DUKE ENERGY®

Catawba Nuclear Station (CNS)

Duke Energy ERO Standardization

TSC/OSC ERO Position Comparison and Evaluation

Revision 0

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1 PURPOSE

Identify differences and deviations between the current CNS ERO and the Duke standard ERO from the TSC and OSC.

Evaluate all deviations to determine whether they create a reduction in effectiveness (RIE) within the Emergency Preparedness Program.

2 DISCUSSION

A program initiative has been undertaken by Duke Energy personnel to standardize the ERO positions, functions and responsibilities (tasks) across the fleet. This involves changes to the current ERO, which for this evaluation is based upon those responder titles and numbers identified in emergency plan and the implementing procedures.

It is recognized that any changes to the ERO structure and the implementing procedures require a detailed §50.54(q) effectiveness evaluation. Regulatory Guide 1.219 provides the following information related specifically to this type of change:

> *[C.1.1.b] Some changes that a licensee may make to its approved emergency plan warrant prior NRC approval to ensure that the changes would not adversely affect the NRC's reasonable assurance determination. However, other general types of changes may have such a minimal effect on this determination that they would not warrant prior NRC approval. For example, changes that reduce the number of personnel available to respond to emergencies or lengthen the time it takes to staff and activate emergency response facilities (ERFs) could affect the NRC's reasonable assurance determination and would require prior NRC staff approval. Minor administrative changes, such as correcting position titles and spelling errors and updating document numbers, would not warrant prior NRC staff review." Between these extremes is a range of possible changes for which the licensee is required to perform and document a detailed, objective evaluation.*

> *[C.1.4.a] …. Proposed changes that could delay emergency declarations, notifications, or PARs may reduce the effectiveness of the emergency plan in that subsequent emergency response actions may not be timely and emergency response personnel, facilities, and equipment may not be in position if it becomes necessary to carry out measures to protect the public health and safety. Generally, the licensee should view any change that could delay an activity or relax a timeliness criterion for the activity as a potential reduction in effectiveness and should evaluate it accordingly.*

Due to the scope of changes being made, this position to position and task to task comparison evaluation has been developed to document the effectiveness review. Attachment 5 documents the methods used to conduct this evaluation.

3   SUMMARY OF CHANGES

3.1   Comparison of ERO Positions, Responders and Response Times

The total number of responders filling augmented ERO positions in the current CNS ERO is 46 and the total number of responders filling augmented ERO positions in the standard ERO is 46 (no change to ERO responders).

- 45 Minute ERO Responders: The standard ERO imposes no changes to 45 minute responders. All 45 minute response positions are staffed in accordance with existing site specific Emergency Plan commitments. CNS has two (2) 45 minute response positions.

- 75 Minute ERO Responders: The standard ERO imposes no changes to 75 minute responders. The current augmented ERO has twenty-four (24) 75 minute responders and the standard augmented ERO has twenty-four (24) 75 minute responders (no change).

- Full Staffing ERO Responders: The standard ERO imposes no changes to full staff responders.. The current augmented ERO has twenty (20) full staff responders and the standard augmented ERO has twenty (20) full staff responders (no change).

	Current CNS	Duke Standard	Difference
45 Minute	2	2	0
75 Minute	24	24	0
Full Staffing	20	20	0
Total	46	46	0

3.1.1   Numeric Change Impact to the Augmented ERO

There is no change to the numeric ERO responders.

- Three (3) responders are added as a result of three new positions.

- Three (3) responders are removed as a result of the elimination of three positions.

3.1.2   Response Time Impact to the Augmented ERO

The changes result in no change to the 75 minute responders.

- Two (2) 75 minute responders are added as a result of two full staffing positions being changed to 75 minute positions.

- Two (2) 75 minute responders are removed as a result of the elimination of two 75 minute positions being changed into full staff positions.

The changes result in no change to the full staffing responders.

- Two (2) full staff responders are added as a result of two 75 minute positions being changed into full staff positions.

- Two (2) full staff responders are removed as a result of two full staff positions being changed into 75 minute positions.

In practice, all ERO members are called out at the same time and respond as soon as possible. This provides for the quickest response and offers the ability to adjust ERO personnel resources as the specific conditions of the event warrant.

The numeric and response time changes resulting from the adoption of the standard ERO establish a closer relationship between risk significant / key functions and the positions assigned those functions. The objective of the changes is to ensure those functions and their processes are linked directly to the augmented minimum staffing positions to allow for optimum relief of on shift personnel and less complicated response execution following facility activation.

