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Manager, Regulatory Affairs

October 20, 2016

10 CFR 50.54(q)

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

Subject: **Docket Nos. 50-206, 50-361, 50-362, and 72-41**  
**Revised Emergency Plan Implementing Procedure (EPIP)**  
**San Onofre Nuclear Generating Station (SONGS) Units 1, 2, and 3**  
**and the Independent Spent Fuel Storage Installation**

Dear Sir or Madam:

Pursuant to 10 CFR 50.54(q)(5), Attachment 1 of this letter provides a copy of the following revised Emergency Plan document:

Procedure	Rev.	Effective Date
SO123-VIII-ERO-2, Shift Manager / Emergency Director Checklist	2	September 27, 2016

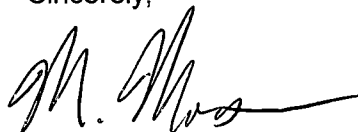
As specified in 10 CFR 50.54(q)(5), Attachment 2 provides a report and analysis summary for these EPIP changes. These changes do not reduce the effectiveness of the Emergency Plan or the EPIPs.

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

AX45  
NMSS26  
NRR  
NMSS

If you have any questions, please contact me at (949) 368-7418.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Kay", with a long horizontal flourish extending to the right.

for

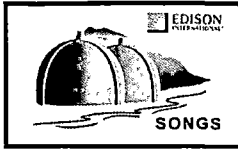
J. Kay

Attachments: 1. Revised Emergency Plan Implementing Procedure  
2. Report and Analysis Summary

cc: Emergency Response Coordinator, NRC Region IV (2 copies of Attachment 1)  
K. M. Kennedy, Regional Administrator, NRC Region IV  
M. G. Vaaler, NRC Project Manager, SONGS Units 1, 2 and 3  
W. C. Allen, NRC Project Manager, SONGS ISFSI

**Attachment 1**

**Revised Emergency Plan Implementing Procedure**



**Shift Manager / Emergency Director Checklist**

**SO123-VIII-ERO-2  
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	Procedure Usage Requirements	Sections
Reference Use	<ul style="list-style-type: none"> <li>• Review and understand the procedure before performing any steps, including the prerequisite section.</li> <li>• Have a copy or applicable pages/sections open at the work site.</li> <li>• Use Placekeeping method according to SO123-XV-HU-3.</li> <li>• If any portion of the document is performed from memory, do so in the sequence specified. Perform each step as written, except when an approved process specifically allows deviation.</li> <li>• Refer to the procedure or instruction at least once to ensure completion of the task in accordance with the requirements.</li> <li>• Review the document at the completion of the task to verify that all appropriate steps are performed and documented.</li> </ul>	ALL

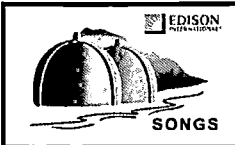
Color Usage	Location
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**LEVEL 1 QA PROGRAM AFFECTING**

**50.59 DNA / 72.48 DNA / RX DNA / 50.54(q) APPLIES**

Procedure Type
General

Procedure Owner
<b>Kelli Gallion</b>



**Shift Manager / Emergency Director Checklist**

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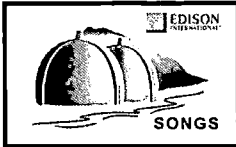
### 1.0 **PURPOSE AND SCOPE**

- 1.1 Provide guidance for the Shift Manager (SM) / Emergency Director (ED) for assessing, classifying, and declaring emergency events.
- 1.2 Provide guidance on making emergency notifications.
- 1.3 This procedure applies when an event has occurred at the San Onofre Nuclear Generating Station (SONGS) that requires assessment for entry into and implementation of the Permanently Defueled Emergency Plan (PDEP).

### 2.0 **RESPONSIBILITIES**

- 2.1 Shift Manager (SM) is responsible for initial assessment, classification, and declaration of events.
- 2.2 SM will, upon declaration of an emergency event, assume the responsibilities of the Emergency Director (ED). ED will assign members of the shift organization to carry out prioritized actions as described in the PDEP Implementing Procedures.
- 2.3 IF the SM is unavailable or becomes incapacitated for any reason, THEN the Certified Operator has the authority to assume the position of ED until properly relieved.
- 2.4 ED is responsible for the following actions:
  - 2.4.1 **Non-delegable responsibilities:**
    - Classifying, and declaring emergency events
    - Authorizing notification of offsite authorities (State/local and NRC notifications).
    - Authorizing the use of EPA-400 emergency exposure controls (emergency worker dose limits that exceed 10CFR20 occupational exposure limits) per EP(123) EA.
  - 2.4.2 **Key delegable responsibilities:**
    - Managing available station resources
    - Initiating assessment and mitigative/corrective actions
    - Initiating onsite protective actions
    - Deciding to call for offsite police, fire, or ambulance assistance
    - Augmenting the emergency staff as deemed necessary
    - Requesting Federal Assistance
    - Notifying SCE Corporate Officers and the Company's Duty Spokesperson

### REFERENCE USE



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### 3.0 DEFINITIONS

3.1 None

### 4.0 PRECAUTIONS AND LIMITATIONS

4.1 None

### 5.0 PREREQUISITES

5.1 **VERIFY** this document is current by using one of the methods described in SO123-XV-HU-3.

