

**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

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***Revised Document**

Pacific Gas and Electric Company
Diablo Canyon Power Plant
Summary of the Analysis of Changes

Emergency Plan Implementing Procedure G-4, Revision 28

Assembly and Accountability

**Summary of the Analysis of Changes to Emergency Plan Implementing Procedure
G-4, Revision 28**

Summary of Changes:

Procedure EP G-4, Revision 28, content and format have been completely revised with changes summarized below. The change allows delegation of subordinate tasks away from the Shift Manager/Site Emergency Coordinator (SM/SEC) to reduce their work load while retaining responsibility for completion of Assembly and Accountability (A&A) functions. Steps throughout the procedure have been reworded for clarity, relocated to subordinate staff when appropriate, and renumbered in order to streamline and update the Diablo Canyon Power Plant (DCPP) A&A process.

Change 1 - Section 1, Scope

Modified step numbering and wording for added clarity. Step 1.3 added three new criteria to make clear that any event which may jeopardize the safety of personnel may warrant assembly and accountability, if it is deemed necessary, in order to determine if personnel are missing and to provide information to ensure the safety of the assembled personnel. PS-10 requires the establishment of the means and time required to warn or advise onsite individuals of protective actions to be followed in an emergency with consideration given to evacuation and sheltering. The additional steps support PS-10 to consider other internal or external threats to site personnel thereby improving function to warn and advise onsite individuals. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the Emergency Plan (E-Plan) is required.

Change 2.a - Section 2.1, Discussion, General Guidelines

The general guidelines section was expanded with new content, reworded, reorganized, and renumbered. Steps were added to more fully summarize the A&A process to provide procedure users with improved understanding. The new discussion Steps 2.1.7 through 2.1.17 provide the expanded information. Step 2.1.2, Early Work Release (EWR) was added to include events below the level of an Site Area Emergency (SAE) if assembly is not required may warrant the early releasing of nonessential personnel from the site. Step 2.1.4 discussion of untenable assembly areas was moved to new Section 15, "Assembly Area Leader," Step 15.3.1, assigning responsibility for the action to the leader in charge of the assembly area instead of leaving it in the discussion section. This change helps improve the general understanding of the A&A process, and better aligns with the PS-2 requirement to ensure that responsibilities for emergency response are unambiguously defined to improve function. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 2.b - Section 2.2, Discussion, Definitions

This section was expanded and existing definition steps were reworded, reorganized, and renumbered. New content Steps 2.2.7 through 2.2.20 provide the expanded definitions. These changes clarify existing definitions and add new procedure terms, defined for clarity and completeness, with no change of intent. Step 2.2.6 Assembly Area definition was revised to separate areas inside the protected area (Control Room (CR), Technical Support Center (TSC) and Operational Support Center (OSC)) from assembly areas for consistency and to clarify that Assembly Areas are outside the protected area (PA). The CR, TSC, and OSC definition was moved to Step 2.2.12 and listed as Emergency Response Facilities (ERFs). These changes and additions better align the implementing procedure with the DCPP E-Plan. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 3 - Section 3, Responsibilities

This section was modified by rewording, reorganizing, and renumbering existing steps to better align with updated Assembly and Accountability processes. The changes were editorial except for the following steps:

- Step 3.1, Diablo Canyon Watch Commander (DCWC) added new content in Step 3.1.5 reporting initial accountability results to the TSC Security Advisor or Shift Manager. This is the DCWC's primary responsibility to meet the 30-minute accountability requirement. This change aligns with the PS-10 requirement to provide for a capability to account for all individuals onsite at the time of the emergency and ascertain the names of missing individuals within 30 minutes of the start of an emergency and account for all onsite individuals continuously thereafter.
- Added a new Step 3.2 position and associated responsibilities for the Assembly Area Leader position discussed in Section 15. These are the first arriving Managers or Supervisors who take charge at the assembly areas and help manage communications, resources, keep order, and ensure assembly areas are tenable.
- Expanded Step 3.5, SEC responsibilities to better align with actual duties assumed from the SM during turnover of command and control.
- Added a new Step 3.7 Radiation Protection position and associated responsibilities in new Section 16 for personnel who monitor the Assembly Areas and the assembled personnel per E-Plan Section 6.6.4.

The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 4 - Section 4, Prerequisites

This section has a minor wording change for clarity. This change is editorial with no change in intent.

