

## **10 CFR 50.54(q)(5) Summary**

## **10 CFR 50.54(q)(5) Summary**

In accordance with 10 CFR 50.54(q)(5), Duke Energy is providing a summary of the Fleet Emergency Plan Implementing Procedure being submitted with this letter.

### **AD-EP-ALL-1000, Conduct of Emergency Preparedness, Revision 2**

This fleet procedure was revised to:

- Add a new responsibility to the EP Site Functional Area Manager position to ensure surveillance tests to determine readiness are performed.
- Relocate the responsibilities for the drill and exercise program for Site and Fleet EP Staff positions to another approved governance document.
- Delete the responsibility for the EP Site Staff to ensure coordination of the public education and information program. With the implementation of the Corporate Communications Department Interface Agreement, lead responsibility for development of public information materials has been transferred from the Site EP staff to Corporate Communications.
- Modify the Fleet Emergency Planning Procedure Review frequencies such that the Emergency Plan Implementing procedures are reviewed annually and non-implementing procedures are reviewed biennially.
- Relocate the requirements for initial and familiarization of EP Staff to another approved procedure.
- Remove the requirement for agreements or contracts that do not provide specific expiration dates to be re-established every three years based on Emergency Plans are updated and maintained current on an annual basis.
- Add guidance for developing, conducting and evaluating simulator scenarios.

Thus, Fleet procedure, AD-EP-ALL-1000, continues to comply with regulations and regulatory commitments. These changes do not result in a reduction in the effectiveness of the Emergency Plan, as written and approved. The changes continue to comply with the requirements of 10 CFR 50.47(b) and the activities do not constitute a reduction in effectiveness or a change in the current Emergency Action Level (EAL) scheme.

RA-17-0021  
Enclosure 2

## **Copy of Fleet Emergency Preparedness Procedure**



NUCLEAR OPERATING FLEET  
EMERGENCY PREPAREDNESS PROCEDURE

**AD-EP-ALL-1000**

**CONDUCT OF EMERGENCY PREPAREDNESS**

REVISION 2

Effective Dates:

05/18/2017  
Brunswick

05/18/2017  
Catawba

05/18/2017  
Harris (HNP)

05/18/2017  
McGuire

05/18/2017  
Oconee

05/18/2017  
Robinson

05/18/2017  
NGO

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**REVISION SUMMARY**

**PRR 2095007  
DESCRIPTION**

- Section 4.7, EP Site Functional Area Managers (EP SFAMS) - Added new responsibility to ensure surveillance tests to determine readiness of emergency response facilities, equipment, and communication systems are performed.
- Section 4.8, EP Site Staff, revised Step 5 from "Coordinates the site drill schedule." to "Supports the drill and exercise program as described in PD-EP-ALL-0800, Drills and Exercises Program."
- Section 4.8, deleted old Step 6, " Ensure coordination of the public education and information program."
- Section 4.9, Fleet EP Staff, revised Step 5 from "Plans and administers ERO drills and exercises" to "Supports the drill and exercise program as described in PD-EP-ALL-0800, Drills and Exercises Program."
- Section 5.1, Control of the E-Plan and EPIPs, added a new Step 4, "Fleet EP Procedures that are Emergency Plan Implementing Procedures shall be reviewed annually. The remaining Fleet EP Procedures should be reviewed biennially. Attachment 5, Fleet Emergency Planning Procedure Review Frequencies, provides a list of Fleet EP Procedures and the associated review frequency." Renumbered subsequent steps. (PRR 2065032)
- Section 5.2.1, Deleted details of the program for initial training and familiarization of EP Staff and replaced with reference to fleet procedure AD-EP-ALL-0501, Emergency Preparedness Staff Training and Qualification.
- Section 5.3, E-Plan Activation Summary and Critique, Note before Step 1. Updated group name from Enterprise Crisis Operations Center (ECOC) to Incident Support Team (IST). Updated position title from ECOC Director to IST Advisor.
- Section 5.3, Step 1, Updated group name from ECOC to IST, position title from ECOC Director to IST Advisor and email address from ECOCDirectors@duke-energy.com to ISTAdvisors@duke-energy.com. Updated SR/O/A/2000/003 enclosure number to current number.
- Section 5.8, EP Support Plan, Letters of agreement, and Contract Reviews, deleted Step 2 that required renewal on a three year frequency. (PRR 2039166)
- Section 5.9, Offsite Response Organization Interface, revised step 4 to change "applicable procedures" to "authentication code word lists in Emergency Response Facilities."
- Added new Section 5.20, Evaluator Simulator Scenarios, to close gap with INPO 14-003 (AR 2078501-10, PRR 2090561). The following steps were added.
  - ◊ Evaluated simulator scenarios conducted in licensed operator requalification training may test implementation of the emergency plan and procedures.
  - ◊ Evaluated simulator scenarios are developed, conducted, and evaluated in accordance with Operations training program standards and guidance.
  - ◊ Emergency preparedness personnel periodically review simulator scenarios and maintain oversight of the evaluation of emergency plan implementation.
  - ◊ Oversight includes tracking drill and exercise performance (DEP) indicator opportunities and the performance of key ERO skills.
- Section 7.0, References, added two new references: PD-EP-ALL-0800, Drills and Exercises Program, and INPO 14-003, Emergency Drill and Exercise Guideline.
- Revised Attachment 1, EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level to update ERONS message Templates in Steps 2.1 and 3.1. Renumbered subsequent steps. (PRR 2071507)
- Added new Attachment 5 to provide a list of Fleet EP Procedures and the associated review frequency (annual or biennial). (PRR 2065032)

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## 1.0 PURPOSE

1. To provide standards and expectations for the Duke Energy Emergency Preparedness (EP) Program to ensure uniform and consistent overall support and direction for Emergency Preparedness within the Nuclear fleet.
2. To ensure the Duke Energy EP Program is maintained by administration of EP documents, emergency response organization personnel, and emergency response facilities providing a continuous high state of readiness for response to an emergency event to protect the public and nuclear station workers.
3. This procedure identifies critical elements of EP and provides defined organizational roles, responsibilities, and processes.

## 2.0 SCOPE

1. This procedure applies to nuclear fleet and station Emergency Preparedness staff and their management.
2. This procedure is intended to supplement the information contained in the site-specific emergency plans and program implementation procedures in an effort to improve program implementation.
  - a. In the event of an emergency at any Duke Energy nuclear station, the Emergency Response Organization will respond using the site-specific emergency plans and emergency plan implementation procedures to mitigate the consequences of the event.
3. EP processes include provisions to interface with and support federal, state, and local emergency planning efforts in order to meet regulatory requirements and commitments to support an integrated planning effort.

## 3.0 DEFINITIONS

1. **Beyond Design Basis (BDB) Events:** A category of accidents that result in severe damage to the station and surrounding areas that is greater than the licensing basis for the station.
2. **Corporate Functional Area Manager (CFAM):** Per AD-AD-ALL-0001, Corporate Functional Area Managers (CFAM) and Peer Group Process, the CFAM is the highest level of governance authority for the functional area. The CFAM leads the efforts to improve functional area performance at all Nuclear Generation Department sites.