5.2 **VERIFY** Level of Use requirements on the first page of this procedure.



6.0 **PROCEDURE**

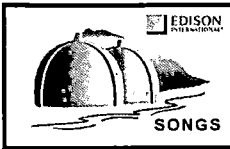
6.1 **Assessment, Classification, and Declaration**

**NOTE**

1. Emergency event declaration is required to be made as soon as conditions warranting classification are present and recognizable, but within 30 minutes in all cases of conditions being present.
2. T = 0 for classification, is when information that plant parameters have met an EAL is available to the Shift Manager or Certified Operator.
3. Notifications are completed to the NRC using the Emergency Notification System (ENS). Backup for NRC communications and all other site communications will be via commercial phone lines or satellite phones.

- 6.1.1 **REVIEW** PDEP-2, Emergency Action Level (EAL) Technical Bases Manual, and EP(123) EAL, *Emergency Action Levels*, to determine whether conditions warrant an emergency classification.
- 6.1.2 **DIRECT** an individual, if available, to complete Emergency Classification section of EP(123) NF, *Notification Form*, using a hardcopy.
- 6.1.3 **COMPLETE** Emergency Classification section of EP(123) NF, found on the Portal under Org Units > Nuclear > **PDEP Emergency Notification: Form for Operations Use ONLY.**
- 6.1.3.1 IF email/Portal is unavailable, THEN complete a hardcopy of EP(123) NF. (Completion of this hardcopy will be separate from the one in Step 6.1.2.)
- 6.1.4 **OBTAIN** concurrence regarding Classification criteria of EP(123) NF.
- 6.1.4.1 IF conditions meet the criteria to CLASSIFY an event within 30 minutes of EAL criteria being met, THEN DECLARE the event and **ASSUME** the duties of Emergency Director (ED), otherwise exit this procedure.
- 6.1.4.2 **PERFORM** Command Center "Team Update" for EAL declaration.





# Shift Manager / Emergency Director Checklist

## 6.2 Initial Notifications

- 6.2.1 **COMPLETE** remainder of EP(123) NF.
- 6.2.2 **OBTAIN** peer check, if available, for remainder of EP(123) NF.
- 6.2.3 **SELECT** "SAVE AS" to save completed EP(123) NF to desktop.
- 6.2.4 **CREATE** an Email with subject line: "SONGS Emergency Notification".
- 6.2.5 **SEND** EP(123) NF to group email list "SONGS Emergency Notification" within 15 minutes of EAL declaration (Courtesy Notification).
- 6.2.6 **PRINT** EP(123) NF.
- 6.2.7 **NOTIFY** station personnel of the emergency declaration and response actions, using EP(123) PA, *PA/Siren Coordination*.
- 6.2.8 IF there are known personnel working in high noise areas or outbuildings without public address system coverage, THEN DIRECT available personnel to notify them.
- 6.2.9 **DETERMINE** ERO recall as follows:
  - 6.2.9.1 For an Alert declaration:
    - RECALL** on-duty ERO Coordinator to report to the Command Center within 2 hours of Alert declaration.
    - RECALL** on-duty RP Coordinator to report to the Command Center within 2 hours of Alert declaration.
    - RECALL** all off-duty ERO and RP Coordinators.
    - RECALL** Supplemental personnel as needed for the event (e.g., Technical Coordinators, Maintenance personnel, RP Technicians):

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## Shift Manager / Emergency Director Checklist

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6.2.9.1.1 **REPORT** Location for recalled personnel (unless otherwise specified above)

Command Center

Parking Lot 4 staging area (by the Security Trailer)

Work location

Other: \_\_\_\_\_

6.2.9.1.2 Areas to avoid: \_\_\_\_\_

6.2.9.2 For an NOUE declaration:

**RECALL** on-duty ERO Coordinator (recommended).

**RECALL** on-duty RP Coordinator (recommended).

**RECALL** all off-duty ERO and RP Coordinators (optional).

**RECALL** Supplemental personnel as needed for the event  
(e.g., Technical Coordinators, Maintenance personnel, RP Technicians):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

6.2.9.2.1 **REPORT** Location for recalled personnel:

Command Center

Parking Lot 4 staging area (by the Security Trailer)

Work location

Other: \_\_\_\_\_

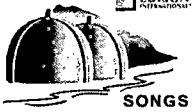
6.2.9.2.2 Areas to avoid: \_\_\_\_\_

6.2.10 **CONTACT** the on-duty ERO Coordinator using Emergency Response Directory.

