

**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 6
Farley Justification Matrix**

FARLEY NUCLEAR POWER PLANT

JUSTIFICATION MATRIX

Purpose

The purpose of this attachment is to identify the commitments in the current Farley Nuclear Power Plant Emergency Plan Revision 64, identify the equivalent or modified commitment in the integrated Fleet Emergency Plan and Farley Site Annex, and justify on a commitment-by-commitment basis the proposed License Amendment.

CHANGE MATRIX

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>The purpose of the Joseph M. Farley Nuclear Plant (FNP) Emergency Plan is to protect the health and safety of the general public, persons temporarily visiting or assigned to the plant, and plant employees in accordance with the requirements set forth in Appendix E, "Emergency Plans for Production and Utilization Facilities", of 10CFR50, "Licensing of Production and Utilization Facilities".</p>	<p>EP INTRODUCTION</p> <p><u>Purpose</u> The Southern Nuclear Operating Company's (SNC) Emergency Plan provides the means to protect the health and safety of the general public, persons temporarily visiting or assigned to nuclear power plants operated by SNC, and plant employees. SNC operates the Hatch Nuclear Plant (HNP), Farley Nuclear Plant (FNP), and Vogtle Electric Generating Plant (VEGP).</p> <p><u>Background</u> 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>Introduction:</u> Detailed procedures concerning the implementation of the Emergency Plan are not included here but are included in the Emergency Plan Implementing Procedures.</p> <p><u>Summary:</u> Southern Nuclear Operating Company corporate management 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 ionizing radiation originating within a company facility.</p>	<p>EP Introduction: Detailed procedures concerning the implementation of the 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.</p> <p>The SNC EP describes the organization and 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Additional detail has been added regarding governmental relationships.</p>
<p>Information submitted in this plan was developed in accordance with the elements outlined in NUREG-0654, FEMA-REP-1, Rev. 1 "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants". Information that describes the Emergency Operations Facility (EOF) for Southern Nuclear is outlined in Appendix 7(G).</p>	<p>EP Introduction: 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>B. SUMMARY</u> Southern Nuclear Operating Company corporate management 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 ionizing radiation originating within a company facility. The authority for planning, developing, and coordinating emergency control measures is discussed in Appendix 9 (I), Responsibility For The Planning Effort. The Farley Plant Emergency Plan describes the organization and facilities both onsite and offsite that will be used to deal with a spectrum of accidents ranging from minor onsite incidents to those that could affect the general public. There are three phases of responsive action contained within the Farley Plant Emergency Plan. The first phase includes initial actions directed toward the protection of personnel and the elimination of the potential for further exposure to the hazard. The second phase includes immediate and planned action directed toward termination of the incident, containment of the effluent, establishment of incident boundaries, establishment of control, channeling of information, and protection of the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively utilizing these phases, emergencies are classified according to increasing severity as Notification of Unusual Event, Alert, Site Area Emergency or General Emergency.</p>	<p>EP Introduction: SNC has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. The authority for planning, developing, and coordinating emergency control measures is derived from being the Nuclear Regulatory Commission (NRC) license holder for the nuclear power plants operated by SNC. The SNC Emergency Plan describes the organization and 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. There are three phases of responsive action described in the SNC Emergency Plan. The first phase includes initial actions to protect personnel and eliminate the potential for further exposure to the hazard. The second phase includes immediate and planned action to terminate the condition, contain any effluent, establish incident boundaries, establish control, channel information, and protect the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively using these phases, emergencies are classified according to increasing severity: Unusual Event, Alert, Site Area Emergency, or General Emergency.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p>II. ORGANIZATION The organization, responsibilities and functions of Southern Nuclear Operating Company onsite and offsite resources are individually discussed below. The onsite and offsite organizations provide emergency response during the activation, emergency, and recovery phases of accident response. Principal federal, state, local and private agencies are also discussed. Figures 12 and 13 illustrate the interrelationships of these organizations before and after Emergency Operations Facility activation respectively.</p>	<p>EP Introduction: There are supporting and complementing emergency plans, including those of federal agencies, the states of Alabama, Georgia, South Carolina, and individual counties. SNC has overall responsibility for maintaining a state of readiness to implement this Plan for the protection of plant personnel, the general public, and property from hazards associated with any facility operated by the company. There are three phases of responsive action contained within the SNC Emergency Plan. The first phase includes initial actions to protect personnel and eliminate the potential for further exposure to the hazard. The second phase includes immediate and planned action to terminate the condition, contain any effluent, establish incident boundaries, establish control, channel information, and protect the facility and equipment. The third phase is to restore the facility to its normal operating condition. To respond effectively using these phases, emergencies are classified according to increasing severity as Unusual Event, Alert, Site Area Emergency, or General Emergency.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>A. ONSITE</u> The normal onsite organization for Farley Nuclear Plant is shown on Figure 1.</p>	<p>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. The number and ERO position titles of personnel available within 75 minutes following declaration of an Alert or higher classification are shown in Tables 1, 2 and 3. ANNEX Table 2.2.A</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.</p>
<p><u>Section II.A:</u> Management positions in the onsite organization meet the qualification requirements of ANSI N18.1-1971.</p>	<p>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. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned to onsite emergency response positions will receive training specific to their position.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p>Section II.A: The qualifications for the professional-technical level positions also meet the requirements of ANSI N18.1-1971.</p>	<p>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. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned to onsite emergency response positions will receive training specific to their position.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p><u>1. Technical Support Center (TSC)</u> The emergency onsite organization implemented for events requiring activation of the TSC is described in FNP-0-EIP-0 and is shown in Figure 2. Responsibilities and authorities of personnel in the TSC emergency organization are as follows:</p>	<p>EP Figure B.2.B – Technical Support Center organization</p>	<p>Figure B.2.B is provided to address the TSC organization proposed for the SNC Standard Emergency Plan. Individual positions are described below.</p>

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<p><u>Section II.A.1.a: a. Emergency Director (ED)</u> The ED is charged with the responsibility of overall direction of onsite emergency activity including near-site field monitoring team dispatch and control and interfacing with offsite organizations and agencies until the Emergency Operations Facility (EOF) is activated. After the EOF is functional, the ED is responsible for overall direction of all in-plant emergency activity. The ED shall supervise the TSC, and manage the in plant recovery efforts and the in plant recovery organization. The ED shall communicate directly with the EOF Manager when the EOF is activated and shall have full authority to direct the onsite recovery efforts without further consultation when the situation demands such action. Following EOF activation when time permits the ED will consult with EOF personnel prior to initiating major evolutions or changes in plant configuration.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p>The ED's general responsibilities include:</p> <ol style="list-style-type: none"> 1) Staffing the TSC. The TSC will be staffed by plant supervisory personnel supplemented by plant engineering, technical and administrative personnel as necessary to staff the TSC 24 hours a day and discharge the responsibilities discussed below. 2) Evaluating the classification of the emergency and amending as appropriate. Terminating an emergency level will not be delegated to other elements of the emergency organization and will be performed in accordance with approved procedures. 3) Verifying correct control room response to the emergency classification. 4) Determining radiological status and initiating notifications to state agencies (and local agencies for General Emergencies). The decision to notify offsite government agencies may not be delegated to any other element of the emergency organization. 5) Initiating, on initial or upgrade emergency notifications, recommendations to state agencies on advisability of evacuations. Recommendations to local agencies when state authorities cannot be contacted for immediate evacuation may not be delegated to any other element of the emergency organization. 6) Initiating rescue or emergency repair operations as appropriate. 7) Maintaining plant security. 8) Establishing communications with and providing information to the EOF Manager. 	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p>In fulfilling the above listed responsibilities the Emergency Director (ED) is guided by the procedures listed below: FNP-0-EIP-8.1 Emergency Phone Directory FNP-0-EIP-8.3 Communication Equipment Operating Procedures NMP-EP-104 Dose Assessment NMP-EP-110 Emergency Classification Determination and Initial Action NMP-EP-111 Emergency Notifications NMP-EP-112 Protective Action Recommendations</p>	<p>Annex Appendix C</p>	<p>The specific procedural reference for the ED has been deleted.</p> <p>Function-based EIPs to direct overall ERO response will be developed as part of the approval process for this License Amendment Request.</p>

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<p>The ED position is initially filled by the Shift Manager until relieved by the on-call ED. It is the intent of SNC that the ED will be transferred from the Control Room as soon as practicable.</p>	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p>The line of succession of individuals who may serve as the ED is as follows: Vice President – Nuclear Plant Site Plant Manager Site Support Manager Operations Director On-call Operations Supervisor Shift Manager Shift Supervisor Other Managers or staff designated by the Plant Manager The above line of succession does not preclude higher level management from assuming the role of Emergency Director (ED) in any circumstance which, in the judgment of the manager, is appropriate or necessary to protect the health and safety of the public. This designation also does not relieve higher level management from the responsibility to be aware of those circumstances that may initiate this action. These individuals will be trained as EDs.</p>	<p>No equivalent Plan/Annex statement</p>	<p>No line of succession is provided in the SNC Standard Emergency Plan. The Plan commits to providing 24-hour staffing coverage for the ERO, with qualified ERO personnel trained for the respective positions in accordance with the approved Emergency Plan.</p>

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<p><u>b. TSC Manager</u> The on-call TSC Manager reports to the Technical Support Center (TSC) and is responsible for implementing FNP-0-EIP-6, "TSC Setup and Activation", assisting the ED with classification assessment and emergency plan implementation per NMP-EP-110, "Emergency Classification Determination and Initial Action" and coordination of communications between the TSC and other locations per NMP-EP-111, "Emergency Notifications".</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p>
<p><u>c. Operations Supervisor</u> The on-call Operations Supervisor reports to the Technical Support Center (TSC) and is responsible for coordinating the efforts of the operating crew, advising the ED on emergency operations and facilitating communications between the ED and Shift Supervisor. Supervisory personnel designated by the Plant Manager and holding a Senior Reactor Operator License rotate as the on-call Operations Supervisor.</p>	<p>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 mitigating 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p>

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<p><u>d. Maintenance Supervisor</u> The on-call Maintenance Supervisor reports to the TSC and is responsible for implementing FNP-0-EIP-5, "Maintenance Support to the Emergency Plan", including coordination of the efforts of Emergency Repair Parties and advising the ED on proposed modifications, alterations or repair to plant systems and on specifics of plant systems and equipment. Supervisory I&C and Maintenance personnel designated by the Plant Manager rotate as the on-call Maintenance Supervisor.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p>

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<p><u>e. Health Physics Supervisor</u> The Health Physics Supervisor reports to the TSC and is responsible for implementation of FNP-0-EIP-4, "Health Physics Support to the Emergency Plan", including coordination of the efforts of in-plant Field Monitoring Teams, decontamination activities, Health Physics and ALARA support, and advising the ED on the status of onsite and offsite radiation protection activities. This individual is also responsible for coordination of out-of-plant and SNC offsite Field Monitoring Teams until relieved by the Emergency Operations Facility (EOF) staff. The Health Physics Supervisor and other supervisory personnel designated by the Plant Manager and, to the maximum extent possible, meeting the requirements of Regulatory Guide 1.8, September 1975, rotate as the on-call Health Physics Supervisor.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p> <p>The title was changed from Health Physics Supervisor to Radiation Protection Supervisor, to better align with current plant terminology.</p>
<p><u>f. Security</u> Security supervision is responsible for implementing FNP-0-EIP-7, "Security Support to the Emergency Plan", maintaining site security, and advising the ED.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p>

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<p><u>g. Engineering Supervisor</u> The on-call Engineering Supervisor provides engineering expertise for advising the ED in the development of plans for modifications, alterations, or repairs to plant systems. The on-call Engineering Supervisor is responsible for assisting the on call Maintenance Supervisor with plant repair and mitigation activities by coordinating the necessary engineering resources.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p><u>h. Chemistry Supervisor</u> The on-call Chemistry Supervisor reports to the TSC and is responsible for implementation of FNP-0-EIP-20, "Chemistry and Environmental Support to the Emergency Plan" including coordination of offsite dose projections and in plant sampling. The on-call Chemistry Supervisor is responsible for coordinating offsite dose projections until relieved by the Emergency Operations Facility (EOF) staff.</p>	<p>EP B.2.1.10 TSC Chemistry Support The TSC Chemistry Support reports to the RP Supervisor. The TSC Chemistry Support is responsible for directing and evaluating in-plant chemistry and analyses, directing and evaluating post-accident sampling, and assisting in core damage assessment.</p> <p>EP B.2.1.6 TSC Dose Analyst The Dose Analyst reports to the RP Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.</p>	<p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p> <p>The SNC Standard Emergency Plan uses on-shift Chemistry to perform the Dose Assessment function.</p>
<p><u>i. Emergency Notification Network (ENN) Communicator</u> The on-call ENN Communicator reports to the TSC and is responsible for communications with the state and local government agencies using the guidance found in NMP-EP-111, "Emergency Notifications ".</p>	<p>EP B.3.1.8 EOF Emergency Notification Network (ENN) Communicator The ENN Communicator in the EOF reports to the Emergency Communication Coordinator and is responsible for providing offsite agency notifications and periodic updates.</p>	<p>The revised Plan provides for simultaneous activation of the TSC and EOF. The Control Room will be relieved for the ENN function by the EOF ENN Communicator.</p>

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<p><u>i. Emergency Notification System (ENS) Communicator</u> The on-call ENS Communicator reports to the TSC and is responsible for communications with the Nuclear Regulatory Commission (NRC) using the guidance found in NMP-EP-111, "Emergency Notifications ".</p>	<p>EP B.2.1.9 EOF Emergency Notification System (ENS) Communicator The ENS Communicator reports to the Operations Supervisor and is responsible for ensuring NRC notifications are completed in accordance with the requirements of 10 CFR 50.72 and 73.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage were deleted based on the conversion to function based procedures.</p>

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<p><u>k. Shift Manager</u> The Shift Manager is responsible for directing operational activities to classify and combat the emergency as delineated in NMP-EP-110, "Emergency Classification Determination and Initial Action". The Shift Manager acts as the Emergency Director (ED) until relieved by the on-call ED and until relieved has the authority and responsibility to immediately and unilaterally initiate any necessary emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures.</p>	<p>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 offsite emergency measures. The ED, at their discretion or when procedurally required, activates the ERO. The Emergency Director's non-delegable duties include:</p> <ul style="list-style-type: none"> • Event classification in accordance with the emergency classification system. • Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination. • Notification 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. <p>After being relieved as Emergency Director, the Shift Manager directs the activities of the operating crew and is responsible for the safe operation of the plant. The Shift Manager, after relinquishing duties and responsibilities of the Emergency Director, functionally reports to the Operations Supervisor in the Technical Support Center (TSC).</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>I. Emergency Repair Party</u> The Emergency Repair Party, as shown in Figure 2, is a group of personnel competent in operations and repair work who will be used during an emergency situation to make temporary repairs to systems/components in order to mitigate the effects of the emergency. An Emergency Repair Party for initial re-entry and repair will consist of individuals as required from the following personnel groups: Operations Personnel Maintenance Personnel Instrumentation and Control Personnel Health Physics Personnel Chemistry Personnel</p>	<p>B.2.2 Operations Support Center (OSC) B.2.2.1 OSC Manager B.2.2.2 OSC Mechanical Maintenance Group Lead B.2.2.3 OSC Electrical Group Lead B.2.2.4 OSC RP / Chemistry Group Lead B.2.2.5 OSC I&C Group Lead B.2.2.6 OSC Emergency Response Facility (ERF) Communicator B.2.2.7 OSC Personnel</p> <ul style="list-style-type: none"> • Search and rescue. • Repair. • Post-accident sampling. • Internal survey. • Field monitoring. 	<p>Terminology in the SNC Standard Emergency Plan was updated to describe the industry standard OSC organization.</p> <p>The contents of that organization are in Section B.2.2 of the SNC Standard Emergency Plan.</p> <p>The positions by title, without the detailed description from B.2.2, are provided in column 2 to the left.</p>

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<p><u>m. Field Monitoring Team (FMT)</u> The Field Monitoring Teams, as shown in Figure 2, consisting of permanent plant employees and/or qualified vendor personnel, will perform onsite and offsite monitoring. They will provide radiation protection support at the Southeast Alabama Medical Center, during transport of potentially irradiated and/or contaminated casualties, and at the Assembly Areas, and at any other location onsite or offsite as instructed by the Emergency Director (ED) or EOF Manager. To perform these functions a number of teams will be designated consisting of a Team Leader and an Assistant. Team Leader - A Health Physics Technician or qualified vendor technician. Assistant - Any qualified plant employee or vendor personnel.</p>	<p>EP Table 2 EP B.3.1.6 EOF Field Team Coordinator The Field Team Coordinator reports to the Dose Assessment Supervisor. The Field Team Coordinator develops the environmental sampling strategy in response to potential radiological releases and advises the Dose Assessment Supervisor and Dose Analyst of measured radiological values in the environment. EP I.7 The capability to take offsite soil, water, and vegetation samples is provided by a minimum of two (2) Field Monitoring Teams (FMTs). 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>The Field Team Coordinator (EOF) was added as the focal point of direction of activities once the EOF is activated.</p>

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<p><u>n. Dose Assessment Staff</u> The Shift Supervisor is responsible for offsite dose projections until relieved by the Technical Support Center (TSC) staff. Personnel reporting to the Chemistry Supervisor are responsible for making dose projections until the Emergency Operations Facility (EOF) is activated, at which time EOF dose assessment personnel become responsible for making offsite dose projections. These projections may initially be made automatically by a computerized dose projection program described in FNP-0-M-007, Emergency Dose Calculation Manual, using guidance found in FNP-0-EIP-9.1, "Automated Dose Assessment Method". A manual personal computer methodology is provided in NMP-EP-104, Dose Assessment, for long term dose assessment or in the event that the automatic computerized system is inoperable</p>	<p>Annex Table 2.2.A EP B.2.1.6 TSC Dose Analyst The Dose Analyst reports to the RP Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event. 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. EP B.3.1.5 EOF Dose Analyst The Dose Analyst reports to the Dose Assessment Supervisor. The Dose Analyst operates the dose assessment model to provide estimates of environmental dose in the event of a radiological release attributable to the event.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.</p>

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<p>Normally, dose projections are transmitted to appropriate state authorities by telecopy, commercial telephone, the Emergency Notification Network (ENN), or by posting dose projections on the SNC Integrated Data Display System. The Emergency Notification System (ENS), Health Physics Network (HPN), and commercial telephone lines are available for transmission of dose assessment data to the NRC. Data will be provided as directed by the NRC at the time of need.</p>	<p>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.</p> <p>EP B.3.1.13 EOF Health Physics Network (HPN) Communicator The HPN Communicator reports to the Dose Assessment Supervisor and is responsible for providing radiological and environmental information to the NRC using the HPN Line.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p><u>o. Additional Plant Staff Assignments</u> <u>1) Operations Support Center (OSC) Manager</u> The OSC Manager will be considered to be the senior individual in the OSC and will report to the Maintenance Supervisor. The OSC Manager will take the lead in coordinating the activities of the OSC or other location directed by the Emergency Director per FNP-0-EIP-5.0. The senior individual at each of the Assembly Areas will become the supervisor at that location. The Assembly Area senior individual will take the lead in coordinating the activities of the Assembly Area in support of OSC operations as directed by the OSC Manager.</p>	<p>EP B.2.2 Operations Support Center (OSC) 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>Specific references to procedure usage was deleted based on the conversion to function based procedures.</p>

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<p><u>2) Radiological monitoring</u> The Health Physics Group is responsible for all aspects of applied health physics. Emergency monitoring will be provided by a Health Physics Technician on shift, a qualified/trained vendor technician, or qualified member of the plant staff. Health Physics supervision will be responsible for relocation of access control to both units as necessary, and for implementing procedures for handling highly radioactive samples.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p><u>3) Fire Fighting and Rescue</u> The plant fire brigade and rescue team on all shifts will be composed of personnel described in NMP-ES-035-010. The fire brigade will be directed by the Fire Brigade Chief with the aid of FNP-0-EIP-13.</p>	<p>Annex Table 2.2.A EP B.6.4 Fire Fighting To supplement the Fire Brigade onsite, agreements are made with local fire departments. Details on the services offered may be found in the SNC plant's site-specific Annex. Annex 2.3.1 Fire Fighting (SEP B.6.4) In the event an emergency is declared as a result of a fire at Farley Nuclear Plant, the City of Dothan Fire Department has agreed to provide support to help combat the fire.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.</p>
<p><u>4) First Aid</u> At least one person on each shift will be qualified to perform first aid.</p>	<p>Annex Table 2.2.A EP O.3 First Aid Training Individuals assigned as First Aid responders shall maintain qualifications for first aid and Cardio-Pulmonary Resuscitation (CPR) training.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex.</p>

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<p><u>5) Decontamination</u> Personnel decontamination is the responsibility of the Health Physics Group and during an emergency the responsibility of the Field Monitoring Team. Area and equipment decontamination onsite as the result of an accident will be a joint effort of personnel from the Operations, Maintenance, Chemistry and Health Physics Groups.</p>	<p>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.</p> <p>EP K.7 Offsite Decontamination Nonessential onsite personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>6) Personnel Accountability</u> Personnel accountability is the responsibility of each plant supervisor or senior individual onsite in the group. That is, each supervisor is responsible for accounting for each person onsite in his group or visiting his group. Details for personnel accountability are provided by FNP-0-EIP-10, "Evacuation, Personnel Accountability, and Site Dismissal". Information pertinent to personnel accountability will be kept by security guards at each access control point.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p><u>7) Record Keeping</u> A record of all significant events that occur will be kept by the operating crew in the Plant Operator's Logbook. A log will be kept by a designated plant staff member who will be responsible for maintaining communications with the corporate headquarters, and offsite authorities as directed by the Emergency Director. Radiological information such as radiological survey data, personnel exposures, decontamination activities and information from onsite groups will be maintained by the Health Physics Supervisor.</p>	<p>No equivalent Plan/Annex statement.</p>	<p>Record keeping is a procedural level function of each individual. Plant Operations logbook/log keeping is controlled by Operations procedures.</p>

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<p><u>8) Communications</u> Responsibility for initial offsite communications will be handled by the Shift Supervisor or Emergency Director. After the emergency organization is activated, designated plant staff member(s) may be assigned to maintain communications with the Emergency Operations Facility (EOF) and with offsite authorities. If the Emergency Director is not located in the control room he may maintain communications with the control room through an assigned individual. When the Emergency Operations Facility (EOF) is activated, the EOF staff may handle communication with offsite authorities. Communications interfaces are shown in Figure 3.</p>	<p>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 offsite emergency measures. The ED, at their discretion or when procedurally required, activates the ERO. The Emergency Director's non-delegable duties include:</p> <ul style="list-style-type: none"> • Notifications of offsite agencies and approval of state, local, and NRC notifications. 	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p><u>B. OFFSITE</u> The normal Alabama Power Company (APC) offsite company organization is shown in Figure 5. The normal Southern Nuclear Company Corporate organization and its relationship to the onsite organization is shown in Figure 6. The Emergency Communication Organization is shown and described in the Emergency Communications Plan in Appendix 10(J).</p>	<p>EP B.3 Offsite Emergency Response Organization (ERO) The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company corporate offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.</p>	<p>The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision.</p> <p>For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .</p>

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<p><u>1. Emergency Operations Facility (EOF)</u> The Emergency Operations Facility (EOF) Emergency Response Organization (ERO) and its relationship to the Technical Support Center (TSC) emergency organization is described in Appendix 7(G).</p>	<p>EP B.3 Offsite Emergency Response Organization (ERO) The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company corporate offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.</p>	<p>The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision.</p> <p>For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .</p>
<p><u>2. Corporate Organization</u> In the event of an emergency condition at FNP that requires activation of the Corporate Emergency Response Organization (ERO) the organization will be activated to notify Emergency Organization personnel and to provide corporate support from SNC.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>a. Corporate Duty Manager</u> The Duty Manager is responsible for the overall management of emergency support at FNP. The Duty Manager is the primary contact for support from off-site agencies, and provides assistance, and advice to the EOF Manager and Emergency Director in decisions involving the overall effect of the event. The Duty Manager will serve as the corporate spokesperson until such time as an alternate Duty Manager or other trained individual is available to assume the role of spokesperson. This position will be filled by a qualified individual designated by the Executive Vice President.</p>	<p>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.</p> <p>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.</p>	<p>With the realignment of the EOF description in the SNC Standard Emergency Plan, the EOF Director and Nuclear Spokesperson are now specifically identified as the individual in Command and Control of the respective facilities.</p>
<p><u>3. Emergency Communication Organization</u> The Emergency Communication Organization (ECO) is discussed in Appendix 10(J).</p>	<p>EP B.3 Offsite Emergency Response Organization (ERO) The EOF and JIC Organizations consist of staff members from the SNC, Alabama Power Company, and Georgia Power Company Corporate Offices. This organization is responsible for providing offsite emergency response support and resources as needed. The EOF and JIC Organizations are displayed in Figures B.2.D and B.2.E. The EOF and JIC Organizations may also include state and local personnel.</p>	<p>The offsite organization is integrated into the SNC Standard Emergency Plan in the proposed revision.</p> <p>For the detailed position by position comparison, see the justification section for the referenced current plan Appendices .</p>