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### 3.0 DEFINITIONS (continued)

3. **Emergency Plan (E-Plan):** The site Emergency Plan is the document(s) prepared and maintained by the licensee that identify and describe the licensee's methods for maintaining emergency preparedness and responding to emergencies. An emergency plan includes the plan as originally approved by the NRC and all subsequent changes made by the licensee with, and without, prior NRC review and approval under §50.54(q). [10 CFR 50.54(q)(1)(ii)].
4. **Emergency Plan Implementing Procedures (EPIPs):** Emergency Plan Implementing Procedures are procedures used to declare or respond to an emergency. [BNP] These procedures are designated as Plant Emergency Procedures (PEP).
5. **Emergency Preparedness (EP) Forum:** The EP forum serves as the station oversight meeting for senior site management to provide oversight of industry trends and issues, EP improvement initiatives, upcoming Emergency Response Organization (ERO) training, site EP program health, site specific EP initiatives, and to provide management support for new initiatives and implementation of new regulatory requirements. Meeting schedule and format are specified in AD-AD-ALL-0004, Fleet Standard Work Day.
6. **Emergency Preparedness Peer Group:** The assembly of corporate and site emergency preparedness peers (Corporate and Site Functional Area Managers), as defined in AD-AD-ALL-0001, Corporate Functional Area Managers (CFAM) and Peer Group Process, that communicate frequently and meet periodically with the goal of achieving best practices and policies to address operational and business plan goals to achieve top industry performance. The Emergency Preparedness Peer Group will address philosophical, policy, and broad process issues.
7. **Emergency Preparedness Working Group:** Emergency Preparedness Working Groups function as subcommittees chartered by the Emergency Preparedness Peer Group based upon a technical or manpower need to complete a discrete project or task. There are both standing and temporary Emergency Preparedness Working Groups.
8. **Performance Indicators (PIs):** A set of metrics defined by the NRC or Emergency Preparedness Peer Group to monitor emergency preparedness program performance. Regulatory Performance Indicators monitored by the NRC are contained in NEI 99-02, Regulatory Assessment Performance Indicator Guideline.
9. [BNP, HNP, RNP] **Required ERO Response Time:** The time at which all required minimum staff ERO personnel have arrived at their assigned facility and are available for turnover. {7.1.1.g}

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### 3.0 DEFINITIONS (continued)

10. **Severe Accident Management Guidelines (SAMGs):** Documents that direct emergency actions under severe accident conditions outside the design basis for the station.
11. **Site Functional Area Manager (SFAM):** Per AD-AD-ALL-0001, Corporate Functional Area Managers (CFAM) and Peer Group Process, the SFAM is the highest level of authority at a site for a specific functional area. EP also has SFAMs in the corporate office for centralized functions. SFAMs are the primary members of the Emergency Preparedness Peer Group.

### 4.0 RESPONSIBILITIES

#### 4.1 Senior Management

1. Provides leadership to ensure plant and corporate management and employees understand the importance of a well implemented emergency preparedness program to protect public health and safety and remain engaged to ensure that a self-critical, self-identifying culture exists.

#### 4.2 Senior Vice President and Chief Nuclear Officer

1. The Senior VP/CNO has overall responsibility and authority for all nuclear activities, including emergency preparedness programs, and has corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plants to ensure nuclear safety.

#### 4.3 Site Vice President

1. Ensures Emergency Preparedness (EP) policies and standards are implemented at the site.
2. Ensures site organizations comply with EP related requirements.
3. Provides site resources necessary to maintain equipment important to EP.
4. Ensures the administration, implementation, and maintenance of the Station's Emergency Plan and Emergency Plan Implementing Procedures.
5. [CNS, MNS, ONS] Approves the Station Emergency Plan (or designee).

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**4.4 EP Corporate Functional Area Manager (EP CFAM)**

1. Provides governance and oversight for the Emergency Preparedness (EP) functional area.
2. Serves as Chairperson for the EP Peer Group meetings.
3. Establishes the EP functional area fleet-wide best practices and oversees the development of fleet standardized EP policies, programs, and processes.
4. Promotes consistent implementation across the fleet of standardized policies, programs, processes, and best practices.
5. Develops and maintains the EP CFAM A3 Summary.
6. Collects and evaluates EP performance information from the Peer Group, fleet and site indicators, management review meetings, internal and external assessment reports, and Nuclear Oversight assessments.
7. Manages and improves the Emergency Preparedness and Emergency Response Organization (ERO) Training Programs.
8. Ensures the sharing of EP industry best practices and operational experience among the nuclear sites.
9. Manages external relationships with regulatory and industry oversight agencies, utility and industry peers, industry groups, and other advisory groups.
10. Reviews new and revised regulations and industry guidance to ensure fleet application as appropriate.

**4.5 EP Projects and Programs Manager (EP SFAM)**

1. Assists the CFAM in carrying out CFAM responsibilities.
2. Provides routine oversight for the sites as assigned by the CFAM.
3. Provides direction and control of projects related to emergency response programs, facilities, and equipment.
4. Provides direction and control of the development and submittal of evaluated exercise scenarios.
5. Provides direction and control of the offsite agency programs supporting Duke Energy Emergency Preparedness.
6. Sponsors EP Working Groups established in the areas of projects, programs, and exercise development.

**4.6 EP Procedures And Training Manager (EP SFAM)**

1. Assists the CFAM in carrying out CFAM responsibilities.
2. Provides routine oversight for the sites as assigned by the CFAM.
3. Provides direction and control of the emergency response training program, including the EP training specialists.
4. Provides direction and control of the development and maintenance of the Fleet EP procedures.
5. Sponsors EP Working Groups established in the areas of emergency preparedness training and fleet procedures.

**4.7 EP Site Functional Area Managers (EP SFAMs)**

1. Maintain a comprehensive emergency preparedness program to protect public health and safety and a culture of strong accountability for results.
2. Ensure initial training and development of the Emergency Preparedness Staff.
3. Maintain financial accountability of the site EP Program.
4. Manage EP Performance Improvement Programs.
5. Monitor and provide input to improve the Emergency Preparedness and Emergency Response Organization (ERO) Training Programs.
6. Ensure coordination of the public education and information program.
7. Manage and continuously improve interfaces with:
  - Site management
  - Fleet emergency organizations
  - Regulatory agencies
  - Off-site emergency response organizations
8. Manage regulatory updates, industry standards, and operating experience for evaluation or implementation into the Emergency Preparedness Program.

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**4.7 EP Site Functional Area Managers (EP SFAMs) (continued)**

9. Review new and revised regulations and industry guidance and ensure site application as appropriate.
10. Provide results of the site's Nuclear Oversight (NOS) assessment, related to the offsite interface, to the Offsite Response Organizations (ORO) in an appropriate format after the assessment report is published.
11. Ensure Emergency Plan and Emergency Plan Implementing Procedure submittals are handled in accordance with this procedure and AD-LS-ALL-0002, Regulatory Correspondence.
12. Ensure actual events are critiqued, including assembling and retention of appropriate documentation.
13. Ensure surveillance tests to determine readiness of emergency response facilities, equipment, and communication systems are performed.

**4.8 EP Site Staff**

1. Maintains Emergency Preparedness compliance to ensure public health and safety.
2. Implements the Corrective Action, Self-Assessment, Benchmarking and Operating Experience Programs as they apply to Emergency Preparedness.
3. Maintains and continuously improves the effectiveness of the Emergency Response Organization by performing the following:
  - a. Ensuring the ERO is prepared to respond and mitigate any postulated emergency.
  - b. Notifying the ERO of required actions for an increase in the Homeland Security's National Terrorism Advisory System Level according to Attachment 1, EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level.
4. Continuously improves the Site Emergency Plan and implementing procedures.
5. Supports the drill and exercise program as described in PD-EP-ALL-0800, Drills and Exercises Program.
6. Ensures the site's physical facilities, capabilities, methods, and resources for implementing the site's Emergency Plan are maintained in accordance with 10 CFR 50.54(q).

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**4.8 EP Site Staff (continued)**

7. Performs surveillance tests to determine readiness of, and makes improvements to, emergency response facilities, equipment, and communication systems.
8. Maintains and continuously improves interfaces with off-site response organizations by performing the following:
  - a. Building working relationships of support and trust.
  - b. Providing support for public information development and dissemination.
  - c. Providing support for the development and maintenance of response plans.