6.2.10.1 **ENSURE** the on-duty ERO Coordinator is fit for duty, including 5 hour abstinence from alcohol consumption (Reference SO123-XV-7).

6.2.10.2 **REVIEW** event details.

6.2.10.3 **REVIEW** ERO recall requirements determined in step 6.2.9.



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6.2.10.4 **DIRECT** the on-duty ERO Coordinator to perform recall requirements determined in step 6.2.9.

6.2.10.4.1 **DIRECT** the on-duty ERO Coordinator to **ENSURE** recalled personnel are fit for duty, including 5 hour abstinence from alcohol consumption (Reference SO123-XV-7).

6.2.10.5 **DIRECT** the on-duty ERO Coordinator to perform notifications per SO123-VIII-ERO-3.

### NOTE

1. Verbal Notifications to State, Local, and Federal agencies must be completed within 60 minutes of event classification.
2. NRC may be contacted concurrently with State and Local agencies if event is a Hostile Action.

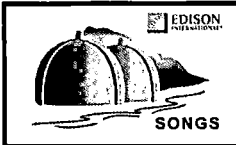
6.2.11 **NOTIFY** the following agencies within 60 minutes of classification, and **VERIFY** receipt of the completed EP(123) NF:

✓	AGENCY	TIME NOTIFICATION COMPLETED
	Camp Pendleton	
	San Diego County	
	Orange County	
	State of California (Cal OES)	

6.2.11.1 **LOG** the time each notification is completed.

6.2.12 **CONTACT** the NRC Headquarters Operations Officer (HOO) immediately after notification of the appropriate State and Local agencies and within 60 minutes of classification time. **PROVIDE** the NRC the information on completed NRC Form 361, *Event Notification Worksheet*.

6.2.12.1 **LOG** time notification is complete.



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### NOTE

Remaining sections of this procedure may be performed in any order.

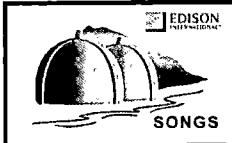
### 6.3 Event-Related Radioactive Release in Progress

- 6.3.1 **PERFORM** or **DIRECT** dose assessments using SO123-VIII-ERO-6, *Dose Assessment*.
- 6.3.2 **ENSURE** an RP Technician is dispatched to measure downwind dose rates at the Site Boundary within the EAB (refer to map in the Command Center ERO notebook).
  - 6.3.2.1 **ENSURE** RP Technician reports to the Command Center prior to deployment to inventory and test survey and sampling equipment that will be used.
  - 6.3.2.2 **ENSURE** RP Technician is provided a briefing.
  - 6.3.2.3 **ENSURE** communications with RP Technician are performed via radio or cell phones.
- 6.3.3 **IF** dose rates are measurable at the Site Boundary along Old Hwy 101, **THEN ENSURE** an RP Technician is dispatched to measure downwind dose rates at the EAB.
  - 6.3.3.1 **REQUEST** RP Technician to immediately **NOTIFY** the Command Center if dose rates at the EAB are > 10 mR/hr (EAL entry criteria).
- 6.3.4 **IF** dose rates are measurable at the EAB, **THEN ENSURE** an RP Technician is dispatched to perform off site field monitoring.
  - 6.3.4.1 **CONSIDER** implementing appropriate protective actions and obtaining additional resources.
- 6.3.5 Prohibit eating and drinking when uncontrolled releases of radioactivity have occurred until habitability surveys indicate that such activities are permissible.
- 6.3.6 **DIRECT** the RP Technician to evaluate ongoing radiological conditions.

### 6.4 Contamination Detected

- 6.4.1 **CONTROL** onsite access to potentially contaminated potable water and food supplies.
- 6.4.2 **RESTRICT** access to contaminated areas and items.
- 6.4.3 **ADHERE** to normal plant contamination control criteria as much as possible; however, these criteria may be modified should conditions warrant.
- 6.4.4 **DIRECT** RP Technician to **PERFORM** surveys and release of material and/or personnel (Reference SO123-VII-20.9.2 and SO123-VII-20.9.4).

### REFERENCE USE



**NOTE**

Environmental monitoring at or beyond the Site Boundary should take place AFTER radiological release has stopped.

**6.5 Environmental Monitoring**

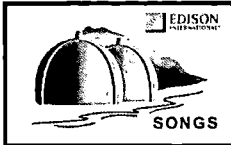
- 6.5.1 **EVALUATE** the need to initiate Environmental Monitoring based on plant conditions or field survey data.
- 6.5.2 **IF** Environmental Monitoring is necessary, **THEN DIRECT** Radiological Effluent Environmental Specialist or designee to perform or coordinate collection, analysis, classification, and shipment of water, vegetation, soil, and air samples.