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<p><u>4. Recovery Phase Organization</u> Upon termination of the emergency condition and at the discretion of the Emergency Director, the SNC Emergency Organization will shift to the Recovery Phase Organization shown in Figure 10. The Recovery Manager has authority to modify the organization as deemed necessary.</p>	<p>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. 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.</p> <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>See SNC Standard Emergency Plan Section M1 for additional direction for determining when to enter the Recovery Phase and the purpose of recovery actions.</p> <p>The actual recovery organization below the recovery manager will be event-specific and determined on the transition to recovery. Section M provides a generic organization and guidance for determination of the specific needs of the event.</p>

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<p><u>a. Recovery Manager</u> The Recovery Manager shall direct the overall recovery effort. He has the full authority and responsibility to make decisions regarding plant recovery and return to operation. This position will be filled by the Vice President– Nuclear Plant Site or designee.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>b. Recovery Support Director</u> The Recovery Support Director is responsible for all administrative aspects of recovery activity. The line of succession for the Recovery Support Director shall be designated by the Vice President –Nuclear Plant Site, should the Recovery Organization be required.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager.</p> <p>The specific event will drive individual responsibilities.</p>

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<p><u>c. Technical Support Director</u> The Technical Support Director is responsible for managing all supplemental engineering, technical and licensing support resources needed in the recovery effort. The line of succession for the Technical Support Director shall be designated by the Vice President – Nuclear Plant Site, should the Recovery Organization be required.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager.</p> <p>The specific event will drive individual responsibilities.</p>

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<p><u>d. Recovery Support Supervisor</u> The Recovery Support Supervisor is responsible for coordinating or monitoring operational support recovery activities as directed by the Recovery Support Director. This position will be filled by a qualified individual designated by the Recovery Support Director.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager.</p> <p>The specific event will drive individual responsibilities.</p>

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<p><u>e. Administrative Support Supervisor</u> The Administrative Support Supervisor is responsible for supervising EOF recovery phase administrative activities including:</p> <ol style="list-style-type: none"> 1) Special communications needs 2) Manpower augmentation 3) Personnel Affairs for temporarily assigned personnel 4) Special Budget Activities 5) Clerical Support 6) Other activities as assigned by the Recovery Support Director <p>This position will be filled by a qualified individual designated by the Recovery Support Director.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager.</p> <p>The specific event will drive individual responsibilities.</p>

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<p><u>f. Engineering Supervisor</u> The Engineering Supervisor is responsible for offsite engineering resources directed toward design modification, major repair and engineering evaluations associated with recovery and return to operation. Responsibilities include: 1) Coordination of offsite engineering and technical support for design changes and repairs 2) Interfacing with Architect/Engineering firms for detailed technical support 3) Interfacing with NSSS supplier for detailed analyses and technical support 4) Coordinating and expediting procurement activities. This position will be filled by a qualified individual designated by the Technical Support Director.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. <p>Figure M.2 provides a typical recovery operation organization.</p>	<p>The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager.</p> <p>The specific event will drive individual responsibilities.</p>

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<p><u>g. Licensing Supervisor</u> The Licensing Supervisor is responsible for all recovery phase licensing activities. His responsibilities include: 1) Interfacing with the NRC to resolve license issues 2) Interfacing with Architect/Engineer firms or NSSS supplier to obtain technical and engineering analyses as necessary to resolve licensing issues 3) Coordinating with the Engineering Supervisor on design changes resulting from licensing issue resolution 4) Preparation of NRC required reports associated with the accident or recovery effort. This position will be filled by a qualified individual designated by the Technical Support Director.</p>	<p>EP M.1: The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. 	<p>The SNC Standard Emergency Plan outlines a general recovery organization and provides overall responsibility for the event under the Recovery Manager.</p> <p>The specific event will drive individual responsibilities.</p>
<p><u>C. OUTSIDE ORGANIZATIONS</u> Coordination with Governmental agencies is discussed in Appendix 7(G), section E. The following provides additional site specific details to the Appendix 7(G) discussion.</p>		<p>See the Appendix 7 section of the Justification Matrix for the detailed descriptions.</p> <p>Section A. Assignment of Responsibility contains the description of the major organizations.</p>

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<p><u>1. Government Agencies</u> The Nuclear Regulatory Commission has published its incident response plan in NUREG-0728, specifying NRC actions, responsibilities, functions and authorities during an emergency.</p>	<p>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. The Chairman can transfer control of emergency response activities when deemed appropriate. Incident Response Centers have been established at the four NRC regional offices and NRC headquarters, to centralize and coordinate NRC's emergency response. Provision is made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>Written agreements have been reached with the other offsite agencies listed below with regard to the type of support that will be furnished to the Joseph M. Farley Nuclear Plant in the event of an emergency. These agreements have been developed to ensure that there is a clear understanding of assigned responsibilities and that there will be proper coordination of activities in the event of an emergency. Letters of Agreement on File with offsite support groups are given in Part I, Appendix 2(B).</p>	<p>EP B.5 Letters of Agreement (LOAs) The respective nuclear power plants have obtained LOAs with private contractors and others who provide emergency support services. LOAs, as a minimum, state that the cooperating organization will provide its normal services in support of an emergency at the affected plant. LOAs are referenced in the site-specific plant Annex and the actual letters are maintained in accordance with Emergency Plan procedures.</p>	<p>The SNC Standard Emergency Plan contains the commitment for the Letter of Agreement in the description of services from the various support agencies.</p> <p>The general statement that LOAs exist is not needed in the Plan.</p>

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Corporate and/or plant personnel will be dispatched to principal government agencies on an as needed basis.	EP B.3.1.15 EOF Liaisons Liaisons report to the Offsite Response Coordinator and respond to the applicable state 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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Anticipated offsite federal assistance is discussed in the individual state plans.	See Section A.1.	The SNC Standard Emergency Plan in Section A.1 describes the federal agencies providing direct support to the Emergency Plan. Additional support addressed in the existing statement is specific support to the offsite responders. The federal agencies described in the Plan include: A.1.1 Nuclear Regulatory Commission (NRC) A.1.2 Department of Homeland Security (DHS) A.1.3 Federal Emergency Management Agency (FEMA) A.1.4 Department of Energy (DOE) A.1.5 Federal Bureau of Investigation (FBI) A.1.6 National Weather Service (NWS) A.1.7 Environmental Protection Agency (EPA)
<u>a. Department of Energy Savannah River Operations Office</u> In the event of a General Emergency, the DOE Savannah River Operations Office has agreed to provide a DOE Radiological Assistance Team. This assistance team will be limited to advisory assistance in handling radiological emergencies. The Emergency Director is authorized to request this assistance.	EP A.1.4 Department of Energy (DOE) The DOE provides radiological assistance on request, and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. Following a radiological incident, DOE operates as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The Radiological Assistance Team can be expected to respond to SNC operated sites as directed by the Savannah River Operations Office of DOE.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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<p><u>b. Nuclear Regulatory Commission</u> Upon notification of an emergency condition, the NRC will implement the incident response plan described in NUREG-0728. In addition to fulfilling its regulatory responsibilities, it is expected that the NRC will provide technical assistance and recommendations. For Site Area and General Emergencies, dispatch to SNC facilities of a NRC Region II site team is anticipated with arrival expected 2 to 6 hours following notification. As described in Section III, office space, telephones, etc. have been provided for NRC personnel at the Technical Support Center and Emergency Operations Facility.</p>	<p>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. The Chairman can transfer control of emergency response activities when deemed appropriate. Incident Response Centers have been established at the four NRC Regional Offices and NRC Headquarters, to centralize and coordinate NRC's emergency response. Provision is made for NRC personnel at the plant's Technical Support Center and the Emergency Operations Facility.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>c. State of Alabama</u> The Alabama Radiation Control Division of the State of Alabama Department of Public Health is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. This plan provides a detailed description of the notification procedures and responsibilities and duties of the local and state agencies involved. Since the primary concern of the Alabama Radiation Control Division is for the welfare and safety of the general public, they will have primary responsibility and authority for handling the offsite aspects of the emergency in Alabama.</p>	<p>EP A.2.1 State of Alabama EP A.2.1.1 Alabama Emergency Management Agency (AEMA) The Alabama Emergency Management Agency coordinates the Radiological Emergency Plans and offsite operations of affected state agencies and local governments, including notification of state and local agencies of a nuclear incident at a nuclear power plant impacting the state of Alabama, direction of activities at the state Emergency Operations Center, coordination of non-radiological operations with utility and federal authorities, and coordination of news information.</p> <p>EP A.2.1.2 Alabama Department of Public Health, Office of Radiation Control Through the Alabama Department of Public Health, the Alabama Office of Radiation Control is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. The state plan provides a detailed description of the notification procedures and the responsibilities and duties of the local and state agencies involved. The Alabama Office of Radiation Control has primary responsibility and authority for handling the offsite aspects of an emergency in Alabama with primary focus on the welfare and safety of the general public.</p> <p>EP A.2.1.3 Other Alabama State Agencies Responsibilities of other state agencies are described in the Alabama Radiological Response Plan for Nuclear Power Plants.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>An agreement is in place with the State of Alabama to provide available resources and equipment to support the mitigation and response to an emergency at Plant Farley 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 Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>EP A.2.1 State of Alabama EP A.2.1.1 Alabama Emergency Management Agency (AEMA) The Alabama Emergency Management Agency coordinates the Radiological Emergency Plans and offsite operations of affected state agencies and local governments, including notification of state and local agencies of a nuclear incident at a nuclear power plant impacting the state of Alabama, direction of activities at the state Emergency Operations Center, coordination of non-radiological operations with utility and federal authorities, and coordination of news information.</p> <p>EP A.2.1.2 Alabama Department of Public Health, Radiation Control Division Through the Alabama Department of Public Health, the Alabama Radiation Control Division is responsible for initiating the "Alabama Radiological Response Plan for Nuclear Power Plants" in support of an emergency at the Farley Nuclear Plant. The state plan provides a detailed description of the notification procedures and the responsibilities and duties of the local and state agencies involved. The Alabama Radiation Control Division has primary responsibility and authority for handling the offsite aspects of an emergency in Alabama with primary focus on the welfare and safety of the general public.</p> <p>EP A.2.1.3 Other Alabama State Agencies Responsibilities of other state agencies are described in the Alabama Radiological Response Plan for Nuclear Power Plants.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>d. State of Georgia</u> 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.</p>	<p>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).</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>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 Farley 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 Early County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>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).</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>e. State of Florida</u> Upon notification of an emergency condition by SNC or the Alabama Emergency Management Agency, the Florida Department of Community Affairs, Division of Emergency Management, State Warning Point will implement the "State of Florida Radiological Emergency Management Plan for Nuclear Power Plants". The Department of Community Affairs, Division of Emergency Management has the authority and responsibility for coordinating the efforts of local and state agencies in Florida to provide for the health and safety of the general public in the event of a radiological incident. The Department of Health-Bureau of Radiation Control will provide support to the Company in matters related to the Florida ingestion pathway radiological emergency response.</p>	<p>Annex 1.6 State of Florida Upon notification of an emergency condition by SNC or the Alabama Emergency Management Agency, the Florida Department of Community Affairs, Division of Emergency Management, State Warning Point will implement the "State of Florida Radiological Emergency Management Plan for Nuclear Power Plants." The Department of Community Affairs, Division of Emergency Management has the authority and responsibility for coordinating the efforts of local and state agencies in Florida to provide for the health and safety of the general public in the event of a radiological incident. The Department of Health-Bureau of Radiation Control will provide support to the Company in matters related to the Florida ingestion pathway radiological emergency response.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>f. Houston County, Alabama</u> The Chairman of the Houston County Commission has the overall responsibility for emergency preparedness and local response in Houston County. Houston County has also accepted responsibility for evacuations in Henry County out to the 10 mile EPZ. The Houston County Emergency Management Agency coordinates planning and operations of all local agencies in support of an incident at Farley Nuclear Plant. A detailed emergency plan is maintained in case of an emergency at the Farley Nuclear Plant. This plan is Part I of the "Alabama Radiological Response Plan for Nuclear Power Plants".</p>	<p>Annex 1.7.1 Houston County, Alabama (SEP A.2.4) The Chairman of the Houston County Commission has the overall responsibility for emergency preparedness and local response in Houston County. Houston County also has accepted responsibility for evacuations in Henry County out to the 10 mile EPZ. The Houston County Emergency Management Agency coordinates planning and operations of all local agencies in support of an incident at Farley Nuclear Plant. A detailed emergency plan is maintained in case of an emergency at the Farley Nuclear Plant. An agreement is in place with Houston County, Alabama to provide available resources and equipment to support mitigation and response to an emergency at Plant Farley 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 Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>An agreement is in place with Houston County, Alabama to provide available resources and equipment to support the mitigation and response to an emergency at Plant Farley 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 Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>Annex 1.7.1 Houston County, Alabama (SEP A.2.4) The Chairman of the Houston County Commission has the overall responsibility for emergency preparedness and local response in Houston County. Houston County also has accepted responsibility for evacuations in Henry County out to the 10 mile EPZ. The Houston County Emergency Management Agency coordinates planning and operations of all local agencies in support of an incident at Farley Nuclear Plant. A detailed emergency plan is maintained in case of an emergency at the Farley Nuclear Plant. An agreement is in place with Houston County, Alabama to provide available resources and equipment to support mitigation and response to an emergency at Plant Farley 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 Houston County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>g. Early County, Georgia</u> The Chairman, Early County Board of Commissioners, has responsibility for overall radiological emergency response planning. The actual plan development and coordination of emergency actions is carried out by the Blakely-Early County Emergency Management Agency. The "Blakely-Early County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Joseph M. Farley Nuclear Power Plant" is given as part of the "State of Georgia Radiological Emergency Plan".</p>	<p>Annex 1.7.2 Early County, Georgia (SEP A.2.4) The Chairman, Early County Board of Commissioners, has responsibility for overall radiological emergency response planning. The actual plan development and coordination of emergency actions is carried out by the Blakely-Early County Emergency Management Agency. The "Blakely-Early County Emergency Management Agency Radiological Emergency Plan for Nuclear Incidents/Accidents Involving Joseph M. Farley Nuclear Power Plant" is given as part of the "State of Georgia Radiological Emergency Plan." An agreement is in place with Early County, Georgia, to provide available resources and equipment to support mitigation and response to an emergency at Plant Farley 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 Early County 911 center, the county EOC, or through the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>h. City of Dothan, Alabama - Fire Department</u> In the event an emergency (Section IV) is declared as a result of a fire at Farley Nuclear Plant, the Dothan Fire Department has agreed to provide support to help combat the fire. The Dothan Fire Department resources are listed in FNP-0-EIP-13, "Fire Emergencies". The estimated response time to Farley Nuclear Plant is 30 minutes. The Emergency Director is authorized to request this assistance. Request for fire support will be made by the control room or site security to the Houston County 911 center, Houston County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>Annex 1.7.3 City of Dothan, Alabama (SEP B.6.4) In the event an emergency is declared as a result of a fire at Farley Nuclear Plant, the Dothan Fire Department has agreed to provide support to help combat the fire. The estimated response time to Farley Nuclear Plant is 30 minutes. The Emergency Director is authorized to request this assistance. Request for fire support will be made by the control room or site security to the Houston County 911 center, Houston County EOC, or the Incident Command Post, as applicable, based on the nature and timing of the event.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>2. Contractor and Private Offsite Organizations</u> a. Southern Nuclear/Southern Company Services Southern Company Services, Incorporated (SCS), an affiliated service company, served as the original architect-engineer. 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 functions previously performed by SCS to include design, licensing, and fuel management support during normal operation.</p>	<p>EP A.3.1 Southern Nuclear Operating Company (SNC) Southern Nuclear Operating Company (SNC) serves as the architect-engineer.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>b. Bechtel Power Corporation</u> Bechtel is the architect/engineer for portions of Unit 1 and for Unit 2. Bechtel provides support in the areas of new concept design (including drawings, specifications, safety reviews, etc.); modification design; engineering support for licensing issues; and as advisor on component and system operation. The Engineering Support Manager (Emergency Support Phase) and the Technical Support Director (Recovery Phase) interface directly with Bechtel.</p>	<p>EP A.3.2. Bechtel Power Corporation SNC has established an agreement with Bechtel Power Corporation to obtain engineering and construction services which may be required following an accident.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>c. Westinghouse</u> Westinghouse is the NSSS supplier for both Farley units. Their support activities associated with the NSSS include installation, testing, and corrective action assistance in their scope of supply; engineering support for licensing issues; new concepts design and modification design; advisor on components and systems; and engineering support related to operation, maintenance, and corrective action. The Engineering Support Manager (Emergency Support Phase) and the Technical Support Director (Recovery Phase) provide interface with Westinghouse either directly or through SCSL.</p>	<p>EP A.3.3 Westinghouse SNC has established an agreement with Westinghouse to obtain general services related to nuclear steam supply system (NSSS) operations during and following an accident situation. Westinghouse provides the capability to respond on a 24-hour-a-day basis.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>d. Institute of Nuclear Power Operations (INPO), Nuclear Energy Institute (NEI) and Electric Power Research Institute (EPRI).</u> Southern Nuclear Operating Company is a participating member of INPO and as such will have available technical expertise from this organization in areas of nuclear power plant operation in accordance with established agreements (Letter of Agreement - Appendix 2(B)). Also, INPO and EPRI have a plan describing their combined emergency information response capabilities. Their assistance is available to Southern Nuclear Operating Company (Letter of Agreement – Appendix 2(B)).</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>e. Maintenance Assistance</u> Assistance in the area of maintenance and repair is made available by contractor organizations.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The non-specific statement in the current Plan is incorporated into the more detailed description of Support provided in the SNC Standard Emergency Plan and Site Annex.</p>
<p><u>f. Radiological Monitoring Assistance.</u> 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).</p>	<p>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).</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>g. Other Utilities</u> Southern Nuclear Operating Company is a signatory to the "Voluntary Assistance Agreement By and Among Electric Utilities Involved in Transportation of Nuclear Materials" and a signatory to the "Nuclear Power Plant Emergency Response Voluntary Assistance Agreement" (see Appendix 2(B)). Although these agreements do not impose an obligation on any signatory to provide assistance, they establish the contractual framework by which assistance may be requested and provided expeditiously.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>III. FACILITIES AND EQUIPMENT</u> <u>A. CONTROL CENTERS</u></p>		

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<p><u>1. Technical Support Center (TSC)</u> During any emergency condition the center for coordinating all in-plant activities will be the TSC. Located immediately north of the Unit 2 control room area, the TSC is designed to accommodate up to 25 people for the evaluation of plant status, coordination of damage assessment and emergency actions, and interface with the NRC, Emergency Operations Facility (EOF) and Operations Support Center (OSC). Provision is also made for control and coordination of communications with offsite agencies and of out-of-plant radiation monitoring activities until the EOF is activated and assumes these functions. The TSC when activated will normally maintain the function of offsite communications for initial and upgrade notifications to federal, state, and local authorities. An overall space of 22 feet x 65 feet, with a 9-foot ceiling height, has been provided. Room layout is as follows:</p> <ul style="list-style-type: none"> a. Monitoring Area b. Planning and Coordination Area c. Document Room d. Conference Area <p>Figure 14 shows the above layout.</p>	<p>Annex 5.1.2 Technical Support Center (SEP H.1.2) Located immediately north of the Unit 2 control room area, the TSC (Figure 5.1.A) is designed for the evaluation of plant status, coordination of damage assessment and emergency actions, and interface with the NRC, Emergency Operations Facility (EOF), and Operations Support Center (OSC). Provision is also made for control and coordination of communications with offsite agencies and of out-of-plant radiation monitoring activities until the EOF is activated and assumes these functions. The TSC is designed to be habitable to the same extent as the control room for postulated radiological accidents. Its ventilation system includes a deep-bed charcoal filter to remove air-borne contamination, and it has the capability of pressurizing the TSC area and recirculating the room air through the charcoal filter. A permanent radiation monitor is provided to continuously indicate radiation dose rates and airborne activity. A radiation alarm in the main control room make-up air supply duct automatically initiates room pressurization and recirculation. Electrical power sources are designed so the HVAC, wall outlets, and lighting can be powered from the diesel generators if offsite power is lost. The TSC maintains access to drawings and records necessary for the response to an emergency event at FNP. These records can be accessed on a digital records system. This system is supplied backup power from an uninterruptible power supply to allow retrieval of records in the event of a loss of power. Annex Figure 5.1.A</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>The TSC is designed to be habitable to the same extent as the control room for postulated radiological accidents. Its ventilation system includes a deep-bed charcoal filter to remove air-borne contamination, and it has the capability of pressurizing the TSC area and recirculating the room air through the charcoal filter. A permanent radiation monitor is provided to continuously indicate radiation dose rates and airborne activity. A radiation alarm in the main control room make-up air supply duct automatically initiates room pressurization and recirculation. Electrical power sources are such that the HVAC, wall outlets and lighting can be powered from the diesel generators if offsite power is lost.</p>	<p>Annex 5.1.2 Technical Support Center (SEP H.1.2) The TSC is designed to be habitable to the same extent as the control room for postulated radiological accidents. Its ventilation system includes a deep-bed charcoal filter to remove air-borne contamination, and it has the capability of pressurizing the TSC area and recirculating the room air through the charcoal filter. A permanent radiation monitor is provided to continuously indicate radiation dose rates and airborne activity. A radiation alarm in the main control room make-up air supply duct automatically initiates room pressurization and recirculation. Electrical power sources are designed so the HVAC, wall outlets, and lighting can be powered from the diesel generators if offsite power is lost.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>The TSC contains a set of piping and instrumentation drawings for each unit and technical manuals on selected major equipment. Other technical data are readily available from the document control facility in the plant Service Building which may be reached by intra-plant phone from the TSC. Also available in the TSC are the Emergency Plan, Emergency Plan Implementing Procedures, Abnormal Operating Procedures, Emergency Response Procedures, Severe Accident Management Guidelines, and Unit Operating Procedures along with other general reference material.</p>	<p>Annex 5.1.2 Technical Support Center (SEP H.1.2) The TSC maintains access to drawings and records necessary for the response to an emergency event at FNP. These records can be accessed on a digital records system. This system is supplied backup power from an uninterruptible power supply to allow retrieval of records in the event of a loss of power. These records include:</p> <ul style="list-style-type: none"> • Technical specifications. • Plant operating procedures. • Final safety analysis report. • 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. 	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>Should the emergency situation so dictate, the Emergency Director may shift the staff to other locations as designated by the Emergency Director.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The ability to relocate the facility is provided at procedural level. The non-specific statement in the current Plan provides no additional value.</p>
<p><u>2. Emergency Operations Facility (EOF)</u> The EOF facilities and equipment are described in Appendix 7(G).</p>	<p>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).</p>	<p>The description was standardized and incorporated in the SNC Standard Emergency Plan.</p> <p>See Appendix 7(g) section for the detailed comparative description.</p>

