled procedurally on an event-specific basis. The Control Room is a potential relocation point. The alternative facility developed as part of the November Emergency Preparedness rulemaking provides another option.
Operations at the TSC are directed by the TSC Manager.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
OSC The OSC consists of the service building breakroom and other areas, as necessary, to stage support personnel.	**Annex 5.1.3** Operations Support Center (SEP H.1.3) The OSC consists of the service building break room and other areas available for staging of support personnel.	The commitment wording was standardized and relocated to the Site Annex
The OSC includes groups such as Instrument Technicians, Mechanics, Electricians, Nuclear Chemistry and HP Technicians, System Operators, and oncoming shift personnel who assemble to aid in the response to an emergency.	**EP B.2.2.7**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition, the OSC is the initial assembly point for all radiological emergency team (RET) members.	**Annex 5.1.3** Operations Support Center (OSC) This includes groups such as Instrument and Control Technicians, Mechanics, Electricians, Nuclear Chemistry and Radiation Protection (RP) Technicians, System Operators, and oncoming shift personnel who assemble to aid in the response to an emergency.	The commitment wording was standardized and relocated to the Annex
Briefings will be held with each team prior to being dispatched. Work to be performed, cautions, plant conditions, and radiological information will be included in the briefings.	**Annex 5.1.3** Operations Support Center (OSC) Briefings will be held with each team prior to being dispatched.	The SNC Standard Emergency Plan and Annex maintain the commitment to assemble and dispatch event response teams from the OSC. The details of team management will be relocated to EPIPs.
Status boards containing plant conditions and emergency classification will be available in the OSC.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan and Annex maintain the commitment to assemble and dispatch event response teams from the OSC. The details of team management will be relocated to EPIPs.
Emergency kits containing radiation monitoring equipment, first-aid supplies, decontamination supplies, breathing apparatus, portable lighting, and hand-held radios are available to the OSC.	**EP H.1.3**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
In the event the OSC becomes uninhabitable during an emergency, OSC functions will be conducted from the alternate OSC located in the Simulator Building.	**EP H 1.3**: Alternate locations are available should the OSC become uninhabitable. **Annex Section 5.1.3:** If the OSC is deemed uninhabitable, the OSA may be moved to other locations as deemed appropriate by the OSC Manager	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Operations at the OSC are directed by the OSC Manager.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
EOF Description of EOF operations and staffing is contained in Appendix 7.	**EP H.2** Offsite Emergency Facilities **EP 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 details of the EOF have been incorporated into Section H of the SNC Standard Emergency Plan. The comparative analysis is included in the justification section for Appendix 7.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Available (Simulator Building) classrooms and conference rooms will be utilized for field monitoring team assembly and dispatch activities and for the alternate OSC.	**EP 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.	The SNC Standard Emergency Plan and Annex maintain the commitment to assemble and dispatch event response teams from the OSC. The details of team management will be relocated to EPIPs.
This area of the Simulator Building has a ventilation system that is functionally similar to the system used in the TSC without charcoal filtration. During normal mode of operation, a slight positive pressure is maintained. During emergency operation, no outside air is allowed and positive pressure is not maintained. The ventilation system has recirculation through high-efficiency particulate air filters during emergency mode only. Section H.4: This location is designed to provide a radiation protection shielding factor of 5. Dedicated portable radiation monitors are available for surveillance.	**EP H 1.3**: Alternate locations are available should the OSC become uninhabitable. **Annex Section 5.1.3:** If the OSC is deemed uninhabitable, the OSA may be moved to other locations as deemed appropriate by the OSC Manager.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Normal power to the simulator building is from offsite power. Emergency lighting is provided by 3-hour wall packs.	No equivalent Plan/Annex statement	The simulator building is an alternative location for the OSC. The description of power is not required in the Plan.
Kits containing equipment for conducting offsite radiological monitoring are located in the Simulator Building on plant site.	**Annex 5.1.3** Emergency kits containing radiation monitoring equipment, first-aid supplies, decontamination supplies, breathing apparatus, portable lighting, and portable radios are available to the OSC.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Alternative Facility During a security related event or other event that precludes onsite access, the TSC and OSC ERO staff will be directed to an alternative facility. This facility is located in the Plant Hatch JIC building across the hall from the Public Information Workroom and adjacent to the Public Response Workroom. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources and work planning resources for performing engineering assessment activities, including damage control team planning and preparation for return to the site.	**EP 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. • 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. **Annex 5.1.4** Alternative Facility (SEP H.1.4) During a security-related event or other event that precludes onsite access, the TSC and OSC ERO will be directed to an alternative facility. This facility is located adjacent to the Georgia Power Company operating headquarters in Vidalia, Georgia and is approximately 22 miles from HNP. The alternative facility is equipped with the necessary communications and data links to support communications with the control room, site security, and the EOF. The available communications and data links also provide access to SNC document management resources, and to work planning resources for performing engineering assessment activities including damage control team planning and preparation for return to the site. Guidance for use of the facility is in site procedures.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Joint Information Center (JIC) Description of the JIC resides in the HNP Emergency Communications Plan.	**EP 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. At the discretion of the Public Information Director, a near site media center may be activated to coordinate press releases with local media.	*The Emergency Information Management* Process has been incorporated into Section H (Facilities) and Section G of the Emergency Plan. The justifications for the Emergency Information Management Process are provided separately in the submittal.
Activation and Staffing of Emergency Facilities During the initial stages of an emergency, activities at HNP are directed from the Control Room. For a NUE, no other facilities are activated.	**EP H.1**: 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..	The wording was standardized to address the levels activation would occur. The statement of non-activation for the NUE was eliminated.
Upon declaration of an Alert or higher level classification, the TSC is activated and becomes fully operational ASAP, but not later than approximately 1 hour following the initial notification.	**EP H.1**: 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..	The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan. The activation time commitment is justified in the Technical Analysis Section of this LAR.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Overall direction and control are exercised from the TSC for an Alert or Higher situation.	**EP H.1.2** Technical Support Center (TSC) TSC functions include: • Support for the Control Room's emergency response efforts. • Performance of response management functions when in Command & Control.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Activation of the OSC is initiated at an Alert or higher level classification.	**EP H.1** 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..	The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan.
The OSC becomes operational ASAP, but not later than approximately 1 hour following initial notification.	**EP H.1**: 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..	The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan. The activation time commitment is justified in the Technical Analysis Section of this LAR.
Activation and staffing of the EOF is contained in Appendix 7.	**EP H.2** Offsite Emergency Facilities **EP 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.	EOF activation has been incorporated into Section H of the SNC Standard Emergency Plan. The commitment to activate the facilities at Alert or higher was relocated to the SNC Standard Emergency Plan. The activation time commitment is justified in the Technical Analysis Section of this LAR.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
For security related events, the activation of emergency facilities may be delayed as described in section B. Activation of ERO members will be performed for hostile action based events to promptly staff alternative facilities, in order to minimize delays in overall site response. The ERO will be staged in a manner that supports rapid response to limit or mitigate site damage or the potential for an offsite radiological release.	**EP 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. • 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant Monitoring and Data Handling Systems 1. Geophysical Phenomena Monitors a. Meteorological Meteorological monitoring is in place at HNP. The instruments are mounted on a 100-meter primary tower located to the south of the power block and on a 45-meter backup tower located to the southeast of the power block.	**EP H.5.1:** Meteorological Instrumentation: A permanent meteorological monitoring station is located near each 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. **Annex Section 5.6.1:** Meteorological monitoring is in place at HNP. The instruments are mounted on a 100-meter primary tower located to the south of the power block and on a 45-meter backup tower located to the southeast of the power block.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section H: Parameters measured and transmitted to the Control Room include: • Windspeed. • Wind direction. • Vertical temperature difference. • Ambient temperature.	**Annex 5.6.1**: Parameters measured and transmitted to the Control Room include: • Windspeed. • Wind direction. • Vertical temperature difference. • Ambient temperature.	The commitment wording was standardized and relocated to the Site Annex.
A building that houses meteorological equipment is located near the base of each tower. The system is powered by an uninterruptible power supply.	**Annex 5.6.1**: A building that houses meteorological equipment is located near the base of each tower. The system is powered by an uninterruptible power supply for high availability.	The commitment wording was standardized and relocated to the Site Annex.
Additionally, meteorological information *can be obtained from the National* Weather Service to supplement onsite data and provide a backup to the plant meteorological monitoring program.	**Annex 5.6.1**: Additionally, meteorological *information can be obtained from the National* Weather Service to supplement onsite data and provide a backup to the plant meteorological monitoring program on an as-needed basis.	The commitment wording was standardized *and relocated to the Site Annex.*
The important parameters for characterizing the transport of airborne radioactivity are windspeed, wind direction, and atmospheric stability (e.g., derived from the standard deviation of the horizontal wind direction or vertical temperature difference).	**Annex 5.6.1** The important parameters for characterizing the transport of airborne radioactivity are wind speed, wind direction, and atmospheric stability (e.g., derived from the standard deviation of the horizontal wind direction or vertical temperature difference).	The commitment wording was standardized and relocated to the Site Annex.
These meteorological parameters are used in a calculational methodology to assess the offsite radiological consequences of accidental releases of airborne radioactivity. The methodology is described in Section I, Accident Assessment.	**Annex 5.6.1** These meteorological parameters are used in a calculation methodology to assess the offsite radiological consequences of accidental releases of airborne radioactivity. The methodology is described in Section I, Accident Assessment, of the SNC Standard Emergency Plan.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
b. Hydrologic The normal and emergency source of plant cooling water is the Altamaha River, which provides makeup to the cooling towers. The probable maximum flood level is approximately 105 ft msl.	**Annex 5.6.1** Hydrologic_(SEP H.5.1) The normal and emergency source of plant cooling water is the Altamaha River, which provides makeup to the cooling towers. The probable maximum flood level is approximately 105 ft msl.	The commitment wording was standardized and relocated to the Site Annex.
c. Seismic Seismic monitoring instrumentation for HNP consists of time-history accelerographs, peak recording accelerographs (PRAs), a response-spectrum recorder, and seismic switches.	**EP H.5.1**: 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. **Annex Section 5.6.1:** Seismic monitoring instrumentation for HNP consists of time history accelerographs, peak recording accelerographs (PRAs), a response spectrum recorder, and seismic switches. Activation of the seismic switches causes an audible and visual annunciation in the Control Room to alert the plant operator (PO) that an earthquake has occurred. These initial set points are based on experience in existing plants and may be changed once significant plant operating data, which indicate that a different set point will provide better strong-motion accelerometer (SMA) system operation, are obtained.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
One triaxial seismic switch, with a horizontal setpoint of 0.08 g, is installed on the drywell pedestal on the 87 ft level of the Unit 2 reactor building.	**Annex 5.6.1:** One triaxial seismic switch, with a horizontal set point of 0.08g, is installed on the drywell pedestal on the 87 ft level of the Unit 2 reactor building.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A second seismic switch is located outside the biological shield on the 185 ft level of the Unit 2 reactor building and has a vertical setpoint of 0.063 g.	**Annex 5.6.1**: A second seismic switch is located outside the biological shield on the 185 ft level of the Unit 2 reactor building and has a vertical set point of 0.063g.	The commitment wording was standardized and relocated to the Site Annex.
They are backup devices which actuate visual and audible annunciators in the Control Room.	**Annex 5.6.1**: They are backup devices which actuate visual and audible annunciators in the Control Room.	The commitment wording was standardized and relocated to the Site Annex.