**6.6 Contaminated Injury**

- 6.6.1 **DIRECT** RP Technician to decontaminate victim before transportation as long as the decontamination does **not** obstruct the medical attention given the victim **OR** cause an unnecessary delay in transporting (Reference SO123-VII-20.9.4).
- 6.6.2 During transportation of contaminated injury, **DIRECT** RP Technician to accompany the victim and prevent the further spread of contamination.

**6.7 Emergency Exposure Authorization**

- 6.7.1 **IF** it is necessary to exceed normal radiation exposure limits (5 Rem TEDE) to save a life, protect the public, or save vital equipment, **THEN** authorize emergency exposure limits using Form EP(123) EA, *Emergency Exposure Authorization*.
- 6.7.2 Justify exposure of workers that is incurred for the protection of large populations when the collective dose avoided by the emergency operation is significantly larger than that incurred by the workers involved.
- 6.7.3 **LOG** names of individuals and **COMPLETE** form EP(123) EA.



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**6.8 Follow-Up Notifications**

6.8.1 **PERFORM** this section:

- Approximately every two hours after completion of Step 6.2, Initial Notifications;
- When there is a change in Release status (e.g., Effluent EAL Threshold met);
- When a significant change in event status occurs as determined by the ED.

6.8.2 **COMPLETE** EP(123) NF, *Notification Form*, located on the Portal.

6.8.2.1 IF email/Portal is unavailable, THEN COMPLETE a hardcopy of EP(123) NF.

6.8.3 **SELECT** "SAVE AS" to save completed EP(123) NF to desk top.

6.8.4 Create an Email with subject line: "SONGS Emergency Notification".

6.8.5 Send EP(123) NF to group email list "SONGS Emergency Notification".

6.8.6 Print EP(123) NF.

6.8.7 Call the following agencies and **ENSURE** EP(123) NF was received and understood:

✓	AGENCY	TIME NOTIFICATION COMPLETED
	Camp Pendleton	
	San Diego County	
	Orange County	
	State of California (Cal OES)	

6.8.8 **LOG** time each notification is completed.

6.8.9 **PROVIDE** and log updates to the NRC approximately every two hours **OR** when conditions change using NRC Form 361, *Event Notification Worksheet*.



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### 6.9 Assessment Actions

- 6.9.1 IF the event is currently classified as an NOUE, THEN assess conditions continually for possible upgrade to an Alert.
- 6.9.1.1 IF conditions warrant upgrade to an Alert, THEN reenter this procedure at Section 6.1.
- 6.9.2 Assess staffing needs and **ENSURE** they are obtained as required:
- ERO Coordinator
  - Technical Coordinator
  - Radiation Protection Coordinator
  - Additional supplemental personnel
- 6.9.3 Assess conditions and available station parameters to determine the status of spent fuel. Consider:
- Is spent fuel adequately cooled?
  - Are there any conditions that threaten ability to cool spent fuel?
  - Are there any physical conditions threatening spent fuel or its safety systems?
- 6.9.4 Assess any security issues threatening normal site operations.
- 6.9.5 Assess resource needs and **ENSURE** resources are obtained as required.



**6.10 Ongoing Station Coordination Actions**

6.10.1 **IF** on-site protective actions are required due to the emergency, **THEN NOTIFY** plant personnel by site PA or radio.

6.10.1.1 **NOTIFY** station personnel of the following:

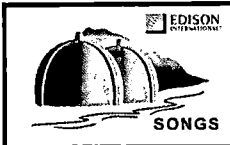
- Emergency classification
- On site protective actions
- Any special instructions due to the event

6.10.2 **ENSURE** supplemental personnel are briefed/trained commensurate with the situation and task to be performed, including radiological and plant specific hazards.

6.10.3 **CONDUCT** formal briefing of assembled ERO approximately every hour using the following guidance:

- What are current emergency classification and emergency action level?
- What are current hazards?
- What are onsite protective actions?
- What actions are being taken and what are associated priorities?
- What additional resources or personnel are needed?
- What are potential event upgrade criteria?





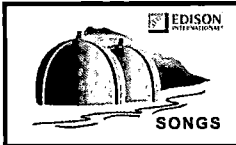
6.11 **Onsite Protective Actions**

6.11.1 **MAINTAIN** awareness of any conditions that may require taking protective actions for site personnel. Conditions may include:

- Increasing Radiation Levels
- Airborne Hazards (radioactive or hazardous gases)
- Fires
- Spill of chemical or radioactive materials
- Water leaks
- Structural Damage
- Security issues
- Any other condition which may present a hazard to personnel

6.11.2 **DIRECT** appropriate protective actions including but are not limited to:

- Precautionary dismissal of non-essential personnel
- Local Area Evacuation
- Protected Area Evacuation
- Site Evacuation
- Exclusion Area Boundary (EAB) Evacuation
- Assembling onsite personnel
- Accounting for personnel inside the Protected Area
- Notification of onsite persons impacted
- Determining and maintaining accountability of assembled personnel, and for identifying and determining the locations of personnel that were not evacuated
- Search and rescue
- Monitoring of evacuees for contamination and control measures if contamination is found
- Evacuating and treating onsite injured personnel, including potentially contaminated personnel
- Use of protective clothing, respirators, or SCBA
- Implementation of response team control measures
- Implementation of two-person rules for personnel sent into unknown hazards
- Command Center relocation to an alternate location (e.g., 70' RCA control point, K10/K20, D44 conference room)
- Recommending State Beach closure.