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<p><u>3. NRC Support Facilities</u> Support facilities for the NRC have been provided at the Site Training Facility. Adequate functional working space and telecommunication capability for up to 10 people (approximately 750 ft²) has been provided in this near-site facility.</p>	<p>Annex 5.1.5 A near site location is maintained at the FNP Training Center with space for members of an NRC Site Team.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>4. Operations Support Center (OSC)</u> The Breakroom (outside the Technical Support Center) will serve as the Operations Support Center (Figure 19), from which emergency operations support will be provided. In the event that the Operations Support Center becomes untenable, it will be relocated onsite or to offsite company facilities in Headland, Alabama (Figure 17) at the discretion of the Emergency Director.</p>	<p>Annex 5.1.3 Operations Support Center (SEP H.1.3) The break room (outside the Technical Support Center) will serve as the Operations Support Center (Figure 5.1.B), from which emergency operations support will be provided. The OSC is where operational support personnel such as instrument technicians, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel assemble to aid in the response to an emergency. The OSC will accommodate the support and technical staff to respond to an event on one or both Units. The OSC has the capability to communicate with the control room, the Technical Support Center (TSC), and the Emergency Operations Facility (EOF). Operations at this facility will be directed by the OSC Manager.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>5. 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 Alabama Power Company (APC) Old Crew Headquarters Building in Headland, Alabama. 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, work planning resources, plant technical data displays, and other SNC specific resources for performing engineering assessment activities, including damage control team planning and preparation for return to the site. Procedural guidance for the alternative facility is provided in NMP-EP-135, Alternative Facility Setup and Operation.</p>	<p>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 staff will be directed to an alternative facility. This facility is located in the Alabama Power Company (APC) Old Crew Headquarters Building in Headland, Alabama. 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, work planning resources, plant technical data displays, and other SNC-specific resources for performing engineering assessment activities, including damage control team planning and preparation for return to the site. Guidance for the alternative facility activation and operation is provided in implementing procedures.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>5. Joint Information Center</u> The Houston County Juvenile Court Services Building (Figure 17) will serve as a working and briefing center for local, state and national news media (Lease Agreement – Appendix 2(B)). All official information released by SNC and APC regarding the emergency will be released from the Joint Information Center once it has been activated.</p>	<p>Annex 5.1.6 Joint Information Center (JIC) (SEP H.2.2) The FNP JIC is located in Dothan, Alabama at the Houston County Juvenile Court Services Building. The JIC is the central location for the coordination and dissemination of information to news media and responses to public and media inquiries. Details of the JIC for FNP are in section H of the Emergency Plan. If the decision is made to activate the JIC, the CMC in Birmingham, Alabama will maintain emergency communications response coordination until the JIC is ready to assume these responsibilities.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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	<p>EP H.2.3. Joint Information Center (JIC) After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs). Site specific JIC is provided in the site specific Annexes.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>B. COMMUNICATIONS SYSTEMS</u> Several modes of communication are available, during both normal and emergency conditions, to transmit and receive information within the plant and at locations onsite and offsite.</p>	<p>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 at other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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	<p>EP H.2.3. Joint Information Center (JIC) After the initial notification of an emergency at the Alert classification or higher, the Public Information Director will coordinate with the EOF Emergency Director and affected OROs and determine whether to activate the JIC. Upon the decision to activate the JIC, the Public Information Director and JIC staff transfer from the CMC to the site specific JIC. Once the JIC is staffed the Public Information Director will manage the emergency communications response from the JIC in coordination with ORO public information officers (PIOs). Site specific JIC is provided in the site specific Annexes.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>B. COMMUNICATIONS SYSTEMS</u> Several modes of communication are available, during both normal and emergency conditions, to transmit and receive information within the plant and at locations onsite and offsite.</p>	<p>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 at other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>1. Commercial Telephones</u> The commercial telephone lines consist of several lines connected through local exchanges to the Bell Telephone system. Access to these lines is available through selected private automatic exchange (PAX) telephones located throughout the plant, including the control room, TSC, and Joint Information Center. Commercial telephone lines servicing the Corporate Office may be accessed through off-premises extensions (OPX) of the Corporate Office PAX which are located in selected plant locations, including the TSC, and in the EOF. Availability of OPX and PAX telephones capable of accessing commercial telephone lines is tabulated in Table 1. Commercial telephone lines are also available at the Birmingham EOF and the Birmingham Corporate Communication Offices. A facility minimum of thirty (30) commercial telephone lines are available at the Joint Information Center.</p>	<p>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 at other locations onsite and offsite including the Joint Information Center near the SNC site. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>2. Private Automatic Exchange</u> The plant private automatic exchange (PAX) consists of a network of telephones located strategically throughout the plant, at various stations on the site (including the Control Room, TSC and OSC) and at selected offsite locations Joint Information Center, the State of Alabama Forward Emergency Operations Center in Houston County, the State of Georgia Forward Emergency Operations Center in Early County, the AEMA EOC in Clanton, Alabama, the ARCD EOC in Montgomery, Alabama, and the GEMA EOC in Atlanta, Georgia. Selected PAX phones are capable of communication with similar private automatic exchanges at the Corporate Office, other APC/SNC facilities, and facilities of Southern Company affiliates (e.g. Southern Company Services and Georgia Power Company).</p>	<p>Annex 5.2 On-Site Communications (SEP F.1) Normal on-site communications is provided by the plant telephone system (network and commercial). The plant public address (PA) system also may be used for in-plant communications. The PA system is powered by normal plant power, backed up by uninterruptible power. Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, OSC EOF, and Security. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities. EP F Table 5</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>In addition to the PAX network, selected phones operate as off-premises extensions (OPX) of the APC Corporate Headquarters private automatic exchange and operate independently of the plant PAX system. These phones may be used for calling APC/SNC facilities and offices connected to the APC Corporate Headquarters PAX system or for accessing Bell Telephone System commercial lines in Birmingham. OPX and PAX phone availability is tabulated in Table 1.</p>	<p>Annex 5.2 On-Site Communications (SEP F.1) Normal on-site communications is provided by the plant telephone system (network and commercial). The plant public address (PA) system also may be used for in-plant communications. The PA system is powered by normal plant power, backed up by uninterruptible power. Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, OSC EOF, and Security. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities. EP F Table 5</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>3. Microwave</u> APC's microwave system provides telephone circuits to all of the company's power plants and major offices including the Alabama Power Office in Headland, Alabama. All primary microwave routes are provided with standby RF equipment with automatic switchover. The microwave telephone circuits available may be used by dialing through the PAX system.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The SNC Standard Emergency Plan and Annex provides detailed descriptions of the primary and back-up communications capabilities.</p>

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<p><u>4. Alabama Control Center (ACC) Link</u> A computer link to the Alabama Control Center network is located in the Switchhouse. The link provides for communications with the ACC for purposes of load dispatch and coordination with the Southern Company Power Control Center and other APC plants.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The load dispatch link provides no capability for implementation of the Site Emergency Plan.</p>
<p><u>5. Two-Way Radio</u> Two-way radios and base stations are available at the site as follows:</p>	<p>Annex 5.2 On-Site Communications (SEP F.1) Portable radios are used for communications between individuals and base stations located in the Control Room, TSC, OSC EOF, and Security. There is also a plant intercom system. Intercom units are installed at selected plant locations primarily for specific task related activities.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>a. Plant operations frequency -</u> This radio frequency provides communication between the Control Room, TSC, EOF, and personnel in the plant equipped with operations frequency radios. This frequency may be used as a backup frequency for communicating with offsite/onsite field monitoring teams.</p>	<p>EP F Table 5</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>b. Plant security frequency -</u> This radio frequency provides communication between the Control Room, TSC, EOF, Security Offices, mobile units in security vehicles and other selected company owned vehicles and personnel equipped with security frequency walkie-talkies.</p>	<p>EP F Table 5</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>c. Plant field monitoring frequency</u> - This radio frequency provides communication between the TSC, EOF, and personnel in the plant equipped with FMT frequency radios. This frequency may be used as a backup for communicating with offsite/onsite field monitoring teams.</p>	<p>EP F Table 5</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>d. Digital radio system (multi frequency)</u> - This radio system provides both onsite/offsite group and private radio communication. This radio system will be the normal communication system for the field monitoring teams.</p>	<p>EP F Table 5</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>6. Public Address and Party Lines</u> A plant wide public address system consisting of six separate and independent communications lines (one page and five party lines) exists to provide quick communications between two or more locations, even in high noise level areas. The page channel is used to call personnel over the speakers, issue plant-wide instructions or to communicate between two or more hand-sets. The party lines are used to carry on communication after the paged party has answered. One of the party lines will be dedicated as an emergency communications channel during emergency conditions.</p>	<p>Annex 5.2 On-Site Communications (SEP F.1) Normal on-site communications is provided by the plant telephone system (network and commercial). The plant public address (PA) system also may be used for in-plant communications. The PA system is powered by normal plant power, backed up by uninterruptible power.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>7. Sound Powered Telephone</u> Sound powered telephone lines are located between critical points in the plant and are normally used primarily for communications during maintenance and refueling.</p>	<p>EP F Table 5</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>8. Plant Emergency Alarm</u> The Plant Emergency Alarm is a variable tone alarm. The warble tone may be used to alert plant personnel, contractors, and visitors onsite in the event of a Site Area Emergency or General Emergency or other condition requiring all personnel to report to their emergency Assembly Areas. The siren tone may be used to muster the fire brigade or at the discretion of the Shift Supervisor in order to alert personnel. Blue beacon lights located in high noise areas or other locations where the alarms may not be audible are also activated to provide a visual emergency notification.</p>	<p>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. EP F Table 5</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>9. NRC Emergency Notification System (ENS)</u> This dedicated Federal Telephone System (FTS) communications line provides a dialup communications link to the NRC operations office in Bethesda, MD and would be used for continuous communications in the event of an emergency. Phones are located in the control room, TSC, EOF, and in the Shift Foreman's office adjacent to the Control Room.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>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.</p>

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<p><u>10. NRC Health Physics Network (HPN)</u> This dedicated Federal Telephone System (FTS) communications line provides a dialup communications link with the NRC to provide radiological information. Phones are located in the TSC and in the EOF.</p>	<p>EP F.1.4.2 NRC Health Physics Network (HPN) This communications line provides a communications link with the NRC to provide radiological information.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>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.</p>

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<p><u>11. State/Local Agency Emergency Notification Network (ENN)</u> This communications system provides an immediate communications link with the State of Alabama, the State of Georgia and local county personnel in Alabama and Georgia who would possibly be notified in the event of an emergency. Telephones with speakers on this communication network are located at the EOF; TSC; Shift Foreman's Office adjacent to the control room; Alabama Radiation Control Division; Alabama Emergency Management Agency; State of Alabama Department of Public Safety; Houston County (AL) Sheriff's Dispatcher; Houston County Office of Radiological Health; Georgia Emergency Management Agency (GEMA); Early County (GA) Sheriff's Dispatcher; Early County Emergency Management Agency; and GEMA Forward Emergency Operations Center (Early County). The communications system locations listed above for the FNP Shift Support Supervisor's Office; the Alabama Department of Public Safety, the Georgia Emergency Management Agency, the Houston County Sheriff's Dispatcher's Office, and the Early County Sheriff's Dispatcher's Office are staffed 24 hours a day.</p>	<p>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.</p> <p>EP F.1.3 Provisions exist for continuous communications with state and local governments within the Emergency Planning Zones, as detailed above. At least one on-site and one offsite communications system is maintained, each with a backup power source to ensure continuous communications.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>12. NRC Reactor Safety Counterpart Link (RSCL)</u> This dedicated FTS communications line provides a dialup communications link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee. Phones are located in the TSC and EOF.</p>	<p>EP F.1.4.3 NRC Reactor Safety Counterpart Link (RSCL) This communications line provides a communications link for the NRC to conduct internal NRC discussions on plant equipment conditions separate from the licensee.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>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</p>
<p><u>13. Protective Measures Counterpart Link (PMCL)</u> This dedicated FTS communications line provides a dialup communications link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions. Phones are located in the TSC and EOF.</p>	<p>EP F.1.4.4 Protective Measures Counterpart Link (PMCL) This communications line provides a communications link for the NRC to conduct internal NRC discussions on radiological releases, meteorological conditions, and the need for protective actions.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>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</p>
<p><u>14. Management Counterpart Link (MCL)</u> This dedicated FTS communications line provides a dialup communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC Director of Site Operations or top level licensee management at the site. Phones are located in the TSC and EOF.</p>	<p>EP F.1.4.5 Management Counterpart Link (MCPL) (Executive Bridge Line) This communications line provides a communications link for any NRC internal discussions between the NRC Executive Team Director or Executive Team members and the NRC response team leader or top-level licensee management at the site.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>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</p>

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<p><u>15. Local Area Network (LAN) Access</u> This dedicated FTS communications line provides the NRC site team with access to the NRC Operations Center's LAN. Connections are provided in the TSC and EOF.</p>	<p>EP F.1.4.7 Southern Company Network Access This communications line provides the NRC site team with access to the NRC Operations Center's LAN. LAN connections are provided on the Southern Company Network.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>16. Telecopier</u> Telecopiers are located at the TSC, EOF, Alabama Radiation Control Division, Alabama Emergency Management Agency, GEMA, Houston County Emergency Management Agency, and Early County Emergency Management Agency.</p>	<p>No equivalent Plan/Annex statement</p>	<p>No specific reference to copying equipment was provided in the SNC Standard Emergency Plan</p>
<p><u>17. SNC Integrated Data Display System</u> This system provides a direct data link via the internet between Farley Nuclear Plant and at Houston County Emergency Management Agency (EMA), Alabama Radiation Control Division in Montgomery, Georgia EMA in Atlanta, Early County EMA, and the EOF. It may be used to rapidly transmit information on current emergency classification, radiological conditions, and meteorological conditions.</p>	<p>EP I.1 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>18. Emergency Response Data System (ERDS)</u> These communications lines provide channels by which raw reactor parametric data is transmitted from the site to the NRC. The affected Unit ERDS will be activated within one hour following the declaration of an Alert emergency or above.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>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</p>
<p><u>19. Other Communication Systems</u> A cellular phone is provided for use by the EOF Manager while in transit to the EOF.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The specific communications systems required to support the functions of the Emergency Plan are provided in the Plan and Site Annex. The proliferation of individual cell phones precluded the need to provide the ED with a specific phone.</p>
<p><u>C. ASSESSMENT FACILITIES</u> In order to carry out the assessment actions described in Section IV, facilities must be available for initial as well as continuous evaluation of emergency conditions.</p>		<p>Introductory wording in the current Plan was omitted. No change was made to the facilities.</p>

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<p><u>1. Onsite Systems and Equipment</u> <u>a. Natural Phenomena Monitors</u> The plant is equipped with a meteorological tower instrumented as shown in Table 2, with both primary and secondary instrumentation for wind speed (10m and 45.7m), wind direction (10m and 45.7m), ambient temperature (10m and 60m), and dew point (10m and 60m). There is also a single channel of instrumentation for precipitation with associated data loggers located at the meteorological tower building. The meteorological tower instrumentation feeds wind speed, wind direction, precipitation, dew point, delta temperature, and sigma theta data to the plant computer. This data is utilized for dose calculations. Computer terminals in the TSC and EOF can be utilized to obtain real time or 15 minute average readouts of meteorological data. Should the plant's meteorological equipment become inoperable, information is available from the approved Flight Service, from the Georgia Pacific Paper Company, or from the regional National Weather Service offices.</p>	<p>Annex 5.6.1 Geophysical Phenomena Monitors (SEP H.5.1) <u>Meteorological (SEP H.5.1)</u> A meteorological monitoring program is in place at FNP. Instruments are mounted on a 60-meter tower located on the plant site. Parameters measured and transmitted to the control room include:</p> <ul style="list-style-type: none"> • Windspeed (10 m and 45.7 m). • Wind direction (10 m and 45.7 m). • Vertical temperature difference (10m and 60m). • Ambient temperature (10 m and 60 m). • Dewpoint temperature (10 m). • Precipitation (base). <p>The meteorological tower instrumentation feeds wind speed, wind direction, precipitation, dew point, delta temperature, and sigma theta data to the plant computer. This data is used for dose calculations. Computer terminals in the TSC and EOF can obtain real time or 15-minute average readouts of meteorological data. Should the plant's meteorological equipment become inoperable, information is available from the approved Flight Service, from the Georgia Pacific Paper Company, or from the regional National Weather Service offices.</p> <p>The important parameters for characterizing the transport of airborne radioactivity are wind speed, wind direction, and atmospheric stability (derived from the standard deviation of the horizontal wind direction or vertical temperature difference). These meteorological parameters are used in a calculation methodology to assess the offsite radiological consequences of accidental releases of airborne radioactivity.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>Various types of seismic instrumentation are located on vital pieces of equipment and structures throughout the site, a number of which have readout and/or annunciation in the control room. A complete discussion of these monitors is given in FSAR Section 3.7.4. Seismic information may also be obtained from the National Earthquake Center in Golden, Colorado.</p>	<p>Annex 5.6.1 Geophysical Phenomena Monitors (SEP H.5.1) <u>Seismic (SEP H.5.1)</u> Various types of seismic instrumentation are located on vital pieces of equipment and structures throughout the site, a number of which have readout and/or annunciation in the control room. A complete discussion of these monitors is given in FSAR Section 3.7.4. Seismic information may also be obtained from the National Earthquake Center in Golden, Colorado.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>The plant is equipped with hydrologic monitors to monitor river water level and service water pond level. These monitors have readout and annunciation in the control room. Redundant river water level monitors provide control room indication from 65 to 130 feet MSL river level. A discussion of service water pond level monitors is given in FSAR Section 9.2.1.5.</p>	<p>Annex 5.6.1 Geophysical Phenomena Monitors (SEP H.5.1) <u>Hydrologic (SEP H.5.1)</u> The plant is equipped with hydrologic monitors to monitor river water level and service water pond level. These monitors have readout and annunciation in the control room. Redundant river water level monitors provide control room indication from 65 to 130 feet MSL river level. A discussion of service water pond level monitors is given in FSAR Section 9.2.1.5.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>b. Radiological Monitors</u> Portable monitors and sampling equipment used during normal plant operations are available in the Health Physics Instrument Issue Room on elevation 155 of the auxiliary building for use during emergencies. Portable monitors and/or sampling equipment designated for emergency use are located in various areas of the plant. A general category listing of emergency supplies and equipment is included in Appendix 1(A) and an itemized listing can be found in FNP-0-EIP-16, "Emergency Equipment and Supplies".</p>	<p>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.</p> <ul style="list-style-type: none"> • Area monitors respond to gamma radiation. • Airborne monitors detect and measure radioactive gaseous effluent concentrations. <p>Emergency response procedures provide methods for determining relationships between monitor readings and releases, material available for release, and extent of core damage.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>Process, area and effluent monitors that may be used for emergency assessment are described in Appendix 3(C). A complete discussion of these monitors is given in FSAR Sections 11.4 and 12.1.4. Monitors on gaseous effluent release points provide input signals to a plant computer utilized for offsite dose calculations; computer terminals in the TSC and EOF can be utilized to obtain one minute or 15 minute average effluent activity data. FNP-0-EIP-30, "Post Accident Core Damage Assessment", provides correlations between containment high range area monitor readings and core damage.</p>	<p>EP H.5.2.2 Liquid and Gaseous Sampling Systems The process sampling system consists of the normal sampling system and additional sampling panels located throughout the plant. Pre-designated monitoring and sampling points are listed in site procedures. Sampling systems are installed or can be modified to permit reactor coolant and containment atmosphere sampling even under severe accident conditions. The system i 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>c. Post Accident Sampling Facilities</u> Facilities are provided for obtaining highly radioactive samples while minimizing personnel exposure. Reactor coolant samples, both pressurized (RCS) and unpressurized (RHR/containment sump) may be obtained utilizing a remotely operated sampling panel. The panel provides for obtaining samples of both liquid phase and non-condensable gas phase components. Particulate, iodine and noble gas samples may be obtained from the containment atmosphere or the plant vent stack utilizing remotely operated valves. All systems provide for collection of small aliquots of the sampled media. Sampling capability also exists for the steam generators and steam jet air ejectors. Shielded containers, portable shielding and remote handling apparatus allow analysis with minimum exposure.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>d. Fire Detection</u> Fire and smoke detection monitors are located in all vital buildings on the plant site with extensive coverage in the Auxiliary Building, Containment and Turbine Building. A complete description of the fire protection and detection systems is given in FSAR Section 9.5, and fire protection re-evaluation report entitled, "Farley Nuclear Plant Fire Protection Program Re-evaluation".</p>	<p>EP H.5.4 Fire Detection System The Fire Detection System is designed to detect products of combustion or heat in designated areas of the plant. The fire alarm communication systems and subsystems are located at strategic points throughout the plant to warn personnel of a fire or other emergency conditions. Additional description of the fire system is provided in the FSAR.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>2. Environs Monitoring Facilities and Equipment</u> A comprehensive environmental monitoring program is established for the Farley Plant covering both onsite and offsite areas</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Equipment used in this program that may be used for emergency assessment is as follows: a. OSLDs b. Air particulate and iodine monitors c. Portable radiation survey instruments</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Although the OSLDs and the air particulate and iodine samples may be evaluated by an outside vendor, the capability for evaluating the air particulate and iodine samples exists at the plant. FNP-0-RCP-25 provides methodology for utilizing available air sampling and monitoring equipment to measure radioiodine concentrations in air in the plume exposure EPZ as low as 10⁻⁷ uCi/ml under field conditions. Interference from noble gas and background radiation will not decrease the minimum detectable activity. A detailed description of the minimum portable and fixed health physics equipment available at the site is given in FSAR Section 12.3. Predesignated monitoring and sampling points are listed in FNP-0-EIP-4, "Health Physics Support to the Emergency Plan".</p>	<p>No equivalent Plan/Annex statement</p>	<p>The counting specific information was maintained in applicable procedures.</p>
<p>The states of Georgia and Florida have mobile laboratory facilities that could be used in case of emergencies. All field monitoring data will be transmitted to and analyzed at the EOF (the TSC until the EOF is staffed). The University of Georgia and Oak Ridge National Laboratories have fixed radiological laboratories in the general geographic area that can aid in radiological analysis. It is estimated that the response time for these organizations will range from 2 to 4 hours.</p>	<p>EP H.6.3 Laboratory Facilities External facilities for counting and analyzing samples, and for dosimetry processing, can be provided by other SNC-operated plants including the GPC Central Laboratory, state, federal, or contracted laboratories. Outside analytical assistance may be requested from state and federal agencies, or through contracted vendors. The DOE, through the Radiological Assistance Program (RAP) has access to any national laboratory.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>The plant is equipped with a computer which utilizes automatically input meteorological data, effluent monitor data and selected plant parameter data (e.g. steam generator pressure, plant vent stack flow rate, etc.) to calculate estimated and projected offsite dose. The system automatically actuates when effluent monitors indicate abnormal release point activity and continues until manually terminated. Computational results are available at computer terminals located at the TSC, EOF and other selected locations.</p>	<p>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 model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.</p>

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<p>In the event that the above computer is not available and for long term dose assessment, a manual personal computer method is provided in NMP-EP-104, Dose Assessment ". The system calculates estimated and projected offsite dose, and plume dimensions, location and arrival times out to 50 miles from the plant site. Meteorological data, effluent monitor data and plant parameter data utilized in the manual calculations will usually be obtained from local data systems. In the event that the local data systems are not available then data may be obtained from the control room meteorological data recorder, effluent monitor instruments and control room indicators.</p>	<p>EP 1.3 Offsite Dose Assessment SNC-operated nuclear power plants use an offsite dose assessment program that estimates doses from radiological accidents for comparison with the EPA Protective Action Guidance and acute health effect thresholds. The dose calculation model is available in the Control Room, TSC, and EOF for use in projecting potential offsite doses. The program estimates reactor source term, atmospheric transport, and doses resulting from radiological emergencies and can be used to assist in making protective action determinations. The system supplements assessments based on plant conditions. The model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.</p>

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<p>A detailed discussion of the automatic offsite dose assessment method is provided in FNP-0-M-007, "Emergency Dose Calculation Manual". A detailed discussion of the manual offsite dose assessment method is provided in the MIDAS (Meteorological Information and Dose Assessment System) Technical Manual.</p>	<p>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 model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all of the existing regulatory requirements, so the ARDA program is no longer needed.</p>

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<p>Results of dose estimates and projections are provided to off-site agencies responsible for initiating protective actions using the SNC Integrated Data Display System, telecopy system, ENN, ENS and/or commercial telephones.</p>	<p>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 model was developed to allow consideration of the dominant aspects of source term, transport, dose, and consequences. Because the program is designed to be used during a radiological emergency, it is assumed that the amount of activity being released and the meteorological conditions will not be precisely known.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.</p>

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<p><u>3. Personnel Monitoring Equipment</u> In addition to the portable radiological monitors discussed in Section III.C.1.b external dosimetry equipment is available for personnel monitoring and dose assessment. Digital alarming dosimeters (DADs) provide immediate dose assessment for emergency personnel. Dose assessment will also be provided by plant OSLDs and vendor OSLDs which can be processed on an emergency basis within 24 hours. All dose results will be retained in permanent records for each individual.</p>	<p>EP K.3.1 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>D. PROTECTION,</u> <u>DECONTAMINATION AND FIRST</u> <u>AID FACILITIES</u> <u>1. Protective Facilities and</u> <u>Equipment</u> The Plant Assembly Areas are designated as the Control Room, Technical Support Center (TSC), Operations Support Center (Room 2452 – North of TSC), Support Building Auditorium, Support Building Cafeteria, Maintenance Training Center, PAP (Non-PA side), Visitor's Center Auditorium, Switchhouse, Fabrication Shop, and Warehouse Receiving Area (Figure 19). All personnel on the plant site will report to one of these designated assembly areas when the Plant Emergency Alarm is sounded. All personnel will be instructed in advance as to which assembly area to report in the event that the Plant Emergency Alarm is sounded.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Alternate Assembly Areas designated for use at the discretion of the Emergency Director are the Contractor Parking Lot, Switchhouse Parking Lot, an area between the Unit #2, 2A, and 2B Cooling Towers, the Utility Building, the Southeast corner of the Control Room, the OPS Ready Room, and the Health Physics (HP) Office (Figure 19).</p>	<p>No equivalent Plan/Annex statement</p>	<p>With the incorporation of more detailed protective actions for the HAB event, the commitment to maintain the Assembly ability was maintained in the SNC Standard Emergency Plan, but specifics were eliminated to allow for more effective case-by-case management of the function.</p>