- Removal of the TSC Assistant Operations Engineering position: This position was a support position and the duties have been assumed by various members of the standard ERO. Given that all required functions within the TSC have been accommodated in the new procedure, and timeliness is unaffected, this change is found to be acceptable.

- Removal of the TSC Emergency Planner position: This position was a support position and the duties have been assumed by various members of the standard ERO. Given that all required functions within the TSC have been accommodated in the new procedure, and timeliness is unaffected, this change is found to be acceptable.

- The DRC Supervisor did not exist in the CNS Emergency Plan, but had actions in the OSC Activation Procedure. All actions contained within the DRC Supervisor procedure are implemented elsewhere in the standard OSC organization. Given that all required functions within the OSC have been accommodated in the new procedure, and timeliness is unaffected, this change is found to be acceptable.

- One of two Offsite communicators was moved from 75 min response to full response. The EOF assumes offsite communications when activated.

- Moved the OSC Manager position from a full staffing position to a 75 minute response. This is considered an enhancement. The basis for this change is to specify the OSC facility management ERO position as a requirement for activation and thus relieve the Control Room SM of the direction of repair and corrective action functions as soon as possible.

- Moved the TSC NRC Communicator position from a full staffing position to a 75 minute response. This is considered an enhancement. The basis for this change is to ensure communications with the NRC is established and thus relieve the Control Room of this function as soon as possible.

Collectively and individually these changes do not decrease the capability or the timeliness of the ERO to perform their assigned tasks. No site specific commitments regarding particular ERO positions, tasks or their response time were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Refer to Attachment 1 for a position-by-position comparison of the CNS and standard ERO responders in the TSC and OSC, sorted by facility and by function.

3.2 Comparison of the ERO Hierarchy / Reporting Relationships

In the adoption of the standard ERO, CNS facility staffing continues to be grouped by major functions. In general, each of the directors, managers and supervisors / coordinators in the standard ERO maintain a similar span of control to that of the current ERO.

Summary descriptions of the changes to the ERO reporting hierarchy are as follows:

- All risk significant functions (classification, notification, protective actions and assessment) are assigned to minimum staffing positions aligned within the hierarchy.

- The Assistant Emergency Coordinator position in the TSC and the Assistant OSC Manager position in the OSC have been formalized. This allows each facility lead to maintain an oversight and coordination role while the assistant's focus can be on facility operations.

- Engineering leadership and functions have been aggregated in the TSC which provides improvements in engineering team communications and management.

The organizational/hierarchical changes improve the reporting relationships and management levels of the ERO and streamline the process path for risk significant functions. The organizational/hierarchical changes do not overload the next level supervisor/manager positions. The organizational/hierarchical changes do not decrease the capability or the timeliness of the ERO to perform their assigned tasks. No site specific commitments regarding a particular ERO hierarchy were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Refer to Attachment 2 for a comparison of the organization charts illustrating the current augmented ERO and the standard augmented ERO.

3.3 Comparison of ERO Responsibilities by Position

Deviations created by the addition, removal or modification of a task to a particular ERO position did not degraded the capability or timeliness to perform that associated function. No site specific commitments regarding a particular ERO task assignment were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Refer to Attachments 3 and 4 for comparisons and evaluations of added, removed and modified tasks between the current augmented ERO and the standard augmented ERO.

Augmented ERO Comparison by Facility

Current ERO Position Title	45	75	Full	Standard ERO Position Title	45	75	Full
Technical Support Center	0	6	13		0	7	12
Emergency Coordinator		1		Emergency Coordinator		1	
Assistant Emergency Coordinator			1	Assistant Emergency Coordinator			1
Offsite Agency Communicator		2		Offsite Communicator		1	1
NRC Communicator			1	NRC Communicator		1	
CR/TSC Communicator			1	CR Operations Bridge			1
Assisitant Ops Engineer			1				
Offsite Dose Assessor		1		Dose Assessor		1	
RP Manager			1	RP Manager			1
Ops Superintenent			1	Operations Manager			1
Operations Engineer			1	Assistant Ops Manager			1
Engineering Manager			1	Engineering Manager			1
Reactor Engineer		1		Reactor Engineer		1	
				Electrical Engineer (moved from OSC)		1	
Systems Support Engineer		1		Mechanical Engineer		1	
Emergency Planner			1				
Security Manager			1	Security Coordinator			1
Evacuation Coordinator			1	Site Evacuation Coordinator			1
Log/Status Keeper			1	Log Keeper			1
Data Coordinator			1	OAC Support			1
				IT Support			1