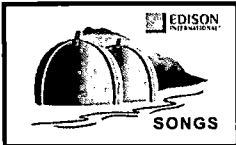
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- 6.11.3 **ENSURE** exposure accountability is maintained and proper personnel radiological monitoring equipment is provided for personnel during emergency conditions.
- 6.11.4 **ENSURE** access to high radiation areas is only permitted with prior approval and personnel are not allowed to enter known or potential high radiation areas unless their exposure has been properly evaluated.
- 6.11.5 **ENSURE** periodic habitability surveys of the Command Center are performed during an emergency.
- 6.11.5.1 **IF** the facility is determined to be uninhabitable, **THEN** evacuate in order to prevent or minimize exposure to radiation and radioactive materials.
- 6.11.6 **IF** necessary to facilitate response to emergency conditions, **THEN** suspend any security measure described in the Physical Security Plan or any license condition or technical specification in accordance with 10CFR50.54(x) and (y).
- 6.11.6.1 **NOTIFY** the NRC as soon as practical and in all cases within one hour of the occurrence of any deviation from the plant's Technical Specifications authorized pursuant 10CFR50.54(x) using NRC Form 361, *Event Notification Worksheet*.
- 6.11.7 Criteria for ordering assembly and/or evacuation
- 6.11.7.1 **IF** any of the hazards listed in step 6.11.1 are present, **THEN INITIATE** actions for a local area evacuation per SO23-13-1.
- 6.11.7.2 **IF** any of the hazards listed in step 6.11.1 affect the Command Center, **THEN INITIATE** actions for Operation from the Alternate Command Center per SO23-13-2.
- 6.11.7.3 **IF** any of the hazards listed in step 6.11.1 affect major portions of the Protected Area(s), Owner Controlled Area, ISFSI or NIA, **THEN INITIATE** site assembly and/or evacuation.
- 6.11.8 Assembly
- 6.11.8.1 **DETERMINE** Assembly Area to be used based upon hazards present (i.e., building structure damage due to earthquakes or radiological release direction).
- 6.11.8.1.1 **IF** none of the designated assembly areas can be used, **THEN DETERMINE** an alternate location.
- 6.11.8.1.2 **DIRECT** NSSS to implement Assembly actions per Attachment 2.
- 6.11.8.2 **PERFORM** PA/Siren coordination to assemble non-emergency response personnel using EP(123) PA.

REFERENCE USE



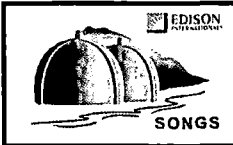
## Shift Manager / Emergency Director Checklist

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- 6.11.8.3 **DIRECT** NSSS to provide accountability of individuals remaining within the Protected Area within 30 minutes of PA announcement.
- 6.11.8.4 **PROVIDE** Assembly Area Coordinator(s) with plant information appropriate to the event using Assembly Area Briefing script located in the ERO Notebook.
- 6.11.8.5 **DIRECT** Assembly Area Coordinator(s) to determine accountability of personnel on site.
- 6.11.8.6 **PERFORM** PA/Siren coordination to periodically (every hour or as conditions change) update personnel on plant status using EP(123) PA.
- 6.11.9 Site Evacuation
  - 6.11.9.1 **DETERMINE** safest evacuation route based upon available radiological data and traffic impediments.
    - 6.11.9.1.1 **REQUEST** input from RP and NSSS as needed.
    - 6.11.9.2 IF a radiological release is in progress, THEN IDENTIFY parking lots which are known or likely to have vehicle contamination.
      - 6.11.9.2.1 **REQUEST** input from RP as needed.
    - 6.11.9.3 **DIRECT** NSSS to implement Site Evacuation actions per Attachment 2.
    - 6.11.9.4 **PERFORM** PA/Siren coordination to evacuate non-emergency response personnel using EP(123) PA.
    - 6.11.9.5 **ENSURE** PA announcement provides pertinent information to personnel (i.e., leave the site, relocate at alternate location, evacuation route, parking lots unavailable due to contamination, means for transporting, areas to avoid, monitoring and decontamination actions).
  - 6.11.10 EAB Evacuation / Access Control
    - 6.11.10.1 **PERFORM** announcement for EAB evacuation using the Public Perimeter Address System.
    - 6.11.10.2 **REQUEST** State Parks to evacuate and control access to the beach areas within the EAB.
    - 6.11.10.3 **REQUEST** Camp Pendleton to evacuate and control access to areas within the EAB.
    - 6.11.10.4 **PERFORM** Follow-Up Notifications per Section 6.8