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<p>The Operations Support Center will provide protection for emergency Operations, Health Physics and Repair Party personnel. An emergency cabinet is provided which contains emergency supplies.</p>	<p>Annex 5.1.3 Operations Support Center (SEP H.1.3) The break room (outside the Technical Support Center) will serve as the Operations Support Center (Figure 5.1.B), from which emergency operations support will be provided. The OSC is where operational support personnel such as instrument technicians, mechanics, electricians, chemical/radiation technicians, equipment operators, and incoming shift personnel assemble to aid in the response to an emergency. The OSC will accommodate the support and technical staff to respond to an event on one or both Units. The OSC has the capability to communicate with the control room, the Technical Support Center (TSC) and the Emergency Operations Facility (EOF). Operations at this facility will be directed by the OSC Manager.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>The Maintenance Shop and Central Security Control have emergency cabinets provided which contain emergency supplies.</p>	<p>Annex 5.5 Emergency Kits (SEP H.9) Emergency supplies and equipment are located at various places at the plant. 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.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>The Support Building Auditorium will provide for assembly of Maintenance, and Facilities personnel. No protective equipment is provided for this facility; however, if required, all non-essential personnel will be evacuated to a safe location.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The SNC Standard Emergency Plan maintains the commitment to support the Assembly function.</p>
<p>The Support Building Cafeteria will provide for assembly of Support Building Personnel, Service Building, and Service Building Annex personnel. No protective equipment is provided for this facility; however, if required, all nonessential personnel will be evacuated to a safe location.</p>	<p>Annex 5.7 Protective Facilities and Equipment (SEP J) Assembly Areas (SEP J.4.1) In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when the announcement of evacuation is made. Protective actions, including relocation of on-site personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>Contractor Personnel, MODS Building, and ES Building Personnel will assemble in the Fabrication Shop. After accountability, these personnel will be evacuated if necessary.</p>	<p>Annex 5.7 Protective Facilities and Equipment (SEP J) Assembly Areas (SEP J.4.1) In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when the announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>OPS Training Center personnel and personnel training in the OPS Training Center will assemble in the Visitor Center Auditorium.</p>	<p>Annex 5.7 Protective Facilities and Equipment (SEP J) Assembly Areas (SEP J.4.1) In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>Maintenance Training Center Personnel and personnel training in the Maintenance Training Center will assemble in the Maintenance Training Center.</p>	<p>Annex 5.7 Protective Facilities and Equipment (SEP J) Assembly Areas (SEP J.4.1) In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>If necessary, Alternate Assembly Areas will be utilized to conduct accountability and non-essential personnel will be evacuated from the plant site. In the event that the PAP becomes untenable due to accident conditions, the Switchhouse and/or Maintenance Training Center will become the alternate shelter(s). Protective equipment for these locations is listed in Appendix 1(A). Under extreme conditions, APCo facilities that may be used as a personnel staging area are available approximately eight miles from the plant site.</p>	<p>Annex 5.7 Protective Facilities and Equipment (SEP J) Assembly Areas (SEP J.4.1) In the event of a plant evacuation, the On-Site Assembly Areas (or Off-Site Assembly Areas, as appropriate) will be used. The function of the assembly area is to provide a center for personnel accountability and radiological contamination screening, along with any other immediately necessary actions. The assembly areas are located in various buildings throughout the site. Alabama Power Company facilities may be used as the off-site assembly area at the discretion of the Emergency Director. The off-site assembly area location will be announced over the public address system when announcement of evacuation is made. Protective actions, including relocation of onsite personnel in the event of an attack or threat of hostile action against the site, have been developed for that specific situation. Specific protective actions in this case are identified in site procedures not readily available to the public.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>2. Decontamination and First Aid A first aid station and a decontamination area are located on the plant site. The decontamination area is located in the Auxiliary Building at elevation 155 near the Health Physics Office. The first aid station is located in the Auxiliary Building at elevation 155 and a Nurses Station is located in the Training/Visitors Center. Personnel decontamination and first aid supplies are provided for each of the two areas. Stretchers and first aid kits are located strategically throughout the plant.</p>	<p>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.</p> <p>EP K.5 Decontamination 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>There is at least one person on each shift qualified to perform first aid. Plant employees are considered to be first aid qualified upon successful completion of the Company's First Aid Course and are required to be requalified within three years.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>3. Medical Transportation</u> Request for ambulance support will be made by the control room or site security to the Houston County 911 center, Houston County EOC, or the incident command post, as applicable, based on the nature and timing of the event.</p>	<p>Annex 5.8.2 Ambulance Service (SEP B.6.2, L.4) Injured or 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. Ambulance services are coordinated through the Houston County 911 center. Houston County maintains agreements with local fire and ambulance services that may respond to FNP.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>a. Local Rescue Squads</u> Ashford Rescue Squad Columbia Rescue Squad Dothan Ambulance Service</p>	<p>Annex 2.3.3.1 Local Ambulance and Rescue Squads</p> <ul style="list-style-type: none"> • Ashford Rescue Squad. • Columbia Rescue Squad. • Dothan Ambulance Service (Pilchers Ambulance Service), Inc. 	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>4. Medical Treatment:</u> The detailed plans for the handling and care of injured personnel potentially contaminated and/or highly irradiated are contained in Part II, Medical Plan and FNP-0-EIP-11, "Handling of Injured Personnel". A brief description of the facilities and services available for medical support is given below. Letters of agreement on file from these facilities.</p>	<p>EP L.1 Hospital and Medical Services In addition to the on-site first aid response, arrangements have been made with local hospitals for treatment and evaluation of serious injuries or sicknesses. SNC-operated nuclear power plants have arranged for hospital and medical services having the capability to evaluate radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals. The hospitals are equipped and hospital personnel trained to address contaminated injured individuals. Training of medical support personnel at the agreement hospitals includes basic training on the nature of radiological emergencies, diagnosis and treatment, and follow-up medical care. Plant personnel are available to assist medical personnel with decontamination, radiation exposure and contamination control. Arrangements, by letter of agreement or contract, are maintained by SNC-operated plants with a qualified hospital located in the vicinity of the nuclear power plant for receiving and treating contaminated persons with injuries requiring immediate hospital care.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan and Site Annex.</p>

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<p><u>a. Southeast Alabama Medical Center</u> The Southeast Alabama Medical Center in Dothan, Alabama, has agreed to receive and care for injured personnel that may be contaminated or irradiated. In addition to routine medical care, space has been provided for a decontamination and emergency treatment facility and for storage of emergency medical equipment, monitoring equipment and dosimeters. Entrance to this facility will not affect the use of the hospital emergency room.</p>	<p>Annex Section 2.3.2 Annex 2.3.2.1 Southeast Alabama Medical Center The Southeast Alabama Medical Center in Dothan, Alabama, has agreed to receive and care for injured personnel that may be contaminated or irradiated. In addition to routine medical care, space has been provided for decontamination and emergency treatment and for storage of emergency medical equipment, monitoring equipment, and dosimeters. Entrance to this facility will not affect the use of the hospital emergency room.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>b. University of Alabama Hospital</u> The Division of Oncology of the University of Alabama Hospital in Birmingham, Alabama, has agreed to provide, on a priority basis, definitive care for irradiated and/or contaminated casualties. An area of the hospital has been modified to provide for such radiological emergencies. At the physicians discretion, persons who have been exposed may be sent to the University of Alabama Medical Center after receiving treatment at the Southeast Alabama Medical Center.</p>	<p>Annex 2.3.2.2 University of Alabama Hospital The Division of Oncology of the University of Alabama at Birmingham (UAB) Hospital in Birmingham, Alabama, has agreed to provide, on a priority basis, definitive care for irradiated and/or contaminated casualties. An area of the hospital has been modified to provide for such radiological emergencies. At the physicians' discretion, persons who have been exposed may be sent to UAB after receiving treatment at the Southeast Alabama Medical Center.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>c. Oak Ridge Institute for Science and Education - REAC/TS</u> The Oak Ridge Institute for Science and Education-REAC/TS team at Oak Ridge, Tennessee, has agreed to accept any type of radiation accident victim in need of hospitalization. At the physician's discretion, persons who have been exposed may be sent to ORISE-REAC/TS after receiving treatment at the Southeast Alabama Medical Center.</p>	<p>Annex 2.3.2.3 Oak Ridge Institute for Science and Education - REAC/TS The Oak Ridge Institute for Science and Education-REAC/TS team at Oak Ridge, Tennessee, has agreed to accept any type of radiation accident victim in need of hospitalization. At the physicians' discretion, persons who have been exposed may be sent to ORISE-REAC/TS after receiving treatment at the Southeast Alabama Medical Center.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p><u>IV. ASSESSMENT ACTIONS AND PROTECTIVE MEASURES</u> <u>A. CLASSIFICATION OF EMERGENCIES</u> <u>CLASSIFICATION OF EMERGENCIES IS DESCRIBED IN APPENDIX 11(k)</u></p>	<p>SECTION D: EMERGENCY CLASSIFICATION SYSTEM D.1 Classification of Emergencies</p>	<p>The SNC Standard Emergency Plan incorporated the Classification discussion in Section D. This submittal does not impact the current approved Emergency Action Level Scheme.</p> <p>See Appendix 11(k) Justification section for the details of the Classification Process.</p>

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<p><u>B. POST ACCIDENT ASSESSMENT ACTIONS</u> Effective coordination and direction of all elements of the emergency organization require continuing assessment through the duration of the emergency situation. In addition to continued monitoring of control room instrumentation and plant parameters, some special assessment actions are, initiated if appropriate. These assessment functions are identified below:</p>	<p>EP I.1 To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant. 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>1. Reactor Coolant Sampling, Containment Atmosphere Sampling and Plant Vent Stack Sampling.</u> RCS, containment atmosphere and/or plant vent stack samples will be taken and analyzed to assess the severity of core damage and the potential radiological consequences. The detailed sampling procedures for each area are provided in FNP-1/2-CCP-1300, "Chemistry and Environmental Activities During a Radiological Accident". FNP-0-EIP-30, "Post Accident Core Damage Assessment" provides a method to estimate the extent of core damage utilizing various plant monitor readings.</p>	<p>EP I.1 To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant.</p> <p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>2. Surveillance of Control Room Monitors</u> Surveillance of radiological and meteorological monitors in the control room is primarily the responsibility of operations personnel. However, in the event that offsite assessments based on this data are necessary, an individual designated by the Emergency Director will maintain surveillance over effluent monitor readings and dose projections, periodically reporting them to those designated in FNP-0-EIP-6, "TSC Setup and Activation". If the dose assessment computer is inoperable, the designated individual will periodically log the monitor values.</p>	<p>EP I.1 To adequately assess the emergency condition, applicable emergency facilities have the equipment and instrumentation necessary to monitor essential plant information, except where local monitoring is required. Evaluation of plant conditions is accomplished by monitoring plant parameters from both the Control Room and within the plant.</p> <p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>3. In-Plant and Site Surveys</u> During emergency conditions in-plant, site and site boundary surveys will be performed as appropriate by the Field Monitoring Team as described in FNP-0-EIP-4, "Health Physics Support to the Emergency Plan." The Field Monitoring Team will be capable of sampling under field conditions and will be capable of measuring radioiodine in the presence of noble gas and background radiation to as low as 5 x 10⁻⁸ uCi/cc.</p>	<p>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 environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation, and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC-operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>4. Population Exposure</u> Exposure projections shall be periodically estimated in the affected sectors utilizing projected dose and measured dose rates. The Dose Assessment Supervisor will work with the state/local agency representatives to determine the Total Effective Dose Equivalent (TEDE) exposure (resulting from external exposure and inhalation of the plume and external exposure from deposition) and thyroid Committed Dose Equivalent (CDE) exposure (resulting from the inhalation of radio-iodines).</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.</p>
<p><u>5. Environs Surveys and Monitoring</u> a. Short Term Assessment Short term assessment will involve the use of the estimates and projections provided by the emergency dose calculation computer programs performed in accordance with NMP-EP-104, "Dose Assessment".</p>	<p>EP I.7 Environs Surveys and Monitoring 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Onsite and offsite surveys will be performed as necessary to verify release information or as a backup assessment method should the instrumentation used for dose assessment go off-scale or become inoperable.</p>	<p>EP 1.3 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p> <p>The MIDAS-NU model in use for the Fleet is a full class B dose assessment model that supports multi-unit and multi-accident modeling, while the ARDA program is a simple Class A dose assessment model without multi-unit and multi-accident capability. The MIDAS model meets all existing regulatory requirements, so the ARDA program is no longer needed.</p>

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<p>Monitoring teams will normally be dispatched in vehicles and will be equipped with two-way radios for communication with the TSC or EOF.</p>	<p>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 environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Teams will be equipped with liquid sampling equipment, a GM instrument, an ion chamber instrument, and/or an air sampler as deemed appropriate by the Emergency Director, Health Physics Supervisor or Dose Assessment Supervisor.</p>	<p>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 environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>An environs survey team could be in the field within one hour. Radiological survey and sampling points will be identified by sector as shown in Figure 20.</p>	<p>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 environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>The correlation of various measured parameters (contamination levels, water and air activities) to dose rates for key isotopes and gross radioactivity levels is provided by FNP-0-RCP-25.</p>	<p>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 environmental monitoring equipment includes portable survey, counting, and air sampling instrumentation and other radiological monitoring equipment and supplies to be used by the FMTs. Samples are taken at predetermined locations as well as those locations specified during and after a release. Environmental measurements are used as an aid in determining and assessing protective actions for the general public and recovery actions for the plant. Field Monitoring Teams are dispatched by SNC operated plants to perform a variety of functions during conditions that may involve significant releases of radioactive materials from a plant. Radiological survey and sample data is used to define affected area boundaries, verify or modify dose projections and protective action recommendations, and assess the actual magnitude, extent, and significance of a liquid or gaseous radioactive material release. Field monitoring data is analyzed by personnel in the TSC until relieved by the EOF staff.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>b. Long Term Assessment</u> The long term aspects involving offsite assessments of contamination involving analysis of soil, vegetation, food, milk and water will be primarily handled by the states of Alabama, Georgia, and Florida as discussed in their Radiological Emergency Plans. The response of SNC would be to increase the sampling frequency of its established environmental monitoring program.</p>	<p>No equivalent Plan/Annex statement</p>	<p>Long term assessment will be event-specific and subject to ORO control in conjunction with the FRMAC if required. The statement was not carried forward to the SNC Standard Emergency Plan.</p>
<p><u>C. PROTECTIVE ACTIONS AND EMERGENCY ACTION LEVELS</u> The nature of protective actions to be implemented, the criteria for application, and the area involved or groups of persons for whom the protective actions would be taken are given here.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>1. Onsite Protective Action</u> a. Evacuation In the event of a Notification of Unusual Event an area of the turbine building, auxiliary building, or containment may have to be evacuated. Personnel would be notified to evacuate the affected area via the public address system as directed by the Emergency Plan Implementing Procedures.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Should a Site Area Emergency, General Emergency, or an Alert be declared, immediate notification of all persons onsite may be accomplished by sounding the Plant Emergency Alarm and announcing the condition over the plant public address system. Personnel onsite would report to their pre-assigned assembly area and preparations for evacuation of nonessential persons from the site would begin. Depending on the severity of the emergency condition, these individuals will be held in an assembly area, evacuated, or returned to work.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>If a site evacuation is warranted, personnel will be advised as to which routes should be used. The normal routes are State Highway 95 North or South and County Road 42 West (Figures 17 and 19). All personnel being evacuated from the site will be monitored before being released. Personnel leaving the site would then proceed, in their own vehicles, on one of these major routes, to their residences. Transportation for persons without vehicles will be arranged.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>The details for evacuation and personnel accountability of all categories of personnel listed above are given in FNP-0-EIP-10, "Evacuation, Personnel Accountability, and Site Dismissal" and FNP-0-EIP-14 "Emergency Response Teams".</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>b. Personnel Accountability</u> Each plant supervisor or the senior individual onsite from his group is responsible for accounting for all persons working in or visiting his group. Accountability within the Protected Area will be determined by the senior individual at the assembly area coordinating with the Security Response Center (SRC) and then will be reported to the Emergency Director by the senior plant security force member at the SRC. Accountability within the Controlled Area will be determined by the senior individual at each assembly area coordinating with the Security Response Center (SRC) Staff and then will be reported to the Emergency Director by the senior individual in the SRC. Contractor personnel assigned to Plant Modification and Maintenance Support (PMMS) report to the Fabrication Shop and will assemble by individual craft. Fitness for Duty Facility personnel outside the Protected Area report to the Visitor's Center Auditorium</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>No public access areas pass through or are within the owner controlled area. The owner controlled area is fenced and/or posted. Security patrols are conducted at random intervals as a part of daily routine.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The Security Patrols referenced in the current Plan statement are a function of Security Plan not Emergency Plan requirements.</p>

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<p>Detailed procedures for determining and reporting accountability and Responsibilities for accountability during local evacuations are given in FNP-0-EIP-10, "Evacuation, Personnel Accountability, and Site Dismissal".</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Following accountability initiation, security personnel will control site access and egress for the duration of the emergency, maintaining entry/exit logs to allow accountability of all personnel onsite.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>c. Hostile Action Protective Measures</u> 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 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.</p>	<p>EP J.4 Onsite Protective Actions 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>c. Contamination and Exposure Control Measures</u> The limits for personnel exposure set forth in 10CFR20 shall not be exceeded without approval of the Emergency Director or his designee.</p>	<p>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."</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>1) Farley Nuclear Plant personnel who have completed the onsite radiation protection training, may receive</p> <ul style="list-style-type: none"> o 10 Rem When emergency onsite action is required to eliminate a source or potential source that represents a hazard to the general public or to prevent a substantial loss in property and a lower dose is not practicable. o 25 Rem For life-saving operations such as rescue and search for known missing persons or for protection of large populations when a lower dose is not practicable. o >25 Rem but not to exceed 100 Rem For lifesaving or protection of large populations only on a voluntary basis. The volunteer worker should do so with full awareness of the associated risks for the radiation dose to be incurred. 	<p>EP Table K.1.A</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>2) Hospital and Ambulance Service Personnel, may receive</p> <p>o 3 Rem If there is an adequate number of attendants such that rotation may be accomplished without further endangering the patient(s).</p> <p>o 5 Rem If the number of attendants is limited such that personnel cannot be rotated.</p> <p>o 25 Rem To save a life.</p>	<p>EP Table K.1.A</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Dosimetry, respiratory protection equipment and protective clothing will be issued for use in accordance with established Radiological Control Procedures. A supply of radio protective drugs (potassium iodide) is available onsite and, if necessary, will be issued at the direction of the Emergency Director to emergency personnel remaining or arriving onsite.</p>	<p>EP J.4 Onsite Protective Actions Onsite protective actions for routine and emergency conditions are detailed in the plant's Radiation Protection Program. SNC-operated nuclear power plants maintain an inventory of respiratory protection equipment, anti-contamination clothing, and potassium iodide (KI) that is available to emergency workers remaining on site. During an emergency, protective actions would be taken to minimize radiological exposures or contamination affecting onsite personnel. Measures which would be taken are:</p> <ul style="list-style-type: none"> • On-shift and emergency response personnel use respiratory protection in any environment involving exposure to high level airborne activity or oxygen deficient atmosphere, or where air quality is in doubt. The criteria for issuance of respiratory protection are described in plant Radiation Protection procedures. • Anti-contamination clothing is available for use by onsite personnel. The criteria for issuance of protective clothing are described in plant Radiation Protection procedures. • The criteria for administering a thyroid-blocking agent (KI - Potassium Iodide) to emergency personnel depends on the projected absorbed dose to the thyroid based on the severity and magnitude of the accident. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>The levels of permissible radioactive contamination for personnel and equipment to be released from an RCA during an emergency are as follows:</p> <p>Personnel Equipment <5,000 dpm/100 cm² ND GMT/100 cm² (smearable) And < .25 mR/hr (fixed)</p>	<p>No equivalent Plan/Annex statement</p>	<p>The release of material will be a function of post emergency plan actions and potentially ORO evaluation.</p>

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<p>However, the Emergency Director may authorize higher levels based on plant conditions and recommendations from the HP Supervisor. When levels above these values are encountered, decontamination will be initiated. Facilities, supplies and waste disposal capability exists to provide for both personnel (emergency or onsite relocated) and equipment decontamination. Methods for equipment decontamination are discussed in NMP-HP-304, "Decontamination of Areas, Tools, and Equipment" and for personnel in NMP-HP-303, "Personnel Decontamination" with particular attention being given to radioiodine contamination of the skin. Extra clothing for personnel will be provided in the event personal clothing is confiscated. Information on personnel decontamination facilities is contained in Section III.</p>	<p>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." 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 on-site 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>To prevent or minimize direct or subsequent ingestion exposure to radioactive materials deposited on the ground or other surfaces, access into the exclusion area will be controlled by security personnel. Additionally, if conditions warrant, the site drinking water will be sampled and analyzed for radioactivity and quarantined, if necessary. If a quarantine is placed on the water, it will not be returned to use until the activity has returned to within acceptable limits as dictated by the State of Alabama Board of Health "Regulations Governing Public Water Supplies".</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Personnel which are found to be contaminated when monitored during evacuation will be returned to the plant for decontamination if possible. If the plant is not accessible, the personnel will be transported to the nearest decontamination facility.</p>	<p>EP K.7 Offsite Decontamination Nonessential onsite personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Offsite contamination controls are described in the states of Alabama, Georgia, and Florida plans.</p>	<p>EP K.7 Offsite Decontamination Nonessential onsite personnel may be evacuated to an offsite reception center or assembly area, as discussed in Section J. Radiological controls personnel at that location will monitor evacuees and determine the need for decontamination. In the event that decontamination of evacuees locally is not possible, personnel can be sent to designated locations for monitoring and decontamination.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>2. Offsite Protective Action</u> The states of Alabama, Georgia, and Florida are responsible, in their respective state, for handling the offsite radiological aspects of any emergency that should develop at the Farley Nuclear Plant. The Emergency Plans for Alabama, Georgia, and Florida are given in each states Radiological Emergency Plan.</p>	<p>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 Manager will be responsible for recommending protective actions for the offsite population. Responsibility for carrying out the protective actions rests with offsite authorities.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>The criteria to be used for offsite protective action recommendations is given below. The basis for protective action guides is the "Manual of Protective Action Guides and Protective Action for Nuclear Incidents", EPA-400-R-92-001. It should be noted that these levels are quite low and are used as guidelines for protective action rather than rigid levels of action. Recommendation of sheltering in residences shall be considered when there is radiological puff release that exceeds the projected dosage for a general emergency listed in section a below or there are hazards on or offsite that would make an evacuation dangerous. Areas within a ten mile radius in which protective action is deemed necessary will be referred to by Evacuation Zone as shown in Figure 21. The population distribution within this ten-mile radius has been predicted for the life of the plant and is summarized graphically in Figure 22.</p>	<p>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:</p> <ul style="list-style-type: none"> • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>a. Classification of Offsite Incidents</u> SNC Classification Projected Dosage (Organ or Media Involved) GENERAL 1.0 Rem TEDE 5.0 Rem Thyroid CDE SITE AREA 0.1 Rem TEDE 0.5 Rem Thyroid CDE</p>	<p>No equivalent Plan/Annex statement</p>	<p>This section restates numerically the EPA Protective Action Guidelines previously committed to. They are also the trigger for the equivalent radiologically based Emergency Action Levels in the site approved EALs.</p> <p>The data is not needed in the plan.</p>