**4.9 Fleet EP Staff**

1. Maintains Fleet Emergency Preparedness compliance to ensure public health and safety.
2. Implements the Corrective Action, Self-Evaluation, Benchmarking and Operating Experience Programs as they apply to Emergency Preparedness.
3. [CNS, MNS, ONS] Maintains and continuously improves the effectiveness of the Emergency Response Organization at the Common EOF by performing the following:
  - a. Ensuring the ERO is prepared to respond and mitigate any postulated emergency.
  - b. Notifying the EOF ERO of required actions for an increase in the Homeland Security's National Terrorism Advisory System Level according to Attachment 1, EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level.
4. Maintains and continuously improves the corporate/fleet emergency plan implementing procedures.
5. Supports the drill and exercise program as described in PD-EP-ALL-0800, Drills and Exercises Program.
6. Leads Emergency Preparedness projects.
7. Maintains and continuously improves the Emergency Preparedness and Emergency Response Organization Training Programs.
8. [CNS, MNS, ONS] Ensures readiness of and make improvements to EOF, equipment, and communication systems.

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**4.9 Fleet EP Staff (continued)**

9. Maintains and continuously improves interfaces with off-site response organizations by performing the following:
  - a. Building working relationships of support and trust.
  - b. Providing support for public information development and dissemination.
  - c. Providing support for the development and maintenance of response plans.
10. Maintains the Emergency Response Organization Database.

**4.10 [CNS, MNS, ONS] Plant Operations Review Committee (PORC)**

1. NSD 308, Plant Operations Review Committee, outlines the responsibilities of the Plant Operations Review Committee (PORC).
2. Proposed Emergency Plan changes, which after 10 CFR 50.54(q) evaluation, appear to reduce the effectiveness of the Emergency Plan or change the emergency action level scheme and require submittal to the Commission for approval as a license amendment per 10 CFR 50.90, shall be forwarded to the site's Organizational Effectiveness Manager for review by the PORC prior to submitting to the NRC.
3. Proposed Emergency Plan changes, which after 10 CFR 50.54(q) evaluation, appear to create non-compliance with 10 CFR 50.47 or 10 CFR 50 Appendix E, and thus require exemption from regulations by the Commission per 10 CFR 50.12, shall be forwarded to the site's Organizational Effectiveness Manager for review by the PORC prior to submitting to the NRC.

**4.11 All Personnel**

1. Personnel working at Duke Energy are responsible for informing responsible supervisory personnel or for taking appropriate corrective actions whenever any deficiency in the implementation of the requirements contained in Emergency Plan or Emergency Plan Implementing Procedures is determined.

## 5.0 INSTRUCTIONS

### 5.1 Control of the E-Plan and EPIPs

1. 10 CFR 50.54(q) states, in part, 'The nuclear power reactor licensee may make changes to these plans without Commission approval only if the changes do not reduce the effectiveness of the plans and the plans, as changed, continue to meet the standards of 50.47(b) and the requirements of Appendix E to this part. Proposed changes that reduce the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission.'
2. Emergency Preparedness personnel initiate, generate, review, implement, and document changes to the Emergency Plans and Emergency Plan Implementing Procedures.
3. Emergency Plans shall be updated, reviewed, and certified to be current on an annual basis.
  - a. [CNS, MNS, ONS] Revisions to the Emergency Plan shall be indicated by drawing a vertical line in the margin beside the sentence or paragraph revised.
4. Fleet EP Procedures that are Emergency Plan Implementing Procedures shall be reviewed annually. The remaining Fleet EP Procedures should be reviewed biennially. Attachment 5, Fleet Emergency Planning Procedure Review Frequencies, provides a list of Fleet EP Procedures and the associated review frequency.
5. Changes to the Emergency Plan and Implementing Procedures shall be made as necessary to improve procedures during emergency situations, satisfy current regulatory requirements, correct mistakes, facilitate use, or to correct any deficiency determined by drills or exercises.
6. Revisions to the Emergency Plan or Emergency Plan Implementing Procedures shall be evaluated for the need for a Change Management Plan per AD-PI-ALL-0003, Change Management. If required, then determine the complexity and develop a Change Management Plan.
7. Changes to the E PLAN and EPIPs are reviewed prior to implementation to ensure compliance with the licensing basis and for a potential reduction in effectiveness in accordance with the following procedures:
  - a. AD-LS-ALL-0007, Applicability Determination Process
  - b. AD-EP-ALL-0602, Emergency Plan Change Screening and Effectiveness Evaluations 10 CFR 50.54(q)



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**5.1 Control of the E-Plan and EPIPs (continued)**

- c. AD-DC-ALL-0201, Development and Maintenance of Controlled Procedure Manual Procedures
- 8. Proposed changes that reduce the effectiveness of the Emergency Plan must be formally submitted for prior approval as a license amendment per §50.90.
- 9. A change to the entire Emergency Action Level (EAL) Scheme shall be submitted as a license amendment for prior NRC approval per §50.90. The §50.54(q) change process shall be followed for all other EAL changes.
- 10. Emergency Preparedness shall be forwarded an approved copy of each Implementing Procedure revised by another group.
- 11. Commitments shall be controlled per the requirements of AD-LS-ALL-0010, Commitment Management Program.
- 12. NRC submittals are to be prepared per AD-LS-ALL-0002, Regulatory Correspondence.
- 13. The Emergency Plan and Implementing Procedures are controlled documents distributed in accordance with the station Emergency Plans.

**5.2 EP Staff Training**

Requirements for the training/familiarization of EP staff are specified in 10 CFR 50.47(b)(16) and governed by the Site Emergency Plan.

**5.2.1 Initial Training**

- 1. The programs for the training and familiarization of EP staff is specified in AD-EP-ALL-0501, Emergency Preparedness Staff Training and Qualification.

**5.2.2 Continuing Training**

- 1. Continuing training for the EP staff is through on-the-job training related to Site Emergency Plan and procedure revisions, drills/exercises, involvement in assessments and benchmarking at other sites, and review of operating experience.

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### 5.2.2 Continuing Training (continued)

2. Other training is provided through the attendance of short courses, seminars, or executive conferences that relate specifically to emergency preparedness. Additional acceptable annual continuing training resources for EP Staff consist of:
  - Attendance at the NEI EP Training Workshop
  - Attendance at INPO EP Managers Workshop
  - Attendance at NEI EP Forum
  - Attendance at Federal Emergency Management Agency (FEMA) National or Regional REP Conferences
  - Attendance at Offsite Emergency Management Conference
  - Attendance at International Association of Emergency Managers (IAEM)
  - Attendance at Industry EP Specific workshops as approved by the EP CFAM/SFAM
  - Fleet training developed and approved by the EP CFAM/SFAM
  - Local EP training workshops
3. Continuing training shall be documented annually per site specific procedures.

### 5.2.3 10 CFR 50.54(q) Evaluator Qualification Process

1. In addition to the above training, EP Staff should complete training on the Applicability Determination process, 10 CFR 50.59 and 10 CFR 50.54(q) process per fleet procedures, as directed by the EP SFAMs.
2. The 10 CFR 50.54(q) qualification process is described in AD-EP-ALL-0502, Emergency Preparedness 10 CFR 50.54(q) Training Requirements.

### 5.2.4 EP CFAM and SFAM Training

1. If not already completed, then the EP CFAM/SFAM should review the elements of EP training as outlined in Subsection 5.2, EP Staff.
2. If the EP CFAM/SFAM does not have prior EP Staff experience, then the EP CFAM/SFAM should complete the INPO Emergency Preparedness Manager's Training Course within 2 years.

### 5.3 E-Plan Activation Summary and Critique

#### NOTE

[BNP, HNP, RNP] Fleet EP Managers (EP CFAM, EP Projects and Programs Manager, EP Procedures and Training Manager) have been added to the Emergency Response Organization Notification System (ERONS) to provide notification to the Incident Support Team (IST) of any event classified Alert or higher. Have on hand all Emergency Notification Forms (ENFs) transmitted to state and local agencies up to this time. Be prepared to answer questions concerning information on the ENFs as well as any other information requested by an IST Advisor when called back.