Current ERO Position Title	45	75	Full	Standard ERO Position Title	45	75	Full
Operations Support Center	2	18	7		2	17	8
OSC Coordinator			1	OSC Manager		1	
				Assistant OSC Manager			1
				OSC Operations Liaison			1
Nuclear Supply Chain			1	Generation Supply Chain Liaison			1
Maintenance Manager		1		Maintenance Supervisor			1
Equipment (Electrical) Engineer (moved to TSC)		1					
Operations Supervisor			1	Operations Supervisor			1
RP Supervisor			1	RP Supervisor			1
On-Site Survey RC Technician	1	1		On-Site Survey RP Qualified Personnel	1	1	
In-Plant Survey RC Technician	1	1		In-Plant Survey RP Qualified Personnel	1	1	
Protective Actions RC Technician		6		Protective Actions RP Qualified Personnel		6	
FMT Members		4		FMT Members		4	
Chemistry Manager			1	Chemistry Supervisor			1
Log Keeper			1	Log Keeper			1
DRC Supervisor			1				
IAE Technician (OSC)		2		IAE Technician (OSC)		2	
Mech Maint Technician (OSC)		1		Mechanical Technician (OSC)		1	
Radwaste Operator (OSC)		1		Radwaste Operator (OSC)		1	
Total Augmenting ERO:	**2**	**24**	**20**		**2**	**24**	**20**

Augmented ERO Comparison by Function

Functional Area	Major Tasks	CNS ERO Emergency Positions	45 Min.	75 Min.	Full Staff	Standard ERO Emergency Positions	45 Min.	75 Min.	Full Staff
2. Direction and Control	Command and Control	Emergency Coordinator (TSC)		1		Emergency Coordinator(EC) (TSC)		1	
	Facility Control	Assistant EC (TSC)			1	Assistant EC (TSC)			1
		OSC Coordinator (OSC)			1	OSC Manager (OSC)		1	
						Assistant OSC Manager (OSC)			1
		Function 2 Totals:	**0**	**1**	**2**		**0**	**2**	**2**
3. Notification & Comm.	Emergency Communications	Offsite Agency Comm (TSC)		2		Offsite Communicator (TSC)		1	1
		NRC Communicator (TSC)			1	NRC Communicator (TSC)		1	
	Plant Status & Technical Activities	Assistant Ops Engineer (TSC)			1				
						OSC Operations Liaison (OSC)			1
		CR/TSC Communicator (TSC)			1	CR Operations Bridge (TSC)			1
		Function 3 Totals:	**0**	**2**	**3**		**0**	**2**	**3**
4. Radiological Assessment	Offsite Dose Assmt	Offsite Dose Assessor (TSC)			1	Dose Assessor (TSC)		1	
	Offsite Surveys	FMT Members-2 teams (OSC)		4		FMT Members - 2 teams (OSC)		4	
	Onsite Surveys	RP Qualified Personnel (OSC)	1	1		RP Qualified Personnel (OSC)	1	1	
	In-plant Surveys	RP Qualified Personnel (OSC)	1	1		RP Qualified Personnel (OSC)	1	1	
	RP Supervisory	RP Manager (TSC)			1	RP Manager (TSC)			1
		RP Supervisor (OSC)			1	RP Supervisor (OSC)			1
		Function 4 Totals:	**2**	**7**	**2**		**2**	**7**	**2**
5. Plant System Engineering, Repair, and Corrective Actions	Technical Support / Accident Analysis	OPs Superintendent (TSC)			1	Operations Manager (TSC)			1
		Operations Engineer (TSC)			1	Assistant Ops Manager (TSC)			1
		Engineering Manager (TSC)			1	Engineering Manager (TSC)			1
		Reactor Engineer (TSC)		1		Reactor Engineer (TSC)		1	
		Equipment (Electrical) Engineer (OSC)		1		Electrical Engineer (TSC)		1	
		Systems Support Eng (TSC)		1		Mechanical Engineer (TSC)		1	
		Emergency Planner (TSC)			1				
		Maintenance Manager (OSC		1		Maintenance Supervisor (OSC)			1
		Operations Supervisor (OSC)			1	Operations Supervisor (OSC)			1
		Chemistry Manager (OSC)			1	Chemistry Supervisor (OSC)			1
	Repair and Corrective Actions	DRC Supervisor (OSC)			1				
		Nuclear Supply Chain (OSC)			1	Generation Supply Chain Liaison (OSC)			1
		IAE Technician (OSC)		2		IAE Technician (OSC)		2	
		Mech Maint Technician (OSC)		1		Mechanical Technician (OSC)		1	
		Radwaste Operator (OSC)		1		Radwaste Operator (OSC)		1	
		Function 5 Totals:	**0**	**8**	**8**		**0**	**7**	**7**