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<p><u>b. Response</u></p> <p>GENERAL</p> <p>Classification Protective Actions to be Recommended to State Authorities</p> <p>NMP-EP-112, "Protective Action Recommendations," provides detailed guidance on the methodology and determination of protective action recommendations (PARs). PARs were developed in accordance with NUREG-0654 Supplement 3 Rev. 1. Evacuation Time Estimates and Offsite Response Organizations were fully involved in the development of the PARs.</p> <p>The Emergency Director will approve the PAR decision developed by the methodology in the Initial and Follow-Up Flowcharts, shown as Chart 1, Initial and Chart 2, Follow-Up. Recommendations will be based on plant conditions, projected dose estimates, or available monitoring data.</p>	<p>EP J.5 Offsite Protective Action Recommendations (PARs)</p> <p>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.</p> <p>There are various types of protective actions that can be recommended to the state and counties. They may include the following:</p> <ul style="list-style-type: none"> • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>SITE AREA</u></p> <p>Classification Protective Actions to be Recommended to State Authorities</p> <p>No Protective Action Recommendations are to be made at the Site Area emergency level. The Emergency Director should upgrade to a General Emergency if PARs are determined to be needed and not already in a General Emergency.</p>	<p>EP J.5 Offsite Protective Action Recommendations (PARs)</p> <p>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.</p> <p>There are various types of protective actions that can be recommended to the state and counties. They may include the following:</p> <ul style="list-style-type: none"> • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>ALERT</p> <p>Classification Protective Actions to be Recommended to State Authorities</p> <p>No Protective Action Recommendations are to be made at the Alert level. The Emergency Director should upgrade to a General Emergency if PARs are determined to be needed and not already in a General Emergency.</p>	<p>EP J.5 Offsite Protective Action Recommendations (PARs)</p> <p>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.</p> <p>There are various types of protective actions that can be recommended to the state and counties. They may include the following:</p> <ul style="list-style-type: none"> • Evacuation. • Shelter in place. • Monitor and prepare. • Thyroid blocking agent (consider using KI (potassium iodide)) in accordance with state plans and policy. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>The authority for initiation or relaxation of protective action recommendations is vested solely with the Emergency Director and may not be delegated to any other member of the emergency organization. Processes for development, approval, and notification of protective action recommendations are described in NMP-EP-111, "Emergency Notifications", and NMP-EP-112 "Protective Action Recommendations".</p>	<p>EP B.1.1 The Emergency Director's non-delegable duties include:</p> <ul style="list-style-type: none"> Perform the duties and responsibilities of Protective Action Recommendation (PAR) determination. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Chart 1 Initial Protective Actions Recommendations</p>	<p>No equivalent Plan/Annex chart</p>	<p>Section J5 of the SNC Standard Emergency Plan specifies the requirement to make Protective Action Recommendations consistent with NUREG-0654 Supplement 3. PAR flowcharts are controlled at the procedural level.</p>
<p>Chart 2 Follow Up Protective Action Recommendations</p>	<p>No equivalent Plan/Annex chart</p>	<p>Section J5 of the SNC Standard Emergency Plan specifies the requirement to make Protective Action Recommendations consistent with NUREG-0654 Supplement 3. PAR flowcharts are controlled at the procedural level.</p>
<p><u>V. ACTIVATION OF EMERGENCY ORGANIZATION</u> <u>A. DECLARATION OF AN EMERGENCY</u> The Shift Manager shall have the authority and responsibility to immediately and unilaterally declare an emergency and initiate emergency response. Section IV of this plan delineates criteria for declaring emergency conditions.</p>	<p>EP B.1.1 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 offsite emergency measures.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Upon declaration of an emergency the Shift Manager will immediately notify the on-call Emergency Director (ED). Until the on-call ED arrives onsite and relieves the Shift Manager, the Shift Manager shall complete the duties of the ED prior to the on-call ED taking full responsibility for implementation of the Emergency Plan. Duties of the Shift Manager as an Emergency Director are addressed in NMP-EP-110, "Emergency Classification Determination and Initial Action" and NMPEP-111, "Emergency Notifications".</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>The ED, Shift Clerk, or designee will notify the EOF Manager of the emergency condition. The EOF Manager will decide on the appropriate level of activation utilizing the criteria shown in Table 4.</p>	<p>EP B.1.1 The ED, at their discretion or when procedurally required, activates the ERO.</p>	<p>The SNC Standard Emergency Plan fully incorporates EOF activation into the site organization. Activation will be driven by event Classification. The statement determining the need to activate is no longer required.</p>
<p><u>B. ORGANIZATION ACTIVATION</u> The minimum quantity of personnel available on shift and the quantity of additional personnel available within 75 minutes following declaration of the emergency to staff the emergency organization are shown in Table 3. A copy of the On-Shift Staffing Analysis which forms the technical basis for Minimum Shift Staffing provided in Table 3 is maintained in the SNC document management system. Reference OSA-FNP-001.</p>	<p>EP B.1 The number and ERO position titles of personnel available within 75 minutes following declaration of an Alert or higher classification are shown in Tables 1, 2 and 3.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan and Site Annex.</p>

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<p>Each shift shall have a Shift Technical Advisor (STA). The STA will have No duties or responsibilities for manipulation of controls or command of operations during an emergency.</p>	<p>Annex Table 2.2.A</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>The normal shift crew will consist of at least those positions listed as "on shift" in Table 3. There will be a licensed operator in each unit's control room at all times when fuel is in the core of the respective unit. There will be a Senior Reactor Operator (SRO) in the control room (shared) at all times when fuel is in either core. Shift staffing for core alterations will also include either a SRO limited to fuel handling or a SRO not assigned any duties concurrent with core alterations.</p>	<p>EP B.1: The normal on-site organization of an SNC-operated nuclear power plant provides a staff fully capable of providing the initial response to an emergency event. Annex Section 2.1: The normal plant operating crew is staffed and qualified to perform actions that may be necessary to initiate immediate protective actions and implement the emergency plan, and is designated as the responsible group for such actions.</p>	<p>For Emergency Response purposes the operations staff has been validated by the conduct of a staffing analysis meeting the requirements of 10 CFR 50 Appendix E.IV.A.9.</p> <p>Emergency Plan staffing will be controlled by the staffing plan contained in the SNC Standard Emergency Plan and Site Annex.</p> <p>The commitment for positioning of ROs/SROs is not contained in the Fleet Emergency Plan or annex but is a Technical Specification requirement.</p>
<p>Upon receiving notification of an emergency, the Emergency Director will proceed to the site. A shift communicator will coordinate the plant call list to notify those individuals of the Emergency Organization needed to meet initial activation requirements. The EOF Manager will be notified in accordance with NMP-EP-110, "Emergency Classification Determination and Initial Action".</p>	<p>EP B.1.1 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, at their discretion or when procedurally required, activates the ERO.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>During hostile action based events, 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.</p>	<p>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:</p> <ul style="list-style-type: none"> • Communicate with the Control Room, Security, and the EOF. • Conduct engineering assessment activities including damage control team planning and preparation. <p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Criteria for the activation of the Technical Support Center, Operations Support Center, and Emergency Operations Facility are shown in Table 4.</p>	<p>EP Figures B.2.B through B.2.E</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>1. Technical Support Center Activation</u> The onsite emergency response organization which will be directed from the TSC is described in Section II. The TSC will be staffed and ready to receive emergency response functions by the following on-call individuals within 75 minutes following declaration of an emergency requiring TSC activation: Emergency Director TSC Manager Operations Supervisor Health Physics Supervisor Engineering Supervisor Maintenance Supervisor ENN Communicator.</p>	<p>EP H.1 Onsite Emergency Response Facilities SNC-operated nuclear power plants have established a Technical Support Center (TSC) and an onsite Operations Support Center (OSC), which are staffed and activated within 75 minutes of the declaration of an Alert or higher classification. EP Figure B.2.B</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Within eight hours of the declaration of the emergency one full complement of personnel as designated above will be available to relieve the TSC personnel.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>There shall be sufficient personnel available within 16 hours of the declaration of the emergency to ensure that the TSC can be staffed on a 24-hour-a-day basis for at least one week</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>2. Operations Support Center (OSC) Activation</u> The Operations Support Center will be staffed and ready to provide support to the emergency response effort as directed by the Emergency Director within 75 minutes following declaration of an emergency requiring OSC activation.</p>	<p>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. EP Figure B.2.C</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan. See separate justification related to augmentation timeliness.</p>
<p>Other members of the Emergency Organization arriving at the plant will report to their assigned assembly areas.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The Plan specifies reporting responsibilities for members of the ERO and assembly/evacuation responsibilities for all others.</p>
<p>Within 8 hours after declaration of an emergency, sufficient personnel shall be available in the OSC to ensure that shift personnel can be relieved by qualified individuals.</p>	<p>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. EP Figure B.2.C</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Within 16 hours after declaration of an emergency, sufficient personnel shall have been notified and placed on-call to ensure that the OSC can be staffed on a 24-hour-a-day basis for at least one week.</p>	<p>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. EP Figure B.2.C</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>3. Emergency Operations Facility (EOF) Activation</u> The corporate emergency response organization which will be activated to respond from the EOF is described in Appendix 7(G).</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>4. Alternative Facility Activation</u> 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 assessment and offsite notifications will be performed by the EOF. Procedural guidance for the alternative facility is provided in NMP-EP-135, Alternative Facility Setup and Operation.</p>	<p>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:</p> <ul style="list-style-type: none"> • Communicate with the Control Room, Security, and the EOF. • Conduct engineering assessment activities including damage control team planning and preparation. <p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>C. OFFSITE CORPORATE ORGANIZATION ACTIVATION</u> The corporate emergency response organization which will be directed from the EOF is described in Appendix 7(G). The corporate Emergency Communication Organization activation is described in Appendix 10(J).</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>D. OFFSITE LOCAL, STATE AND FEDERAL AGENCIES</u> Notification of offsite governmental agencies is discussed in Section VI. Activation of the state agencies is discussed in their respective plans.</p>	<p>EP H.3 State and local Emergency Operations Centers (EOC) EOCs operated by the state and by local communities allow direction and control of emergency response functions. The states' EOCs are capable of continuous (24-hour) operations for a protracted period. The county EOCs serve as Command and Control headquarters for local emergency response activities as well as a center for the coordination of communications to field units and to the state EOCs. Additional details for state and county EOCs are in the state and county emergency plans.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Section VI: Figure 24 illustrates the order and responsibilities for notification in the event of an emergency.</p>	<p>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 Section 4.1.1: State and local counties surrounding FNP will be notified within 15 minutes of the declaration of an emergency condition <u>State of Alabama:</u> <ul style="list-style-type: none"> • Alabama Emergency Management Agency (AEMA). <u>Alabama County Authorities</u> <ul style="list-style-type: none"> • Houston County Sheriff's Dispatcher's Office. <u>State of Georgia:</u> <ul style="list-style-type: none"> • Georgia Emergency Management Agency (GEMA), <u>Georgia County Authorities:</u> <ul style="list-style-type: none"> • Early County Sheriff's Dispatcher's Office. </p>	<p>The commitment/process of notification was maintained as currently described in Figure 24 of the Farley Plan. The figure was deleted and the process described in words in the Plan/Annex sections.</p>

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Table 3 No title (Facility Staffing)	<p>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. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned onsite emergency response positions will receive training specific to their position.</p> <p>EP O.4.1 Emergency Response Organization (ERO) ERO members will receive Emergency Plan training on an annual basis. Personnel identified receive training appropriate to their position in the areas of:</p> <ul style="list-style-type: none"> • Accident assessment. • Accident mitigation. • Notifications. • Emergency Classifications. • Protective Action Recommendations. • Emergency Action Levels. • Emergency Exposure Control. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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Table 4: Emergency Facility Activation	<p>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). 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.</p>	The wording was relocated and transferred to the SNC Standard Emergency Plan.
<p><u>VI. NOTIFICATION PROCEDURES</u> FNP-0-EIP-8.1, "Emergency Phone Directory", contains a listing (updated quarterly) of the names, addresses, and telephone numbers of the individuals and organizations referred to in this section. A copy of FNP-0-EIP-8.1 will be maintained in the control room and by the on-call Emergency Director.</p>	<p>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. Reliable primary and backup means of communication have been established. The use of the communications systems during normal and emergency conditions has been integrated into plans, procedures, and the training program.</p>	The wording was relocated and transferred to the SNC Standard Emergency Plan.
Figure 24 illustrates the order and responsibilities for notification in the event of an emergency.	No equivalent Plan/Annex figure	The Plan provides the commitment for the various notification types and processes required to effectively implement the Emergency Plan.

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<p>An authentication method is used to verify any notifications made by FNP utilizing commercial telephones.</p>	<p>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. These notifications include a means of verification or authentication. The methods used for authentication are developed and mutually agreed to by the utility and offsite authorities.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>A. STATE AND LOCAL AGENCY NOTIFICATION</u> The Emergency Director is responsible for notifying the Alabama Emergency Management Agency and the Georgia Emergency Management Agency of all declared emergencies. The Alabama Emergency Management Agency will notify the Alabama Radiation Control Office of the State of Alabama Department of Public Health who will in turn notify the Florida Division of Emergency Management.</p>	<p>EP B.1.1 The Emergency Director's non-delegable duties include:</p> <ul style="list-style-type: none"> • Notifications of offsite agencies and approval of state, /local, and NRC notifications). 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>In addition to these State notifications, the Emergency Director will notify local emergency management agencies in Houston County, Alabama and Early County, Georgia utilizing the Emergency Notification Network or commercial telephone.</p>	<p>EP B.1.1 The Emergency Director's non-delegable duties include:</p> <ul style="list-style-type: none"> • Notifications of offsite agencies and approval of state, local, and NRC notifications). 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>NMP-EP-111, "Emergency Notifications", contains the initial messages that will be used by the Emergency Director to notify the state and local agencies for the different classifications of emergencies. The content of emergency messages has been mutually agreed upon with State and Local agencies. The procedure to be followed for message authentication is contained in NMP-EP-111, "Emergency Notifications." These initial messages shall contain, at a minimum the following if applicable and available:</p> <ol style="list-style-type: none"> 1. Class of emergency 2. Actual or potential release information 3. Potentially affected population 4. Advisability of protective measures 	<p>EP E.2.2.2: 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 EIPs. The content of the forms has been reviewed and agreed on by the respective Offsite Response Organizations.</p>	<p>The description of the initial message was standardized between the SNC sites and expanded to better align with current guidance.</p>

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<p>Required follow-up message information has been agreed upon by the states. NMP-EP-111 makes provisions for follow-up messages to be sent to the states. These messages contain the following information as appropriate:</p> <ol style="list-style-type: none"> 1. Location of incident and name and telephone number (or communications channel identification) of caller 2. Date/time of accident 3. Class of emergency 4. Type of actual or projected release (airborne, liquid) and estimated duration times 5. Estimate of quantity of radioactive material released or being released and the height of release 6. Chemical and physical form of released material, including estimates of the relative quantities and concentrations of noble gases, iodines, and particulates 7. Meteorological conditions (wind speed, direction (from), stability classification; form of precipitation, if any) 8. Projected dose at site boundary 9. Projected dose at about 2, 5, and 10 miles 10. Emergency response actions underway 11. Recommended emergency actions, including protective measures in sector(s) affected 12. Prognosis for worsening or termination of event based on plant information 	<p>EP E.2.2.3: The Emergency Director is responsible for the completion of a follow-up emergency message. The appropriate support coordinator will ensure the emergency communicator(s) periodically provide follow-up messages to the appropriate offsite federal, state, and local authorities.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p><u>B. PLUME EXPOSURE PATHWAY EMERGENCY PLANNING ZONE PUBLIC NOTIFICATION AND INFORMATION</u></p> <p>1. Notification</p> <p>a. Primary</p> <p>Southern Nuclear Operating Company has provided the administrative and physical means for alerting and providing prompt instructions to the public within the plume exposure pathway EPZ by providing an Alert and Notification System (ANS) for the entire plume exposure pathway EPZ. Primary alerting is accomplished by use of a siren system. The siren alerting system consists of 89 pole mounted sirens. Each siren operates on battery power with battery charge maintained through an inverter that receives power from the local electrical grid or from a solar panel. Each siren site contains two radios - one for the primary radio signal frequency operating in the UHF band and one for the backup radio frequency operating in the VHF band. Repeaters for the primary and backup radio frequencies are provided on two separate radio towers with associated power, control, and radio communication provided. Siren system activation, test, and monitoring panels are provided at each for the counties of Houston and Henry County, Alabama; one for Early County, Georgia; and one for the State of Georgia.</p>	<p>EP E.2.5: 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.</p> <p>Annex 4.2: Within the Plume Exposure Emergency Planning Zone (EPZ), there exist provisions for alerting and providing notification to the public.</p> <p>Annex 4.2: Siren system activation, test, and monitoring panels are provided for Houston County and Henry County in Alabama, Early County in Georgia, and the state of Georgia.</p>	<p>The wording was standardized and aligned with current wording. Specific requirement for the communities is maintained in the revised description in the Site Annex.</p>

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<p>Residents in the plume exposure pathway EPZ have been instructed to tune to specific emergency alert radio or TV stations if the sirens are activated.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p>Following activation of the siren system, emergency notifications will be made to the public within the 10 mile plume exposure pathway EPZ by activation of the Emergency Alert System (EAS). State and local Emergency Management Agencies will initiate activation of the local EAS stations through a dedicated EAS activation console. The EAS activation console provides a connection to designated EAS stations that allows for activation of the station through redundant communications pathways. Emergency messages are transmitted from the EAS activation console via phone line, internet, or satellite connections. Activation of the station does not require that the station be manned. Emergency messages are coordinated between the local Emergency Management Agencies and the State Emergency Management Agencies prior to activation of the local radio stations, as specified in the local area plans. A full description of the Farley ANS design is provided in the FEMA approved ANS Design Report (ANS-FNP-001) in the SNC document management system.</p>	<p>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 panels are provided for Houston County and Henry County in Alabama, Early County in Georgia, and the State of Georgia. A full description of the Farley ANS design is provided in the FEMA approved ANS Design located in the SNC document management system.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>b. Special Alerting and System Backup</u> 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 at each for the counties of Houston and Henry, Alabama, at Early, Georgia, and for the State of Georgia.</p>	<p>Annex 4.2 Special alerting uses 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 of the installed siren system and the notification capability of local radio and television stations through EAS. Capability to activate of the calling system is provided for Houston County and Henry County, Alabama and Early County, Georgia.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>2. Information Processes for dissemination of information to local news media and the public annually are discussed in the Emergency Communications Plan, Appendix 10(J).</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>3. News Release Coordination and Rumor Control</u> Processes for news release coordination and rumor control are discussed in the Emergency Communications Plan, Appendix 10(J).</p>	<p>EP G.3 News Releases The Utility will issue news releases covering events, conditions, and actions at the Plant. News releases are designed to be a written confirmation of events and are public information. The SNC News Writer will write news releases in the EOF and obtain SNC approval from the EOF Manager, then forward them to the JIC as appropriate. The Facility Manager at that location will obtain communications approval and direct distribution of the release.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>C. NRC OFFICE OF INSPECTION AND ENFORCEMENT</u> The Emergency Director or his designee will notify the Nuclear Regulatory Commission of any emergency condition utilizing the Emergency Notification System.</p>	<p>EP B.1.1 The Emergency Director's non-delegable duties include:</p> <ul style="list-style-type: none"> • Notifications of offsite agencies and approval of state, local, and NRC notifications. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Section VI.D: If conditions warrant, immediate assistance will be requested by the Emergency Director from the DOE Savannah River Operations Office</p>	<p>EP A.1.4: The DOE has agreed to provide radiological assistance on request, and has radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident. The Interagency Radiological Assistance Team can be expected to respond to SNC operated sites as directed by the Savannah River Operations Office of DOE.</p>	<p>Commitment wording was standardized within the three SNC sites and relocated without process change to the SNC Standard Emergency Plan.</p>
<p><u>F. FIRE</u></p>		

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<p><u>VII. RECOVERY</u> <u>A. METHODOLOGY</u> Due to the unforeseeable conditions that would exist in an emergency condition, specific recovery criteria and procedures will be developed when required, considering maximum protection for plant personnel and the general public consistent with reasonable efforts to restore the affected Unit and continuing operation of the unaffected unit.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>The decision to relax protective measures will be based upon a comprehensive review of plant system parameters. These shall include but not be limited to the following:</p> <ol style="list-style-type: none"> 1. Stability of the reactor shutdown condition i.e., successful movement toward a cold shutdown condition. 2. Integrity of the reactor containment building. 3. Operability of radioactive waste systems and decontamination facilities. 4. The availability and operability of a heat sink. 5. The integrity of power supplies and electrical equipment. 6. The operability and integrity of instrumentation including radiation monitoring equipment. In the latter instance this shall include portable equipment assigned to the emergency. 7. Availability of trained personnel and support services. 	<p>EP M.1: The following guidelines, as applicable to the specific situation, will be addressed prior to terminating the emergency:</p> <ul style="list-style-type: none"> • 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. 	<p>The SNC Standard Emergency Plan establishes standard wording for the consideration of the relaxation of protective measures.</p>

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<p>The Emergency Director will analyze the input from his advisors in the areas listed above to determine if plant restoration efforts can begin. The following criteria shall be considered appropriate for the consideration of relaxation of protective measures:</p> <ol style="list-style-type: none"> 1. Plant parameters of operation no longer indicate a potential or actual emergency exists. 2. The release of radioactivity from the plant is controllable and no longer exceeds permissible levels and no danger to the public from this source is credible. 3. The plant is capable of sustaining itself in a long term shutdown condition. 4. Plant entry and clean-up is possible without workers receiving in excess of their permissible exposures. 	<p>EP M.1 The following guidelines, as applicable to the specific situation, will be addressed prior to terminating the emergency:</p> <ul style="list-style-type: none"> • 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. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>B. ORGANIZATION</u> The recovery organization which will conduct the activities of returning the plant toward its pre-emergency condition to the extent reasonable is described in Section II.B.3.</p>	<p>EP M.1 The Recovery Manager will structure the recovery organization to accomplish the following general objectives:</p> <ul style="list-style-type: none"> • 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. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>C. NOTIFICATION</u> The Emergency Director shall notify the Vice President – Nuclear Plant Site and company management that a decision has been reached to initiate a recovery operation. The ED shall then notify offsite agencies' representatives ensuring the NRC, and state and local authorities are provided with the same information. He shall also inform these agencies if any change in the structure of the recovery organization is to occur.</p>	<p>EP M.3 Recovery Notification Members of the ERO will be informed when Recovery is initiated. The recovery organization may be structured like the emergency response organization, with additional modifications depending on the nature of the accident, post-accident conditions, and other factors. The State EOC will be advised when the plant deems it safe to begin the reentry phase of the offsite recovery operation. If the Governor ordered an evacuation, the law requires the Governor to officially rescind the order before any return can be made to evacuated areas. The states are responsible for coordinating reentry procedures for the offsite population.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>VIII. MAINTAINING EMERGENCY PREPAREDNESS</u> <u>A. EXERCISES AND DRILLS</u> Periodic drills and exercises will be conducted as described below. The scenarios for use in these drills will include the following elements:</p> <ul style="list-style-type: none"> • The basic objective, • The date, time, place(s) and participating organizations, • The simulated event, • A time schedule of real and simulated events, • A narrative summary describing conduct of the drill. 	<p>EP N.2.1 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:</p> <ul style="list-style-type: none"> • 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. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>Monitoring personnel shall be stationed at various locations to observe each individual's ability to perform his assigned emergency function. During drills and Nuclear Regulatory Commission (NRC) non-evaluated exercises, on-the-spot correction of erroneous performance and a demonstration of proper performance may be made by the monitoring personnel.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>1. Radiation Emergency Exercises a. Exercises simulating radiation emergencies will be conducted on a frequency consistent with 10 CFR 50, Appendix E.IV.F. These scenarios will be varied from exercise to exercise such that all major elements of the plans and emergency organizations are exercised at least once every 8 years. These exercises will be preplanned with the following purposes:</p> <ol style="list-style-type: none"> 1) To determine the effectiveness of the FNP emergency organization in handling emergencies, 2) To evaluate communications and action support with offsite agencies, 3) To evaluate the interface with and the response of the Company Emergency Organization, 4) Test the adequacy, timing, and content of the EIPs, 5) Test emergency equipment and communications networks, 6) Test the public Alert and Notification System, 7) Keep affected personnel aware of their role in the plan. 	<p>EP N.2.1 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 activities such as:</p> <ul style="list-style-type: none"> • 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. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>b. Both full-scale and small-scale exercises will be conducted and will include participation by appropriate State and local government agencies as follows:</p> <p>1) A full scale exercises which tests as much of the Plant Farley, 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.</p> <p>(a) Biennial exercise scenarios will be submitted to the NRC under § 50.4 at least 60 days before use in the biennial exercise.</p> <p>(b) 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.</p> <p>(c) Biennial evaluated exercises will be varied such that the following scenario elements are demonstrated over the course of an 8-year exercise cycle:</p> <ul style="list-style-type: none"> • 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. 	<p>EP N.3</p> <p>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:</p> <ul style="list-style-type: none"> • 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 on-site 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. <p>Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations. A record of exercises conducted during the 8-year exercise planning cycle that documents the contents of scenarios used during that cycle shall be maintained in accordance with Drill and Exercise procedure guidance. SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>(d) An ingestion pathway exercise will be conducted on a frequency to ensure the States have the opportunity to participate in an ingestion pathway exercise at least once every exercise cycle.</p>	<p>EP N.1.3 Ingestion Exposure Pathway Exercise States within an ingestion exposure pathway EPZ are expected to exercise plans and preparedness related to ingestion exposure pathway measures at least once every 8 years. Opportunities are provided to any state or local government located within the plume exposure pathway EPZ to participate in annual drills and biennial exercises when requested by that state or local government.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>2) A small scale exercise will be conducted each year that a full scale drill is not conducted. This small scale exercise will include a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities and tests at least one other component (e.g., medical or offsite monitoring) of the offsite emergency response plans for the company and State and local agencies within the plume exposure pathway EPZ. The principal functional areas of emergency response include:</p> <ul style="list-style-type: none"> • 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. 	<p>EP N.2.1 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 activities such as:</p> <ul style="list-style-type: none"> • Management and coordination of emergency response. • Accident assessment. • Event classification. • Notification of offsite authorities; • Assessment of the on-site and offsite impact of radiological releases. • Protective action recommendation development. • Protective action decision making. • Plant system repair and corrective actions. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>c. For Nuclear Regulatory Commission (NRC) evaluated exercises, the NRC will be provided with a description of exercise objectives at least 75 days prior to the exercise. Participation in the exercise by the NRC shall be at their discretion.</p>	<p>EP N.3 SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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d. The Alabama Emergency Management Agency will provide FEMA with a description of exercise objectives at least 90 days prior to a FEMA evaluated exercise. Participation in the exercise by FEMA shall be at their discretion.	No equivalent Plan/Annex statement.	The rule change directing submittal to the Nuclear Regulatory Commission by the site effectively separates the need to identify the offsite requirements for submittal.