Activation of the seismic switches causes an audible and visual annunciation in the Control Room to alert the plant operator (PO) that an earthquake has occurred. These initial setpoints are based upon experience in existing plants and may be changed once significant plant operating data, which indicate that a different setpoint will provide better strong-motion accelerometer (SMA) system operation, are obtained.	**Annex 5.6.1** Activation of the seismic switches causes an audible and visual annunciation in the Control Room to alert the plant operator (PO) that an earthquake has occurred. These initial set points are based on experience in existing plants and may be changed once significant plant operating data, which indicate that a different set point will provide better strong-motion accelerometer (SMA) system operation, are obtained.	The commitment wording was standardized and relocated to the Site Annex.
d. Fire Detection The fire detection system at HNP includes smoke and thermal detectors and manual fire alarms. Fire detection systems are provided in all areas with safe shutdown equipment, as well as other locations throughout the plant. In addition to initiating fire suppression systems, indications from the fire detection system are transmitted to the Control Room.	**EP H.5.4:** The Fire Detection System is designed to quickly 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Radiation Monitoring System (RMS) The RMS receives and processes radiological input readings during normal and abnormal operating and accident conditions; measures, evaluates, and reports radioactivity in designated areas; and monitors releases of radioactive materials in liquid and gaseous effluents. Data from the RMS are available in the Control Room. A more detailed description of the RMS is provided in the HNP-2-FSAR, Section 11.4.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section H: The post-accident radiation monitors provide radiation monitoring after an accident.	**EP H.5.2.2:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
There are three types of radiation monitors in the RMS: airborne and air particulate radiation monitors, liquid radiation monitors, and post-accident radiation Backup power to the post-accident monitors is supplied by a DG to ensure against interruption of monitor operation and loss of data.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The post-accident radiation monitors provide radiation monitoring after an accident.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The monitors are comprised of area, airborne, and air particulate monitors.	**EP H.5.2.1**: The monitors are comprised of area, airborne, and air particulate monitors	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Area monitors respond to gamma radiation photons within any energy range from 60 KeV to 3 MeV.	**EP H.5.2.1:** Area monitors respond to gamma radiation.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Airborne monitors are capable of detecting and measuring radioactive gaseous effluent concentrations with compositions ranging from fresh equilibrium noble gas fission product mixtures to 10-day-old mixtures.	**EP H.5.2.1**: Airborne monitors detect and measure radioactive gaseous effluent concentrations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Backup power to the post-accident monitors is supplied by a DG.	No equivalent Plan/Annex statement	
SPDS The SPDS provides a display of plant parameters from which the status of operation can be assessed, in the Control Room, the TSC, and the EOF.	**EP H 5.3.2**: The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The SPDS performs the following functions: • Aids Control Room operators in the rapid detection and identification of abnormal operating conditions. • Provides additional specific information used to analyze and diagnose the cause of abnormal operating conditions. • Monitors plant response to corrective actions. • Provides grouping of parameters to enhance the operators' capability to quickly assess plant status without surveying concurrently all Control Room displays. • Directs the operators' attention to other specific confirmatory non-SPDS Control Room displays. • Provides human factors engineered display formats in simple and consistent display patterns and codings. • Provides display information on a real-time basis, along with validation of data. • Provides generated selectable trend displays on a real-time basis for monitoring reactivity control, reactor core cooling and heat removal from the primary system, RCS integrity, radioactivity control, containment integrity, and other selected parameters.	**EP H.5.3.2** Safety Parameter Display System (SPDS) The SPDS parameters are available is in operation during normal and abnormal operating conditions in the Control Room, TSC, and EOF. **EP I.1** 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The SPDS in the Control Room consists of displays of sets of concentrated parameters from which plant safety status can be rapidly assessed.	**EP I.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
SPDS can also be displayed in the TSC and the EOF to maximize the exchange of information between these facilities and the Control Room.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The SPDS is in operation during normal and abnormal operating conditions.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The selection of parameters to be displayed on the SPDS is based on the parameters required to monitor the critical safety functions identified by the General Electric Owners Group (GEOG). These parameters will aid Control Room operators in determining the safety status of the plant. The justification for selecting these parameters is contained in the analyses and background information generated by the GEOG to support the critical safety function restoration guidelines. The emergency response guidelines, which contain the critical safety function restoration guidelines and identify the parameters used to monitor the critical safety functions, have been submitted to the NRC by the GEOG.	**EP I.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Post-accident Sampling Capability Capability exists for obtaining grab samples of reactor coolant samples (RCS), suppression pool coolant samples, and primary containment atmosphere samples. Various chemical analyses and radiological measurements on these samples can be performed, including the determination of radionuclide concentrations.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Analysis may be performed onsite if radiological conditions allow; otherwise, analysis will be performed at an offsite laboratory facility.	**EP 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). **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The results from these analyses are used to assess the extent of core damage and the potential source term.	**EP 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. **EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Laboratory Facilities HNP has a laboratory facility for analysis of radioactive samples. The major pieces of equipment include a solid-state gamma spectrometer and a beta/gamma gas proportional counter.	**EP H.5.2.3**: SNC sites have a laboratory facility for analysis of radioactive samples.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The training section of the simulator building includes a laboratory which can be used for analysis of environmental media.	**EP 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. **EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Analysis instrumentation suitable for analyzing environmental samples is available at that location.	**EP 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. **EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Backup laboratory facilities are available at Plant Vogtle. This backup capability would be used if facilities at HNP were not available.	**EP H.6.3**: 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Additionally, arrangements have been made for commercial offsite laboratory analysis, as needed.	**EP C.3.2** Contract Laboratories Additional outside analytical assistance may be requested from contracted vendors. These laboratories provide bioassay analysis and radiochemical analysis services.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Other Process Parameters Several other process parameters, including RCS pressure and temperature, containment pressure and temperature, liquid levels and other system indications, are useful both for the initiation phase and continued assessment. Several of these are used in the classification process as discussed in Section D, Emergency Classification System.	**EP 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. **EP 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. **EP H.5.3.2** Safety Parameter Display System (SPDS) The SPDS is in operation during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Offsite Radiological Monitoring HNP has sufficient portable equipment and trained personnel to field a minimum of three field monitoring teams. These teams are dispatched to offsite locations and are also utilized for site boundary and owner-controlled area surveys. Each team obtains emergency monitoring materials and equipment including dosimetry, two-way radio equipment, meters for measuring gamma and beta/gamma dose rates, and air samplers for collecting particulates and iodines.	**EP H.6.2**: 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.	The Fleet Commitment wording is standardized to support initial deployment of two environmental field teams. The two field teams deployment is based on existing industry standards and practices.
Emergency Supplies and Equipment Emergency supplies and equipment are located in the Control Room, the TSC, the OSC, and the Simulator Building.	**EP H.9**: Emergency kits are available at each SNC-operated nuclear power plant. Designated site or department procedures identify the equipment in the various emergency kits. **Annex 5.5**: Emergency supplies and equipment are located at various plant locations. Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Equipment in these kits is calibrated in accordance with the suppliers' recommendations. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use.	**EP H.8**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section H: Spare equipment is also maintained to replace inoperative or out-of-calibration equipment.	**EP H.8**: Sufficient reserves of instruments and equipment are maintained to replace those removed from emergency kits or lockers for calibration or repair	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Typical listings of the emergency supplies and equipment are included in Appendix 4.	No direct equivalent Plan/Annex kit statement. **EP 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.	The SNC Standard Emergency Plan and Site Annex retain the commitment to provide emergency supplies and equipment. Appendix 4 was deleted. The specific equipment and supplies is a procedural level step. Elimination allows more flexibility in maintaining current equipment and supporting the needs of the ERO.
I. ACCIDENT ASSESSMENT This section describes the methods, systems, and equipment available for assessing and monitoring actual or potential offsite consequences of a radiological emergency.	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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Initial assessment actions are the responsibility of the Operations SOS and/or the SS, using available shift personnel.	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section I: Subsequent assessment actions are directed by the ED.	**EP B.1.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Plant Parameters Plant system and effluent parameter values characteristic of the spectrum of off-normal conditions and accidents and the manner in which these values are used to classify an emergency are provided in Section D	**EP I.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
. Some of the parameters monitored include: RCS pressure, reactor water level, drywell pressure, drywell radiation level, effluent monitor readings, and ARM readings.	**EP I.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency response procedures include methods for quickly assessing plant system and effluent parameter values and classifying the emergency condition. Additional information relative to plant instrumentation is provided in Section H.	**EP D.1.1.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Radiological Monitors In-plant radiological measurements provide information helpful in assessing emergency conditions. Systems are installed to permit reactor coolant and drywell atmosphere sampling under emergency conditions. Post-accident sampling capability and the RMS are described in Section H of this Plan.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The drywell wide-range radiation monitor and the drywell hydrogen monitor are used to provide an early indication of the quantity of radioactivity available for release from the containment.	**EP H.5.2.1**: Radiation monitoring instruments are located at selected areas within each 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant procedures include a correlation between the monitor reading and the extent of core damage. Estimates derived from these monitor readings are used until a sample using PASS has been obtained and analyzed.	**EP H.5.2.1** Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Determination of Release Rate Section H of this Plan describes RMS and PASS. These systems, in combination with procedures located in the Control Room, the TSC, and the EOF can provide the information needed to determine the radiological source term.	**EP 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency response procedures provide methods for determining relationships between monitor readings and releases and/or material available for release.	**EP H.5.2.1**: Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release and extent of core damage.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Dose Projection System The Meteorological Information Dose Assessment System (MIDAS) is the dose calculation computer model used at HNP. Dispersion is computed using either a straight line or the variable trajectory dispersion model. Both models are time-dependent and provide integrated doses, as well as dose rates, using EPA 400 dose factors.	**EP 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The dose calculation model will be provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses.	**EP I.3**: The dose calculation model is provided in the Control Room, TSC, and EOF for use in projecting potential offsite doses.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The TSC will assume responsibility for this function from the Control Room after the TSC is activated.	**EP B.2.1.5**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
This function will be transferred to the EOF as soon as practicable from the TSC, to relieve the TSC of unnecessary burden; however, the TSC will maintain the capability of dose projections should the EOF not be available. Backup calculations will be performed in the TSC, as needed.	**EP B.3.1.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Meteorological data are obtained and evaluated, as described in Section H. The meteorological data collection system can be accessed directly from the Control Room, the TSC, and the EOF. The EOF will be able to provide this information upon request to any offsite organization.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Up to three teams will be deployed for field monitoring. These teams are available for offsite field monitoring within the plume exposure pathway EPZ, as described in Section H	**EP 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 wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Initially at least two persons can be dispatched from on-shift personnel for offsite surveys. The on-shift HP/Chem department foreman will provide for field monitoring coordination until the TSC is activated.	**EP 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 wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms. The justification for response in 75 minutes is provided separately in this License Amendment request.
Once the emergency facilities are activated, the HP/Chem Supervisor in the TSC or the Dose Assessment Supervisor in the EOF can request monitoring teams from support personnel located at the OSC.	**EP 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. **EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms. The justification for response in 75 minutes is provided separately in this License Amendment request.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Field Monitoring Teams consist of at least two people. These teams are formed at the OSC and dispatched as described in Section B.	**EP I.7** 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. **Annex Table 2.2.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. Conduct of initial Field Surveys by on-shift personnel can be performed by a single individual as designated in the Site Annex.
Materials and equipment for conducting offsite radiological monitoring are located in the Simulator Building. Typical equipment available for field monitoring is listed in Appendix 4.	**EP 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
Offsite field monitoring teams normally use company vehicles and have a two-way radio for communications.	**EP F Table 5**	The commitment wording was standardized and relocated to the Site Annex.