Functional Area	Major Tasks	CNS ERO Emergency Positions	45 Min.	75 Min.	Full Staff	Standard ERO Emergency Positions	45 Min.	75 Min.	Full Staff
6. In-Plant PAs	Radiation Protection	RP Qualified Personnel (OSC)		6		RP Qualified Personnel (OSC)		6	
		Function 6 Totals:	**0**	**6**	**0**		**0**	**6**	**0**
7. Access Control	Sec & Accountability	Security Manager (TSC)			1	Security Coordinator (TSC)			1
		Evacuation Coordinator (TSC)			1	Site Evacuation Coord (TSC)			1
		Function 7 Totals:	**0**	**0**	**2**		**0**	**0**	**2**
8. Resource Allocation and Admin	Administration	Log Keeper (TSC)			1	Log Keeper (TSC)			1
		Log/Status Keeper (OSC)			1	Log Keeper (OSC)			1
	Facility Operations	Data Coordinator (TSC)			1	OAC Support (TSC)			1
						IT Support (TSC)			1
		Function 8 Totals:	**0**	**0**	**3**		**0**	**0**	**4**
		TOTAL:	**2**	**24**	**20**		**2**	**24**	**20**

1.   Addition and Removal of Positions and Responders

1.1.   The total number of responders filling augmented ERO positions in the current CNS ERO is 46 and the total number of responders filling augmented ERO positions in the standard ERO is 46 (no difference).

   1.1.1. Three (3) responders are added to the CNS ERO.

   1)   TSC IT Support (full staff)

   2)   Assistant OSC Manager (full staff)

   3)   OSC Operations Liaison (full staff)

   1.1.2. Three (3) responders are removed from the CNS ERO.

   1)   TSC Assistant Operations Engineer (full staff)

   2)   TSC Emergency Planner (full staff)

   3)   OSC DRC Supervisor (full staff)

1.2.   Specific comparison between the ERO staffing numbers in each facility are as follows:

   1.2.1. **TSC** – The TSC ERO staffing numbers remain at 19:

   1)   TSC IT Support was added (+1)

   2)   Electrical Engineer (moved from OSC) (+1)

   3)   Emergency Planner was removed (-1)

   4)   Assistant Operations Engineer was removed (-1)

   1.2.2. **OSC** – The OSC ERO staffing numbers remain at 27:

   1)   Assistant OSC Manager was added (+1)

   2)   OSC Operations Liaison was added (+1)

   3)   DRC Supervisor was removed (-1)