Change 5 - Section 5, Precautions and Limitations

This section's wording was modified for clarity. Step 5.2.3 was added as new content to say if assembly is delayed at an SAE or greater emergency classification level (ECL), accountability should still be completed by the DCWC. This change supports PS-10 for a range of protective actions including hostile conditions. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required

Change 6 - Section 6, Instructions

This section was modified by rewording, reorganizing, and renumbering existing steps to better align with updated procedure processes. The instructions now point to new sections instead of the old attachments for each function or position. This change provides for improved place keeping for the end users as requested during initial procedure review. The sequence of sections and attachments were reordered with the intent of improving overall process flow and timeliness. These updates and additions to the procedure provide better alignment with the E-Plan and improve timeliness. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 7 - Section 7, Records

Editorial modifications were made to the records steps to provide more specific information. These changes are editorial no change in intent.

Change 8 - Section 8 References

Modified one existing reference with a more specific location and added four new references for completeness. These changes are editorial with no change in intent.

Change 9 - Section 9, SM's Checklist (was Att. 3) and Section 11, SEC Checklist (was Att. 4)

Some steps were reworded for clarity and relocated when appropriate to streamline the A&A process. Delegation of subordinate tasks away from the SM position is designed to reduce their work load while they retain responsibility for the overall function. Procedure numbering was completely revised to allow better place keeping, step referencing, and improved processes to safely assembly and account for site personnel.

The SM duties contain similar functions to the SEC but have enough differences due to facility locations and the unique titles of their Emergency Response Organization (ERO) direct reports, that they were given similar processes to accomplish their A&A functions. To that end, using Section 9, the SM can delegate someone to perform Section 10, "Control Room Assembly and Accountability Checklist," to perform site-wide communications and initial accountability for control room personnel. Also, termination of assembly and accountability happens separately and are now procedurally split with their own criteria for termination spelled out. Accountability continues periodically until the event is over as decided by the SM/SEC. The CR now performs accountability in the same way as the other response facilities. These changes align with and support the PS-2 requirement to ensure that emergency personnel responsibilities for emergency response is unambiguously defined, and adequate staffing to provide initial facility accident response in key functional areas are maintained at all times. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 10 - Section 10, Control Room Assembly and Accountability (was part of Att. 3 SM Checklist)

Some of the existing procedural guidance was relocated from the SM/SEC checklists to other ERO staff positions to reduce the SM/SEC workload, thereby allowing delegation of routine functions to other subordinate ERO positions while maintaining overall responsibility. This new Control Room Accountability Checklist (Section 10) was added to complete a CR roster more in line with the TSC and OSC accountability process and is called out by Section 9, Shift Manager Checklist. This change directs CR personnel to provide a written accountability roster by fax to the Accountability Coordinator with names of the operators assigned to the CR including extras and operators in the field contacted to ensure they are safe. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 11 - Section 11, TSC Assembly and Accountability Checklist (was Att. 4 SEC Checklist)

Some steps were reworded for clarity and relocated when appropriate to streamline the A&A process. Delegation of subordinate tasks away from the SEC is designed to reduce their work load while they retain responsibility for the overall function. The SEC can delegate the TSC Director to perform this checklist. Procedure numbering was completely revised to allow better place keeping, step referencing, and improved processes to safely relocate and account for site personnel. This change better aligns with and supports the PS-2 requirement to ensure that responsibilities for emergency response are unambiguously defined.

The SEC duties contain similar functions to the SM but have enough differences due to facility locations and the unique titles of their ERO direct reports, that they were given similar processes to accomplish their A&A functions. To that end, using Section 11, the SEC can delegate someone to perform Section 12, "Security Advisor Checklist," to perform initial accountability for TSC. Also, termination of assembly and accountability happens separately and are now procedurally split with their own criteria for termination spelled out. Accountability continues periodically until the event is over as decided by the SM/SEC. These changes align with and support the PS-2 requirement to ensure that emergency personnel responsibilities for emergency response is unambiguously defined, and adequate staffing to provide initial facility accident response in key functional areas are maintained at all times. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 12 - Section 12, TSC Security Advisor Checklist (previously was Attachment 6)