It is estimated that teams can be in the field and performing monitoring tasks within approximately 1 hour of the determination of the need for field monitoring.	**EP 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 wording was standardized and relocated to the SNC Standard Emergency Plan. The commitment was modified to support two field teams based on industry norms. The justification for response in 75 minutes is provided separately in this License Amendment request.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Preselected radiological sampling and monitoring locations are designated on the HNP 10-mile EPZ field monitoring map. Offsite field monitoring teams perform sampling at these locations and others as directed by the HP/Chem Supervisor in the TSC or the Dose Assessment Supervisor in the EOF.	**EP I.7**: Samples are taken at predetermined locations as well as those locations specified during and after a release.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A communicator maintains periodic communications contact with all field monitoring teams.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
To facilitate direction of the teams and reporting of results, both the field monitoring teams and the communicator use identical maps showing the sampling locations.	**EP I.7**: Samples are taken at predetermined locations as well as those locations specified during and after a release.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The cartridge and air particulate filter are returned to the laboratory at the plant site for isotopic analysis if the field analysis reading is 100 cpm above background on an HP-210 probe or equivalent. The cartridges can be counted in the field without interference from noble gas (background count rate below 300 cpm on an HP-210 probe or equivalent).	**EP I.9**: Field monitoring equipment has the capability to detect and measure airborne radioiodine in the presence of noble gases.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The cartridge and air particulate filter are returned to the laboratory at the plant site for isotopic analysis if the field analysis reading is 100 cpm above background on an HP-210 probe or equivalent.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition to direct monitoring and air sampling, the assessment program may utilize the environmental sampling program in which environmental samples (water, air, soil, and vegetation) are collected and analyzed in the laboratory for detailed radionuclide data.	**EP I.7:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
This program is implemented at the direction of the Dose Assessment Manager or designee.	No direct equivalent Plan/Annex statement. **EP I.7** The environmental monitoring equipment include 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 determining and assessing protective actions for the general public and recovery actions for the plant.	Section B of the SNC Standard Emergency Plan provides specific responsibilities for Dose Assessment/radiological monitoring.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Data obtained from the field monitoring program (including data from offsite agencies) can be utilized to perform or refine dose projections. Any adjustments to dose projections will be considered in the evaluation of protective action recommendations as described in Section J	**EP I.7** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
J. PROTECTIVE RESPONSE This section describes the protective actions that were developed to limit radiation exposure of plant personnel and the public following an accident at the plant. This section addresses conditions relative to the Alert, the Site Area Emergency, or the General Emergency classifications. Any protective response taken at the NUE level is done so at the discretion of the ED.	EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Protective Response for Onsite Personnel Protective response for onsite personnel (including visitors and contractor personnel) depends upon alerting, assembly and accountability, evacuation, monitoring, and decontamination.	EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
1. Alerting Section E of this Plan, Notification Methods and Procedures, describes the methods to be used to alert onsite personnel of emergency conditions.	**Annex 4.3.1** Alerting (SEP E.2.1, J.1) Section E of the Emergency Plan (EP), Notification Methods and Procedures, describes the methods to be used to alert on-site personnel of emergency conditions.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Assembly and Accountability Upon activation of the plant emergency alarm, plant personnel assigned specific emergency responsibilities proceed to their designated respective emergency response locations, where they are logged in and accounted for.	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Accountability reports for the Control Room, the OSC, and the TSC are provided by the Security Department ASAP.	**EP 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.	*The commitment wording was standardized* and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Thereafter, personnel emergency assignment tracking will be in place at each of the ERF to account for all onsite individuals throughout the emergency. This accountability may include use of the security computer system, assignment logs, and required periodic communications between emergency teams and the Control Room and the TSC.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel report to their normal reporting area during an Alert for the purpose of assembly and initial accountability.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	**Annex 4.3.2** Assembly (SEP J.4.1) Nonessential plant personnel located within the Protected Area will exit the protected area upon hearing the Site Area or the General Emergency alarm, and report to designated assembly areas. Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel located within the protected area leave upon hearing the Site Area or the General Emergency alarm.	**Annex 4.3.2** Assembly (SEP J.4.1) Nonessential plant personnel located within the Protected Area will exit the protected area upon hearing the Site Area or the General Emergency alarm, and report to designated assembly areas. Visitors, contractors, and escorted personnel will leave the protected area during an Alert or higher declaration.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Security Department accounts for each person inside the protected area by using the security computer system, which is provided Emergency Diesel backup power as well as an emergency backup fail-over computer.	**EP J.4.2** : 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
This system is supplemented by the availability of telephone and radio communications capability between the Control Room, the OSC and the TSC. This methodology provides for accountability of all individuals inside the protected area within approximately 30 minutes of the emergency declaration.	**EP J.4.2**: : 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Accountability reports are made periodically to the ED by the Security Department.	No equivalent Plan/Annex statement	The processing of Accountability reports is a procedural action. The SNC Standard Emergency Plan retains the commitment to perform the function in a timely manner.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel, visitors, and contractors located within the protected area proceed to a rally point location outside the protected area [normally, the Plant Entry Security Building (PESB); however, if radiological conditions prohibit its use, Gate 17 or any ED designated gate exiting the protected area may be used as a rally point].	**Annex 4.3.2** Assembly (SEP J.4.1) Personnel assembly is mandatory at the Site Area Emergency or higher level classification. Upon activation of the plant emergency alarm, plant personnel assigned specific emergency responsibilities will proceed to their designated emergency response locations. Assembly of site personnel outside of the Protected Areas is accomplished by non-essential personnel reporting to designated assembly areas. Assembly may be initiated at any time site management deems it appropriate for personnel safety reasons.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A security patrol periodically inspects all offices and work locations outside the protected area to ensure that all personnel have received instructions regarding onsite protective measures.	**EP J.4** 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. **Annex 4.3.3** Security Events (SEP J.4) On-site protection of employees during security events involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex. Conduct of the function is more appropriately a procedural level function.
Search and Rescue If protected area accountability reveals a missing person, the ED or designee assembles a search and rescue team per the emergency response procedures. The search and rescue team can obtain information on last known location from the security computer system or reports from other personnel. A search of likely areas will be conducted until the missing individual is located.	**EP J.4.2** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Evacuation Evacuation of all nonessential personnel (if feasible) is ordered by the ED whenever: a. It is determined that a threat to the safety of onsite personnel exists. b. A Site Area Emergency or a General Emergency is declared.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED or designee provides evacuation route directions to personnel directed to leave the plant site using the PA system and other communications means. This information, including the evacuation routes (North and/or South on U.S. Highway 1) are included in applicable implementing procedures.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Nonessential plant personnel, visitors, and contractors will be directed to the designated county relocation centers if a radiological release is in progress during the emergency. The appropriate relocation centers are Toombs County High School for northern evacuations and Appling County High School for southern evacuations. Evacuation is generally by individually owned vehicles.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Directions provided to evacuees are based on radiological necessities and specific protective action requirements.	No direct equivalent Plan/Annex statement.	The responsibility to provide for site evacuation is specified in the SNC Standard Emergency Plan and Annex.
Security Events Onsite protection of employees during hostile actions 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 procedures provide specific actions to take during hostile action based events. These actions will be communicated to onsite personnel via the plant PA system and other communications means as applicable.	**Annex 4.3.3** Security Events (SEP J.4) On-site protection of employees during security events involves a combination of restricted movement, movement to safe locations, and site evacuation depending on the nature of the event and advance warning. Specific actions to be taken during such events are included in site procedures.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Monitoring and Decontamination When an Alert is declared but no site evacuation is anticipated, personnel who have left the protected area are monitored by portal monitors.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) When an Alert is declared but no site evacuation is anticipated, personnel who have left the protected area are monitored by portal monitors. If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations. For a Site Area Emergency or a General Emergency, or when site evacuation is expected and a release of radioactivity has occurred, monitoring is performed by portal monitors at the Plant Entry Security Building or by portable monitoring equipment at the rally point areas. The Rally Point Team establishes a control point at the rally point area and monitors evacuees before releasing them. The monitoring teams maintain the appropriate records.	The commitment wording was standardized and relocated to the Site Annex.
If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) If necessary, decontamination is completed using the plant decontamination facilities located in the Control building or other onsite locations.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
For a Site Area Emergency or a General Emergency, or when site evacuation is expected and a release of radioactivity has occurred, monitoring is performed by portal monitors at the PESB or by portable monitoring equipment at the rally point areas. The Rally Point Team establishes a control point at the rally point area and monitors evacuees before releasing them.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) For a Site Area Emergency or a General Emergency, or when site evacuation is expected and a release of radioactivity has occurred, monitoring is performed by portal monitors at the Plant Entry Security Building or by portable monitoring equipment at the rally point areas. The Rally Point Team establishes a control point at the rally point area and monitors evacuees before releasing them. The monitoring teams maintain the appropriate records.	The commitment wording was standardized and relocated to the Site Annex.
The monitoring teams maintain the appropriate records.	**Annex 4.3.4** Monitoring and Decontamination (SEP K) The monitoring teams maintain the appropriate records.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Should decontamination become necessary, the Rally Point Team will conduct decontamination onsite, preferably at the predesignated locations in the Environmental Building or Building 10.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Decontamination and waste disposal are completed in accordance with plant procedures.	**EP K.5** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Use of Onsite Protective Equipment and Supplies Plant emergency kits and other supplies are used to provide dosimetry, monitoring equipment, protective clothing, and respiratory protection gear for individuals arriving or remaining onsite during the emergency.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A supply of potassium iodide is stored in the primary ERF and will be distributed as directed by the ED when thyroid exposures are projected to be above 25 Rem CDE.	**EP B.1.1** The Emergency Director's non-delegable duties include: • Issuance of potassium iodide (KI) to plant employees as a thyroid blocking agent. **EP H.1.2** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant radiation protection procedures dictate the requirements for use of dosimetry, respiratory protection, and protective clothing. A list of the emergency supplies available at ERF and other onsite areas is detailed in the plant procedures.	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Protective Response for the Public The licensee is responsible for ensuring that timely recommendations for protective actions reach appropriate State and local officials. These officials (as described in Section A) are responsible for alerting the public and ordering shelter and/or evacuation, if necessary.	**EP 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. Alerting The means used by HNP to alert local and State agencies and the means used by State and local agencies to alert the public are described in Section E and Appendix 3 of this Plan.	**Annex 4.1.1** Notification Process (SEP E.2.2.1) State and local warning points are staffed 24 hours per day. State and county authorities to be notified within 15 minutes of the declaration of an emergency condition are: State of Georgia: • Georgia Emergency Management Agency (GEMA) Georgia county authorities: • Appling County warning point. • Jeff Davis County warning point. • Tattnall County warning point. • Toombs County warning point. **Annex 4.2** Alert and Notification System (ANS) (SEP E.2.5) Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section J: The ED is responsible for providing protective action recommendations to State and local officials as part of initial notifications and follow-up communications.	**EP 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
These recommendations are based upon assessment actions described in Section I of this Plan. Using available information regarding plant conditions, projected dose estimates, and any available monitoring data, the ED recommends whether the public should be advised to seek shelter or evacuate.	**Annex 4.4** Protective Actions for the Offsite Public (SEP J.5) The Emergency Director will recommend the necessary protective actions to offsite authorities based on predetermined protective actions for a General Emergency Classification or results of offsite dose assessment. Upon activation of the EOF, the EOF Emergency Director will be responsible for recommending protective actions for the offsite population.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The mechanism for making these recommendations is described in Section E of this Plan. These recommendations are based upon the Environmental Protection Agency (EPA) Protective Action Guidelines and NUREG-0654 Supplement 3 Rev 1. NMP-EP-112, Protective Action Recommendation, provides detailed guidance on PAR determinations.	**EP 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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Current PARs were developed in coordination with Offsite Response Organizations. Table J-3 provides details regarding the determination of initial protective actions recommendations for the public.	**EP 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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Table J-4 provides details for determining followup PARs.	No equivalent Plan/Annex Table.	SNC Standard Emergency Plan Section J.5 maintains the commitment to provide PARs for the population. Specific designation of followup PARs is part of the general requirement. A separate table is no longer necessary.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Plant conditions, plume dose projection calculations, and offsite monitoring results should be evaluated when making protective action recommendations.	**EP 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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
If significant discrepancies exist between field monitoring results and plume dose rate projection calculations, an evaluation should be made. The most conservative valid dose projections based on evaluation results should be used in the determination of protective action recommendations.	**EP 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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Evacuation Determining the benefit of evacuation must take into account the time needed to complete the evacuation.	**EP 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 the use of KI (potassium iodide)) in accordance with state plans and policy.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 5 includes further detail regarding how these estimates were developed and presents information on evacuation routes, evacuation areas, relocation centers, shelter areas, and the population distribution by evacuation areas and zones.	Annex Appendix A	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
TABLE J-3 INITIAL PROTECTIVE ACTION RECOMMENDATIONS	No equivalent Plan/Annex Table	SNC Standard Emergency Plan Section J.5 maintains the commitment to provide PARs for the population. Specific separation of initial and followup PARs is part of the general requirement. A separate table is no longer necessary.