REFERENCE USE

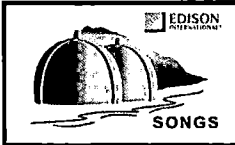


## 6.12 Mitigative Actions

- 6.12.1 **DETERMINE** appropriate actions required to mitigate the effects of the event with input from the ERO Coordinator and the Technical Coordinator (if present).
- 6.12.2 **DIRECT** Operator to perform system and component manipulations and basic radiation surveys as needed.
- 6.12.3 **DIRECT** an RP Technician to perform radiation protection duties as needed.
- 6.12.4 **OBTAIN** needed resources to carry out mitigative actions.
- 6.12.5 IF the magnitude of actions requires technical and craft support, THEN ENSURE the Technical Coordinator is recalled to coordinate them.
- 6.12.6 **DIRECT** mitigative actions.
- 6.12.7 Make log entries of personnel dispatched, time departed, location, and return time.
- 6.12.8 **REFER** to SO23-V-5.100 for mitigation strategies to events resulting in extensive Plant damage.

## 6.13 Shift Turnover

- 6.13.1 **REVIEW** the following items with the oncoming Shift Manager:
- Completed EP(123) NF forms
  - Current site conditions
  - Current protective actions
  - Mitigative activities in progress
  - Numbers of ERO and support personnel onsite
  - Your ERO position Logbook
- 6.13.2 **ANNOUNCE** turnover of Emergency Director responsibilities to the Command Center.
- 6.13.3 Log time of turnover in your Logbook.



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**6.14 Event Closeout**

6.14.1 WHEN the following conditions are met, THEN terminate the emergency:

- Any event-related radioactive releases have been stopped
- Conditions are stable or improving
- Site radiation levels are stable and decreasing with time
- Any fire, flooding, security issues, or similar emergency conditions are under control or no longer exist
- Senior station management has been notified of the impending emergency termination

6.14.2 **COMPLETE** EP(123) NF, *Notification Form*, located on the Portal.

6.14.3 **SELECT** "SAVE AS" to save completed EP(123) NF to desk top.

6.14.4 **CREATE** an Email with subject line: "SONGS Emergency Notification".

6.14.5 **PRINT** EP(123) NF.

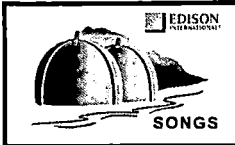
6.14.6 **SEND** EP(123) NF to group email list "SONGS Emergency Notification".

6.14.6.1 IF email/Portal is unavailable, THEN COMPLETE a hardcopy of EP(123) NF.

6.14.7 **NOTIFY** station personnel of event closeout and response actions using EP(123) PA, *PA/Siren Coordination*.

6.14.8 Call the following agencies within 60 minutes of event closeout **AND ENSURE** EP(123) NF was received and understood:

✓	AGENCY	TIME NOTIFICATION COMPLETED
	Camp Pendleton	
	San Diego County	
	Orange County	
	State of California (Cal OES)	



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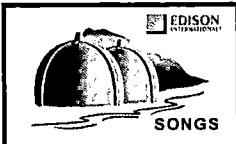
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- 6.14.9 **ANNOUNCE** event termination to the ERO.
- 6.14.9.1 **LOG** the time notifications were completed.
- 6.14.10 **PROVIDE** update to the NRC using NRC Form 361, *Event Notification Worksheet*, immediately after notification of the appropriate state and local agencies.
- 6.14.10.1 **LOG** the time of update.
- 6.14.11 **COORDINATE** with Corporate Communications to provide a written summary within 8 hours of an Alert closeout or within 24 hours of an NOUE closeout to the following agencies:
- Camp Pendleton
  - San Diego County
  - Orange County
  - State of California (Cal OES)
  - NRC
- 6.14.12 Contact site VP to determine who will fill the Recovery Director.
- 6.14.13 **DIRECT** the Recovery Director to implement reentry and recovery per Attachment 1.
- 6.14.14 **ASSEMBLE** and organize all Emergency Director documentation pertaining to the event (e.g., logs, procedures, attachments, completed forms and checklists).
- 6.14.14.1 **REVIEW** documentation for completeness and accuracy.
- 6.14.14.2 **PROVIDE** documentation to the Emergency Preparedness Manager.
- 6.14.15 Participate in post event critiques / reviews.

### 7.0 **RETENTION OF RECORDS**

- 7.1 **PROVIDE** all paperwork generated in response to the emergency event (e.g., logs, procedures, attachments, completed forms, and checklists) to the Emergency Preparedness Manager.
- 7.2 Refer to Attachment 1, Section for Emergency Response Records.
- 7.3 Emergency Response Records shall be maintained in EP files for a period of six years.