1. [BNP, HNP, RNP] EP CFAM or Fleet SFAMs contact the Incident Support Team (IST) Advisors by
  - Sending an email to [ISTAdvisors@duke-energy.com](mailto:ISTAdvisors@duke-energy.com)
  - Phoning the Enterprise Security Console at 704-382-8851 or 800-943-7584, requesting they contact the IST Advisor on call, and provide a call back number for the IST Advisor. {7.1.3}
2. [CNS, MNS, ONS] EOF Emergency Planner notifies the IST for any event where the EOF is activated per SR/0/A/2000/003, Activation of the Emergency Operations Facility, Enclosure 6.15, Emergency Planner Checklist. {7.1.3}
3. The EP SFAM (or designee) is assigned the responsibility of reviewing actual events that have been classified or have been considered for classification as an emergency (e.g., Unusual Event, Alert, Site Area Emergency, General Emergency). Attachment 2, Emergency Plan Activation Summary and Critique (sample), provides guidance on the information needed.
4. Fleet EP and Corporate Communications will assist site EP in the development of the event report and the collection of records and other documentation from the Common Emergency Operations Facility (EOF) and the Joint Information Center (JIC), as applicable.
5. Site EP for the sites/Fleet EP for the Common EOF conducts critiques with ERO members to identify issues requiring corrective action.
6. Site EP assists Regulatory Affairs to ensure post-event written reports are provided to off-site authorities as required.
7. Site EP solicits comments and reviews any recommendations for revisions to the Site E-Plan and implementing procedures and upgrades of emergency response facilities.

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### 5.3 E-Plan Activation Summary and Critique (continued)

8. Site EP coordinates the correction of identified deficiencies and ensures documentation of corrective action is prepared.
  - a. Fleet Procedure AD-EP-ALL-0803, Evaluation and Critique of Drills and Exercises, may be used for guidance in preparing written reports.
  - b. Documentation of actual events will be included in the e-folder of the applicable Condition Report and retained as required by Nuclear Record Retention Rules.
9. Site EP forwards training improvement recommendations to the appropriate training group(s).
10. Site or fleet EP will conduct a critique with State and local government officials to assess the interface between the ERO and offsite response organizations.
11. The FEMA Disaster Initiated Review (DIR) Standard Operating Guide (SOG) will be used by FEMA and the NRC for post-event reviews, if applicable.
  - a. Use AD-EP-ALL-0901, Determining the Status of Offsite Emergency Preparedness, to support the FEMA DIR.
12. For events considered for classification but not actually classified, the EP SFAM (or designee) should verify that no EAL thresholds were exceeded. If the reviewer finds that an EAL threshold has been exceeded, then this information must be communicated to the Shift Manager immediately for reporting per AD-LS-ALL-0006, Notification/Reportability Evaluation.

### 5.4 Performance Improvement Cornerstones

To ensure the Emergency Preparedness program are adequately and effectively performing the criteria in the site Emergency Plans, they are monitored through fleet procedural processes. Program health is monitored using industry standard self-evaluation techniques.

#### 5.4.1 Corrective Action Program

1. The Corrective Action Program shall be used to capture all events that do not meet program regulations, requirements or expectations, or are otherwise conditions adverse to quality. If any doubt exists about an issue, initiate a CR per AD-PI-ALL-0100, Corrective Action Program. {7.1.1.e}

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#### 5.4.2 Benchmarking

1. To achieve continuous improvement in the emergency preparedness program, benchmarking the best in the industry should be conducted both at the fleet and site level.
  - a. AD-PI-ALL-0300, Self-Assessment and Benchmark Programs

#### 5.4.3 Self-Assessments

1. Self-assessments shall be conducted in accordance with site and corporate policy. Self-assessments should be performed before any NRC inspection, INPO evaluation, upon identification of significant adverse trends, or as directed by management.
  - a. AD-PI-ALL-0300, Self-Assessment and Benchmark Programs

#### 5.4.4 Operating Experience (OE)

1. Industry OE shall be reviewed for applicability to EP Program elements. OE reviews shall be documented as required by:
  - a. AD-PI-ALL-0400, Operating Experience Program
  - b. AD-PI-ALL-0401, Significant Operating Experience Program

#### 5.4.5 Independent Review

1. Nuclear Oversight - Audits performs independent reviews of the site emergency preparedness programs as necessary, based on an assessment against performance indicators, and as soon as reasonably practicable after a change occurs in personnel, procedures, equipment, or facilities that potentially could adversely affect emergency preparedness, but no longer than 12 months after the change. In any case, all elements of the emergency preparedness program must be reviewed at least once every 24 months.
2. Guidance for performing the assessment against the performance indicators is provided in the Emergency Preparedness Administrative Procedure AD-EP-ALL-0001, Emergency Preparedness Key Performance Indicators.
3. The independent review will include the following: plans, procedures, training programs, drills/exercises, equipment, and state/local government interfaces.
4. The result of the review, along with recommendations for improvements, will be documented, reported to corporate and nuclear site management, and retained for a period of five years.

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**5.4.5 Independent Review (continued)**

5. The corporate or nuclear site management, as appropriate, will evaluate the findings affecting their area of responsibility and ensure effective corrective actions are taken.
6. Each nuclear site shall provide the part of its NOS audit report involving the evaluation for adequacy of interface with state and local governments to the appropriate state and local governments within 30 days of issuance of the audit report via email or US Postal Service and request confirmation of receipt to document regulatory compliance.

**5.5 Performance Indicators (PIs)**

**5.5.1 NRC Reactor Oversight EP Cornerstone Indicators**

1. Each site shall collect and report performance indicator data according to NEI 99-02 using AD-LS-ALL-0004, NRC Performance Indicators and Monthly Operating Report Data.

**5.5.2 Fleet EP Key Performance Indicators**

1. Each site shall compile, on a monthly basis, a set of fleet-wide sub-tier indicators that track program performance.
2. Any negative trends shall be entered into the corrective action program and an action plan established, in accordance with AD-BO-ALL-0002, Performance Measures Program and AD-EP-ALL-0001, Emergency Preparedness Performance Indicators.

**5.5.3 Plant Specific Indicators**

1. Each site may develop site specific Tier 3 indicators beyond the Fleet-Wide indicators based on management discretion.

**5.6 Alert & Notification System (ANS)**

1. Each site shall maintain and test their ANS in accordance with the description and commitments contained in the Site Emergency Plan and the FEMA approved ANS System Design Report.
2. An up-to-date design document describing the siren system and associated procedures should be maintained in accordance with FEMA Guidance.
3. Any changes in the siren system or testing process shall be submitted to FEMA for approval.

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## **5.7 Public Information**

### **5.7.1 News media**

1. Duke Energy will annually provide the news media with information about the site emergency plans, radiation, plant operation, and points of contact for release of public information in an emergency.
2. The information may take the form of a group presentation, documented individual contacts, or material provided to members of the news media throughout the year by Corporate Communications.
3. These activities will be documented according to the site's protocol.

### **5.7.2 Public information**

1. Duke Energy has a program of public education and information at each nuclear site as stated in the sites' Emergency Plans.
  - a. The program is performed in conjunction with state and local Emergency Management officials to provide the permanent and transient populations within the plume exposure pathway emergency-planning zone with emergency information.
  - b. The program provides for a coordinated and periodic dissemination of information regarding the early warning system and actions to be taken by the general public in the event of an emergency.
2. Literature, in the format of brochures, calendars, or area telephone book pages, is disseminated annually to all addresses within a 10-mile radius of each nuclear site, and is available to the general public within the same area.
  - a. The information includes, but is not necessarily limited to:
    - Educational information on radiation
    - Emergency preparedness contact for additional information
    - Protective measures (e.g., evacuation routes and relocation centers, sheltering, respiratory protection, and radio-protective drugs)
    - Primary emergency alert system radio station
    - Pick-up points for school children (South Carolina)
    - Information for residents with special needs.

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**5.7.2 Public information (continued)**

- b. Public information for the transient population includes lake access signs and emergency planning information provided to transient locations such as area hotels, motels, schools, and large businesses within the 10-mile Emergency Planning Zone (EPZ).
  - (1) Transient locations will be identified by the site Emergency Preparedness Functional Area Manager or designee, the site nuclear communications staff, and state and county emergency management officials.
  - (2) The list of transient locations will be reviewed and updated as needed.
  - (3) Locations will be contacted to ensure adequate copies of materials are available.
  - (4) Signs are field verified annually to ensure they are in good condition and contain current information.

