

12.1 ORGANIZATION AND RESPONSIBILITY

12.1.1 MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATIONS

The Entergy Organization is described in the Quality Assurance Program Manual (QAPM). The role of the corporate organization is to monitor, assess and provide support to the Entergy Operations' nuclear sites and help minimize the activity of the nuclear sites staffs that are not directly related to day-to-day site management. The Chief Executive Officer has the ultimate responsibility for the safe and reliable operations of Entergy Operation's nuclear sites.

The plant organizational structure is shown in Figure 12-1. Plant specific titles for the generic titles given in the Technical Specifications are located in Figure 12-2.

12.2 TRAINING

The training program follows the applicable regulations and either (a) is accredited by the National Nuclear Accrediting Board or (b) meets the standards of Section 5 of ANSI/ANS 3.1-1978. The program provides that those personnel involved in the operation of a nuclear plant possess a combination of education, experience, and skills sufficient to ensure the safe and efficient operation of the plant.

12.2.1 PLANT STAFF TRAINING PROGRAM

12.2.1.1 Plant Access Training

Plant Access Training is provided periodically to personnel requiring unescorted access into the plant protected area. Plant Access Training provides information concerning topics such as security, safety, fire protection, steam/water cycle, organization, site description, procedures, quality program, radiation safety indoctrination, and fitness for duty policies. The course has an associated examination required for course completion. The challenge course requires completion of a written examination. The challenge course is required for renewal of unescorted access authorization.

12.2.1.2 Radiation Worker Training (RWT)

Radiation Worker Training is provided periodically for persons who routinely work in "radiation controlled areas," performing operations, inspections, administrative, maintenance, or safety functions. The course provides information on:

1. Radiation safety fundamentals.
2. 10 CFR 20 and Entergy radiation exposure limits and controls/external exposure control measures.
3. Radioactive contamination limits and controls/internal exposure control measures.
4. Radioactive materials control methods.
5. Radioactive waste management and control procedures.
6. Preparation for emergencies - Worker-related information and actions.
7. Radiation safety program description.
8. Respiratory protection program description, NUREG-0041 compliance.

9. Radiation survey requirements.

Successful completion of the course requires passing a written examination and satisfactorily performing the following practical actions:

1. Read electronic dosimeters and interpret alarm conditions.
2. Properly don and remove a full set of protective clothing.
3. Properly enter and leave a contamination area, including whole body frisk (may be done in conjunction with donning and removing protective clothing).
4. Demonstrate the ability to work under an RWP.

The challenge course is required for renewal of unescorted access authorization to a radiation controlled area. The challenge course requires successful completion of a written examination and is administered annually.

12.2.1.3 Licensed and Nonlicensed Operator Training Program

This program is made up of the following individual programs:

Nonlicensed Operator
Reactor Operator
Senior Reactor Operator
Shift Supervisor
Shift Engineer
Continuing Training for Licensed Personnel

These programs include classroom instruction, laboratory, simulator and on-the-job (OJT) training as appropriate to ensure licensed and nonlicensed operators possess the knowledge and skills to safely and effectively operate the plant.

All programs have been accredited by the National Nuclear Accrediting Board.

12.2.1.4 Instrumentation and Controls (I&C) Technician Training Programs

This program provides initial and continuing training for I&C Technicians of all levels and includes training in the classroom, laboratory and OJT settings. It includes nuclear plant orientation, basic theory of electronics, process measurements and control, and application of theory to specific plant equipment. Training in maintenance techniques, plant administrative procedures and plant systems is included.

This program has been accredited by the National Nuclear Accrediting Board.

12.2.1.5 Mechanical and Electrical Maintenance Personnel Training Program

The initial qualification and continuing training program is provided for mechanical and electrical maintenance personnel including supervisors, which includes classroom, laboratory and OJT training as appropriate. The training includes basic skills and advanced maintenance techniques.

The electrical maintenance personnel, mechanical maintenance personnel and mechanical maintenance supervisor training programs have been accredited by the National Nuclear Accrediting Board.

12.2.1.6 Radiological Protection Technician Training Program

This program provides both initial and continuing training to radiological protection technicians of all levels from newly assigned to experienced personnel. Classroom, laboratory and OJT training are provided to ensure the technician has the knowledge and skill to competently complete job responsibilities.

This program has been accredited by the National Nuclear Accrediting Board.

12.2.1.7 Chemistry Technician Training Program

This program provides both initial and continuing training to chemistry technicians of all levels from newly assigned to experienced personnel. Classroom, laboratory and OJT training are provided to ensure the technician has the knowledge and skill to competently complete job responsibilities.

This program has been accredited by the National Nuclear Accrediting Board.

12.2.1.8 Engineering Support Personnel Training Program

Initial orientation and continuing training is provided to newly assigned and experienced engineering personnel. This program consists of classroom and OJT training.

This program has been accredited by the National Nuclear Accrediting Board.

12.2.1.9 Fire Protection Training

Each member of the Fire Brigade will receive initial and periodic requalification training which satisfies NRC guidance document "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance" dated 8/19/77. This training will typically consist of classroom and practical training in fire suppression and the Plant Fire Protection System.

Fire fighting drills are also performed as required by NRC guidance document "Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance" dated 8/19/77 for each Shift Fire Brigade.

All Auxiliary Operators receive initial fire fighting instruction including fire suppression and Plant fire protection equipment training. They also receive annual fire protection retraining. Other Plant personnel receive fire protection training in Plant Access Training.