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<p>a. Periodic Emergency Drills</p> <p>1) 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.</p> <ul style="list-style-type: none"> • 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., PWR). • 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. 	<p>EP N.3</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <p>Drills and exercise scenarios will be varied from year to year to test major components of the plans and preparedness organizations. A record of Exercises conducted during the 8-year exercise planning cycle that documents the contents of scenarios used during that cycle shall be maintained in accordance with Drill and Exercise procedure guidance.. SNC sites submit Biennial Exercise scenarios under 10 CFR 50.4 for NRC review 60 days prior to the exercise.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>b. Fire Drills</u> 1) Fire Drills will be conducted with fire brigade members as required by the plant's FSAR. 2) Fire Drills will be conducted annually which will involve the Dothan Fire Department.</p>	<p>EP N.2.3: Fire drills will be conducted at nuclear plants in accordance with Plant Technical Specifications and Plant procedures. Annex 2.3.1: Fire Drills will be conducted annually and will involve the Dothan Fire Department.9</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan and Site Annex</p>
<p><u>c. Medical Emergency Drills</u> A medical emergency drill will be conducted annually which will involve ambulance and offsite medical treatment facility participation.</p>	<p>EP N.2.4: 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.</p>	<p>The commitment was relocated unchanged to the SNC Standard Emergency Plan.</p>
<p><u>d. Radiological Monitoring Drills</u> Radiological monitoring drills will be conducted annually which will include initiating onsite and offsite radiological monitoring of vegetation, soil, water, and air.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>e. Health Physics Drills</u> Health Physics drills will be conducted semiannually which will involve response to simulated elevated airborne and liquid samples and direct radiation measurements in the plant environment. Analysis of reactor coolant samples including use of the post accident sampling system will be conducted annually.</p>	<p>EP N.2.6: 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.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>

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<p>f. Appropriate local, state, and federal agencies will be advised of major drills in advance to allow their observation or participation. All observing or participating agencies will be requested to provide comments on drill evaluation and it will be the responsibility of the Plant Manager to implement corrective action as appropriate.</p>	<p>EP N.3 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. EP N.4 Exercise Evaluation and Critique 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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>3. Evaluations and Corrective Actions</u> A formal critique will be performed for all exercises, drills, and training that provide performance opportunities to develop, maintain, or demonstrate key skills in order to identify weak or deficient areas that need correction. All observing or participating agencies will be requested to provide comments on drill evaluation. Any weaknesses or deficiencies that are identified in a critique of exercises, drills, or training will be corrected. Corrective action, as appropriate, for company onsite and offsite weaknesses shall be the responsibility of the Vice President-Nuclear Plant Site. Corrective action, as appropriate, for company public information weaknesses shall be the responsibility of the APC Public Relations Senior Vice President and the SNC Vice President and General Counsel.</p>	<p>EP N.5 Exercise/Drill Corrective Actions The critique and evaluation process is used to identify areas of the Emergency Preparedness Program that require improvement. The Emergency Preparedness group is responsible for evaluating recommendations and comments, determining which items will be incorporated into the program or require corrective actions, and for scheduling, tracking, and evaluation of item resolution. Whenever exercises or drills indicate deficiencies in the SNC Standard Emergency Plan, site-specific Annexes, corresponding implementing procedures, or training lesson plans, such documents will be revised as necessary. The results of exercise critiques, particularly comments on identified areas that require improvement or reevaluation, will be submitted to the Emergency Preparedness Supervisor or designee, for review. The Emergency Preparedness Supervisor or designee will consult with responsible department heads and assign corrective action activities, as appropriate.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>B. TRAINING 1. Training of the Plant Emergency Organization All Farley Nuclear Plant personnel, including those assigned on a temporary basis or in a training status, will receive a thorough orientation on all emergency plans and procedures required to ensure their safety. Changes in emergency plans and EIPs applicable to all plant personnel will be presented using training notices or other appropriate means.</p>	<p>EP O.4.8: General Employee Training (GET). GET will include general training in emergency preparedness for plant and other site personnel.</p>	<p>The SNC Standard Emergency Plan standardizes wording for generic emergency preparedness training and specifies a location for the training without change in intent.</p>
<p>Persons with specific duties during an emergency will receive additional training appropriate to their respective assignments. The responsibility for coordinating their training is that of the Plant Training Manager.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>Continuing training will be provided to all personnel as described below: Specific training that will be conducted is listed below: a. Emergency Director Training (annually) members of the plant staff who may serve as Emergency Director will receive training in: 1) Supervision of emergency teams, 2) Emergency assessment including interpretation of data and estimation of radiation exposure, 3) Coordination and communication with offsite groups.</p>	<p>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. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned on-site emergency response positions will receive training specific to their position.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>b. Field Monitoring Team Training (annually) This training will be given to plant and vendor personnel that may be required to perform surveys in-plant, on the environment, or at SAMC. It will include instruction in the selection and use of survey instruments and air sampling equipment and in re-entry criteria.</p>	<p>EP O.4.3 Radiological Field Monitoring Teams Radiological Field Monitoring Team personnel will receive classroom and hands-on training for the actions they will be expected to perform during an emergency. The following general topics will be included in the training:</p> <ul style="list-style-type: none"> • Equipment and equipment checks. • Communications. • Plume tracking techniques. • Personnel monitoring. • Emergency exposure criteria. • Locations and use of radiological emergency equipment. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>c. First Aid Training (triennially) Plant personnel will be considered first aid qualified upon successful completion of the Company's - First Aid and CPR Course.</p>	<p>EP O.4.6 Medical Support On-site medical personnel receive specialized training in the handling of contaminated victims and hospital interface. Offsite ambulance and hospital personnel are offered annual training as outlined in Section O.1.1.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>d. Fire Control (per FSAR requirements) A training program for the plant employees that serve on fire fighting teams is conducted under the direction of the Plant Training Manager. This course covers methods and equipment for fighting all types of fires that could occur on the site. Appropriate emphasis is placed on the radiological aspects of fire fighting. Drills and critiques are conducted periodically to train Fire Brigade personnel and to maintain their efficiency.</p>	<p>EP O.4.4 Fire Brigade Training Individuals assigned to Fire Brigade shall maintain fire brigade qualifications.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>e. Emergency Repair Party Training (annually)</u> Maintenance and I and C personnel who may be assigned to the Emergency Repair Party receive training in Radiation Control Procedures as part of their normal plant training. Personnel selected for Emergency Repair Party work will possess the required journeyman skills for the particular activity.</p>	<p>EP O.4.5 Operations, Maintenance, Chemistry, and Radiation Protection Training Operations, Maintenance, Chemistry, and Radiation Protection personnel who would be assigned to Repair and Damage Control Teams are trained as part of their normal job-specific duties to respond to both normal and abnormal plant operations.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>f. Security Personnel (annually)</u> Security personnel will receive training on FNP-0-EIP-7, "Security Support to the Emergency Plan", including personnel evacuation and accountability, access control, vehicle escort, and bomb search activities. Personnel will also receive training on Contingency Implementing Procedure 13 covering security activities during fire, explosion, or other catastrophe.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The SNC Standard Emergency Plan maintains the commitment to train all personnel assigned Emergency Plan requirements in addition to those not assigned to the ERO. Security training requirements are also controlled in the Security Plan.</p>
<p><u>g. Communications Personnel (annually)</u> Personnel responsible for the transmission of emergency information and instructions will receive training in accordance with Appendix 10(J).</p>	<p>EP O.4.7 News Media Training Local news media personnel will be offered an annual training opportunity as described in Section G.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>2. Training of the Corporate Emergency Organization</u> Information related to corporate emergency organization training is provided in Appendix 7(G).</p>	<p>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. Requalification training for onsite ERO members consists of an annual review of the Emergency Plan in the form of a general overview. In addition to SNC Emergency Plan overview training, personnel assigned on-site emergency response positions will receive training specific to their position.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>3. Training of Local Services Groups</u> Offsite groups, such as fire departments, police and sheriff's departments, and ambulance services, that may participate in onsite activity will be encouraged to attend a training course to ensure that they are familiar with the plant layout and their actions in the event of radiological and non-radiological incidents. The Plant Training Manager is responsible for coordinating this training.</p>	<p>EP O.1.1 Training of Local Services Groups A training opportunity will be offered annually for offsite organizations and agencies as specified in respective agreements and understandings. In addition, those offsite organizations and agencies that may provide onsite emergency assistance will be encouraged to become familiar with the general layout of SNC plants, and will be invited to attend applicable Emergency Plan training and orientation courses. Annually, training will be offered for hospital personnel, ambulance and rescue personnel, police, and fire departments. The training shall include the procedures for notification, basic radiation protection, and their organizations' expected role.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>4. Training of SNC Emergency Planners</u> The EP Supervisor, Emergency Planning Coordinator, and other individuals with emergency planning responsibilities are trained by self-study and by attending industry seminars, short courses, workshops, etc.</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p><u>C. INSPECTION, CALIBRATION AND TESTING OF EMERGENCY EQUIPMENT AND SUPPLIES</u> To insure the operational readiness of emergency supplies and equipment the following will be performed:</p> <ol style="list-style-type: none"> 1. Periodic calibration using manufacturers' recommendations as guidelines on all portable emergency instrumentation designated for emergency use. This includes both onsite equipment and offsite equipment at SAMC supplied by APC/SNC. 2. Inspection quarterly of all onsite and SAMC emergency equipment and supplies designated for emergency use and supplied by APC/SNC. The purpose of the inspection is to ensure that the inventory is correct, that the supplies are functional and that instrument calibration is current. 3. An adequate reserve of emergency equipment will be maintained to allow for equipment taken out of service for repair, calibration, or replacement. 	<p>Annex 5.5 Emergency Kits (SEP H.9) Emergency supplies and equipment are located at various places at the plant. 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.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>

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<p><u>4. Communications Checks</u> a. Communications checks will be performed monthly with all locations which are part of the Emergency Notification Network.</p>	<p>Annex 5.4 Communication channels with the state of Alabama, 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. ERDS is tested each calendar quarter. Communications procedures and systems are also tested each calendar year.</p>	<p>The wording was relocated and transferred to the Site Annex.</p>
<p>b. The Emergency Notification System shall be tested at least monthly. c. The telephone numbers of organizations listed in FNP-0-EIP-8.1 will be updated quarterly and verified annually.</p>	<p>EP F.3 Communications Tests Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages in the test.</p> <ul style="list-style-type: none"> • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>d. The EOF/TSC/OSC conference capability will be tested at least annually.</p>	<p>EP F.3 Communications Tests Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages utilized in the test.</p> <ul style="list-style-type: none"> • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>e. Radio communication equipment for Field Monitoring Team communications will be tested at least annually.</p>	<p>EP F.3 Communications Tests Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages utilized in the test.</p> <ul style="list-style-type: none"> • Communication from the Control Room, TSC, and EOF to the NRC Operations Center will be tested monthly. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>

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<p>e. The public Alert and Notification System will undergo a full activation test at least annually.</p>	<p>EP F.3 Communications Tests Communications tests will be conducted on the frequency specified below. Each of these tests includes provisions to ensure participants in the test are able to understand the content of the messages utilized in the test.</p> <ul style="list-style-type: none"> • The fixed siren portion of the Alert and Notification System (ANS) will be tested and verified in accordance with existing FEMA approvals. 	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p><u>D. REVIEW AND UPDATING OF THE PLAN AND PROCEDURES</u> Responsibility for the planning effort, including review and updating of the emergency plans and procedures, is described in Appendix 9(I).</p>	<p>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.</p>	<p>The wording was relocated and transferred to the SNC Standard Emergency Plan.</p>
<p>APPENDIX 1(A) EMERGENCY SUPPLIES AND EQUIPMENT</p>		<p>The SNC Standard Emergency Plan and Annex maintain the commitment to perform the functions required to implement the Emergency Plan. Equipment and supplies necessary to perform those functions are maintained in the procedure and surveillance processes.</p>
<p>APPENDIX 2(B) INDEX Letters of Agreement on File</p>		<p>The agencies for which LOA are maintained are incorporated in the description of provided services in the respective sections of the SNC Standard Emergency Plan and Site Annex. A separate listing of LOAs is no longer required.</p>
<p>APPENDIX 3(C) RADIATION MONITORING SYSTEM</p>		<p>The SNC Standard Emergency Plan and Annex maintain the commitment to perform the functions required to implement the Emergency Plan. Equipment and supplies necessary to perform those functions are maintained in the procedure and surveillance processes.</p>

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APPENDIX 4(D) I. EMERGENCY PLAN PROCEDURES		The SNC Standard Emergency Plan and Annex will be implemented through a function-based procedure scheme developed parallel with the approval and implementation process as part of this submittal.
APPENDIX 5(E) EVACUATION TIME ESTIMATES FOR THE FARLEY NUCLEAR PLANT	Annex Appendix A	The wording was relocated and transferred to the Site Annex.
APPENDIX 6(F) SUPPORTING EMERGENCY PLANS	Annex Appendix C	The wording was relocated and transferred to the Site Annex.
APPENDIX 7(G) EMERGENCY OPERATIONS FACILITY	The information is in the Standard SNC Standard Emergency Plan and Farley Annex.	The SNC Standard Emergency Plan incorporates the Central EOF into the overall Plan and addresses EOF functions in the respective Plan areas rather than as a separate appendix.
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 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

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<p>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.</p>	<p>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 Technical Support Center (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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>The SNC Standard Emergency Plan integrates the Corporate response as part of the trained and qualified ERO. A separate statement is not necessary.</p>
<p>Appendix 7 A.3: The EOF will be activated for an ALERT, SITE AREA or GENERAL emergency classifications.</p>	<p>EP H.2.1: Staffing and activation of the EOF is mandatory upon declaration of an Alert or higher classification.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>Appendix 7 A.3: This facility (EOF) will be operational within about an hour of the initial notification.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p> <p>The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.</p>
<p>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.</p>	<p>No equivalent Plan/Annex statement.</p>	<p>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.</p> <p>The change in activation times will be justified separately in the Technical Analysis Section of this License Amendment Request.</p>

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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 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.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.	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.
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.

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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.
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	EP B.3.1.2 EOF Manager The EOF Manager reports to the EOF ED and is responsible for managing and directing EOF activities, developing recovery plans, procuring outside services and equipment as necessary, coordination with offsite agencies, and approving news releases. 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 wording was standardized and relocated to the SNC Standard Emergency Plan.

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<p>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.</p>	<p>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.</p>	<p>General statement on activation of the ERO is sufficient for staffing.</p>
<p>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.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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

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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 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 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.
Appendix 7 B.4: The TSC will initially be responsible for dose projection and field team control activities.	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.

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<p>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.</p>	<p>Figure B.2.A 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.</p>	<p>Figure B.2.A describes the transfer of non-delegable responsibilities between the ERFs. Section B.3 provides the overall responsibility of EOF responders.</p> <p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>EP B.3.1.11: The 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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>EP B.3.1.12: 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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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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.
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 using 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.

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Appendix 7 D.1: Data is also available to all state agencies responding to the EOF.	<p>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.</p>	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.	<p>SECTION I: ACCIDENT ASSESSMENT 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.</p>	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.
Appendix 7 D.1: Data may also be obtained manually via telephone from the Control Room and the TSC to the EOF.	<p>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.</p>	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).	<p>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: Emergency Response Facility (ERF) Communicators</p>	The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.

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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.
Appendix 7 D.1: Computer workstations are dedicated for performing dose assessment for multiple sites.	No equivalent Plan statement.	Dose Assessment (Section I) describes the dose assessment function and equipment needed to support that function. Section B identifies required personnel.
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 within the ERO, for required offsite responders, and to the public through 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.

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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.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 Technical Support Center (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 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 with the document management section for SNC. The following records or information are available: <ul style="list-style-type: none"> • 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.

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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.

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<p>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.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> • Accident assessment. • Accident mitigation. • Notifications. • Emergency Classifications. • Protective Action Recommendations. • Emergency Action Levels. • Emergency Exposure Control. 	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>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.</p>	<p>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 has no purpose in the SNC Standard Emergency Plan.</p>

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>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.</p>	<p>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 or exercises shall:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>	<p>The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.</p>
<p>Appendix 7 G.1.2: EOF activation is required at least 3 times annually (1 scenario per site per year).</p>	<p>No equivalent Plan/Annex statement</p>	<p>The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.</p>
<p>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.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The SNC Standard Emergency Plan incorporates the EOF into the base Plan response. Separate drill criteria for the EOF are no longer required.</p>

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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: <ul style="list-style-type: none"> • 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: FARLEY NUCLEAR PLANT EMERGENCY PLAN NUREG 0654 CROSS REFERENCE INDEX	No equivalent Plan/Annex cross reference	The SNC Standard Emergency Plan and Annex are structured in the same manner as NUREG-0654 Revision 1. The Plan/Annex as reflected in the Table of Contents functions as the cross-reference.
APPENDIX 9(I) RESPONSIBILITY FOR THE PLANNING EFFORT	SECTION P: RESPONSIBILITY FOR THE PREPAREDNESS EFFORT	The commitment was relocated to the SNC Standard Emergency Plan as described below.

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<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) programs. Reporting to the Executive Vice President is the Vice President Fleet Operation Support and the Vice President - Nuclear Plant Site.</p>	<p>EP Section P Introduction: 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.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>No direct equivalent Plan/Annex statement</p>	<p>The SNC Standard Emergency Plan integrates the overall Emergency Planning/Preparedness effort. The distinction previously separating corporate and site responsibilities is eliminated.</p>
<p>The Vice President Regulatory Affairs has Fleet responsibility for emergency planning.</p>	<p>EP P.1: The Vice President Regulatory Affairs has Fleet responsibility for emergency planning.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>
<p>The Fleet Emergency Preparedness Manager has overview management responsibility for the Fleet SNC Emergency Planning program effort. 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.</p>	<p>EP P.1: The Fleet Emergency Preparedness Manager is responsible for the oversight of Emergency Planning activities and coordinating those activities with Licensee, federal, state, and local response organizations.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>

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<p>The Emergency Planning Coordinator(s) reports to the Fleet Emergency Preparedness Manager in support of this effort.</p>	<p>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. 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.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>
<p>The Emergency Plans are maintained by the Fleet Security and Emergency Preparedness Manager.</p>	<p>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 Fleet Emergency Preparedness organization in the SNC Corporate office provides oversight and support for site and corporate functions.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>
<p>The Fleet Emergency Preparedness Manager provides strategic direction for SNC emergency planning and coordinates with site management through the Vice President – Fleet Operations Support.</p>	<p>EP P.1: The Vice President Regulatory Affairs has Fleet responsibility for emergency planning.</p> <p>EP P.1: The Fleet Emergency Preparedness Manager is responsible for the oversight of Emergency Planning activities and coordinating those activities with Licensee and federal, state, and local response organizations.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>The Emergency Planning Coordinator(s) coordinate site input and involvement in emergency planning programs with the Emergency Preparedness Supervisor.</p>	<p>EP P.2 The Emergency Preparedness Supervisor is responsible for coordinating on-site emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>

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<p>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.</p>	<p>EP P.1 Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.</p>	<p>The commitment was relocated to the SNC Standard Emergency Plan.</p>
<p>Emergency Preparedness: The Vice President – (Nuclear Plant Site) is responsible for the site Emergency Preparedness aspects of the program..</p>	<p>EP P.2: The Vice President-(Site) is responsible for the site Emergency Preparedness aspects of the program.</p>	<p>The commitment was relocated unchanged to the SNC Standard Emergency Plan.</p>
<p>The Emergency Preparedness Supervisor is responsible for coordinating emergency preparedness activities onsite and supports offsite emergency preparedness activities in the vicinity of the plant.</p>	<p>EP P.2 The Emergency Preparedness Supervisor is responsible for coordinating onsite emergency preparedness activities and supports offsite emergency preparedness activities in the plant vicinity.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>The Emergency Preparedness Supervisor reports through the Regulatory Affairs Manager to the Vice President – (Nuclear Plant Site).</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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The Emergency Planning Supervisor is responsible to the Regulatory Affairs Manager for implementation of emergency planning strategies.	EP P.3 EIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.	The 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 the Emergency Preparedness Supervisor. The Emergency Preparedness Supervisor is responsible for the implementation of the Emergency Plan and procedure development and maintenance.	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.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Figure 1 shows the EP Organization.	EP Figure P.1	The 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 emergency planning responsibilities are trained by self-study and by attending industry seminars, short courses, workshops, etc.	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 wording was standardized and relocated to the SNC Standard Emergency Plan.
Onsite Emergency Plan Implementing Procedures (EIPs) are maintained by the Regulatory Affairs Manager with the Emergency Preparedness Supervisor being the principal site contact.	EP P.3 EIPs and administrative procedures for the Emergency Preparedness function are maintained by the Fleet Emergency Preparedness Director with a designated EP staff member as the principal contact.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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EIPs for the corporate emergency response organization and procedures governing fleet emergency planning activities 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager or designee performs a review of the site specific emergency plan annually and all onsite EIPs biennially. The review includes the letters of agreement, which are updated as necessary.	EP P.3 Once per calendar year, the designated Emergency Planning staff performs a review of the emergency plans for Southern Nuclear.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Fleet Emergency Preparedness Manager performs a review of the emergency plans for Southern Nuclear once each calendar year. The review includes a comparison for consistency of all emergency plans for the specific sites including the Security Plan, State, County, and the Savannah River Site plan, as appropriate.	EP P.3 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 wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency plans and EIPs are revised in accordance with applicable site procedures.	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 Emergency Plan, agreements and the EIPs are reviewed once per calendar year and updated as needed. These updates take into account changes identified by drills and exercises, and the independent review described below.	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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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 Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The Emergency Planning Coordinator will review Emergency Plan changes to determine if the effectiveness of the site specific plan has been reduced prior to submitting the proposed change for departmental review and subsequently to the PRB for approval.	EP P.1 Emergency Plan changes are reviewed to determine if the effectiveness of the specific plans have been reduced, in accordance with the requirements of 10 CFR 50.54q. Changes that are judged to reduce the effectiveness of the Plan will be submitted to the NRC for approval prior to implementation.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
As required by 10CFR50.54(t). An annual independent audit of the emergency preparedness program is conducted by the SNC Nuclear Oversight Department. This audit is conducted as part of the standard audit program and will include a review of the Emergency Plan, its implementing procedures and practices, emergency preparedness training, annual exercises, equipment, and emergency response facilities. In addition, an audit of the interfaces with offsite agencies is performed by the SNC Nuclear Oversight department.	EP P.3: An independent review of the EP program is conducted as required by 10 CFR 50.54(t).	The wording was standardized and relocated to the SNC Standard Emergency Plan.
Each audit is nominally conducted every 12 months.	EP P.3: An independent review of the EP program is conducted as required by 10 CFR 50.54(t).	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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<p>Audits are performed in accordance with SNC Nuclear Oversight department procedures. Audit reports are written and distributed to management and, in addition, applicable portions of the corporate audit reports are made available to affected Federal, State, and local agencies, as appropriate, in accordance with 10CFR50.54(t).</p>	<p>EP P.3: An independent review of the EP program is conducted as required by 10 CFR 50.54(t).</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>Appropriate departments are responsible for implementing corrective actions resulting from the audit findings. Records of these audits and exercise findings are maintained in accordance with plant procedures.</p>	<p>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. Management controls are implemented for evaluation and correction of the review findings. Records of these audits and recommendations are maintained for at least 5 years.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>In addition to this Plan, several other formal emergency plans have been developed to support the overall emergency response effort. These supporting plans and their sources are listed in procedure NMP-EP-300, SNC Corporate Emergency Preparedness, Conduct of Operations.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>APPENDIX 10(J) EMERGENCY COMMUNICATIONS PLAN</p>	<p>SECTION G: PUBLIC EDUCATION AND INFORMATION</p>	<p>The appendix describing the Emergency Communications Plan has been standardized and incorporated into the ERO Staffing as described in Section B, Facilities as described in Section H, the Emergency Communications portion of Section G of the SNC Standard Emergency Plan and Section 5.1.6 of the Farley Annex.</p>

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APPENDIX 11(K) ASSESSMENT ACTIONS	EP Section D Annex Section 3	The wording was standardized and relocated to the SNC Standard Emergency Plan and Site Annex
ASSESSMENT ACTIONS 1. CLASSIFICATION OF EMERGENCIES The classification system is based on the four emergency classes described in 10CFR50 Appendix E and NUREG 0654, established by the Nuclear Regulatory Commission (NRC), for grouping off-normal nuclear power plant conditions according to (1) their relative radiological seriousness, and (2) the time-sensitive onsite and off-site radiological emergency preparedness actions necessary to respond to such conditions	EP D.1.1.2 Emergency Classification Level Descriptions There are three considerations related to emergency classification levels. These are: (1) The potential impact on radiological safety, either as known now or as can be reasonably projected. (2) How far the plant is beyond its predefined design, safety, and operating envelopes. (3) Whether or not conditions that threaten health are expected to be confined to within the site boundary.	The wording was standardized and relocated to the SNC Standard Emergency Plan.
The existing radiological emergency classes, in ascending order of seriousness, are called: • Notification of Unusual Event (NOUE) • Alert • Site Area Emergency (SAE) • General Emergency (GE) The classes, therefore, determine initial steps to be taken by on site and by corporate emergency response personnel. The emergency classes are used by offsite authorities to determine which of the preplanned actions 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 four emergency classification levels are described as follows: UNUSUAL EVENT (UE) ALERT SITE AREA EMERGENCY (SAE) GENERAL EMERGENCY	The wording was standardized and relocated to the SNC Standard Emergency Plan.