The TSC Security Advisor Checklist has been rearranged, streamlined, reworded, and renumbered for clarity but has the same basic functions as before. The TSC Security Advisor still performs accountability for the TSC, assists the DCWC and OSC Director as needed with accountability, and helps locate personnel if they are identified as missing. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 13 - Section 13, Accountability Coordinator Checklist (previously was Attachment 5)

The Accountability Coordinator Checklist has been rearranged, streamlined, reworded, and renumbered for clarity but has the same basic functions as before. The Accountability Coordinator still performs overall accountability for the protected area, and helps locate personnel if they are identified as missing. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 14 - Section 14, OSC Director Checklist (previously was Attachment 7)

The OSC Director Checklist has been rearranged, streamlined, reworded, and renumbered for clarity but has the same basic functions as before. The OSC Director still performs accountability for the OSC, and helps locate personnel if they are identified as missing. The OSC tracks personnel dispatched to the field. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 15 - Section 15, Assembly Area Leader (new)

A new Assembly Area Leader section was added to ensure an available manager or supervisor takes charge at each of the assembly areas and establishes contact on a bridge line with the TSC Security Advisor. The Assembly Area Leader section provides action steps to assume the duties, pass along important information, keep order, and distribute information packages. This change also provides for better alignment between the procedure and E-Plan Section 6.7.2.1.2. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 16 - Section 16, Radiation Protection (new)

A new Radiation Protection section was added to ensure a RP technician initiates monitoring at each Assembly Area. It includes reporting survey results, contamination reports if applicable, and monitoring general habitability per E-Plan Section 6.6.4. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 17 - Attachment 1, Control Room Accountability (was part of Attachment 3 SM Checklist)

Attachment 1 was added to perform CR accountability after the TSC has been activated. If the OSC is activated they have the responsibility to track all ERO personnel dispatched to the field. The CR must attempt to contact personnel in the field prior to accounting for them if the OSC is not activated. This action ensures that no one is hurt or missing in the plant. This change better aligns with and supports the PS-2 requirement to ensure that functions and responsibilities for emergency responders are unambiguously defined. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 18 - Attachment 2, (was Attachment 1) and Attachment 3 (was Attachment 2) Rosters.

Existing steps were reworded, reorganized, renumbered, and extraneous notes and steps were removed. Removed instructions to Fax the roster form within 15 minutes of the "announcement" to perform A&A. In certain situations, such as SAE, the TSC and OSC may not be activated for up to 60 minutes, and may not have their rosters ready to submit within 15 minutes of sounding the emergency signal. Additionally, the time the rosters are faxed has no bearing on completing the initial 30 minute accountability report that lists the names of all the individuals in the PA both missing and accounted. The revision strengthens this function by making clear that the process is continuously performed until terminated by the SM/SEC. Missing individuals will be found by search teams and roster processing sometime after the initial 30-minute report was completed. The roster forms were otherwise unchanged with no change of intent.

The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 19 - Attachment 4, and (new) Attachment 5, Public Address Announcements

Improved Public Address templates include appropriate queues to provide assurance that adequate announcements are made to help protect the health and safety of site workers. The completion of the hand-written template is delegated to an available CR staff member, approved for site-wide communication, and for the actual announcement after the Site Emergency Signal (SES) is sounded. The results of these changes improve the Site-wide communication process by delegating tasks to subordinate staff while allowing retention of overall responsibility. The result of these changes improve the timeliness of providing site-wide communications to informing the site population to initiate assembly and accountability actions, and better align with the E-Plan. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.

Change 20 - Attachment 6, Added (new) Attachment 6, Protected Area Entry Authorization List

This new Attachment 6 was added to provide a log sheet to record the names of personnel entering the protected area after accountability was initiated. This change provides for enhanced alignment with the PS-10 requirement to provide for a capability to account for all individuals onsite at the time of the emergency and ascertain the names of missing individuals within 30 minutes of the start of an emergency and account for all onsite individuals continuously thereafter. The change continues to meet regulatory requirements established in 10 CFR 50.47(b)(2 and 10) and 10 CFR 50, Appendix E. The change does not impact the overall responsibilities associated with Assembly and Accountability but allows for delegation of tasks and functions to reduce the procedural workload for the SM/SEC. The change does not impact the capability to provide for onsite protective measures in the form of assembly and accountability; including under hostile action conditions. This change sustains function and timeliness for assembly and accountability. No change to the E-Plan is required.