### REFERENCE USE



## Shift Manager / Emergency Director Checklist

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### 8.0 REFERENCES / COMMITMENTS

#### 8.1 Implementing Reference

##### 8.1.1 Procedures

- 8.1.1.1 SO23-V-5.100, SONGS Mitigation Strategies
- 8.1.1.2 SO123-VIII-ERO-3, ERO Coordinator Checklist
- 8.1.1.3 SO123-VIII-ERO-6, Dose Assessment
- 8.1.1.4 SO123-XV-HU-3, Human Performance Program
- 8.1.1.5 SO123-XV-7, Fitness for Duty Program Requirements for Protected Area Access and Assignment to Emergency Response Organization Duties
- 8.1.1.6 SO123-VII-20.9.2, Material Release Surveys
- 8.1.1.7 SO123-VII-20.9.4, Survey and Release of Personnel

##### 8.1.2 Forms

- 8.1.2.1 EP(123) EA, Emergency Exposure Authorization
- 8.1.2.2 EP(123) EAL, Emergency Action Levels
- 8.1.2.3 EP(123) LB, ERO Log Book
- 8.1.2.4 EP(123) NF, Notification Form
- 8.1.2.5 EP(123) PA, PA / Siren Coordination
- 8.1.2.6 NRC Form 361, Reactor Plant Event Notification Worksheet

#### 8.2 Developmental References

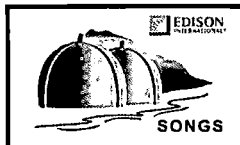
##### 8.2.1 Manuals

- 8.2.1.1 SONGS Permanently Defueled Emergency Plan, Volume 1 (PDEP-1)
- 8.2.1.2 SONGS Permanently Defueled Emergency Plan, Volume 2, EAL Technical Bases Manual (PDEP-2)

##### 8.2.2 Procedures

- 8.2.2.1 SO123-VIII-ADMIN-2, Emergency Preparedness Program Training

### REFERENCE USE



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Reentry and Recovery

Attachment 1

### 1.0 Reentry and Recovery

During a declared emergency, a point will be reached at which time the plant will be placed in a stable condition. With the understanding that this condition could be attained even though specific Emergency Action Levels are still exceeded, the Emergency Director will determine there is no longer a need to keep the emergency organization in effect and to begin plant recovery.

The extent and nature of the corrective and protective measures and the extent of plant recovery will depend on the emergency conditions at hand and the status of plant areas and equipment. The general goals for plant recovery are:

- An orderly evaluation of the cause and effect of the emergency and the implementing of solutions to prevent the immediate recurrence of the incident.
- A planned approach for returning the plant to a stable condition by obtaining the appropriate manpower, materials, and equipment needed to accomplish that end.
- An evaluation of the radiation exposure records for all on site emergency response personnel involved in the incident.
- A planned approach to ensure radiation exposures and contamination control are in keeping with the ALARA program.

### 2.0 Recovery Organization (Performed by Recovery Director)

The recovery organization will be based on normal SONGS organizations and functions with the SONGS executive management position being responsible for directing all site activities.

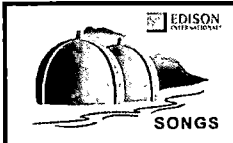
IF the event results in addition support being required to return the site to pre-event status along with increased interface with offsite agencies and/or media involvement, a recovery organization similar to that shown in PDEP-1, Figure M-1 will be put in place.

### 3.0 Recovery Phase Notifications

Onsite personnel will be notified when the plant recovery phase begins.

Offsite authorities and response organizations will be notified when recovery phase begins and ends.





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Reentry and Recovery

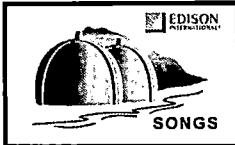
Attachment 1

### 4.0 Emergency Response Records

4.1 Records associated with the emergency to be maintained include:

- cause of the incident,
- personnel and equipment involved,
- extent of injury and damage (onsite and offsite) as a result of the incident,
- locations of contamination with the final decontamination survey results,
- corrective actions taken to terminate the emergency,
- actions taken or planned to prevent a recurrence of the incident,
- onsite and offsite assistance requested and received, and
- any program changes resulting from a critique of emergency response activities.

4.2 Forward Emergency Response Records to Emergency Preparedness Manager.



## Shift Manager / Emergency Director Checklist

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Security Support - Site Assembly and Evacuation Checklist

Attachment 2

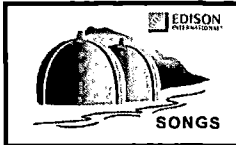
1.0 IF Security cannot support actions below, THEN inform SM/ED immediately.