**5.8 EP Support Plan, Letters of Agreement, and Contract Reviews**

- 1. Duke Energy has established numerous support agreements and contracts with organizations that may be required to provide assistance in the event of an emergency.
- 2. All agreements or contracts are reviewed annually to assure each contributes the desired support to the Emergency Preparedness Program.
- 3. Letters of Agreement and Contracts, including the review frequency, will be documented according to the site's protocol.

**5.9 Offsite Response Organization Interface**

- 1. Emergency Action Levels shall be reviewed with cognizant State and local governmental authorities on an annual basis and this review documented. [7.3.3]
- 2. Appropriate State and local agencies receive copies of site Emergency Plan revisions.
- 3. Coordinate with the appropriate State and local agencies to ensure Duke Energy receives current copies of agency Emergency Plans when these plans are revised.



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**5.9 Offsite Response Organization Interface (continued)**

4. Fleet EP shall contact North and South Carolina Emergency Management agencies semi-annually regarding any authentication code changes. If the authentication code list has changed, then ensure that the EP Peer Team is notified so that authentication code words lists in Emergency Response Facilities can be updated.
5. Off-site agency training shall be conducted as required by the site emergency response training programs.

**5.10 Evacuation Time Estimates (ETEs)**

1. Each nuclear site shall develop ETEs for members of the public.
2. An updated ETE analysis will be submitted to the NRC under 10 CFR 50.4 no later than 365 days after site determination that the criteria for updating the ETE have been met and at least 180 days before using it to form protective action recommendations and providing it to State and local governmental authorities for use in developing offsite protective action strategies. The criteria for determination that an updated ETE analysis have been met are as follows:
  - a. The availability of the most recent decennial census data from the U.S. Census Bureau;

**OR**

  - b. If at any time during the decennial period, the EPZ permanent resident population increases such that it causes the longest ETE value for the two-mile zone or five-mile zone, including all affected Emergency Response Planning Areas, or for the entire 10-mile EPZ to increase by 25 percent or 30 minutes, whichever is less, from the currently NRC approved or updated ETE.
3. During the years between decennial censuses the sites will estimate EPZ permanent resident population changes once a year, but no later than 365 days from the date of the previous estimate, using the most recent U.S. Census Bureau annual resident population estimate and State and local government population data, if available. Sites will maintain these estimates so that they are available for NRC inspection during the period between decennial censuses and shall submit these estimates to the NRC with any updated ETE analysis.
4. Additionally, in the unlikely event that the conditions of the EPZ are changed significantly due to natural phenomena hazards or other reasons (e.g., bridge collapse), an interim update to the ETE is recommended.

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**5.10 Evacuation Time Estimates (ETEs) (continued)**

- ETEs and updates to the ETEs must be provided to State and local governmental authorities and may be used in developing protective action strategies.

**5.11 Change In Homeland National Terrorism Advisory System (NTAS) Level**

- Guidance for actions to be taken in the event the US Department of Homeland Security changes the Homeland National Terrorism Advisory System Level is provided in Attachment 1, EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level.

**5.12 Emergency Preparedness Related Meetings**

- EP Peer Group Meetings will be scheduled periodically at the direction of the EP CFAM as directed by AD-AD-ALL-0001, Corporate Functional Area Managers (CFAM) and Peer Group Process.
- EP Peer Group Calls will be conducted as directed by AD-AD-ALL-0001, Corporate Functional Area Managers (CFAM) and Peer Group Process, unless otherwise directed by the EP CFAM. The EP SFAM should designate a staff member to participate on any call if they are not available.
- Emergency Preparedness Forum Meetings shall be conducted as directed by AD-AD-ALL-0004, Fleet Standard Workday. This meeting provides a forum for the exchange of information and an opportunity to bring issues affecting the EP program to Senior Leadership at each site.

**5.13 ERO Expectation Memo**

- Fleet EP shall prepare an ERO expectation letter annually for signature by the Chief Nuclear Officer (CNO) to be provided to all Emergency Response Organization Members for their review.
- An example letter is provided in Attachment 4, Emergency Response Organization (ERO) Expectations Letter (Example).

**5.14 [BNP, HNP, RNP] ERO Affirmation**

{7.1.1.h}

- The ERO Training and Qualification Program shall include the requirements of Attachment 3, Affirmation of Emergency Response Organization (ERO) Responsibilities and Expectations {7.1.1.a}.

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**5.14 [BNP, HNP, RNP] ERO Affirmation (continued)**

2. The ERO minimum staff on duty (not to include pool positions) shall affirm their readiness and proficiency. Reference the following guideline for the fleet minimum standard: Attachment 3, Affirmation of Emergency Response Organization (ERO) Responsibilities and Expectations {7.1.1.a}.
  - a. The affirmation can be conducted using electronic methods (conference call, email, etc.) and is to provide affirmation for the on-coming on-call personnel that they are prepared to accept on-call ERO responsibilities.

**5.15 Delegation Of Fleet Corporate Functional Area Manager Duties**

1. The EP CFAM may delegate approval responsibilities to any EP SFAM when out of the office.

**5.16 Interface with Nuclear Procedure Group**

1. AD-DC-ALL-1000, Conduct of Procedures, defines the core duties and responsibilities of the Nuclear Procedure Group (NPG) at all sites.
  - a. AD-DC-ALL-1000, Attachment 4, Site Emergency Preparedness and NPG Roles and Responsibilities, lays out the roles and responsibilities that define how NPG and EP interact in support of plant operations.
  - b. AD-DC-ALL-1000, Attachment 10, Functional Area Leadership and Corporate Nuclear Procedure Group (CNPG) Roles and Responsibilities, lays out the roles and responsibilities that define how CNPG and the Functional Area (FA) Leadership interact in the development and maintenance of Nuclear Generation Department Tier 1 and Tier 2 Fleet and NGO Documents and Procedures in support of fleet and plant operations.

**5.17 FLEX and SAMG Program Interface**

1. Duke Energy has programs for Beyond Design Basis (BDB) events controlled by FLEX and SAMG program documents that provide direction for BDB events.
2. ERO members are used to implement various strategies during a BDB event using FLEX procedures and SAMGs.

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**5.18 [BNP, HNP, RNP] Post-Drill/Exercise ERO Qualification Evaluation Guideline**

{7.1.1.f}

1. After post-drill/exercise facility critiques are complete, there shall be a specific discussion conducted with key facility leaders and/or position owners to determine if there was any performance weakness that warrants consideration for removing qualifications. Refer to the following site specific procedures for guidance:
  - [BNP] OPEP-04.3, Performance of Training, Exercises, and Drills
  - [HNP] EPM-200, ERO Training Program
  - [RNP] EPPRO-03, Training and Qualification

**5.19 [BNP, HNP, RNP] ERO Unannounced Drive-In and Call-In Drills**

1. Each site shall conduct a minimum of two off hours unannounced drive-in staffing drills per calendar year (may be counted as one of the four integrated drills). {7.1.1.c}
  - a. Each drill shall include the demonstration of the ERO notification process. {7.1.1.c}
  - b. One of those drills shall involve activation of the EOF/OSC/TSC and will include at least one classification/notification opportunity outside of the Control Room/Simulator (may be a DEP opportunity). {7.1.1.c}
2. Each site shall conduct monthly off-hours unannounced call-in drills. {7.1.1.b} {7.1.1.c} {7.1.1.d}
  - a. This may be waived during site outages. {7.1.1.b} {7.1.1.c} {7.1.1.d}

**5.20 Evaluated Simulator Scenarios**

[7.3.9]

1. Evaluated simulator scenarios conducted in licensed operator requalification training may test implementation of the emergency plan and procedures.
2. Evaluated simulator scenarios are developed, conducted, and evaluated in accordance with Operations training program standards and guidance.
3. Emergency preparedness personnel periodically review simulator scenarios and maintain oversight of the evaluation of emergency plan implementation.