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<p>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 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.</p>	<p>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. 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>The SNC classification scheme is based on NEI 99-01, Rev 4, Methodology for Development of Emergency Action Levels, January 2003 endorsed by Reg Guide 1.101, Rev 4, Emergency Planning and Preparedness for Nuclear Power Reactors. The Initiating Conditions lead each plant to a classification Implementing Procedure which contains the Threshold values for each Initiating Condition.</p>	<p>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.</p>	<p>This submittal does not change the current approved EAL scheme for Plant Farley.</p>

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<p>Each Initiating Condition has specific conditions associated that are termed Threshold Values. When an Initiating Condition is observed and the criteria of it's associated Threshold Values are met, an Emergency Action Level is met and the event is then classified and declared at the appropriate level.</p>	<p>EP D.2.1 An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant conditions. The ICs are segregated into Recognition Categories. 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>The SNC Classification procedures are written to classify events based on meeting the Initiating Condition (IC) and a Threshold Value (TV) for an EAL considering each Unit independently. During events, the ICs and TVs are monitored and if conditions meet another higher EAL, that higher emergency classification is declared and appropriate notifications made. Notifications are made on a site basis. If both units are in concurrent classifications, the highest classification would be used for the notification and the other unit classification noted on the notification form.</p>	<p>EP D.2.1 An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant conditions. The ICs are segregated into Recognition Categories. 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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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<p>At all times, when conditions present themselves that are not explicitly provided in the EAL scheme the Emergency Director has discretion to declare an event based on his knowledge of the emergency classes and judgment of the situation or condition.</p>	<p>EP D.2.1 Although the majority of the EALs provide very specific thresholds, the Emergency Director must remain alert to events or conditions that lead to the conclusion that exceeding the EAL is imminent. If, in the judgment of the Emergency Director, an imminent situation is at hand, the classification should be made as if the threshold has been exceeded.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>Once an emergency classification is made, it cannot be downgraded to a lower classification. All the actions associated with the emergency classification level must 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.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>The described emergency classes and the emergency action levels which determine them are agreed on by SNC and State and local authorities. The emergency action levels will be reviewed by these officials annually.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>a. Notification of Unusual Event 1. Description The classification of Notification of Unusual Event 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.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>2. Response In the event of a Notification of Unusual Event, the Shift Manager will assesses the conditions and implement the Classification EIP.</p>	<p>No equivalent Plan/Annex statement</p>	<p>The responsibilities of the Shift Manager with respect to Classification are provided in Section B of the Plan.</p>
<p>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 Nuclear Regulatory Commission (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.</p>	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position specific duties related to Classification Notification. Section E provides notification information.</p>

Enclosure 6 to NL-16-0169
 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>b. Alert 1. 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 alert 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.</p>	<p>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.</p>	<p>The wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>2. Response In the event of an Alert the Shift Manager will assess the conditions and implement the Classification EIP.</p>	<p>No equivalent Plan/Annex statement.</p>	<p>Section B provides the position specific duties related to Classification Notification. Section E provides notification information.</p>

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 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>The Emergency Organization will then perform the following:</p> <ol style="list-style-type: none"> 1) Within 15 min. of classification, inform State and local offsite authorities of Alert Emergency 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 emergency director. 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 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. 	<p>No equivalent Plan/Annex statement.</p>	<p>Section B provides the position specific duties related to Classification Notification.</p> <p>Section E provides notification information.</p>

Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>c. Site Area Emergency 1. Description The classification of Site Area Emergency 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 security events that result 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 Site Area Emergency classification are not expected to exceed EPA Protective Action Guideline exposure levels except near the site boundary.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>2. Response In the event of a Site Area Emergency, the Shift Manager will assess the conditions and implement the Classification EIP.</p>	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position-specific duties related to Classification Notification. Section E provides notification information.</p>

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 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>The Emergency Organization will perform the following:</p> <ol style="list-style-type: none"> 1) Within 15 min. of classification, inform State and local offsite authorities of Site Area Emergency 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. Technical Support Center (TSC), Operational Support Center (OSC), and the Emergency Operating Facility (EOF)). These actions may be delayed for security based events at the discretion of the emergency director. 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. 8) Provide release and dose projections based on available plant condition information and foreseeable contingencies. 	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position-specific duties related to Classification Notification.</p> <p>Section E provides notification information.</p>

Enclosure 6 to NL-16-0169
 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>The Emergency Organization will perform the following: (cont) 10) Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the Site Area Emergency. 11) Escalate to General Emergency, if appropriate, or close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.</p>	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position-specific duties related to Classification Notification.</p> <p>Section E provides notification information.</p>
<p>d. General Emergency 1. Description The classification of General Emergency 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 security events that result in an actual loss of physical control of the facility. Release of radioactive material for the General Emergency classification can reasonably be expected to exceed EPA Protective Action Guideline exposure levels offsite for more than the immediate site area.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>2. Response In the event of a General Emergency the Shift Manager will assess the conditions and implement the Classification EIP.</p>	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position specific duties related to Classification Notification.</p> <p>Section E provides notification information.</p>

Enclosure 6 to NL-16-0169
 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>The Emergency Organization will then perform the following:</p> <ol style="list-style-type: none"> 1) Within 15 min. of classification, inform State and local offsite authorities of General Emergency 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. Technical Support Center (TSC), Operational Support Center (OSC), and the Emergency Operating Facility (EOF)). These actions may be delayed for security based events at the discretion of the emergency director. 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. 	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position specific duties related to Classification Notification.</p> <p>Section E provides notification information.</p>

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>The Emergency Organization will then perform the following: (cont) 10) Activate the Emergency Response Data System for the affected unit within 1 hour following declaration of the General Emergency. 11) Close out the emergency class by briefing of offsite authorities followed by written summary within 8 hours of closeout.</p>	<p>No equivalent Plan/Annex statement</p>	<p>Section B provides the position specific duties related to Classification Notification. Section E provides notification information.</p>
<p>2. CLASSIFICATION PROCESS The Classification Emergency Plan Implementing Procedure is used to classify the emergency condition upon recognition of an off-normal condition relative to an Initiating Condition.</p>	<p>SECTION D: EMERGENCY CLASSIFICATION SYSTEM EP D.1 Classification of Emergencies EP D.1.1 Emergency Conditions</p>	<p>Section D provides the description of the Classification process</p>
<p>Two Initiating Condition Matrices and a Fission Product Barrier Evaluation table are used depending on the initial mode of the unit. The Hot Initiating Condition matrix and the Fission Product Barrier Evaluation table are used when the unit is in the Technical Specification defined modes of Hot Shutdown, Hot Standby, Startup and Power Operation. A Cold Initiating Condition matrix is used when the unit is in the Cold Shutdown, Refueling, or Defueled modes. The IC Matrices are human factored to read from top to bottom General Emergency to Notification of Unusual Event within a category or subcategory.</p>	<p>EP D.2.1 The Fission Product Barrier and System Malfunction criteria are only applicable when in the hot operating modes. The Cold Shutdown /Refueling System malfunctions are only applicable in cold shutdown and Defueled modes or as specifically designated in each EAL. The EALs associated with the Radiological, ISFSI, and Hazards categories are applicable in all modes of operation.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

Enclosure 6 to NL-16-0169
 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>To facilitate the expeditious classification of emergencies, the various initiating conditions which may result in an emergency class are grouped into six recognition categories as follows:</p> <ul style="list-style-type: none"> • 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) 	<p>EP D.2.1 An Emergency Action Level has two distinct parts. The Initiating Condition (IC) is a brief description of conditions that are compared to existing abnormal plant conditions. The ICs are segregated into Recognition Categories. The Recognition Categories are:</p> <ul style="list-style-type: none"> • 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. 	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>Within each category, sub categories and specific Initiating Conditions are identified. Each Initiating Condition has specific conditions associated that are termed Threshold Values. These Initiating Conditions, Threshold Values, and bases are provided in this Appendix.</p>	<p>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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>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.</p>	<p>EP D.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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>

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 Farley Justification Matrix

Current Farley Emergency Plan Revision 64	Revised SNC Emergency Plan Equivalent Description	Justification
<p>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.</p>	<p>EP D.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.</p>	<p>The commitment wording was standardized and relocated to the SNC Standard Emergency Plan.</p>
<p>Hot Initiating Conditions Matrix</p>	<p>Annex Appendix B</p>	<p>The approved EALs are not affected by this submittal.</p>
<p>Cold Initiating Conditions Matrix</p>	<p>Annex Appendix B</p>	<p>The approved EALs are not affected by this submittal.</p>
<p>Fission Product Barrier Evaluation Modes</p>	<p>Annex Appendix B</p>	<p>The approved EALs are not affected by this submittal.</p>
<p>Emergency Action Level Description (Rev. 63 pages K-10 to K-100)</p>	<p>Annex Appendix B</p>	<p>The approved EALs are not affected by this submittal.</p>
<p>EMERGENCY PLAN Part II MEDICAL PLAN</p>	<p>SNC Standard Emergency Plan Sections A.2, B.5, F.2 and L (entire section) Annex Sections 1.7.1.10, and 2.3</p>	<p>The commitment was standardized and relocated to the SNC Standard Emergency Plan and Annex.</p>

Farley On-Shift Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 on-shift*	Farley Rev 25	Farley Rev 64	Farley 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)	2	4	4
		Auxiliary Operators	2 (per unit)	2	3	7
		Shift Support Supervisor				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 communication		1****	2	2**	1**
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Senior CHM & Env		1	1	1
	Offsite surveys	HP/CHM technicians and other trained personnel		2	2	1
	In-Plant surveys	HP Technicians	1	2	2	1
	Chemistry / Radiochemistry	Chem/HP Technicians	1	1	1	1
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**	1	1	1
		I&C Maintenance		1	1	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	2	1
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	19	28	25

*For each unaffected unit, maintain at least 1 SF, 1 CRO, 1 AO
 **May be provided by shift personnel assigned other functions

***Overall direction to be assumed by EOF Dire when ERFs are fully manned
 ****May be performed by engineering aid to shift supervisor

Farley Augmented ERO Table Comparison

Major Functional Area	Major Tasks	Position Title / Expertise	Table B-1 Augment	Farley (75 min) Rev 25	Farley (75 min) Rev 64	Farley Proposed (75 min)
Emergency Direction and Control						9
Notification / Communication	Notify State/local and federal personnel, maintain communication		2	2	2	11
Radiological Accident Assessment and Support of Operational Accident Assessment	EOF Director	Senior Manager	1	1	1	(a)
	Dose Assessment	HP Expertise				3
	Offsite Surveys	HP Technicians	2	2	6	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	1	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	2	2	3
Total Augmented ERO			15	18	19	43

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

**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 7
Hatch Staffing
Detailed Description and Technical Evaluation**

This License Amendment Request (LAR) revises the current on-shift and augmented Emergency Response Organization (ERO) for Hatch Nuclear Plant (HNP) Unit 1 and Unit 2 Emergency Plan to incorporate a standard on-shift and augmented ERO staffing plan for the Southern Nuclear Operating Company (SNC) Fleet. This proposed change to the ERO will result in an SNC Fleet standard definition of ERO augmentation time as well as an SNC Fleet standard complement of emergency response positions, titles, duties, and responsibilities.

EP Functions Impacted by the Proposed Change

The proposed change impacts the ERO as outlined in 10 CFR 50.47(b) Planning Standards 1 and 2. This change addresses the following Planning Standard Functions:

- 10 CFR 50.47(b) (1): The response organization has the staff to respond and augment on a continuing basis (24/7 staffing) in accordance with the Emergency Plan.
- 10 CFR 50.47(b) (2): Process for timely augmentation of on-shift staff is established and maintained.

The proposed change has been reviewed and continues to perform the functions required of 10 CFR 50.47(b) and the related requirements of 10 CFR 50 Appendix E.

Emergency Response Organization (ERO) Activation

HNP Unit 1 and Unit 2 Emergency Plan Revision 36.0 requires staffing of the augmented ERO at the Alert or higher classification "...ASAP, but not later than approximately 1 hour following the initial notification." It also states, "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."

The proposed SNC Fleet standard definition for ERO augmentation is 75 minutes from declaration. This proposed change redefines the SNC Fleet augmentation time without extension, since the 15-minute notification period will be incorporated in the overall definition of augmentation time. The proposed SNC Fleet definition also removes ambiguous wording such as "about" and "approximately" in order to clearly define the augmentation requirement.

Assignment of Responsibility/Organizational Control

The HNP Unit 1 and Unit 2 Emergency Plan maintains an on-shift organization as documented in the site Emergency Plan Revision 36.0. This Plan identifies the authority and responsibilities for emergency response and assigns major functional areas to on-site and offsite response facilities for augmented response. In the following analysis, the impact of consolidating ERO positions and reassigning responsibilities is assessed based on the capacity of on-shift staff to perform major tasks for each major functional area of HNP.

Plant Operations and Assessment of Operational Aspects

NUREG-0654/FEMA REP-01 Revision 1 guidance assumes the on-shift staff will provide the Plant Operations and Assessment of Operational Aspects functions throughout the emergency. The on-shift operations staffing as provided in the current HNP Unit 1 and Unit 2 Emergency Plan Revision 36.0 meets the operations staffing requirements of 10 CFR 50.54(m)(2)(i) and the HNP Unit 1 and Unit 2 Technical Specifications. In addition to these requirements, the HNP Unit 1 and Unit 2 Emergency Plan provides for a dedicated Shift Manager position to perform

the NUREG-0654/FEMA REP-01 Revision 1 function of Emergency Direction and Control. Per NUREG-0654/FEMA REP-01 Revision 1, this function may be performed as a collateral duty of one of the individuals performing the Plant Operations and Assessment of Operational Aspects function. However, providing a Shift Manager to fill this function as a standalone position enhances the ability of the HNP Unit 1 and Unit 2 control room staff to fulfill the Plant Operations and Assessment of Operational Aspects function while the dedicated ED addresses aspects of the Emergency Direction and Control function. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In accordance with the current HNP Unit 1 and Unit 2 Emergency Plan, the on-shift staffing exceeds the requirements of NUREG-0654/FEMA REP-01 Revision 1 Table B-1, as well as those prescribed in the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan. The proposed SNC Fleet Emergency Plan will add another Reactor Operator to the HNP shift staff, ensuring further support of the Plant Operations and Assessment of Operational Aspects function at the start of an event and until the on-shift staff is properly augmented.

Emergency Direction and Control

NUREG-0654/FEMA REP-01 Revision 1 guidance provides that the Emergency Direction and Control function may be fulfilled by personnel assigned other functions. Per the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan, the Emergency Director (ED) function is was a collateral duty of an ED-qualified individual assigned to the Plant Operations and Assessment of Operational Aspects function until relieved by an augmented ED in the TSC within approximately one hour of notification of an emergency.

As provided in the current version of the HNP Unit 1 and Unit 2 Emergency Plan, the Shift Manager is designated as the on-shift ED to fulfill the function of Emergency Direction and Control until relieved by the Technical Support Center (TSC) ED within approximately one hour of notification of an Alert or higher emergency. With the proposed changes, the Shift Manager/ED is relieved within 75 minutes of declaration of an Alert or higher emergency by the ED in the TSC, who then assumes overall control of the response efforts. This remains unchanged in the proposed SNC Fleet Emergency Plan with the exception of redefining the augmentation time to include the time provided for notification of the ERO.

In addition to the augmentation of an ED in the TSC within 75 minutes of an Alert or higher declaration the proposed SNC Fleet Emergency Plan provides an additional ED will be augmented in the Emergency Operations Facility (EOF) within 75 minutes of an Alert or higher declaration. The aspects of the Emergency Direction and Control function assigned to the TSC and EOF EDs are clearly defined in the proposed SNC Fleet Emergency Plan. The primary role of the EOF ED will be to assume responsibility for state and local notifications and to approve of Protective Action Recommendations (PARs). This ensures that in the unlikely event of a Hostile Action Based (HAB) event in which the site is not accessible to the ERO, an ED would be available in the EOF within 75 minutes of an Alert or higher declaration to assume these aspects of the Emergency Direction and Control function to minimize the burden on the Shift Manager/ED.

Enclosure 7 to NL-16-0169
 Hatch Staffing - Detailed Description and Technical Evaluation

There would be no undue burden on the Control Room staff or impact on the notification function from an addition of the EOF ED. (See table below.)

CONTROL ROOM	TSC	EOF
<u>Shift Manager / Emergency Director</u>	<u>TSC Emergency Director</u>	<u>EOF Emergency Director</u>
Classification	→ Classification	
Notifications		→ Notifications
PARS		→ PARS
Emergency Exposure Controls	→ Emergency Exposure Controls	

Finally, the proposed revision to the HNP Unit 1 and Unit 2 Emergency Plan requires augmentation of the following TSC and EOF positions, which support activation of the TSC and EOF, within 75 minutes of event classification:

- TSC Emergency Director
- TSC Manager
- TSC Operations Supervisor
- TSC Emergency Notification System (ENS) Communicator
- TSC Health Physics Network (HPN) Communicator
- TSC ERF Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Chemistry Support
- TSC Engineering Supervisor
- TSC Reactor Engineer
- TSC Engineering Support
- TSC Maintenance Supervisor
- EOF Emergency Director
- EOF Manager
- EOF Field Team Coordinator
- EOF Emergency Communications Coordinator
- EOF Security Coordinator
- EOF Offsite Response Coordinator
- EOF Emergency Notification Network (ENN) Communicator
- EOF ENS Communicator
- EOF HPN Communicator
- EOF ERF Communicator
- EOF Nuclear Spokesperson
- EOF Technical Assistant
- EOF News Writer
- EOF Field Team Communicator
- EOF Dose Assessment Supervisor

- EOF Dose Analyst
- EOF Technical Supervisor

Notification and Communication

NUREG-0654/FEMA REP-01 Revision 1 guidance requires one Communicator to be assigned on-shift. Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for one Communicator or other trained personnel to perform this function. In the proposed SNC Fleet Emergency Plan staffing for HNP, this function will be modified by a note that indicates this function may be fulfilled by individuals assigned other functions. However, an additional Reactor Operator will be added to the HNP control room staff to ensure there will be sufficient appropriately trained personnel on-shift for the Communications function to be assigned to a member of the control room staff with no collateral tasks. This has been demonstrated and documented by performing a 10 CFR Part 50, Appendix E shift staffing evaluation.

In addition, the proposed SNC Fleet Emergency Plan provides for the transfer of state and local notifications, including authority to approve the content of the notification form, directly to the EOF from the control room. The proposed change includes both sufficient communications personnel to perform the communications and an ED with the authority to approve the content of the notification. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel will be available in the EOF within 75 minutes from time of declaration of an Alert or higher emergency classification to assume the Communications function and minimize the burden on the Shift Manager/ED.

The ability to transfer the Communications function directly to the EOF, and provision of sufficient augmented personnel in the EOF to perform the Communicator function within 75 minutes ensure no additional burden is incurred by the on-shift staff.

Radiological Accident Assessment and Chemistry/Radio-Chemistry

The function of on-site radiological assessment is to: review radiological conditions onsite using data from available instrumentation, assess the impact of changing radiological conditions on emergency classification, assist in accident assessment based upon those changing radiological conditions, and recommend appropriate on-site protective measures.

Classification is performed by the Shift Manager/ED using NMP-EP-110, Emergency Classification Determination and Initial Action procedure, which uses readily available and easily recognized plant instrumentation to determine the appropriate emergency classification. Off-site and onsite surveys provide additional information, such as direct radiation measurements that can be directly applied to emergency classification. The on-shift Radiation Protection (RP) Technician takes direction from the Control Room to provide radiological assessment support until the OSC is activated.

As part of the Plant Operations and Assessment of Operational Aspects function, the operating crew uses symptom-based emergency operating procedures (EOPs) which minimize the need for specific accident assessment. The operating crew performs actions based on symptoms that are described in the EOPs, not based on specific accident assessment.

Similarly, the Shift Manager/ED uses flowcharts in NMP-EP-112, Protective Action Recommendations procedure, which prescribes the decision-making processes for directing on-site protective measures. The simple information needed to accomplish this for rapid decision making by the Shift Manager/ED using readily available information.

The Safety Parameter Display System (SPDS) provides the control room with a display of plant parameters from which the status of plant operation can be assessed. The SPDS has the following functions:

Hatch Staffing - Detailed Description and Technical Evaluation

- Aids the control room operators in the rapid detection and identification of abnormal operating conditions.
- Provides additional specific information 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 assess plant status quickly without surveying all control room displays concurrently.
- 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 coding.
- 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, reactor coolant system integrity, radioactivity control, containment integrity, and other selected parameters.

Therefore, with the proposed changes, the ERO structure continues to meet the intent of the requirements of Appendix E to 10 CFR Part 50 and the standards of 10 CFR 50.47(b).

This Functional Area includes three tasks: EOF Emergency Director; Off-Site Dose Assessment and Chemistry/Radiochemistry; and Off-site, On-Site (out of plant), In-Plant Surveys, and Radiation Protection.

Emergency Operations Facility (EOF) Emergency Director (ED)

The TSC ED is not assigned to the on-shift complement. In the current plan, the TSC ED arrives within approximately 60 minutes of notification of an Alert or higher emergency classification, and relieves the on-shift ED of overall emergency management as well as all off-site responsibilities including PARs and emergency notifications. The EOF is also staffed within this timeframe; however, there is currently no ED provided in the Emergency Operations Facility (EOF).

Under this proposal, within 75 minutes of classification the Shift Manager/ED is relieved in the TSC by the ED who then assumes overall control of the response efforts. The EOF ED arrives and relieves the TSC ED of overall emergency management and off-site responsibilities including PARs, dose assessment, and emergency notifications. This ensures that in the unlikely event of an HAB event in which the site is not accessible to the ERO, sufficient personnel to perform the Radiological Accident Assessment and Support of Operational Accident Assessment function will be available in the EOF within 75 minutes from time of an Alert or higher declaration and minimize the burden on the Shift Manager/ED.

As discussed earlier, the overall function is enhanced by providing a Shift Manager to fill this function as a standalone position beyond the collateral assignment as designated by NUREG-0654/FEMA REP-01 Revision 1 Table B-1, during the period prior to augmentation.

The proposed change presents no adverse impact to the ERO staffing because the TSC and EOF EDs will continue to provide timely relief to the on-shift ED from the duties and responsibilities for offsite functions.

Offsite Dose Assessment (ODA) / Chemistry

NUREG-0654/FEMA REP-01 Revision 1 does not provide for on-shift dose assessment capability. The current version of the HNP Unit 1 and Unit 2 Emergency Plan does provide

for an on-shift capability for performance of dose assessment and is currently assigned to a Reactor Operator. In the proposed change, on-shift dose assessment will be assigned to appropriately trained on-shift personnel (typically a chemistry technician) who will be dedicated to this task with no other collateral emergency response duties. This will in turn free the Reactor Operator to perform other control room related tasks.

With the improvements to the dose assessment software program, as well as plant status, meteorological, and radiation monitoring data, Chemistry can easily and rapidly perform dose assessments during emergency conditions. Enhancements in dose assessment software have reduced to the time required to perform dose assessment runs and provide the results to the ED. In addition, the dose assessment software is operational in a Windows operating system on the SNC Local Area Network (LAN) and as such can be readily accessed from any LAN computer on the SNC network.

A second Chemistry individual is provided as part of the minimum on-shift staffing so that any required chemistry samples may be collected without impacting the chemistry individual assigned to perform dose assessment. A review of the Emergency Operations Procedures (EOPs), Abnormal Operating Procedures (AOPs), HNP Unit 1 and Unit 2 Emergency Plan, and the procedures used by Operations for off-normal plant conditions did not identify any conflicts between completion of dose assessment and other on-shift Chemistry functions within the 75 minute augmentation time frame. An additional Chemistry support individual will be augmented in the TSC within 75 minutes, who will provide oversight for chemistry sampling and analysis activities. An additional Chemistry technician will be augmented in the OSC within 75 minutes to assist in performing chemistry sampling and analysis.

Augmentation by the RP Supervisor TSC within 75 minutes will relieve the Shift Manager/ED of the role of oversight of the on-shift dose assessor. The TSC will retain this task until relieved by the EOF dose assessment staff, which consists of the Dose Assessment Supervisor and Dose Analyst. There is no loss of function or impact on the timing for performing either of the tasks of dose assessment or required radiochemistry sampling by the proposed on-shift staffing provided in the SNC Fleet Emergency Plan.

Offsite/Onsite Surveys, In-Plant surveys and Radiation Protection (RP)

NUREG-0654/FEMA REP-01 Revision 1 identifies one on-shift RP Technician who is responsible for performing in-plant surveys. NUREG-0654/FEMA REP-01 Revision 1 does not provide for any on-shift personnel for on-site out of plant surveys or for off-site surveys. NUREG-0654 / FEMA REP-01 Revision 1 further identifies two RP technicians under the Protective Actions function for performing the tasks of Access Control, Radiation Protection coverage for repair, corrective actions, search and rescue, first aid, firefighting, personnel monitoring, and dosimetry. However, a note modification provides that these individuals may be assigned other functions, for example, the RP technician assigned to the in-plant surveys task and the individual assigned to the Chemistry/Radio-chemistry task under the Radiological Accident Assessment and Support of Operational Accident Assessment function.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides two individuals for the task of off-site survey and an additional individual for the task of on-site (out of plant) survey. Collectively, these individuals include one individual qualified to perform the survey, an assistant to drive the team vehicle, and an individual is to coordinate communications between the survey team and the dose assessor.