TABLE J-4 FOLLOW UP PROTECTIVE ACTION RECOMMENDATIONS	No equivalent Plan/Annex Table	SNC Standard Emergency Plan Section J.5 maintains the commitment to provide PARs for the population. Specific separation of initial and followup PARs is part of the general requirement. A separate table is no longer necessary.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
K. RADIOLOGICAL EXPOSURE CONTROL Emergency Exposure Guidelines During an emergency, it may be necessary to authorize radiation exposures above 10 CFR 20 limits. These higher exposures may be necessary to complete protective, corrective, or lifesaving actions. Table K-1 presents the emergency exposure limits for the licensee emergency workers involved in sampling or other assessment actions, protective actions (e.g., first aid, ambulance, or medical treatment), corrective actions (e.g., emergency repair), or lifesaving actions. These limits are based upon EPA-400, "Manual of Protective Action Guides and Protective Action for Nuclear Incidents," Table 2-2, "Guidance on Dose Limits for Workers Performing Emergency Services." Under all such situations, every reasonable effort will be made to minimize exposures. Decisions as to appropriate exposures, considering the action required and relative risks, will be made by the ED in consultation with HP personnel.	**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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Onsite Radiation Protection Program When necessary, the ED can authorize emergency exposures in excess of 10 CFR 20 limits but within the limits given in Table K-1. Declared pregnant individuals exposure will be controlled in accordance with normal plant procedures. Personnel should have a known radiation exposure history.	**EP K.1** 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."	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Where possible, the normal radiation work permit procedure will be used to control exposures. This procedure requires signature approval, prior knowledge of worker past exposures, and guidance on protective actions to be used in the course of the emergency work	**EP K.3.3**: Where possible, the normal radiation work permit procedure will be used to control exposures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
. If time and urgency do not allow this procedure to be followed, HP supervision may approve emergency radiological work permit controls.	**EP K.3.3**: Based on conditions and urgency Radiation Protection supervision may approve emergency radiological work permit controls.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In all cases, a briefing is given to the emergency team by a qualified HP member. Each team is accompanied by a HP technician as directed by HP supervision. This briefing includes a discussion of the hazards involved in the planned action, as well as protective actions to be taken.	**EP 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.	The conduct of Team operations was eliminated from the SNC Standard Emergency Plan to the standardized radiological protection requirements established in Section K. Conduct of team operations was relocated to EPIPs.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A record of collective exposures incurred during the emergency will be kept by HP supervision. This record of exposure will be used to determine OSC team assignments.	**EP K.3** Exposure Controls **EP 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, on-site 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
All emergency exposures are to be included in personnel radiation exposure records.	**EP K.3.1** 24-Hour Capabilities Exposure records will be maintained for emergency response personnel who are issued dosimetry	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Emergency dosimetry in the form of optically stimulated luminescence dosimeter (OSLD) badge and a self-reading dosimeter is provided to each member of the emergency response organization as he or she reports to the response facilities on an as-needed basis	**EP K.3** Exposure Controls **EP 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, on-site 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
. Offsite authorities responding to HNP facilities are provided with emergency dosimetry, as required.	**EP K.3.1**: In an emergency situation, on-site personnel, offsite support personnel, and local governmental emergency response personnel may be issued monitoring devices. Exposure records will be maintained for emergency response personnel issued dosimetry.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant procedures present information on the types and quantities of dosimetry available in each ERF and other locations.	No direct equivalent Plan/Annex statement	Section H provides the description of equipment/procedures maintained in the ERFs

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
There is a capability to read OSLDs within 24 hours. HP supervision ensures that this is done and maintains exposure records for all emergency response personnel.	**EP K.3** Exposure Controls **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Decontamination Plant procedures contain the action levels for determining the need for decontamination of personnel, clothing, and areas.	**EP K.5**: During normal conditions or an emergency, guidelines to follow for contamination limits are established by the site radiation protection program.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Personnel decontamination facilities are located in the control building and other onsite locations. These locations have all necessary monitoring equipment and decontamination supplies.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Waste generated through the use of the decontamination facilities is collected and processed by the plant liquid radwaste system.	**EP K.5**: Facilities and supplies for decontaminating personnel are available at various plant locations.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
If decontamination activities are required at State/local relocation centers for relocated personnel, a controlled access area will be established in such a way that liquid and solid waste can be collected and returned to the plant for processing as radwaste following normal plant radwaste procedures.	**EP K.7**: Nonessential on-site personnel may be dismissed to an offsite relocation 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 will be sent to designated locations for monitoring and decontamination. Provisions for extra clothing are made and suitable decontaminates are available for the expected type of contaminations, particularly with regard to skin contamination.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Supplies of clean clothing will be transported to the offsite State/local relocation centers to replace any contaminated clothing.	**EP K.7** Offsite Decontamination Nonessential on-site personnel may be dismissed to an offsite relocation 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. Provisions for extra clothing are made and suitable decontaminates are available for the expected type of contaminations, particularly with regard to skin contamination.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Personnel decontamination will be accomplished using water washes or other methods for extreme cases, as described in the plant HP procedures.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Decontamination of serious wounds will be accomplished at the Appling General Hospital or the Meadows Regional Medical Center.	**Annex 2.3.2, 5.8.1**: Agreements with the Appling General Hospital in Baxley, the Meadows Regional Medical Center in Vidalia, and a contract with a medical consulting group have also been established for treatment of injured and contaminated/irradiated individuals.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Equipment and area decontamination will be accomplished using methods described in the plant HP procedures.	**EP K.5** Decontamination 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.	The SNC Standard Emergency Plan maintains the commitment to perform the functions. The reference to procedural control is not necessary.
Onsite Radiological Contamination Control During emergency conditions, the Security Department provides access control. Emergency response personnel are allowed to enter the protected area and report to the appropriate ERF for accountability prior to completing any emergency assignments.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Additional personnel may be allowed onsite with the approval of the ED or the Recovery Manager.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan provides for control and protection of those onsite and acquisition of resources (whether equipment or personnel) as needed. The statement is not required.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Access to in-plant areas that are contaminated is controlled by barriers, signs, locked doors, or personnel stationed for that purpose.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency monitoring teams are responsible for determining the need for onsite radiological access control and establishing the proper method through discussions with TSC personnel.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Plant procedures used for determining contaminated areas will be used for determining the need for access control	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Food and water in radiation-controlled areas will be considered contaminated. The ED or designee will make arrangements for supplies to be brought in.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
TABLE K-1 EMERGENCY EXPOSURE LIMITS	**EP Table K.1.A**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Onsite Capability Provisions have been made to assist personnel who are injured, who may have received high-radiation doses, or who have been contaminated.	**EP L.2**: SNC-operated nuclear power plants maintain onsite first aid supplies and equipment necessary for the treatment of contaminated and/or injured persons.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Portable first-aid kits, available at strategic locations throughout the plant, and decontamination materials are brought to the scene by responding First Responders and HP technicians as needed.	**Annex 5.5**: Emergency supplies and equipment are located at various plant locations. Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Equipment in these kits is calibrated in accordance with the suppliers' recommendations. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	The commitment wording was standardized and relocated to the Site Annex.
There are selected personnel on shift and in the onsite and offsite emergency organizations trained in first-aid and decontamination procedures	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
. In addition to the onsite first-aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses.	**EP L.1**: 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. **Annex Section 5.8.1**: Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.
The first-aid and decontamination area, located in the control building, is equipped with decontamination supplies and other equipment.	**Annex 4.3.4**: If necessary, decontamination is completed using the plant decontamination facilities located in the Control Building or other onsite locations. **Annex 5.5**: Emergency supplies and equipment are located at various plant locations. Procedures require an inspection and operational check of equipment in these kits on a quarterly basis and after each use. Equipment in these kits is calibrated in accordance with the suppliers' recommendations. A set of spares of certain equipment is also maintained to replace inoperative or out-of-calibration equipment.	The commitment wording was standardized and relocated to the Site Annex.
Personnel found to be contaminated but not requiring immediate medical attention will undergo decontamination in accordance with plant procedures.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Where contamination of large, open wounds is involved, personnel may be immediately transported to the Appling General Hospital or the Meadows Regional Medical Center, where they receive prompt medical attention.	**EP L.1**: In addition to the onsite first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses. **Annex 5.8.1**: Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Waste fluids and waste from decontamination of personnel or material will be collected and handled as radioactive waste in accordance with the HNP HP Procedures.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Medical Transportation Injured/externally contaminated personnel who require medical attention will normally be transported by ambulance to the cooperating hospitals.	**Annex 5.8.2:** Injured/externally contaminated personnel who require medical attention will normally be transported by ambulance to the cooperating hospitals. Ambulance crews are trained to handle external contamination cases, and an RP technician accompanies any contaminated patients to the hospital. Support and backup ambulance service are provided by the Appling County EMS and Toombs Montgomery County EMS, respectively. These crews also receive sufficient training in handling contamination cases.	The commitment wording was standardized and relocated to the Site Annex.
Ambulance crews are trained to handle external contamination cases, and an HP technician accompanies any contaminated patients to the hospital.	**Annex 5.8.2**: Injured/externally contaminated personnel who require medical attention will normally be transported by ambulance to the cooperating hospitals. Ambulance crews are trained to handle external contamination cases, and an RP technician accompanies any contaminated patients to the hospital. Support and backup ambulance service are provided by the Appling County EMS and Toombs Montgomery County EMS, respectively. These crews also receive sufficient training in handling contamination cases. EP O.1.1: Annually, training will be offered for hospital personnel, ambulance/rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Support and backup ambulance service are provided by the Appling Ambulance Service and Toombs County Ambulance Service, respectively. These crews also receive sufficient training in handling contamination cases. Arrangements for the use of the local ambulance service are described in Appendix 2, Letters of Agreement.	**Annex 5.8** Medical Support (SEP B, SEP L) **Annex 5.8.1** Hospital and Medical Support (SEP B.6.3.1, L.1) Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex. **EP O.1.1**: Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the Site Annex.
Offsite Services Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling General Hospital, located approximately 11 miles south of the site and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area which is separate from the rest of the complex. Each area contain facilities and equipment for emergency surgery, personnel dosimetry, decontamination, radioactive waste recovery, and portable shields for attendant exposure control. These facilities enable the emergency treatment and the handling of contaminated individuals. Noncontamination injuries will be handled by the hospital with its routine facilities.	**EP L.1:** 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. **Annex 5.8.1**: Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex **EP O.1.1**: Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The medical staff of each hospital is trained to treat externally contaminated patients or individuals who have received high exposures. Trained plant radiation protection personnel assist hospital staff when plant personnel are being evaluated.	**Annex 5.8.2**: Injured/externally contaminated personnel who require medical attention will normally be transported by ambulance to the cooperating hospitals. Ambulance crews are trained to handle external contamination cases, and an RP technician accompanies any contaminated patients to the hospital. Support and backup ambulance service are provided by the Appling County EMS and Toombs Montgomery County EMS, respectively. These crews also receive sufficient training in handling contamination cases. **EP O.1.1:** Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.