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**5.20 Evaluated Simulator Scenarios (continued)**

4. Oversight includes tracking Drill/Exercise Performance (DEP) and Non-Drill/Exercise Performance (Non-DEP) indicator opportunities and the performance of key ERO skills.

**6.0 RECORDS**

Retain information generated per Attachment 2, Emergency Plan Activation Summary and Critique (sample), after an actual declared event as permanent plant records.

## 7.0 REFERENCES

### 7.1 Commitments

1. CR 489031- IER L2 11-39, Lack of Timely ERO and Emergency Response Facility Activation
  - a. [BNP] Recommendation 1
  - b. Recommendation 2.b
  - c. Recommendation 2.c
  - d. Recommendation 2.d
  - e. Recommendation 2.e
  - f. Recommendation 2.f
  - g. Recommendation 3.d
  - h. Recommendation 4
2. CR 403477-26, Formalize Monday Morning Muster Meeting
3. IER L1-13-10, Recommendation 9, Nuclear Accident at the Fukushima Daiichi Nuclear Power Station
4. SOER 99-1, Recommendation 7, Loss of Grid Addendum

### 7.2 Procedures

1. [BNP] [OPEP-04.3](#), Performance of Training, Exercises, and Drills
2. [AD-AD-ALL-0001](#), Corporate Functional Area Managers (CFAM) and Peer Group Process
3. [AD-AD-ALL-0004](#), Fleet Standard Workday
4. [AD-BO-ALL-0002](#), Performance Measures Program
5. [AD-DC-ALL-0201](#), Development and Maintenance of Controlled Procedure Manual Procedures
6. [AD-DC-ALL-1000](#), Conduct of Procedures
7. [AD-EP-ALL-0001](#), Emergency Preparedness Key Performance Indicators

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## 7.2 Procedures (continued)

8. [AD-EP-ALL-0002](#), NRC Regulatory Assessment Performance Indicator Guideline EP Cornerstone
9. [AD-EP-ALL-0501](#), Emergency Preparedness Staff Training Program
10. [AD-EP-ALL-0502](#), Emergency Preparedness 10 CFR 50.54(q) Training Requirements
11. [AD-EP-ALL-0602](#), Emergency Plan Change Screening and Effectiveness Evaluations 10 CFR 50.54(q)
12. [AD-EP-ALL-0803](#), Evaluation and Critique of Drills and Exercises
13. [AD-EP-ALL-0901](#), Determining the Status of Offsite Emergency Preparedness
14. [AD-LS-ALL-0002](#), Regulatory Correspondence
15. [AD-LS-ALL-0004](#), NRC Performance Indicators and Monthly Operating Report Data
16. [AD-LS-ALL-0006](#), Notification/Reportability Evaluation
17. [AD-LS-ALL-0007](#), Applicability Determination Process
18. [AD-LS-ALL-0010](#), Commitment Management Program
19. [AD-PI-ALL-0003](#), Change Management
20. [AD-PI-ALL-0100](#), Corrective Action Program
21. [AD-PI-ALL-0300](#), Self-Assessment and Benchmark Programs
22. [AD-PI-ALL-0400](#), Operating Experience Program
23. [AD-PI-ALL-0401](#), Significant Operating Experience Program
24. [HNP] [EPM-200](#), ERO Training Program
25. [RNP] [EPPRO-03](#), Training and Qualification
26. [NSD-308](#), Plant Operations Review Committee
27. [PD-EP-ALL-0800](#), Drills and Exercises Program
28. [SR/O/A/2000/003](#), Activation of the Emergency Operations Facility

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**7.3 Miscellaneous Documents**

1. 10 CFR 50.4, Written Communications
2. 10 CFR 50.47(b), Emergency Plans
3. 10 CFR 50, Appendix E, Emergency Planning and Preparedness for Production and Utilization Facilities
4. 10 CFR 50.54(q), Conditions of Licenses
5. ACAD 15-010, Guidelines for the Training and Qualification of Emergency Response Personnel
6. Duke Energy Business Continuity and Crisis Management Policy
7. Duke Energy Enterprise Crisis Management Program
8. FEMA Disaster Initiated Review (DIR) Standard Operating Guide
9. INPO 14-003, Emergency Drill and Exercise Guideline
10. NEI 99-02, Regulatory Assessment Performance Indicator Guideline
11. NSIR/DPR-ISG-01, Interim Staff Guidance, Emergency Planning for Nuclear Power Plants
12. NUREG 0654/FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
13. Regulatory Guide 1.101, Emergency Planning and Preparedness for Nuclear Power Reactors
14. Regulatory Guide 1.219, Guidance for Making Changes to Emergency Plans for Nuclear Power Reactors
15. Regulatory Issue Summary (RIS) 2002-12A, Revision 1, Power Reactors NRC Threat Advisory and Protective Measures System



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ATTACHMENT 1

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**<< EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level >>**

**NOTE**

This Attachment is a guideline and may be altered as directed by the EP Corporate or Site Functional Area Manager or designee.

**1.0 DEFINITIONS OF THREAT CONDITIONS**

1. Normal – Low risk of terrorist activities
2. Elevated Alert – Warns of a credible terrorism threat against the United States
3. Imminent Alert – Warns of a credible, specific and impending terrorism threat against the United States (this differs from the notification of an aircraft threat)

**2.0 ELEVATED THREAT**

1. When notified by Security that the Department of Homeland Security (DHS) has increased the National Terrorism Advisory System (NTAS) Level to Elevated Alert, then perform the following:
  - a. Verify the Emergency Off-Site Facility (EOF), Joint Information Center (JIC), Operations Support Center (OSC), and the Technical Support Center (TSC) are available and ready for use by performing a facility walkdown.
  - b. Contact the Control Room to verify they are aware of the increase in threat level.
  - c. Inform the Control Room that Emergency Response Organization (ERO) communications will be made by EP.
  - d. Review ERO notification methods.
  - e. Direct Security to notify ERO personnel via the Emergency Response Organization Notification System (ERONS) of the change in National Terrorism Advisory System (NTAS) level using Template ID 600.
  - f. Distribute an ERO e-mail The following text may be used:

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**<< EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level >>**

**2.0 ELEVATED THREAT (continued)**

'Homeland Security National Terrorism Advisory System Level has been elevated to Elevated Alert. There is no known credible threat to (insert plant). Security events could cause us to activate our facilities (primary or remote). Be prepared at all times to respond quickly and efficiently to ERO callouts. All ERO members are to keep company picture identification badges with you for access to the emergency response facilities and through law enforcement traffic control points. If there is a security threat on site or your normal facility is inaccessible, you may be directed to report to an alternate location at (insert location of remote facility). JIC Staff Members will report to (insert location) location under all conditions.'

- g. Test the offsite agency notification systems using site specific communication test procedures to ensure contact can be made with Emergency Planning Zone (EPZ) counties and State Emergency Operating Centers (EOCs) and Warning Points.
- h. Ensure all Emergency Preparedness periodic test procedures with frequencies of 30 days or less have been completed within the allowed surveillance period by review of completed surveillance procedures.
- i. Contact the Control Room and Security to let them know that the above items have been completed.

**3.0 IMMEDIATE THREAT**

- 1. When notified by Security that DHS has increased the National Terrorism Advisory System Threat Level to Imminent Alert, then perform the following:
  - a. Repeat actions a, d, h, and i for an Elevated Alert Level.
  - b. Direct Security to notify ERO personnel via the Emergency Response Organization Notification System (ERONS) of the change in National Terrorism Advisory System (NTAS) level using Template ID 600.