### 1.1 Site Assembly

- DETERMINE** if personnel will exit the PA through the turnstiles and/or the Manual Operated Gates (MOGs).
- IF personnel will exit the PA through the MOGs, THEN DIRECT Security Officers to collect their security photo-identification badges, visitor badges, and escort badges.
- DIRECT** Security Officers to provide collected badges to Central Alarm Station (CAS) for reconciliation.
- DIRECT** CAS to provide Emergency Accountability Report.
- DIRECT** Security Officers at Security Processing Facilities to deny Protected Area access to persons and vehicles except for the following: recalled ERO; on-site and off-site emergency response vehicles; and delivery or service vehicles required for emergency response activities.

### 1.2 Site Evacuation

- OBTAIN** evacuation route from the SM/ED.
- REQUEST** LLEA assistance with evacuation.
- DIRECT** all OCA access control posts to deny site access to persons and vehicles except for the following: recalled ERO; on-site and off-site emergency response vehicles; and delivery or service vehicles required for emergency response activities.
- DIRECT** all OCA access control posts to instruct all authorized incoming personnel as to safest passable route to their destination.
- DETERMINE** current traffic flow and notify SM/ED of: evacuation start, evacuation complete, and if traffic flow is impeded.
- DIRECT** available Security Officers or other ERO personnel to sweep PA and OCA to ensure complete evacuation of site, retrieve Safeguards Information material left unattended, AND promptly identify any discovered injured personnel.



## Shift Manager / Emergency Director Checklist

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Summary of Changes

Attachment 3

Notification tracking 10 CFR 50.54 (q): 203299418

Author: Lucia Sischo

NN, Order, or Other Action	Description of Change	Reviewer(s)	Step, Section, Attachment or Page
203299418	Add instruction for Email subject line.	Sischo Sheek Doeing NOD SM or Designee	Step 6.2.4
203335631	Add Recall process additional report location option for personnel at work.		Step 6.2.9.3
203262409	Change title to ERO Coordinator.		Throughout
Betterment	Rearrange steps for initial and follow-up notifications.  Correct symbol to match EAL entry criteria.  Add guidance for EAB evacuation.  Correct grammar (plural to singular).  Update Form title.		Sections 6.2, 6.8  Step 6.3.3.1  Steps 6.11.2, 6.11.10  Step 6.11.2  Step 8.1.2.2
3rd Party Comments	Clarify personnel reporting location during Alert declaration.  Indicate alternate reporting location if not Command Center during Alert declaration.  Indicate additional reporting location during NOUE declaration.  Identify areas to avoid during event declaration.  Include restriction to contaminated items.		Sischo Sheek NOD

**Attachment 2**

**Report and Analysis Summary**

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

<b>Document Number:</b> SO123-VIII-ERO-2 <b>Title:</b> SO123-VIII-ERO-2, Shift Manager / Emergency Director Checklist, Revision 2 <b>SONGS Nuclear Notification (NN):</b> 203299418	
<b>Change Description</b> The 10CFR50.54(q) screen and evaluation for SO123-VIII-ERO-2, Revision 2, was performed under NN 203299418 task 5. Changes to the procedure include: <ul style="list-style-type: none"> <li>• Add a specific subject line for email notification, which makes it consistent with follow-up notifications.</li> <li>• Change order to save the file before sending as an email, which does not add appreciable time to the courtesy notification, and does not change the timing for the 60-minute notification to the agencies and the NRC.</li> <li>• Add requirement for on-duty ERO and RP Coordinators to report to the Command Center at Alert declaration.</li> <li>• Add "work location" and "other" to the report location.</li> <li>• Add instruction to restrict access to contaminated items which was inadvertently removed among other text during prior revision.</li> <li>• Add instructions for Exclusion Area Boundary evacuation as an onsite protective action (this item required 10CFR50.54(q) evaluation)</li> <li>• Editorial changes.</li> </ul>	<b>Analysis Summary</b> After incorporation of the changes in SO123-ERO-2, Revision 2, the Permanently Defueled Emergency Plan continues to: <ul style="list-style-type: none"> <li>• Establish and maintain a process for timely augmentation of on-shift staff.</li> <li>• Maintain procedures for notification of State and local governmental agencies capable of alerting them of the declared emergency within 60 minutes after declaration of an emergency and providing follow-up notifications.</li> <li>• Maintain a range of protective actions available for plant emergency workers during emergencies, including the means and time required to warn or advise onsite individuals and individuals who may be in areas controlled by the operator.</li> <li>• Establish resources for controlling radiological exposures for emergency workers.</li> </ul> <p>The Permanently Defueled Emergency Plan continues to meet the regulatory requirements of 10CFR50.47(b)(2), (b)(5), (b)(10), and (b)(11) as exempted. These changes do not modify the licensing basis with regards to reduction in effectiveness. The capability and timeliness to perform the planning functions are not altered by the changes made. The capability and timeliness to perform the associated elements are also maintained.</p>
<b>PREPARED BY:</b> Lucia Sischo <b>DATE:</b> 10-20-2016	<b>REVIEWED BY:</b> Kevin Sheek <b>DATE:</b> 10-20-2016