Temporary Company and contractor personnel undergo the same fire training under Plant Access Training as permanent employees.

12.2.2 TRAINING EFFECTIVENESS EVALUATION

All training programs utilize a program effectiveness feedback mechanism consisting of student critique forms, post employee/supervisor surveys, management observations or interviews and information gathered through alignment and training committee meetings. This information is then used to modify or revise the programs or courses as necessary to meet the plant needs.

12.3 **PLANT PROCEDURES**

12.3.1 **PROCEDURE CONTROL REQUIREMENTS**

Written procedures shall be established, implemented and maintained covering the activities referenced below:

1. The applicable procedures recommended by Appendix A of Regulatory Guide 1.33, Quality Assurance Program Requirements, as endorsed by the **Entergy Quality Assurance Program Manual (QAPM)**.
2. Refueling operations
3. Surveillance and test activities of safety-related equipment
4. Site Security Plan implementation
5. Site Emergency Plan implementation
6. Site Fire Protection Program implementation
7. All programs specified in Technical Specification 5.5

The appropriate senior department manager predesignated by the Site Vice President shall approve such procedures and changes prior to implementation.

Temporary changes to the procedures listed above may be made **in accordance with the requirements of the Entergy Quality Assurance Program Manual (QAPM)**.

12.3.2 UPGRADE AND MAINTENANCE OF EMERGENCY OPERATING PROCEDURES

The "TMI Action Plan" (NUREG-0660 and NUREG-0737) required in Item I.C.1 that Emergency Operating Procedures (EOPs) be upgraded. Under Item I.C.9 the NRC issued the guidance for the EOP upgrade process as NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures." This NUREG was implemented by Generic Letter 82-33, "Supplement I to NUREG-0737 - Requirements for Emergency Response Capability." As specified in NUREG-0899, the EOP upgrade program was to incorporate the following elements into what it termed the "Procedures Generation Package."

1. Plant Specific Technical Guidelines
2. Writers Guide
3. Validation Program for revised EOPs
4. Training for revised EOPs

In an SER dated March 28, 1990, the NRC concluded that the Palisades program for upgrading and maintaining the EOPs was acceptable providing that the identified concerns were resolved. The stated basis for this conclusion was that the program elements should accomplish the objectives of NUREG-0899. The SER also stated that future changes to these program elements need not be reported to NRC but should be documented and justified in an auditable form. The NRC concerns in the SER have been incorporated into the EOP Program.

12.3.3 OPERATING REQUIREMENTS MANUAL (ORM)

The ORM contains equipment operating requirements, operational limits, and testing requirements which are in addition to those in the Technical Specifications. Some of these requirements were formerly in the Technical Specifications, but were relocated to the ORM because they did not meet the criteria of 10 CFR 50.36 for retention in the Technical Specifications.

The ORM is considered to be described in the FSAR and will be revised under 10 CFR 50.59. Changes to the ORM shall become effective after approval by the Plant General Manager.

12.4 **REVIEW AND ASSESSMENT**

The review and audit program consists of an integrated program of reviews and audits. It is described in the Entergy Quality Assurance Program Manual (QAPM), see Chapter 15, "Quality Assurance."

12.5 EMERGENCY PLANNING

The Palisades Site Emergency Plan (SEP) establishes the plans, programs and procedures necessary to limit and mitigate the consequences of potential or actual radiological emergencies. The Palisades SEP provides the necessary prearrangements, directions and organization so that nuclear emergencies can be effectively and efficiently resolved in order to safeguard plant personnel, property and the general public.

The Palisades SEP is intended to meet the emergency planning requirements specified in NUREG-0654 (Rev. 1), 10CFR 50.47 and 10CFR 50 Appendix E. The Palisades SEP has been submitted to and approved by the NRC. It is reviewed annually; any changes or revisions are procedurally controlled and, when required by regulations, are submitted to the NRC for approval.

The Palisades Site Emergency Plan:

- * identifies onsite and offsite emergency response facilities,
- * identifies equipment available for emergency assessment, communications, first aid and medical care, and damage control,
- * provides for classification of emergencies into four categories,
- * depicts notification requirements for classified events,
- * makes provisions for prompt and accurate notifications to local, State and Federal agencies,
- * describes actions necessary to mitigate an emergency.

Training is conducted for emergency response personnel to ensure their proficiency. The training programs for emergency response personnel are based on the requirements of 10CFR 50.47 and 10CFR 50 Appendix E. Exercises are conducted in order to test the adequacy of Emergency Implementation Procedures, to test emergency equipment and communication networks, and to ensure that emergency response personnel are familiar with their duties. Emergency exercises will involve participation by local, State and Federal personnel as prescribed by regulatory requirements.

The Palisades SEP revision and distribution is controlled by the appropriate procedures and is distributed on a controlled basis to all positions and locations requiring them, including appropriate local, State and Federal agencies.

12.6 **INDUSTRIAL SECURITY**

Plans for the physical protection of the Palisades Nuclear Plant are described in a **physical security plan that is protected against unauthorized disclosure in accordance with 10 CFR 73.21(a)**. The physical protection of the Palisades Nuclear Plant meets the requirements of 10 CFR 73.55, as described in the Security Plan.

Plans for the **cyber protection of the Palisades Nuclear Plant are described in a cyber security plan that is protected against unauthorized disclosure in accordance with 10 CFR 73.21(a)**. The cyber protection of the Palisades Nuclear Plant meets the requirements of 10 CFR 73.54, as described in the Cyber Security Plan.