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**<< EP Staff Response to Increased National Terrorism Advisory System (NTAS) Level >>**

**3.0 IMMEDIATE THREAT (continued)**

c. Provide the following information for ERO Key Positions:

- [BNP, HNP, RNP] On-call personnel
- [CNS, MNS, ONS] Duty personnel

'The National Terrorism Advisory System Level has been elevated to Imminent Alert. Your ERO position has been identified as a Key Position and you are being placed on stand-by for response. Please:

- Remain within your response time to your respective facility.
- Keep your company picture identification badges with you for access to your emergency response facility and through law enforcement traffic control points.
- Remain fit for duty.
- Identify a relief person for your position.
- Respond as directed by notification instructions.'
- If the threat is site specific and credible, then direct site response by site specific procedures.

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**<< Emergency Plan Activation Summary and Critique (sample) >>**

**Emergency Classification**

Unusual Event Date/Time: \_\_\_\_\_ Alert Date/Time: \_\_\_\_\_  
 Site Area Emergency Date/Time: \_\_\_\_\_ General Emergency Date/Time: \_\_\_\_\_  
 Downgrade/Recovery Date/Time: \_\_\_\_\_ Termination Date/Time: \_\_\_\_\_

**Emergency Response Personnel** (Attach Notification Reports or List Names for Each Shift)

Control Room Site Emergency Coordinator (SEC)/Control Room Emergency Coordinator (EC)/SEC-MCR \_\_\_\_\_  
 TSC EC/Site EC (SEC) \_\_\_\_\_  
 ERM/EOF Director \_\_\_\_\_  
 Radiation Controls Manager/Radiological Assessment Manager/Radiation Protection Manager \_\_\_\_\_

**Documentation for Event Reconstruction** (Check or N/A)

_____ State & Local Emergency Notification Forms	_____ Dose Projections
_____ NRC Event Notification Worksheets	_____ Offsite Monitoring Results
_____ Operations Logs	_____ Post-Accident Sampling Results
_____ Nuclear Condition Reports/Problem Investigation Reports	_____ Emergency Response Facility Logs
_____ Media Releases	_____ Completed Implementing Procedures
_____ Licensee Event Report (LER) (when written)	_____ Pertinent News Reports
_____ System Fire Report	

**Environmental Radiological Information**

Curies Released Off-Site: \_\_\_\_\_ Sector(s) /Zones: \_\_\_\_\_  
 Highest Projected Total Dose/1 hour: \_\_\_\_\_ Sector(s) /Zones: \_\_\_\_\_  
 Highest Measured Dose Rate: \_\_\_\_\_ Sector(s) /Zones: \_\_\_\_\_  
 Highest Contamination Level: \_\_\_\_\_ Sector(s) /Zones: \_\_\_\_\_



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**<< Emergency Plan Activation Summary and Critique (sample) >>**

**Emergency Plan Activation Summary and Critique - Summary**

Critique Issue - Any undesired condition requiring corrective action for:

1. Procedures, equipment, facilities, or training (e.g., broken or missing equipment, error or omissions in procedures or training programs).
2. A Risk-Significant Planning Standard (RSPS) objective not met (objectives involving emergency classifications, off-site notifications, protective action recommendations, or assessment of radioactive releases).
3. Significant comments by the NRC.

Identify CRs initiated and the recommended person responsible for the CR and Corrective Action(s):

**Performance Indicator (PI) Information**

Ensure information from this event for the Drill & Exercise Performance (DEP) PI is documented accordingly.

\_\_\_\_\_  
Print/Signature (include title)

\_\_\_\_\_  
Date

**Evaluation of Regulatory and Emergency Plan Time Based Commitments**

Ensure information from this even is evaluated for the satisfaction of specific regulatory and Emergency Plan time based commitments(e.g., facility minimum staffing, facility activation, NRC notification, INPO notification, ANI notification). The objective evaluations worksheets in AD-EP-ALL-0803, Evaluation and Critique of Drills and Exercises may be used for this purpose.

\_\_\_\_\_  
Print/Signature (include title)

\_\_\_\_\_  
Date

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<< **Emergency Plan Activation Summary and Critique (sample)** >>

**Off-Site Organization Comments**

List problems or comments regarding the following off-site organizations:

**Federal Agencies (NRC, FEMA, U.S. Coast Guard):**


**State Emergency Management:**


**State Radiation Protection:**


**Risk County(ies):**


**Host County(ies):**


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**<< Affirmation of Emergency Response Organization (ERO) Responsibilities and Expectations {7.1.1.a} >>**

**1.0 ALL ERO MEMBERS:**

1. I affirm that I am qualified and proficient in performing the duties and responsibilities of my ERO position.
2. I understand it is my responsibility to maintain my qualifications and maintain proficiency in performing the duties and responsibilities of my ERO position.
3. I understand the expectation to safely and immediately respond when notified to all actual events (unless I am out of the area of the plant, not fit for duty, unable to leave family members unattended, etc.).
4. I understand that I should keep my ERO Notification Device on and near at all times (turn cell phone to audible when not wearing it) ensuring batteries are adequate. The ERO notification device must be capable of receiving text messages.
5. I understand the following expectations regarding electrical grid disturbance events:

During an electrical grid disturbance (i.e., large scale natural disaster, regional blackout, technological disaster, etc.) communications capabilities (i.e., cell phones, internet, landline telephone systems, etc.) may be lost or severely degraded. ERO members, regardless of on-call status, are expected to monitor local radio, and emergency alert system (EAS) communications for impact to the grid structure. Should the situation appear to be a major disturbance to the power grid, then:

- Ensure your home and family are safe;
- If you are 'fit for duty' and able to leave your family unattended, then report to your designated emergency response facility (ERF).





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ATTACHMENT 4

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<< **Emergency Response Organization (ERO) Expectations Letter (Example)** >>



## Memorandum

Date: February 18, 2016  
To: Nuclear Generation Department Employees  
From: CNO Name  
Subject: Emergency Response Organization (ERO) Expectations

I appreciate your important role in the Emergency Response Organization (ERO). The ERO is vital to protecting the health, safety, and property of the general public and our teammates. Every role on the ERO is an essential element for a well-organized response in the event of an emergency at one of our nuclear sites.

Fleet ERO performance has been improving however, it still does not meet our expectations or industry standards for top quartile performance. Recent examples include: Alert Notification Siren issues and sporadic fleet Drill and Exercise performance in the area of classifications, notifications and protective action recommendations.

I am asking that we all commit to improving our ERO performance.

Please review the attached ERO expectations. If you have any questions concerning your ERO role and responsibilities, please contact your supervisor, your ERO position owner, John Smith (EP Corporate Functional Area Manager) at (xxx) xxx-xxxx, or me.

Thank you in advance for your dedicated and professional participation in the Emergency Response Organization.

JWP: emk

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<< **Emergency Response Organization (ERO) Expectations Letter (Example)** >>

**1.0 EXPECTATIONS AND RESPONSIBILITIES**

***During declared emergencies and unannounced drive-in drills, all ERO position members are expected to respond to their designated emergency response facility (regardless of on-call status) unless they are on vacation or assignment out of the area of the plant, not fit for duty, or unable to leave family members unattended.***

**1.1 Managers/Supervisors**

1. Provide the leadership necessary to ensure that fleet/site management and employees understand the importance of a well implemented emergency preparedness program to protect the public health and safety and remain engaged to ensure that a self-critical, self-identifying culture exists across the fleet/site.
2. Provide the leadership necessary to ensure that ERO performance is sustained at the highest level of industry (top quartile) standards, as measured by the United States Nuclear Regulatory Commission (NRC) Drill and Exercise Performance (DEP), Drill Participation, and Alert and Notification System (ANS) Key Performance Indicators (KPIs.)
3. Support your staff members by ensuring that a high priority is placed on the duties and responsibilities of their ERO position/support role.
  - a. Ensure on-shift and augmented emergency response positions are fully staffed with trained, qualified, knowledgeable, and proficient personnel. Maintaining knowledge and proficiency levels often require going beyond the minimum ERO qualification activities.
  - b. Ensure adequate ERO position staffing levels are maintained during shared resource outage support, vacation periods, and other (e.g., INPO, etc.) temporary assignments.
  - c. Ensure adequate staffing is available during the conduct of drill and exercise activities (e.g., scenario development and validation, players, controllers, and/or evaluators and post-drill/exercise critiques).