Following decontamination, personnel suspected to have ingested radionuclides will undergo bioassay analysis for determination of internal contamination.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
A medical consulting group will provide medical support services to coordinate the total radiological management of radiation accident victims.	**Annex 5.8** Medical Support (SEP B, SEP L) **Annex 5.8.1** Hospital and Medical Support (SEP B.6.3.1, L.1) Arrangements for treating radiologically contaminated and/or irradiated patients have been made with the Appling Healthcare System, located approximately 11 miles south of the site and Meadows Regional Medical Center, located approximately 22 miles north of the site. Each hospital has a radiation emergency area separate from the rest of the complex	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Training of Medical Support Personnel At least once per calendar year, training will be offered for both onsite and offsite personnel having medical support responsibilities. Retraining typically consists of a repetition of the initial training, with the inclusion of lessons learned from the previous year's drills. In addition, drills and exercises are an integral part of the training program and are conducted as specified in Section N, Exercises and Drills.	**EP O.1.1**: Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
M. RECOVERY AND REENTRY PLANNING AND POST-ACCIDENT OPERATIONS The objectives of the licensee following any emergency declaration are to mitigate the consequences of the event and to take those steps described in this Emergency Plan which will minimize any effects upon the health and safety of the public and emergency workers. Once the emergency situation is terminated, the goal is to restore the HNP to normal operating status. For some situations, such as a NUE involving a natural phenomenon that has no effect upon HNP, the emergency situation may not require any change to normal operations; therefore, no formal transition is required. In other circumstances which may involve suspected or actual damage to the plant, a transition is appropriate. This is defined as the recovery phase.	SECTION M: RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS **EP 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 wording was standardized in Section M of the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Commencement of Recovery Phase The ED determines when the recovery phase begins.	**EP M.1**: 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The following guidelines, as applicable to the specific situation, are observed prior to terminating the emergency: 1. The affected reactor is in a stable condition and can be maintained in that condition indefinitely. 2. Plant radiation levels are stable or are decreasing with time. 3. Releases of radioactive material to the environment have ceased or are being controlled within permissible limits. 4. Fire or similar emergency conditions no longer constitute a hazard to safety-related systems or equipment or personnel. 5. Discussions with the licensee's applicable members of the HNP emergency organization, offsite authorities (NRC; Georgia State EMA; and Appling, Jeff Davis, Tattnall, and Toombs County EMA Directors) do not result in identification of any valid reason for not terminating the emergency.	**EP M.1**: 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section M: Once the above conditions are satisfied, the ED will announce that the emergency is terminated and the plant is in a recovery mode.	**EP M.1**: 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. 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section M: He will direct that all elements of the emergency response organization be advised of the change in status via the Emergency Notifications Network, the ENS, and other pertinent communications systems.	**EP M.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section M: At this time, the ED, with the approval of Corporate Management, will designate a Recovery Manager.	**EP M.1**: The Emergency Director will designate a recovery manager to constitute the recovery organization	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section M: He (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 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. • Provide assistance with recovery activities undertaken by State and County authorities, if requested. • Provide public information on the status of recovery operations via releases to the media.	**EP M.1**: 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. • 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Recovery Manager will assign individuals to specific positions depending upon the nature and the extent of damage to the plant. Figure M-1 shows a representative organization for recovery operations.	**EP M.1**: 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. • 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. **Figure M.2** Typical Long Term Recovery Organization	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The responsibilities and functions of the managers shown on Figure M-1 are summarized as follows: • Recovery Manager: has overall responsibility for restoring the plant to a normal operating configuration.	**EP M.1**: 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. • 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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Plant Operations Manager: manages day-to-day in-plant operations and, during recovery, is responsible for ensuring that repairs and modifications will optimize post-recovery plant operational effectiveness and safety.	**EP M.1**: 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. • 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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Design and Construction Support Manager: focuses necessary engineering, design, and construction resources on those aspects of plant recovery requiring redesign, modifications, or new construction; directs and coordinates NSSS and balance-of-plant engineering and construction/repair work.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Radcon/Radwaste Manager: develops plans and procedures to process and control liquid, gaseous, and solid waste to minimize adverse effects on the health and safety of the public and plant recovery personnel. In addition, the Radcon/Radwaste Manager coordinates the activities of staff radiological engineers and radiation protection personnel engaged in waste treatment operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
HP and Chemistry Manager: responsible for as low as reasonably achievable (ALARA) planning, execution, and monitoring; plans and manages decontamination of affected areas and equipment; supervises and directs all special radiological controls, radiochemistry, and chemistry activities required to support the recovery operation.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Technical Support Manager: provides analyses, plans, schedules, and procedures in direct support of plant operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Advisory Support (Recovery Review Board): reviews and approves general recovery plans and procedures, as well as reviewing the consequences of specific recovery operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Scheduling/Planning Manager: prepares plans and schedules and tracks/expedites recovery operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Administrative/Logistics Manager: supplies administrative, logistic, communications, and personnel support for the recovery operation.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Public Information Director: coordinates the flow of media information concerning recovery operations.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Once the organization is established and specific responsibilities are assigned, the Recovery Manager may relocate some or all of the recovery organization staff from the EOF to the plant site.	See Above	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Recovery Manager will designate, in consultation with management, a Recovery Review Board, which will review and approve recovery plans and procedures. This review will address the impact and consequences, both anticipated and potential, of any given recovery operation. The Recovery Review Board will establish administrative and procedural controls, lines of communication, and functional responsibilities of each segment of the organization. In general, any recovery operation will require Recovery Review Board review and approval.	**EP M.1:** 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. • 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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Reentry Planning If the accident situation involved a release of radioactivity, appropriate areas of the plant and site will be monitored to determine contamination and radiation levels. Those areas where surface contamination is > 1000 dpm/100 cm2 will be appropriately identified as radiation or contamination areas, and access will be controlled in accordance with normal plant procedures. When reentry to a radiation area is required for inspection or work, the activity will be preplanned, and plant radiation work practices and ALARA program principles will be followed.	**EP M.1**: 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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.
Exposure Monitoring All personnel who require access to the plant or to radiation areas onsite during the recovery phase will be issued OSLDs and other dosimetry, as appropriate. These OSLDs will be read at least monthly (or more frequently if work in high-radiation areas is undertaken). The results of the dosimeter readings, including integrated exposures (i.e., man-Rems) will be reported to the Recovery Manager, the Radcon/Radwaste Manager, and others in the plant organization who normally receive such reports.	**EP M.1**: 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.	The SNC Standard Emergency Plan assigns responsibility to a Recovery Organization. The assignment of responsibility by day to day title is no longer required. The responsibility falls within the designated Recovery Organization.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The State of Georgia has the responsibility for determining population exposure of the public via plume exposure and ingestion pathways. HNP will provide information including: the release rate of radioactivity, the quantity of radioactivity released, the isotopic composition of released material, and meteorological data to assist the State in its determinations.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
By determining the affected population and performing dose assessment calculations, including determining the quantity of radioactivity and release rate, HNP personnel can estimate the population exposure rate, if necessary. Use of data from fixed monitoring stations (OSLDs and air samplers) can be used to confirm the exposure estimates.	No equivalent Plan/Annex statement	This intermediate phase function will be conducted under the direction of the state with resource support from the federal government.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
N. EXERCISES AND DRILLS HNP maintains an emergency drill and exercise program in accordance with 10 CFR 50 Appendix E.IV.F to test and evaluate the adequacy of emergency facilities, equipment, procedures, communication links, actions of emergency response personnel, and coordination between the HNP and the offsite emergency response organizations. The exercise program for HNP consists of an 8-year cycle that incorporates the use of both Exercises and Drills.	SECTION N: EXERCISES AND DRILLS **EP 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.	The wording was standardized in the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Exercises EP exercises that test integrated response capabilities are conducted in accordance with NRC and FEMA guidance. Exercises are conducted every calendar year and are designed to include the demonstration of a major portion of the basic elements of the EP plans of the participating organizations. The planning and execution of each exercise is coordinated with Federal, State, and local agencies, as appropriate.	**EP N.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The exercise program for HNP consists of an 8-year cycle that incorporates the following features: 1. A full participation exercise which tests as much of the Plant Hatch, State, and local emergency plans as is reasonably achievable without mandatory public participation will be conducted on a biennial basis and evaluated by NRC and FEMA. 2. Biennial exercise scenarios will be submitted to the NRC under § 50.4 at least 60 days before use in the biennial exercise. 3. Each biennial exercise scenario will provide the opportunity for the ERO to perform their key skills as applicable to their emergency response duties in the CR, TSC, OSC, EOF, and Joint Information Center to implement the EP principal functional areas. 4. Biennial evaluated exercises will be varied such that the following scenario elements are demonstrated over the course of an 8-year exercise cycle: • Hostile action directed at the plant site. • No radiological release or an unplanned minimal radiological release that does not require public protective actions. • Initial classification of or rapid escalation to a Site Area Emergency or General Emergency. • Implementation of strategies, procedures, and guidance developed under 10 CFR 50.54(hh)(2). • Integration of offsite resources with onsite response. 5. An ingestion pathway exercise will be conducted on a frequency to ensure the State of Georgia has the opportunity to participate in an ingestion pathway exercise at least once every exercise cycle.	**EP 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. **EP N.3** Scenarios 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. **EP N.1.3** Ingestion Exposure Pathway Exercise **EP N.3** SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The exercise program for HNP consists of an 8-year cycle that incorporates the following features: (cont) 6. During the interval between biennial exercises HNP will maintain emergency response capabilities by conducting an exercise 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: • Event classification. • Notification of offsite authorities. • Management and coordination of emergency response. • Accident assessment. • Assessment of the onsite and offsite impact of radiological releases. • Protective action recommendation development. • Protective action decision making. • Plant system repair and mitigative action implementation.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Drills A drill is a supervised instruction period aimed at testing, developing, and maintaining skills. Activation of all of the emergency response facilities (TSC, OSC, EOF, and JIC) may not be necessary in a particular drill. Drills may be incorporated into an exercise that is supervised and evaluated by a controller organization.	**EP N.2** Drills A drill in this context is a supervised instruction period aimed at testing, developing, and maintaining skills in a particular operation **EP N.2.1** During these drills, activation of all of the licensee's emergency response facilities (Technical Support Center (TSC), Operations Support Center (OSC), and the Emergency Operations Facility (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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. Periodic Emergency Drills During each exercise cycle periodic drills will be conducted to ensure the ERO teams (not necessarily each individual) are provided the opportunity to develop and maintain key emergency response skills within the scope of their duties. The ERO (not necessarily each ERO team) will be provided the opportunity to demonstrate key skills in response to the following scenario elements in drills or exercises. • All functions in each ERF (e.g., all ERFs that are responsible for dose assessment perform those duties in response to a radiological release). • Use of alternative facilities to stage the ERO for rapid activation during hostile action. • Real-time staffing of facilities during off-hours (i.e., 6:00 p.m. to 4:00 a.m.). • Providing medical care for injured, contaminated personnel (every 2 years). • Response to essentially 100 percent of initiating conditions identified in the site emergency plan implementing procedure for classification of emergencies. • Response to actual industry event sequences appropriate for the nuclear plant technology (e.g., BWR). • Use of procedures developed in response to an aircraft threat and in compliance with 10 CFR 50.54(hh)(1). • Use of the strategies associated with 10 CFR 50.54(hh)(2) to mitigate spent fuel pool damage scenarios (all strategies, such as makeup, spray, and leakage control, but not every variation of a given strategy). • Use of the strategies associated with 10 CFR 50.54(hh)(2) to mitigate reactor accidents and maintain containment.	**EP N.3** Scenarios 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
1. Communication Drills To ensure emergency communication channels between HNP and offsite authorities are operable, periodic communication drills are conducted. For drills, the communication is initiated at HNP using the actual message format in accordance with the applicable plan and procedure. By using the standard message format, the drill tests understanding of message content, as well as the communication systems hardware.	**EP 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.*	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The following test and drills are conducted: a. Communication drills among the Control Room personnel, the TSC, the OSC, the EOF, and the Joint Information Center (JIC) are conducted at least once per calendar year. These drills may be conducted in conjunction during an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
b. Communication drills with the State of Georgia EOC; the Appling, Jeff Davis, Tattnall, and Toombs Counties EOCs; and the licensee field monitoring teams are conducted annually. These drills may be conducted in conjunction with an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
2. Fire Drills Fire drills are conducted in accordance with HNP plant procedures. Quarterly drills are scheduled so that every member of the shift fire brigade participates in at least two drills per year.	**EP N.2.3** Fire Drills Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition, an annual practice that requires extinguishing a fire is conducted.	**EP N.2.3** Fire Drills Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
3. Medical Emergency Drills A medical emergency drill involving a simulated contaminated person is conducted one per calendar year. The drill script identifies the simulated injuries and contamination levels of the individual. The simulated injured individual is given initial treatment, as appropriate, by the HNP personnel transported by ambulance to the hospital, and given subsequent treatment by the hospital staff. Throughout the medical drill, the simulated injured person is treated as though he or she were contaminated until decontamination is demonstrated. A medical drill of this scope is conducted at least once each calendar year and may be included as part of an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The medical drill should be rotated between the agreement hospitals.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
4. Radiological Monitoring Drills Plant environs and radiological monitoring drills (onsite and offsite) are conducted at least once each calendar year. For these drills, a team is dispatched to obtain the required measurement or sample. Demonstration of the proper use of monitoring equipment and sampling of environmental media (water, vegetation, soil, and air) are included. Data are recorded in accordance with the applicable procedure, and communications with the appropriate emergency facility are established. The communication portion of the drill includes direction of the monitoring team and reporting of results. This drill may be conducted in conjunction with an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
5. HP Drills Semi-annual HP drills involve response to, and analysis of, simulated elevated airborne or liquid samples and direct radiation in or about the plant environment. Use of protective clothing and respirators will be demonstrated, as appropriate, during the drills but may not be used throughout the drill (e.g., field monitoring teams do not wear protective clothing or respirators for drill purposes). Exposure control considerations are also used during the drills. Semi-annual drills may be conducted, in whole or in part, jointly with an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