As part of the proposed SNC Fleet Emergency Plan the HNP on-shift staffing for the on-site out of plant survey will be performed by a single RP technician or other appropriately trained

personnel. SNC currently uses predesignated, readily accessible survey points around the HNP Unit 1 and Unit 2 plant site for collecting on-site survey data. Prior to dispatch of the on-site out of plant monitoring technician the dose assessor will brief the survey technician on the event conditions, direction of potential/actual plume path, potential radiological conditions, and so forth. The technician will be dispatched to one of the predesignated sample points in the downwind direction of the potential/actual plume path. The survey technician will then obtain the pre-staged on-site out of plant survey kit and vehicle and proceed to the designated location. The dose assessor and the survey technician will have the capability to maintain near continuous communications, which will allow the dose assessor to redirect the technician while in route if needed. Since the designated sample points are on-site and readily accessible from the HNP Unit 1 and Unit 2 plant site road system, there will be no immediate need for the survey technician to travel off-site and this survey can be performed by a single individual without impacting the accuracy or timeliness of the survey.

Additionally, the proposed SNC Fleet Emergency Plan HNP on-shift staffing will eliminate the on-shift individual coordinating communications between the out of plant survey technician and the dose assessor, and instead has the survey technician communicate directly with the dose assessor. This will expedite communication of field survey readings to the dose assessor for input into the dose assessment program, resulting in a shorter completion time of dose assessment runs using actual field survey results.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for augmentation of two off-site survey teams as well as a Field Team Coordinator and Field Team Communicator at the EOF. The proposed staffing for the SNC Fleet Emergency Plan augments a single off-site survey team within 75 minutes of an Alert or higher declaration as well as maintaining the augmentation of the EOF Field Team Coordinator and Field Team Communicator positions currently provided.

Installed effluent radiation monitors and in-plant radiation monitors are able to detect any radioactive release quickly and accurately. The enhanced technology provided by the Safety Parameters Display System (SPDS) and the dose assessment computer model provides reliable visual indication of any radioactive plume and its calculated direction. Quantification of a radioactive release is determined by dose assessment, which is performed by dedicated on-shift personnel then augmented by additional dose assessment personnel in the TSC and EOF. On-site, out of plant field teams and off-site field teams are typically used to verify the status of a potential release and validate the dose assessment model. Dose assessment model validation strategies developed and implemented by the EOF staff typically include directing one team to track the leading edge of the radiological plume and one team to define the lateral edges of the plume and determine plume centerline radiological conditions. If the field team survey data indicates a departure from the dose assessment model, the radiation surveys and air samples collected by these two field teams can be used to perform dose assessment back calculations. SNC believes the two proposed field monitoring teams will be satisfactory for performing these surveys. To better support performing surveys off-site, the on-shift field team, which initially consisted of a single RP technician or appropriately trained individual, can be augmented by the on-shift dose assessor as a vehicle driver (once relieved by the EOF Dose Analyst). Sufficient instrumentation, communication equipment, and transportation will be maintained on-site for augmenting and dispatching additional teams if needed.

Regarding in-plant surveys, Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides for two RP technicians to perform in-plant surveys. The proposed SNC Fleet Emergency Plan HNP on-shift staffing provides one RP technician assigned to the task of

in-plant surveys under the Radiological Accident Assessment and Support of Operational Accident Assessment function. An additional RP technician will be provided for the Protective Actions function discussed later. However, since both of these individuals are qualified RP technicians, they will be available to collectively support either of these functions as needed. An additional two Radiation Protection technicians will respond within 75 minutes to support Radiological Accident Assessment (in-plant) function. This will provide sufficient Radiation Protection resources to address the Radiological Accident Assessment needs of both the on-shift and augmented ERO personnel.

With improved installed instrumentation, dose calculation computer modeling, and dedicated on-shift staffing for dose assessment and on-site out of plant surveys, there is no more than minimal impact to the performance of these tasks as a result of the proposed staffing alignments in the SNC Fleet Emergency Plan.

Plant System Engineering

This functional area includes two tasks: Technical Support, and Repair and Corrective Actions.

Technical Support

NUREG-0654/FEMA REP-01 Revision 1 guidance provided for a Shift Technical Advisor (STA) to be available on-shift to perform the Technical Support task including core/thermal hydraulics in response to the NUREG-0737 requirements resulting from the Three Mile Island accident. Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides an individual to fulfill the STA task. The performance of the Technical Support task includes use of the SPDS computer, which graphically displays the pertinent parameters with trending and graphing capabilities, alarm functions, and color-coded indication for changes in state for various critical safety parameters. This enhances critical parameter monitoring and the rapid identification and assessment of in plant conditions. This remains unchanged for HNP in the SNC Fleet Emergency Plan.

Repair and Corrective Actions

NUREG-0654/FEMA REP-01 Revision 1 Table B-1 specifies the functional area of Repair and Corrective Actions is to be provided on-shift by a total of two individuals who also "may be provided by shift personnel assigned other functions." It further states that the "position title or expertise" for the Repair and Corrective Actions task could be filled by Mechanical Maintenance / Radwaste Operator, Electrical Maintenance, or I&C Technician.

Due to the time needed to stabilize the plant and assess the event, the initial phase of an accident is not expected to involve a significant need for maintenance personnel. Once plant status is understood and the plant is in a stable condition, attention can be focused on corrective maintenance that may be needed to restore plant capabilities.

Typically, the initial stages of Corrective Actions will be minor or of limited scope, such as:

- Mechanical – Identification and operation of faulty valves, clogged filters, packing and seal adjustments, or troubleshooting,
- Electrical – Identification and correction of tripped breakers and overloads, or hands-off troubleshooting,
- I&C – Identification and correction of controller and set point adjustment, calibration, or hands-off troubleshooting.

Until the reactor is stabilized and the causal agents identified, actual repairs or realignment of plant equipment would not require large-scale maintenance support. The current version

of the HNP Unit 1 and Unit 2 Emergency Plan provides for one mechanical journeyman, two electrical journeymen, and one instrument and controls technician on-shift to support the Repair and Corrective Action task. The proposed SNC Fleet Emergency Plan on-shift maintenance staffing numbers will be reduced to one on-shift electrical journeyman. In addition to these personnel, a maintenance supervisor will be added to on-shift to provide supervisory oversight for repair and corrective actions, further enhancing the on-shift response capability. A 10 CFR 50 Appendix E shift staffing evaluation demonstrated that no maintenance personnel were assigned tasks during the 75 minutes prior to augmentation. Additionally, the proposed SNC Fleet Emergency Plan provides for augmentation of maintenance discipline specific leads in the OSC as well as an overall OSC Manager within 75 minutes of an Alert or higher emergency classification. With the described on-shift maintenance staffing, there is no impact on the repair and corrective action tasks described under the Plant System Engineering, Repair and Corrective actions function as the result of removing the one electrical journeyman.

The NRC Public Meeting on July 16, 2015 discussing proposed changes to guidance regarding ERO staffing and augmentation (ML15174A309) identified that the proposed change primarily meets or exceeds the current regulatory guidance of NUREG-0654/FEMA REP-01 Revision 1 Table B-1 and the proposed NUREG-0654/FEMA REP-01 Revision 2. Based on HNP Unit 1 and Unit 2 licensing basis (FSAR), the design philosophy with respect to Emergency Safety Features (ESF), and guidance for restoration, it is unnecessary to have additional Mechanical Maintenance, Electrical Maintenance and I&C Maintenance augmented within the 75 minute timeframe. ESF systems are redundant in trains (physical separation) and have diversity of subsystems. Therefore, the inoperability of different system components in different trains is not anticipated to result in a loss of function of the ESF. This allows flexibility in plant operations under circumstances where components in redundant subsystems may be inoperable.

Protective Actions (In-Plant)

For the Protective Actions (In-Plant) function, NUREG-0654/FEMA REP-01 Revision 1 specifies providing two personnel on-shift who "may be provided by shift personnel assigned other functions." The major tasks of this function are access control, RP coverage for repair, corrective actions, search and rescue, first aid, and firefighting, personnel monitoring, and dosimetry.

Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan provides four individuals for performing this function. However, this number is modified by a note stating "may be provided by shift personnel assigned other functions." Under the proposed SNC Fleet Emergency Plan staffing a single RP technician will support this function.

System Operators are typically dispatched prior to the call-out of augmented personnel. Normally the initial response phase involves search and rescue operations or manual manipulation of equipment. Maintenance actions in the initial response phase are anticipated to be minimal as discussed previously. Installed plant area radiation monitors are used to provide indication of in-plant radiation levels prior to dispatch of personnel into the plant. This allows for personnel to be assigned the appropriate dose and dose rate alarms for their electronic personal dosimetry prior to dispatch and to assign additional Radiation Protection technician support as needed.

Personnel accessing the Radiological Control Areas (RCA) at HNP Unit 1 and Unit 2 are required by procedure to obtain electronic personal dosimetry prior to entry. The same dosimetry is also used as a "key" to unlock turnstiles for access to the RCA. Radiation work permits (RWPs) establish the necessary preset warnings/alarms associated with the dosimetry.

During a declared emergency, the normal RCA entry process may use pre-prepared emergency RWPs using the Digital Alarming Dosimeters DADs. In the event the normal access system is non-functional an emergency reentry process has been developed to use the pre-prepared emergency RWP dose and dose rate alarms manually programmed into the DADs. This ensures the teams dispatched to in-plant areas to perform any function during a declared emergency will be afforded ample warning/alarm prior to exceeding their allowed dose or dose rate. In-plant teams are briefed on radiological conditions prior to being dispatched, including plant event conditions, radiological conditions, dose and dose rate turn back values/alarms, and communications methods to be used if radiological conditions change or if unexpected radiological conditions are encountered. Thus, under emergency conditions, responding personnel will be knowledgeable of dose rates in the area, and radiation protection personnel may not be required to accompany all teams into the plant areas. Dosimeters also can be programmed at the OSC by RP personnel as needed prior to team dispatch. The proposed SNC Fleet Emergency Plan HNP on-shift staffing provides for a total of two Radiation Protection technicians between the Protective Actions (in-plant) and Radiological Accident Assessment (in-plant surveys) to ensure appropriate radiological protective measures are available to the on-shift staff.

An additional two Radiation Protection technicians and an RP/Chemistry OSC lead will be augmented in the OSC within 75 minutes to support the Protective Actions (in-plant) function. This will provide sufficient Radiation Protection resources to address the needs of both the on-shift and augmented ERO personnel for the Protective Actions (in-plant) function.

Fire Fighting

There are no proposed changes to this area. The on-shift Fire Brigade is assigned this task throughout the emergency with off-site support provided by local fire departments.

A staffing analysis meeting the requirements of 10 CFR 50 Appendix E.IV.A.9 for the proposed organization was performed. The results of that analysis showed that the required response functions could be conducted with parallel activation of the fire brigade for the subject scenarios.

Rescue Operations and First Aid

Per NUREG-0654/FEMA REP-01 Revision 1, the Rescue Operations and First Aid function "may be provided by shift personnel assigned other functions." There are no proposed changes to this area. The HNP Unit 1 and Unit 2 Emergency Plan provides appropriately trained on-shift personnel to fulfill this function as a collateral duty. There are no additional personnel augmented for this task. Local off-site support provides for any additional assistance. There are no proposed changes to this area.

Site Access Controls and Personnel Accountability

There are no proposed changes to this area. This function is part of the Security Contingency Plan and is staffed accordingly.

Onsite Emergency Response Organization (ERO) – 10 CFR 50.47(b) (2)

The current ERO provided in Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan was developed in response to NUREG-0654/FEMA REP-01 Revision 1. The ERO developed by NUREG-0654/FEMA REP-01 Revision 1 was developed without a specific technical basis. The Emergency Preparedness Enhanced Rulemaking of November 23, 2011 required the capabilities of the on-shift staff to be validated by a formal analysis. This requirement was

documented in 10 CFR 50 Appendix E.IV.A.9. In support of this submittal, the proposed ERO for the HNP Unit 1 and Unit 2 Site was analyzed and it was determined that the on-shift staff proposed is capable of performing the response functions required of the revised rule.

Reason for the Change

The proposed ERO in the SNC Fleet Emergency Plan provides a standard complement of emergency response positions, titles, duties, and responsibilities. This will result in a more effective interface between ERO members at the sites and their counterparts at the SNC Fleet EOF. Having a common ERO organization for the SNC Fleet will also support sharing of ERO resources between affected and non-affected stations during emergencies.

Establishing an appropriately staffed SNC Fleet standard on-shift and an augmented ERO staffing model with an SNC Fleet standard definition for ERO augmentation time is a practical and prudent alternate method to ensure effective and timely emergency response augmentation.

Details associated with the on-shift ERO, revised augmented ERO, and revised key responsibilities and tasks as identified in NUREG-0654/FEMA REP-01 Revision 1, are included in Enclosure 9.

Planning Basis for Augmented Emergency Response Organization (ERO)

Positions have been designated as 75 minutes responders in the TSC, OSC, EOF, and JIC. These positions perform major functions and supporting functions in each facility. The tables below outline these positions and functions as provided in the proposed HNP Unit 1 and Unit 2 Emergency Plan.

Enclosure 7 to NL-16-0169
Hatch Staffing - Detailed Description and Technical Evaluation

TSC 75 Minute Augmentation ERO		
Major Functional Area	Major Task	Position Title
Emergency Direction and Control		Emergency Director (ED)
		TSC Manager
		Operations Supervisor
		Security Supervisor*
		Support Coordinator**
Notification/Communication	Notify licensee, state, local, and federal personnel & maintain communication	Emergency Notification System (ENS) Communicator HPN Communicator
	Intra-facility Communications	Emergency Response Facility (ERF) Communicator
Radiological Accident Assessment and Support of Operational Accident Assessment	Offsite Dose Assessment	Radiation Protection (RP) Supervisor
	Offsite surveys	Not applicable for this facility
	Onsite and in-plant surveys	
	Chemistry/Radio Chemistry	Chemistry Support
Plant System Engineering, Repair and Corrective Actions	Technical Support	Engineering Supervisor
		Reactor Engineer
		Engineering Support (2)
	Repair and corrective actions	Maintenance Supervisor
Protective Actions	Access Control	Not applicable for this facility
	RP coverage for repair, corrective actions, search and rescue, first aid & firefighting	
	Personnel monitoring	
	Dosimetry	

*Security Supervisor filled by one of the on-shift Security Supervisors.

** Support Coordinator does not have a 75 minute augmentation time.

Enclosure 7 to NL-16-0169
Hatch Staffing - Detailed Description and Technical Evaluation

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

Enclosure 7 to NL-16-0169
Hatch Staffing - Detailed Description and Technical Evaluation

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

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

Enclosure 7 to NL-16-0169
 Hatch Staffing - Detailed Description and Technical Evaluation

JIC Staff*		
Functional Area	Major Task	Position Title
Media Response	Media Response	Public Information Director
		Nuclear Spokesperson
		Technical Assistant
		JIC Manager
		JIC Assistant
		Facility Coordinator
		Clerical Staff
		Security
		Public Response Coordinator
		Public Response Staff
		Media Relations Representative

* JIC Staff do not have a 75 minute augmentation time.

Minimum staff positions have been identified for each facility. Facility activation may be completed upon filling of minimum staffing positions and completion of a briefing on the event to ensure personnel in these positions are ready to accept responsibility for their functions.

Minimum staffing positions for the TSC Organization are as follows:

- TSC Emergency Director (ED)
- TSC Emergency Response Facility (ERF) Communicator
- TSC Manager
- TSC Operations Supervisor
- TSC ENS Communicator
- TSC Radiation Protection (RP) Supervisor
- TSC Engineering Supervisor

Minimum staffing positions for the Operations Support Center (OSC) Organization are as follows:

- OSC Manager
- OSC Emergency Response Facility (ERF) Communicator
- OSC RP / Chemistry Group Lead

Minimum staffing positions for the EOF Organization are as follows:

- EOF Emergency Director (ED)
- EOF Emergency Response Facility (ERF) Communicator
- EOF Manager
- EOF Dose Assessment Supervisor
- EOF Dose Analyst
- EOF ENN Communicator

Minimum staffing positions for the Joint Information Center (JIC) Organization are as follows:

- Public Information Director (PID)

Enclosure 7 to NL-16-0169
Hatch Staffing - Detailed Description and Technical Evaluation

- JIC Manager
- Media Relations Representative
- Public Response Coordinator

In addition to the functional analysis provided, the key Emergency Response Facilities were analyzed to determine the minimum staffing (both numbers and positions) needed for the facilities to activate the facilities and begin facility operations. Any personnel determined to be required to support the minimum staff activation and initiation of activities were added to the revised augmented ERO.

Program Enhancements

The following section discusses technical changes in plant systems, dose assessment, procedures, and training which have been completed in order to better support on-shift functions and ease operator burden. Additional information regarding on-shift and augmented positions and their responsibilities as identified in NUREG-0654/FEMA REP-01 Revision 1 are outlined in Enclosure 9.

Plant Computer System

At the time of the original approval of the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan, the site used an Emergency Response Facility Computer System. The operator interface consisted of a small number of printers located in the control room and computer room.

In 1986, the Emergency Response Facility Computer System was housed in the TSC. The design criteria were based on the requirements of NUREG-0737, Supplement 1, for a Safety Parameter Display System (SPDS) and the upgrading of ERFs. The requirements were met or exceeded by a system of grouped displays of parameters from which plant safety status can be rapidly assessed, provided by Proteus software. The system upgrade included introduction of automatic updates to plant overview and system displays on the computer monitors, consolidated safety parameter displays, and increased frequency of parameter updates.

In 2008/2009, the site integrated SPDS into the plant process computer. This significantly improved plant monitoring capabilities in the control room as well as in the site's ERFs by integrating other independent standalone systems.

Benefits of the upgraded systems include:

- Programming capability for automated response such as indication of critical parameter alarms.
- Improved plant monitoring capability for ED functions.
- Fewer keystrokes required to switch between graphical displays.
- Real time plant data available through graphical displays.
- Functions are available to any desktop computer through the plant's site-wide intranet.

Computer basic functions are supported by instrument buses with back-up power provided by vital buses.

Dose Assessment

The original HNP dose assessment software used manual entry of basic meteorological data and either manual entry of radiological data or use of internally stored source terms. The HNP dose assessment capability was upgraded in the mid-1990s when the MIDAS dose assessment program was installed on the ERF Computer to provide HNP a full Class B dose assessment model.

Improvements have been made to the dose assessment program resulting in minimal user interface required to quickly produce results. Radiological dose assessment has benefited from technological advances that make dose assessment simpler and less time-consuming. Dose assessment is currently performed by on-shift operations personnel using the prompt dose assessment mode of the MIDAS-NU program, which is a Class A model. Once the TSC and EOF staff arrive, a full Class B model of the MIDAS-NU program is employed to perform dose assessment. This program supports multi-unit and multi-accident assessment of radiological releases. The MIDAS-NU program has minimal data entry needs and a minimal number of program windows the user needs to access to perform a dose projection. With the use of the dose assessment program, as well as plant status, meteorological, and radiation monitoring data, one person can easily and rapidly perform dose assessments during emergency conditions.

Specifically designed displays have been developed for obtaining the necessary plant, radiological effluent, area radiation monitor, and meteorological information for dose assessment personnel on-shift using the Meteorological Information Dose Assessment System – Nuclear (MIDAS-NU) program.

Automated Call-Out System

Automated call-out systems have been enhanced to streamline processes for activation of the ERO. A single phone call initiates rapid notification of ERO members, in lieu of individual calls to fill the ERO positions included in the Emergency Plan. The system includes a primary activation location as well as a remotely located back-up capability to ensure uninterrupted operation.

Procedure Improvements

Emergency Operations Procedures (EOPs)/Abnormal Operating Procedures (AOPs)

Since the original emergency plan approval, EOPs have been improved through industry initiatives. EOPs now use a symptom-based approach that demands less assessment and interpretation of plant conditions by the operating crews. EOPs interface well with new technology such as IPC. EOP curves are generated by IPC to graphically display plant conditions relative to limits or required actions.

Emergency Plan Implementing Procedures (EIPs)

In 2008 (Reference NL-08-0160; Revision 27.0 of HNP Unit 1 and Unit 2 Emergency Plan) HNP Unit 1 and Unit 2 updated the classification methodology to NEI 99-01, Revision 4. EALs now incorporate guidance that has simplified the classification process, including the use of an overview matrix of EAL initiating conditions and threshold values, which streamlines the process of evaluating EALs against plant conditions.

Training Improvements

Operations Training

Training is used to strategically drive improved performance at HNP Unit 1 and Unit 2. Since NRC approval of the HNP Unit 1 and Unit 2 Emergency Plan, the application of the Systematic Approach to Training (SAT) has resulted in developing a task list for Operations personnel. The SAT process ensures training is conducted to industry-accepted standards and has led to accreditation of the Operations Training Programs by the National Academy for Nuclear Training.

A dynamic simulator is routinely used during Operations Training. Simulator evaluations include emergency response scenarios that periodically exceed 75 minutes in length and are part of the requalification cycle. Simulator scenarios are designed to be realistic and reflect a wide range of plant conditions, including emergency conditions. During evaluated simulator sessions, the control room staff is taken from normal operation to accident conditions resulting in declaration of at least one event, which can range from Unusual Event to General Emergency. The crew performs critical tasks, classification, accident mitigation, response prioritization, and communications without augmentation from additional responders. The proficiency of the control room staff to perform these functions while maintaining situational awareness, without additional support, is assessed in every training cycle.

The Licensed Operator Continuing Training (LOCT) Program includes licensed crew performance evaluations that consider the scenario guidance attributes of INPO Operations Department Standing Instruction, ODSI-3, and "Operations Department Guidance."

Attachment C of ODSI-3 provides guidance on the realistic integration of the emergency response into crew performance evaluations. The purpose is to ensure the crew performance evaluations realistically represent the additional challenges that the emergency plan responsibilities add to the crew's ability to manage an event. Representing the event as realistically as possible, which includes the additional challenges of emergency plan responsibilities, helps promote the situational awareness necessary during a real event.

STA Training

The Shift Technical Advisor (STA) was originally trained as an advisor to the operating shift per NUREG-0737. In 1990, additional guidelines were developed by INPO for the training of STAs. This is detailed in the document INPO 90-003, Guidelines for Training and Qualifications of Shift Technical Advisors.

The INPO Guidelines describe the role of the STA. The STA performs independent assessments of plant operating concerns, technical support, appropriate corrective actions, analysis of events and their effects, effectiveness of response(s) to emergent conditions, classifications of emergencies, development of recommendations to protect the public, and any other actions related to critical safety functions and plant safety during abnormal and emergency situations. By routinely monitoring equipment and plant operations, the STA can focus on preventive actions in order to mitigate the consequences of an accident and protect public health and safety.

Increases in On-Shift Staffing

There has been an increase in on-shift staffing from what was required in the 1981 Revision of the HNP Unit 1 and Unit 2 Emergency Plan, in order to ensure adequate performance of the major emergency plan functions and tasks. A total of 25 persons are identified for on-shift staffing in Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan, which is an increase from the total of 10 persons in the regulatory guidance provided by NUREG-0654/FEMA REP-01 Revision 1. A comparative chart depicting on-shift and augmented staffing based on NUREG-0654/FEMA REP-01 Revision 1, the 1981 version of the HNP Unit 1 and Unit 2 Emergency Plan, Revision 36.0 of the HNP Unit 1 and Unit 2 Emergency Plan, and proposed revisions are included in Enclosure 9.

Enhancements in Information Sharing with Offsite Agencies

There has been a dramatic increase in the ability of the site to share event-specific information with Offsite Response Organizations (OROs) from the one-to-one telephone systems at the time

of the 1981 Revision of the HNP Unit 1 and Unit 2 Emergency Plan. Real-time plant data is communicated to the Nuclear Regulatory Commission using the approved Emergency Response Data System (ERDS). Additionally, local OROs are provided real-time data with automated methods (currently WebEOC). These enhancements provide more timely and accurate information of actual plant conditions than was originally available.

Improvement Summary

The improvements to staffing, equipment, procedures, communication of plant information, and training since initial approval of the HNP Unit 1 and Unit 2 Emergency Plan have resulted in a significant increase in on-shift capabilities and knowledge. The ERO maintains the depth and capability for continuous 24-hour coverage of the Emergency Response for a protracted period.

Summary

Based on overall improvements in technology, procedures, training, and staffing levels available to ERO since the original implementation of the guidance contained in NUREG-0654/FEMA REP-01 Revision 1, the proposed Emergency Response Organization is capable of implementing the Emergency Plan in accordance with the requirements of 10 CFR 47 and 10 CFR 50 Appendix E.