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**1.1 Managers/Supervisors (continued)**

4. Ensure that Equipment Important to Emergency Response is maintained, using the appropriate fleet/site processes.
  - a. Identify and promptly report deficiencies, repairs, changes, or improvements in facilities, systems, and equipment, near misses, and precursor events related to emergency response.
  - b. Ensure that those issues are captured in the applicable work management, Fleet Observation Program and/or Corrective Action Program.
5. Job Postings for new hires or positions to be filled should contain the specific ERO responsibility the candidate will be expected to fill. In addition, any time requirement and on-call (fitness for duty) requirements should also be specified.

**1.2 ERO Position Owners**

1. For defense in depth, ERO Position Owners should strive to maintain their assigned positions four deep at single-unit sites and five deep at multi-unit sites. Some ERO position members may be in “pool” positions and not assigned to specific teams.
2. When an ERO position vacancy occurs, the ERO Position Owner should:
  - a. Identify a candidate to qualify for the position.
  - b. Ensure ERO Team changes or ERO position changes are reviewed and approved by the candidate’s Supervisor, and the EP organization.
  - c. Work with the individual, their supervisor, and the EP organization to develop a training and drill participation plan to target qualifying the individual in a timely manner (typically within 120 days of assignment). Use tracking assignments to assign and monitor progress.

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**<< Emergency Response Organization (ERO) Expectations Letter (Example) >>**

**1.3 ERO Members**

1. All ERO members are expected to comply with the company's Fitness-For-Duty (FFD) program.
2. Keep your ERO notification device (e.g., cell phone) on or near you at all times, ensuring that the device is adequately maintained (e.g., charged). This includes keeping the device on (in audible mode), unless you are in a training or meeting setting, then it shall be maintained in a silent mode such that you can still be made aware of an emergency event.
3. Maintain your ERO position qualifications up to date. This includes ERO position training as well as Plant Access Training, Radiation Worker Training, respiratory protection, and SAMG as appropriate to your ERO position.
4. Participate during drills and exercises, as scheduled and required.
  - a. All ERO position players, controllers and evaluators are required to attend the pre-drill or exercise briefings and the post-drill and exercise critiques.
  - b. If you are unable to support participation in the scheduled drill or exercise you must:
    - Identify a replacement ERO position player, controller or evaluator who has consented to the change.
    - Obtain permission from the EP Manager, the replacement's supervisor and your supervisor.
    - Coordinate a new drill date in the calendar year for your ERO position participation.
5. Following a large scale natural disaster on site, all ERO personnel should respond to their Emergency Response Facility or their designated alternate site if their Emergency Response Facility is inaccessible, as soon as safely possible. This is not dependent upon receiving an initial ERO notification.
6. REMAIN proficient to carry out your ERO duties and responsibilities.
7. Promptly update your personal information in the appropriate employee database with any changes (e.g., address, home/cell telephone number) and also provide that information to the EP organization.

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**1.3 ERO Members (continued)**

8. Many ERO support role opportunities exist (e.g., scenario development team, controller/evaluator team, maintenance and communications testing, inventory kit surveillance), beyond an assigned ERO position. This enables all staff members the opportunity to fully support the ERO.

**1.4 ERO Position On-Call Requirements**

1. Minimum ERO staff (i.e., the minimum ERO staff members required in an emergency response facility in order to declare the facility operational per each sites' emergency response place), shall be designated as On-Call. Additional ERO staff members (i.e., full staff) may also be designated as On-call.
2. ERO Position staff On-Call requirements:
  - REMAIN fit for duty.
  - ENSURE that you have reliable transportation to respond and can respond within your required time frame.
  - ENSURE that you have child/elder care arrangements, if required, should you need to respond.
  - ENSURE that you have proper attire ready, should you need to respond to your ERF.
  - ENSURE that you have your Duke Energy badge with you, should you need to respond.
  - ENSURE you know the location of your alternate ERF(s).
  - Fulfill ERO Duty Muster Meeting and/or Affirmation requirements.

**1.5 ERO Self-Activation During an Electrical Grid Disturbance**

{7.1.4}

1. During an electrical grid disturbance (e.g., large scale natural disaster, regional blackout, technological disaster, etc.) communications capabilities (e.g., cell towers, internet, line phone systems) may be lost or severely degraded.
2. ERO members (regardless of on-call status) are expected to monitor local radio, television, and Emergency Alert System (EAS) communications for impact on the grid structure.

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**1.5 ERO Self-Activation During an Electrical Grid Disturbance (continued)**

3. Should the situation appear to be a major disturbance to the power grid, then:
  - Ensure your home and family is safe, and
  - Ensure you are fit for duty and able to leave your family unattended, and
  - Report to your assigned ERF.

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**ATTACHMENT 5**

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**<< Fleet Emergency Planning Procedure Review Frequencies >>**

Document ID	Document title	EPIP (Y/N)?	EPIP Site(s)	Review Frequency
AD-EP-ALL-0001	EMERGENCY PREPAREDNESS KEY PERFORMANCE INDICATORS	N		Biennial
AD-EP-ALL-0002	NRC REGULATORY ASSESSMENT PERFORMANCE INDICATOR GUIDELINE EMERGENCY PREPAREDNESS CORNERSTONE	N		Biennial
AD-EP-ALL-0102	WEBEOC®	N		Biennial
AD-EP-ALL-0107	EMERGENCY OPERATIONS FACILITY (EOF) SERVICES	Y	ONS	Annual
AD-EP-ALL-0202	EMERGENCY RESPONSE OFFSITE DOSE ASSESSMENT	Y	ALL	Annual
AD-EP-ALL-0203	PROTOCOL FOR THE FIELD MONITORING COORDINATOR DURING EMERGENCY CONDITIONS	Y	CNS, MNS,ONS	Annual
AD-EP-ALL-0204	DISTRIBUTION OF POTASSIUM IODIDE TABLETS IN THE EVENT OF A RADIOIODINE RELEASE	Y	CNS, MNS,ONS	Annual
AD-EP-ALL-0301	ACTIVATION OF THE EMERGENCY RESPONSE ORGANIZATION NOTIFICATION SYSTEM	Y	BNP, CNS, HNP, RNP	Annual
AD-EP-ALL-0400	EMERGENCY COMMUNICATIONS	N		Biennial
AD-EP-ALL-0404	ADMINISTRATION OF THE EMERGENCY RESPONSE DATA SYSTEM (ERDS)	N		Biennial
AD-EP-ALL-0406	DUKE EMERGENCY MANAGEMENT NETWORK (DEMNET)	Y	CNS	Annual
AD-EP-ALL-0501	EMERGENCY PREPAREDNESS STAFF TRAINING AND QUALIFICATION	N		Biennial
AD-EP-ALL-0502	EMERGENCY PREPAREDNESS 10 CFR 50.54(Q) TRAINING REQUIREMENTS	N		Biennial
AD-EP-ALL-0602	EMERGENCY PLAN CHANGE SCREENING AND EFFECTIVENESS EVALUATIONS 10 CFR 50.54(Q)	N		Biennial
AD-EP-ALL-0801	DESIGN AND DEVELOPMENT OF DRILLS AND EXERCISES	N		Biennial
AD-EP-ALL-0802	CONDUCTING DRILLS AND EXERCISES	N		Biennial
AD-EP-ALL-0803	EVALUATION AND CRITIQUE OF DRILLS AND EXERCISES	N		Biennial
AD-EP-ALL-0901	DETERMINING THE STATUS OF OFFSITE EMERGENCY PREPAREDNESS	N		Biennial
AD-EP-ALL-1000	CONDUCT OF EMERGENCY PREPAREDNESS	N		Biennial
AD-EP-NGO-0403	COMMON EOF DATA COORDINATOR EQUIPMENT STARTUP AND TROUBLESHOOTING	N		Biennial