6. Post-Accident Sampling Drills Post-Accident sampling, under simulated accident conditions, is demonstrated at least once each calendar year. A sample is taken and an analysis performed. Controlled data are used to simulate the potential high-radiation levels that may be encountered during accident conditions. This drill may be conducted in conjunction with an exercise.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Scenarios Each drill and exercise is conducted in accordance with a scenario. The drill scenarios are considerably less extensive than exercise scenarios. The preparation of drill and exercise scenarios is directed by the Emergency Preparedness Supervisor (EPS) or designee, who enlists the assistance of personnel from other departments, as required, to assist in this task.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The scenario for the biennial exercise is prepared under the direction of the EPS or designee and coordinated with offsite authorities.	**EP 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. **EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Biennial exercise scenarios are submitted to the NRC and FEMA in accordance with available guidance.	**EP N.3** SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Scenarios include the following information: • Basic objectives and appropriate evaluation criteria. • Date, time period, place, and participating organizations. • Simulated events. • Time schedules of real and simulated initiating events. • Narrative summary describing the conduct of the drill or exercise, including such items as simulated casualties, offsite firefighting assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities. • Description of arrangements for and advance materials to be provided to official observers.	**EP N.3** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The exercise program is structured with sufficient flexibility to allow free play for decision-making processes.	**EP N.2.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The exercise scenario package identifies a specific accident sequence, a set of messages, and a set of procedural response actions that parallel the accident sequence. The exercise control organization receives general instructions concerning the deviation of plant personnel from procedural response.	**EP N.3** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
The exercise control organization may restrict player action if the response will interfere with the time sequence, restrict player action if the response would prevent demonstration of an exercise objective, and introduce free-play items to the scenario to maintain player interest.	No equivalent Plan/Annex statement	Procedural control of the exercise is more appropriately handled in controller training process.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Specific elements that allow free-play in the decision-making process during the exercise include: • Damage control. • Accident mitigation. • Manpower augmentation actions. • Exposure control actions. • Communication with offsite authorities. • Recommendation of protective actions.	No equivalent Plan/Annex statement	Procedural control of the exercise is more appropriately handled in controller training process.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Evaluations and Corrective Actions All drills and exercises, with the exception of fire drills, are evaluated via the following steps: 1. The exercise or drill controllers/evaluators assemble the players at the conclusion of activities for a critique. Players are encouraged to identify areas where improvements are required. The exercise or drill controllers/evaluators also present their observations to the players. Each controller/evaluator submits his/her comments regarding the drill/exercise to the Exercise Manager. Following the exercise, an overall critique is presented to key players and the controller organization. 2. A report, summarizing the drill/exercise and identifying items for improvement and/or corrective actions, is provided to plant management by the EPS. These items will be tracked in accordance with the plant's corrective action program.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
In addition to the internal critique and evaluation, Federal observers observe, evaluate, and critique the biennial exercise. Corrective actions resulting from this critique will be tracked in accordance with the plant's corrective action program.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Fire drills are evaluated in accordance with the plant Fire Protection Program.	**EP N.2.3** Fire Drills Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING All badged HNP workers receive general training in EP.	**EP O.4.8**: General Employee Training (GET). GET will include general training in emergency preparedness for plant and other site personnel.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Topics include emergency classes, response to emergency conditions, methods of personnel notification, and plant accountability and evacuation procedures.	**EP O.4.8**: GET will include classification, individual response, signals, accountability and site dismissal procedures	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Selected individuals onsite and offsite receive specialized training at least once each calendar year to respond to an emergency situation.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The extent of general training for all badged personnel is documented in HNP procedures.	**EP O.4.8**: General Employee Training (GET). GET will include general training in emergency preparedness for plant and other site personnel.	The conduct and documentation of GET training is a regulatory requirement and governed by site Training Procedures. The statement in the current Plan is not necessary.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The specialized radiological emergency response training is outlined herein; however, full details are provided in the HNP procedures and appropriate training lesson plans.	**EP 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Training for EOF emergency responders is outlined in Appendix 7.	**EP 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.	With the incorporation of the EOF into the base Plan as outlined in the SNC Standard Emergency Plan, Section O of the SNC Standard Emergency Plan includes the EOF training descriptions. See the Justification Matrix for Appendix 7 for specific comparison.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Initial Emergency Response Training Various personnel receive initial emergency response training in the subject areas identified in HNP procedures according to the respective emergency response position to which they will be assigned. It should be noted that these subject areas do not necessarily represent specific course titles, since several individual courses may be used to implement the training in each area. Also, both the content and the depth of training may be varied slightly, depending upon the particular audience, to tailor the presentation to the specific needs of the group. Initial emergency response training is offered on an as-needed basis to fill various emergency response positions.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The training is conducted in accordance with lesson plans.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Section O: Classroom lectures, demonstration and use of equipment, and walk-through of facilities are incorporated into the lesson plans, as appropriate.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
A written examination will be administered at the conclusion of a lesson, as appropriate.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Records of the attendance and the examination scores are retained in accordance with plant procedures.	**EP O.1** 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.	Site Training Requirements maintain the overall responsibility for record keeping. The record keeping statement is not required in the Emergency Plan.
In addition, drills and exercises are an integral part of the training program and are conducted as specified in Section N of this Plan.	SECTION N: EXERCISES AND DRILLS **EP N.1** Exercises SNC-operated nuclear power plants will conduct a biennial exercise and additional periodic drills.	The specific sentence in Section O is not needed to specify the commitment to the function outlined in Section N of the existing and proposed Emergency Plan(s).

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
During practical drills, on-the-spot corrections are made if the situation and time allow; however, if not, the corrections are pointed out in the critique.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Section O: Upon completion of each training session or drill, the participants are asked to critique the training to ensure continued improvement.	SECTION N: EXERCISES AND DRILLS **EP N.1** Exercises 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.	The commitment to conduct formal critiques is documented in Section N of the SNC Standard Emergency Plan.
Section O: Continuing training for emergency responders is offered throughout the year for persons currently holding an emergency response position.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Continuing Emergency Response Training Continuing training for emergency responders is offered throughout the year for persons currently holding an emergency response position.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Continuing training will consist of information regarding any EP equipment and procedure changes which could affect job performance in an emergency.	**EP O.5**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Practical and theoretical EP concepts, industry standards, industry events and lessons learned are reviewed to reinforce previous training and to provide a broader scope and increased depth of knowledge.	**EP O.5**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Applicable critique items resulting from previous training and exercises are reviewed.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Selected objectives from the initial training program may be presented and evaluated if determined to be necessary based on task difficulty, drill critique items and participant feedback.	**EP O.4:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Qualification Initial emergency response personnel qualification is obtained by successful completion of the applicable EP Initial Training course(s) as identified in HNP procedures.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Each emergency responder is required each calendar year to complete the applicable EP Continuing Training course(s) for each of his/her emergency response positions as identified in HNP procedures.	**EP O.4**: 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Also, some positions have additional prerequisites for qualification based on their normally assigned duties. These are as follows: 1. All personnel expected to work in areas that potentially could have excessive airborne radioactivity in emergency conditions should be qualified to wear respiratory protection. This includes the radiological monitoring teams, the operations personnel, the onsite firefighting team, the repair teams, and search and rescue personnel.	**EP O.4**: 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The specific commitment for respiratory training will be evaluated as part of the position specific training and retraining and is not required as a standalone statement in the Plan.
2. Any personnel expected to serve on the search and rescue team should have completed the equivalent of the Red Cross Multimedia First-Aid Course.	**EP O.3**: First Aid Training Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Offsite Emergency Response Training Offsite emergency response training consists of training provided to medical support personnel, as described in Section L of this Plan, and upon the request of State and LEMAs for any pertinent training necessary for emergency response.	**EP O.1**: Personnel from nuclear power plants shall 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. **EP O.1.1:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Additionally, other Southern Company personnel will be trained on an as-needed basis if responding to the plant site.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
P. RESPONSIBILITY FOR THE PLANNING EFFORT: The Executive Vice President/Chief Nuclear Officer (CNO) Southern Nuclear Operating Company (SNC) has overall responsibility and authority for all nuclear activities, including the Emergency Planning (EP) program.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Reporting to the Executive Vice President is the Vice President Fleet Operations Support and the Vice President-(Plant).	**EP P** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The SNC Emergency Planning program is comprised of two distinct and integral functions; emergency planning and emergency preparedness. Responsibility for the performance of these functions is assigned to various members of the SNC organization and coordinated as follows.	**EP P.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Emergency Planning: The Vice President Regulatory Affairs reports to the president/CEO. This individual is responsible for licensing through: providing organizational support and management oversight of the sites to assure prompt and proper disposition or regulatory issues; the development of regulatory positions; advising senior management on priorities and activities affecting regulatory at the nuclear sites; and interfacing with NRC management on behalf of the sites. Other responsibilities include: developing policies, standardized processes, and procedures for the maintenance of the licensing basis; the preparation of submittals to the NRC and other regulatory organizations; and the dissemination of regulatory information.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Reporting to the vice president-regulatory affairs is the fleet emergency preparedness manager, the fleet performance improvement manager, the regulatory affairs director-fleet, and the regulatory affairs director-nuclear development.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The regulatory affairs director-nuclear development is functionally independent of SNC's operating fleet and is noted here for completeness only.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Accordingly, the vice president-regulatory affairs is responsible for administration of the corrective action program in the corporate headquarters, the overall coordination of the corporate emergency preparedness programs (including the common Emergency Operations Facility), Emergency Plans, and site emergency response communication.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
His direct report, the fleet Emergency Preparedness Manager, has the overall governance, oversight, and support of fleet emergency preparedness activities and programs.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager is responsible for overseeing emergency planning activities offsite and coordinating those activities with Licensee, Federal, State, and local response organizations.	**EP P.1** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Planning Coordinator(s) reports to the Fleet Emergency Preparedness Manager in support of this effort. The Emergency Plans are maintained by the Fleet Emergency Preparedness Manager.	**EP P.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Planning Manager provides strategic direction for SNC emergency planning and coordinates with site management through the Vice President-Fleet Operations Support.	**EP P.1** Strategic direction for the emergency preparedness program and maintenance of the SNC Emergency Plan(s) is provided by the SNC Fleet Emergency Preparedness Director.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Planning Coordinator(s) coordinate site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor. The Emergency Planning Coordinator(s) review Emergency Plan changes to determine if the effectiveness of the specific plans have been reduced. Emergency Plan changes which are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	**EP P.1** 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. **EP P.3** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Emergency Preparedness: The Vice President-(Plant) is responsible for the site Emergency Preparedness aspects of the program. The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.	**EP P.2** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President-(Plant).	**EP P.2** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The Emergency Preparedness Supervisor is responsible to the Regulatory Manager for implementation of emergency planning strategies.	**EP P.2** The Emergency Preparedness Supervisor is responsible for the implementation of emergency planning strategies provided by the Fleet Emergency Preparedness Director.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Coordination: The Fleet Emergency Preparedness Manager coordinates site input and involvement in emergency planning programs with Emergency Preparedness Supervisor.	**P.3** Coordination The Fleet Emergency Preparedness Director coordinates site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan procedure development and program maintenance activities.	**P.3** Coordination The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and program maintenance activities.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Figure P-1 shows the EP organization.	Figure P.1 shows the EP organization.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager, Emergency Planning Coordinator, Emergency Preparedness Supervisor, and other individuals with delegated EP responsibilities are trained by self-study, attending industry seminars, short courses, and workshops.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Onsite Emergency Plan Implementing Procedures (EIP) are maintained by the Regulatory Affairs Manager with the Emergency Preparedness Supervisor being the principal site contact.	**EP P.3** EPIPs 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
EIPs for the corporate emergency response organization are maintained by the Fleet Emergency Preparedness Manager.	**EP P.3** EPIPs 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Approved changes to the Emergency Plan are forwarded to key organizations and appropriate individuals who are responsible for implementing the Plan.	**EP P.3** Approved changes to the Emergency Plan are forwarded to key organizations and appropriate individuals who are responsible for implementing the Plan.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Plan, agreements, and the Emergency Implementing Procedures are reviewed once each calendar year and updated, as needed.	**EP P.3** The Emergency Plan, agreements, and the EPIPs are reviewed once per calendar year and updated as needed.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
These updates take into account changes identified by drills and exercises, and the independent review described below.	**EP P.3** These updates take into account changes identified by drills and exercises, and the independent review described below.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
An independent review of the EP program is conducted, as required by 10 CFR 50.54(t). The review includes the Emergency Plan; its implementing procedures and practices, training, annual exercises, readiness testing, equipment and emergency response facilities and interfaces with offsite agencies..	**EP P.3** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The results of the review, along with recommendations for improvements, are documented and reported to plant management and to appropriate offsite agencies.	**EP P.3** The results of the review, along with recommendations for improvements, are documented and reported to plant management and to appropriate offsite agencies.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Management controls are implemented for evaluation and correction of the review findings.	**EP P.3** Management controls are implemented for evaluation and correction of the review findings.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Records of these audits and recommendations are maintained for at least 5 years.	**EP P.3** Records of these audits and recommendations are maintained for at least 5 years.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
In addition to this Plan, several other formal emergency plans were developed to support the overall emergency response effort. Once each calendar year, the Emergency Planning Coordinator performs a review of the emergency plans for Southern Nuclear. This review includes a comparison for consistency of all emergency plans for a specific site including the Security Plan, State, and County plans as appropriate.	**EP P.3** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
These supporting plans and their sources are as follows: Emergency Communications Plan – Southern Nuclear Operating Company		Appropriate Sections of the Emergency Communications Plan have been incorporated into Section G of the SNC Standard Emergency Plan and facilities described in Section H. A separate justification for conduct of Emergency Communications is provided.
Georgia RERP • Base Plan • Annex A, Appling, Jeff Davis, Tattnall, and Toombs Counties • Annex F, Ingestion Pathway	**EP Appendix C**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
FIGURE P-1 TYPICAL EMERGENCY PREPAREDNESS ORGANIZATION	**EP Figure P.1**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
APPENDIX 1 GLOSSARY	**EP Definitions**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 2, Letters of Agreement: All	No equivalent Plan/Annex list of agreements.	The commitment wording was standardized and relocated to the Site Annex. This submittal has no impact on the number or specific type of agencies for which Letters of Agreement were maintained for the Site.
APPENDIX 3 MEANS FOR PROVIDING PROMPT ALERTING AND NOTIFICATION OF THE PUBLIC (PNS)	**EP Section E.2.5** **Annex 4.2**	The commitment wording was standardized and relocated to the Site Annex.
A. INTRODUCTION Prompt alerting and notification of the public within the plume exposure pathway EPZ are the obligation of State and local government or other responsible authority. The responsibility that means exist for this purpose rests with the licensee.	**Annex 4.2** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
An overview of these means is given in this Appendix. A full Alert and Notification System (ANS) description is provided in the FEMA approved Alert and Notification System Design Report (ANS-HNP-001) located in the SNC document management system.	**Annex 4.2** A full description of the Hatch ANS design is provided in the FEMA approved ANS Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
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 this Appendix. 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 objective in all cases.	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia. Special alerting is accomplished through the use of a calling system. Special alerting is initiated in the event of a failure of the system to activate multiple sirens resulting in a loss of coverage in any area. Special alerting may be initiated for a predefined area, a user specified area, user defined groups, or the entire Emergency Planning Zone (EPZ). The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations through EAS. Capability for activation of the calling system is provided for Appling County, Georgia, and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The ED at HNP is responsible for notifying appropriate State and local response organizations, as well as plant emergency personnel, in the event of an emergency.	**Annex 4.2** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
The ICs for each emergency class are delineated in Section D in the main body of this Emergency Plan.	**Appendix B Hatch Annex**	The commitment wording was standardized and relocated to the Site Annex.
The capability for 24-hour-per-day alerting and notification of offsite response organizations and plant emergency personnel is described in Section E.	**Annex 4.2** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. A full description of the Hatch ANS design is provided in the FEMA approved ANS Design Report located in the SNC document management system.	The commitment wording was standardized and relocated to the Site Annex.
In the event of a declared emergency at HNP, initial alerting of the public would be by the siren system and EAS.	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The State of Georgia or Appling County EMA will activate the siren system when it is appropriate to alert individuals within the 10 mile EPZ of an emergency at Plant Hatch	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
Following activation of the siren alerting system, notification will be performed via local radio and television stations (Emergency Alert System).	**Annex 4.2** The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations through EAS. Capability for activation of the calling system is provided for Appling County, Georgia, and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
B. CONCEPT OF OPERATIONS The ANS consists of a primary ANS and a backup system should there be a failure of the primary system: • Primary - Sirens and Emergency Alert System (EAS) stations • System Backup - Reverse calling system	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The concept of operation for the system is as follows: The Primary ANS has two communication pathways. The first pathway is through the primary agency (on site) via the UHF or VHF radio.	**EP 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Should the primary agency fail to activate the system, the secondary pathway will be utilized by the secondary agency (off site in Toombs County).	**Annex 4.2** Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
If neither agency can activate the system, the backup system will be utilized to notify the residents of the 10 mile EPZ.	**Annex 4.2** The calling system serves as a complete backup to the ANS. The system provides both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations through EAS. Capability for activation of the calling system is provided for Appling County, Georgia, and for the state of Georgia.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
The siren alerting system consists of Whelen Model 2900 series electronic omnidirectional sirens. The siren system sound coverage is such that a loss of a single speaker-driver can be tolerated on any siren without reducing siren coverage below the minimum required for populated areas within the EPZ.	**Annex 4.2** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia.	The commitment wording was standardized and relocated to the Site Annex.
The EAS provides government officials the capability to provide immediate communications and information to the general public at the State and local area levels during periods of emergency. EAS activation procedure will be in accordance with State EAS plans.	**EP E.2.5.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Special Alerting and System Backup Special alerting will be accomplished through the use of a calling system. Special alerting will be initiated in the event of a failure of the system to activate multiple sirens resulting in a loss of coverage in any area. Special alerting may be initiated for a predefined area, a user specified area, user defined groups, or the entire EPZ.	**EP E.2.5.1** Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The calling system will serve as a complete backup to the ANS. The system will provide both alerting and notification of EPZ residents independent of the alerting capabilities provided by the installed siren system and notification capability of local radio and television stations.	**EP E.2.5.1** Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
The calling system is designed to be able to contact residents within the EPZ via telephone or cellular phone with a custom message specific to the event. Thus, it meets or exceeds the relevant criteria for backup notification of area residents and businesses.	**EP E.2.5.1** Each site has a FEMA approved backup notification system in the event of a loss of the primary alert and notification system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
C. CRITERIA FOR ACCEPTANCE The minimum acceptable objectives for coverage by the system are: • Capability for both alerting signal and an information or instructional message to the population on an area-wide basis throughout the 10-mile EPZ, within 15 min. • The alerting system will assure direct coverage of essentially 100 percent of the population within 10 miles of the site. • The Acceptance Testing Plan (ATP) focused on demonstrating the operational features of the siren alerting system such as diagnostic tests, silent tests, and full sound volume tests. • A detailed account of the testing process is available in the ANS Design Report.	**EP 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. 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
D. PHYSICAL IMPLEMENTATION In the event of an emergency, the licensee has developed and will maintain plans, systems, procedures, and relationships that are effective in notifying appropriate governmental and other responsible authorities. These authorities will have available to them the means for alerting and notifying the general public and for advising of appropriate responses by the public.	**Annex 4.2** Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public. The state and/or local authorities are responsible for activation of this system. Primary alerting is accomplished by use of a siren system. Each siren operates on battery power with battery charge maintained by an inverter that receives power from the local electrical grid or from a solar panel(s). Siren system activation, test, and monitoring capability are provided for Appling County, Georgia and for the state of Georgia	The commitment wording was standardized and relocated to the Site Annex.
The communications network utilized between the plant and the responsible authorities is described in section E.	No equivalent Plan/Annex statement.	Section E of the SNC Standard Emergency Plan and Site Annex has the description of Communication and Notification requirements for the ANS system.
Notification of the licensee's emergency response personnel is described in Section E of the main body of this Emergency Plan.	No equivalent Plan/Annex statement.	Section E of the SNC Standard Emergency Plan and Site Annex has the description of Communication and Notification requirements for the ANS system.
Notification of State and local response organization personnel would be described in their respective emergency plans.	No equivalent Plan/Annex statement.	Section E of the SNC Standard Emergency Plan and Site Annex has the description of Communication and Notification requirements for the ANS system.
APPENDIX 4 TYPICAL EMERGENCY EQUIPMENT LISTS	No equivalent Plan/Annex appendix/list.	The SNC Standard Emergency Plan provides commitments to perform the functions for which the Emergency Equipment is used. The specific equipment needed to perform those functions varies as equipment/vendors changes. The Plan retains the commitment to perform the function, which eliminates the need to provide the specific equipment listings.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
APPENDIX 5 EVACUATION TIME ESTIMATES FOR HNP PLUME EXPOSURE PATHWAY EPZ	**Appendix A** – Evacuation Time Estimate Study and Map Reference	The Evacuation Time Estimate report for Plant Hatch was relocated to the Site Annex.
APPENDIX 6 – TYPICAL EMERGENCY IMPLEMENTING PROCEDURES	**Annex Appendix C**	A complete set of function-based EPIPs will be developed to support the integrated Plan. Appendix will be updated prior to implementation of the revised Plan.
Appendix 7 A.3: Upon notification of an ALERT or higher classification or as directed by the ED, the EOF will be activated as described in emergency implementing procedures.	**EP H.2.1**: Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 7 A.3: Offsite support personnel and equipment will be dispatched to the site Operations Support Center (OSC) or Technical Support Center (TSC) upon request from the specific site Emergency Director.	**EP B.2.1.15**: The TSC 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan
Appendix 7 A.3: The corporate emergency organization will provide offsite emergency response support and resources to SNC sites 24 hours per day until the emergency has been terminated.	**EP B.1** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The SNC Standard Emergency Plan integrates the Corporate response as part of the trained and qualified ERO. A separate statement is not necessary.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 A.3: The EOF will be activated for an ALERT, SITE AREA or GENERAL emergency classifications.	**EP H.2.1**: Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: This facility (EOF) will be operational within about an hour of the initial notification.	**EP B.2**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.
Appendix 7 A.3: SNC's goal is to begin notification of all required on-call Emergency Response Organization (ERO) personnel as soon as practicable, within 15 minutes, following the declaration of an Alert emergency or higher emergency classification at any SNC site.	**EP B.1.1** The ED, at their discretion or when procedurally required, activates the ERO.	The SNC Standard Emergency Plan moves to a commitment to activate facilities within a timeframe of 75 minutes. Notification of the responding ERO is a step in the overall process and not needed as a separate commitment. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.
Appendix 7 A.3: Minimum EOF staff for facility activation will include the EOF Manager, the Dose Assessment Supervisor, the Dose Analyst, the Field Team Coordinator, the ENN Communicator, and the Licensing Support Coordinator.	**EP Figure B.2.D**	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: Access control for the EOF is established through the use of electronic card readers.	**EP H.2.1**: Access to the EOF is controlled through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 A.3: The emergency director is responsible for the management of the emergency response. Specific duties and responsibilities are provided in the site specific Emergency Plan and Emergency Plan Implementing Procedures.	**EP B.1.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: ... the EOF can be quickly accessed and made operational within about an hour of the initial notification and is safe-guarded against unauthorized personnel.	**EP B.2:** 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. **EP H.2.1**: Access to the EOF is controlled through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan. The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.
Appendix 7 A.3: The building itself (EOF building) has posted security guards and video surveillance cameras.	**EP H.2.1**: Access to the EOF is controlled through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 A.3: Any outside doors that do not have security guards are accessible only by SNC ID badges.	**EP H.2.1**: Access to the EOF is controlled through the use of electronic card readers.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 A.3: If an event were to occur during off-normal hours, a guard will be posted at the main entrance to Building 40 to allow access to offsite agency or other responders without pre-designated ID access.	**EP H.2.1**: Access to the EOF is controlled through the use of electronic card readers.	No equivalent Plan statement. NRC has indicated Security concerns over buildings accessible to the general public and may want a more positive statement of building control.
Appendix 7 B: The EOF Organization is displayed in Figure 1 and typical duty assignments are shown on Table 1.	**EP Figure B.2.D** EOF Organization Chart **EP B.3** Listing of typical duty assignments.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B: Each of the following EOF positions has site-specific personnel designated: • EOF Manager • EOF Technical Supervisor	No direct equivalent Plan/Annex statement	EP O.1 The ERO Training Program assures the training, qualification, and requalification of individuals who may be called on for assistance during an emergency.
Appendix 7 B: In order to augment additional staff that may be needed in the unlikely event of a multi-site accident, SNC will re-activate its ERO notification system.	**EP 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..	General statement on activation of the ERO is sufficient for staffing.
Appendix 7 B: When the EOF is activated, all EOF staff pagers are activated, and all EOF personnel are expected to report to the EOF.	**EP B.2**: 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 B.1: The EOF Managers will typically have either previous plant specific SRO background or long-term supervisory/management experience.	**EP 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.	The commitment was modified to required qualified personnel.
Appendix 7 B.1: The duties and responsibilities of the EOF Manager are as follows: (As listed in App. 7, 14 items listed)	**EP B.3.1.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 B.2: The EOF Technical Supervisor will typically have plant specific long-term engineering/design experience.	**EP 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.	The commitment was modified to required qualified personnel.
Appendix 7 B.2: The duties and responsibilities of the EOF Technical Supervisor are as follows: (As listed in App. 7, 7 items listed)	**EP B.3.1.19**: The EOF 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.3: The duties and responsibilities of the EOF Support Coordinator are as follows: (As listed in App. 7, 8 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.3**: The EOF 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..	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 B.4: The TSC will initially be responsible for dose projection and field team control activities.	**EP B.2.1.5**: The TSC 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.4: When the EOF is activated and ready to assume functions of dose projection/ assessment activities, then the EOF Dose Assessment Supervisor will coordinate transfer of dose assessment, field team control, and protective action determination from the TSC to the EOF.	**Figure B.2.A** **EP B.3** Offsite Emergency Response Organization (ERO)	Figure B.2.A describes the transfer of non-delegable responsibilities between the ERFs. Section B.3 provides the overall responsibility of EOF responders. The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.4: The duties and responsibilities of the EOF Dose Assessment Supervisor are as follows: (As listed in App. 7, 7 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.4**: The EOF 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 B.5: The duties and responsibilities of the Security Coordinator are as follows: (As listed in App. 7, 3 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.11**: The EOF Security Coordinator reports to the EOF Manager. The duties and responsibilities of the Security Coordinator will be assumed by SNC corporate security 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 establishing and maintaining access control for the EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 B.6: The duties and responsibilities of the Offsite Response Coordinator are as follows: (As listed in App. 7, 2 items listed). The individuals designated to assume the position will be indicated on a predetermined rotational schedule.	**EP B.3.1.12**: The EOF 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 C: Initial notifications or emergency response personnel will follow the guidelines specified in the site specific Emergency Plan and Emergency Plan Implementing Procedures.	**EP E.2.1**: Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 C.1: The On-call EOF Manager will be notified of all emergencies classified at any SNC site.	**EP E.2.1:** Emergency Response personnel respond to their assigned Emergency Response Facilities upon notification of an Alert or higher classification level.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: The EOF is located in Birmingham, Alabama and serves as the EOF for all SNC sites (VEGP, FNP, and HNP).	**EP H.2.1**: The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: The EOF will be activated as prescribed in the site specific Emergency Plan implementing procedures.	**EP H.2.1**: Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 D.1: Plant systems information, radiological data, and meteorological data are provided via the SNC Integrated Data Display System to EOF personnel.	**EP H.5.1**: 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. **EP H.5.3.2**: The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Data displays are located in the main caucus area of the EOF, dose assessment area, plant status area, and engineering area within the facility.	**EP H.5.1**: Meteorological information is displayed in the CR, TSC, and EOF by means of the plant computer system **EP H.5.3.2**: The SPDS parameters are available during normal and abnormal operating conditions in the Control Room, TSC, and EOF.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Data is also available to all state agencies responding to the EOF.	**EP H.2.1** Emergency Operations Facility 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: This data is available to state and local authorities via a secure network dedicated to data distribution among the various offsite emergency response facilities.	**EP I.1** Systems and Parameters Monitored 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 D.1: Data may also be obtained manually via telephone from the Control Room and the TSC to the EOF.	**EP 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 on-site and offsite including the Joint Information Center near the SNC site	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Contained within the facility will be the manpower and equipment necessary to provide dedicated direct communication links to the plant site(s).	**EP 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. EP Section B: ERF Communicators	The commitment wording was standardized and relocated to the Site Annex.
Appendix 7 D.1: In addition, there are commercial and company wide phone systems to and from the site(s).	**EP F.1.1**: Reliable primary and backup means of communication have been established. **Annex Section 5.3.2:** Commercial telephones or land lines provide backup for the ENN	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: A communication link will be established and maintained between the Emergency Operations Facility and the Technical Support Center (TSC) until the emergency director determines that the communication link is no longer needed.	**EP 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	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 D.1: Computer workstations are dedicated for performing dose assessment for multiple sites.	**EP 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.	No equivalent Plan statement.
Appendix 7 D.1: The EOF is sized to accommodate 35 persons, including 25 pre-designated persons, 9 persons from the NRC, and 1 person from the Federal Emergency Management Agency (FEMA).	**EP H.2.1**: The EOF is capable of accommodating designated SNC personnel and offsite local, state, and federal responders including NRC and FEMA.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Table 4 provides additional information concerning EOF communications capabilities.	**EP F Table 5**	The SNC Standard Emergency Plan and Annex provide commitments to maintain the communications capabilities among the ERO, required offsite responders, and the public with the Joint Information System. The detailed physical description of equipment maintaining those commitments is subject to change and not necessary to ensure the effective implementation of the Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 D.1: Upon activation of the EOF, Corporate personnel will provide staffing 24 hours per day until directed otherwise by the Emergency Director.	**EP B.1** 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.	The SNC Standard Emergency Plan incorporates the EOF as part of the general ERO supporting ongoing operations. The separate statement is not required.
Appendix 7 D.1: The EOF is a dedicated facility.	**EP H.2.1**: The EOF is a dedicated facility located in Birmingham, Alabama, and serves as the EOF for SNC sites (VEGP, FNP, and HNP).	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Back-up power for the EOF is supplied by onsite diesel generation. All essential equipment is backed up by the diesel generation system.	**EP H.2.1**: Backup power for the EOF is supplied by onsite diesel generation. Essential equipment is backed up by the diesel generation system.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: The following records or information are available: Technical Specifications. Selected plant operating procedures. Emergency Plans. Emergency Plan Implementing Procedures. FSARs. State and local emergency response plans. Savannah River Site Emergency Plan.	**EP H.2.1**: 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). • System piping and instrumentation diagrams and HVAC flow diagrams. • Electrical one-line, elementary, and wiring diagrams.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 D.2: In the unlikely event that individuals should need to respond to the EOF from within the 10 mile EPZ of any SNC plant, they would be surveyed prior to release by local emergency authorities.	No equivalent Plan/Annex statement	Egress of personnel from the EPZ falls under the provisions of the State Plan. A statement in the SNC Standard Emergency Plan is not required.
Appendix 7 D.2: In the unlikely event that the EOF becomes uninhabitable, resources and personnel will be transferred to the Corporate Headquarters of Alabama Power Company.	No equivalent Plan/Annex statement	The corporate EOF is located outside the reasonable expectation for damage based on a naturally occurring event beyond the design basis of the site. Should the EOF be so damaged, the site can re-assume control of the event.
Appendix 7 E.1: Provisions have been made to have direct NRC FTS lines in the TSC and the EOF during an emergency.	**EP F.1.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 F.2.4: The GPC Central Laboratory has personnel and facilities available to provide offsite monitoring, sample analysis, and dosimetry processing for the affected site.	**EP H.6.3**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.1: Corporate personnel identified in the Emergency Response Organization receive training.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 G.1.1: The training consists of familiarization with the Site Emergency Plans and applicable emergency implementing procedures required to carry out their specific functions.	**EP O.4**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.1: A training matrix for corporate personnel assigned to the ERO is shown in Table 2, and training course summaries are presented in Table 3. Training will be documented in accordance with established practices.	**EP O.4**: 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. **EP O.4.1**: 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.1: The corporate emergency planning coordinator(s) are responsible for assuring that training is conducted for corporate emergency response personnel each calendar year.	**EP O.1** 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.	The SNC Standard Emergency Plan maintains the commitment to conduct the training for corporate personnel. Who conducts the training may depend on specific areas of expertise and provides no purpose in the SNC Standard Emergency Plan.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 G.1.2: Drills/ exercises will be conducted each calendar year to test the performance of implementing procedures, personnel, and emergency equipment. These drills/exercises will be conducted with each SNC site.	**EP 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.	The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.
Appendix 7 G.1.2: EOF activation is required at least 3 times annually (1 scenario per site per year).	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.
Appendix 7 G.1.2: At least 1 activation every 5 years will require a concurrent EOF support response for more than one SNC site.	No equivalent Plan/Annex statement	The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.

Current Hatch Emergency Plan Revision 36	Revised SNC Emergency Plan	Justification
Appendix 7 G.1.2: Each drill/exercise will test, as a minimum, the communication links and notification procedures.	**EP N.1:** 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 that emergency organization personnel are familiar with their duties.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.2: Provisions are made for critique of all drills/exercises.	**EP N.4:** 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.	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 G.1.2: Critique items will be forwarded to the site emergency preparedness coordinator for processing in the site specific corrective action program.	**EP N.5:** 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 commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 8: The EAL's will be processed IAW a separate part of this project.	**Annex Appendix B**	The SNC Standard Emergency Plan maintains the approved EAL scheme relocated to the Site Annex.

Enclosure 9 to NL-15-1392
Hatch Justification Matrix

Site On-Shift Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 on-shift*	Hatch 1981	Hatch Rev 36	Hatch Proposed
Plant Operation and Assessment of Operation Aspects		Shift Supervisor (SRO)	1	1	1	1
		Shift Foreman (SRO)	1	1	2	2
		Control Room Operators	2 (per unit)	3	2	4
		Auxiliary Operators	2 (per unit)	3	2	7
		Shift Support Supervisor (SRO)				1
Emergency Direction and Control (Emergency Coordinator) ***		STA. Shift Supervisor or facility manager	1**	1**	1**	1**
Notification / Communication ****	Notify State/local and federal personnel, maintain comm.		1****	1**	1	1**
Radiological Accident Assessment and Support of Operational Accident Assessment	In-Plant surveys	HP Technicians	1	1	1	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
Plant System Engineering	Technical support	Shift Technical Advisor	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Maintenance Supervisor				1
		Mechanical Maintenance	1**	1**	1	1
		Electrical Maintenance	1**		2	1
		I&C Maintenance			1	1
		System Operator			1	
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2**	2**	4	2
Firefighting		Fire Brigade per Tec Specs			5	5**
Rescue Operations and First-Aid			2**	2**	2**	2**
Site Access Control and Personnel Accountability	Security, firefighting communications, personnel accountability	Security personnel per security plan				
Total On-Shift			**10**	**11**	**25**	**25**

*For each unaffected unit, maintain at least 1 SF, 1 CRO, 1 AO fully manned

**May be provided by shift personnel assigned other functions

***Overall direction to be assumed by EOF Dire when ERFs are

****May be performed by engineering aid to shift supervisor

Hatch Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	Hatch (60 min) 1981	Hatch (60 min) Rev 36	Hatch Proposed (75 min)
Emergency Direction and Control					1	9
Notification / Communication	Notify State/local and federal personnel, maintain communication		2	3	2	11
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager	1	1	1	(a)
	Dose Assessment	HP Expertise		1	1	3
	Offsite Surveys	HP Technicians	2	4	4	5
	On-Site Surveys	HP Technicians	1	2		
	In-Plant surveys	HP Technicians	1	2		
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	2
Plant System Engineering	Technical Support	Electrical	1	1	1	1
		Mechanical	1	1	1	1
		Engineering Supervision				2
		Core Thermal / Hydraulic	1	1	1	1
Repair and Corrective Actions	Repair and Corrective Actions	Mechanical Maintenance	1	1	1	1
		Rad Waste Operator	1	1		
		Electrical Maintenance	1	2	1	1
		I&C Technician		1	1	1
		Maintenance Supervision				2
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for repair, corrective actions, search and rescue first-aid & firefighting c. Personnel monitoring d. Dosimetry	HP Technicians	2	4	2	3
Total Augmented ERO			**15**	**26**	**18**	**43**

(a) EOF Emergency Director counted in Emergency Direction and Control.