   4)   Equipment (Electrical) Engineer (moved to the TSC) (-1)
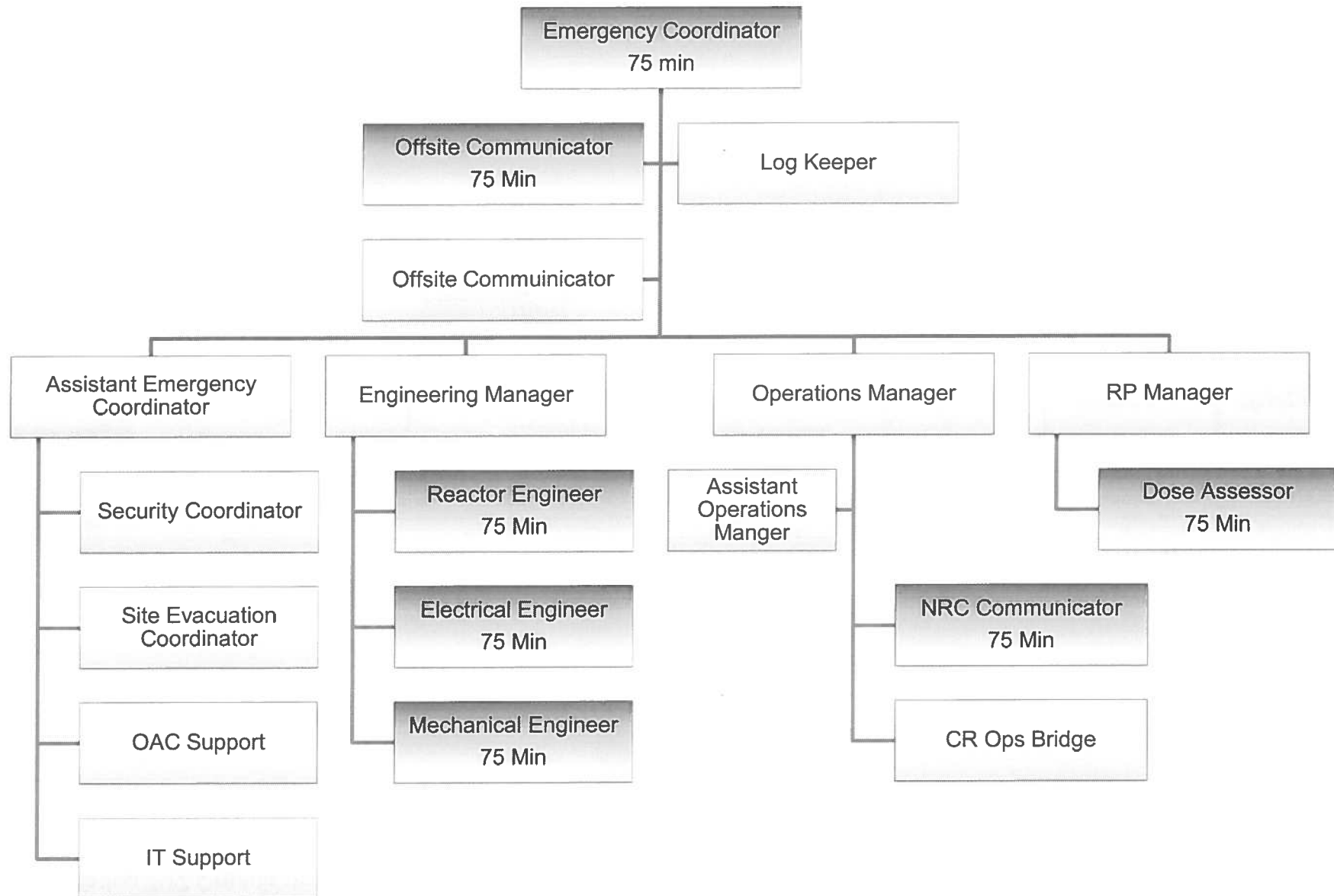
2.   Alteration of ERO Response Times

2.1.   <u>45 Minute Response:</u> The standard ERO imposes no changes to 45 minute responders. All 45 minute response positions are staffed in accordance with existing site specific Emergency Plan commitments. CNS has two (2) 45 minute response positions.

2.2.   <u>75 Minute Response:</u> The current augmented ERO has twenty-four (24) 75 minute responders and the standard augmented ERO has twenty-four (24) 75 minute responders (no change).

   2.2.1.   Two (2) responders are moved from full staff to 75 minute response (+2):

   - TSC NRC Communicator (CNS NRC Communicator)

   - OSC Manager (CNS OSC Coordinator)

   2.2.2.   Two (2) responders are moved from 75 minute to full staff response (-2):

   - One (1) TSC Offsite Communicator (CNS Offsite Agency Communicator)

   - OSC Maintenance Supervisor (CNS Maintenance Manager)

2.3.   <u>Full Staffing</u>: The current augmented ERO has twenty (20) full staff responders and the standard augmented ERO has twenty (20) full staff responders (no change).

   2.3.1.   Three (3) responders are added by new full staff response positions (+3):

   - TSC IT Support

   - OSC Assistant OSC Manager

   - OSC Operations Liaison

   2.3.2.   Two (2) responders are moved from 75 minute to full staff response (+2):

   - One (1) TSC Offsite Communicator (CNS Offsite Agency Communicator)

   - OSC Maintenance Supervisor (CNS Maintenance Manager)

   2.3.3.   Three (3) responders are removed by the elimination of 3 full staff response positions (-3):

   - TSC Assistant Operations Engineer

   - TSC Emergency Planner

   - OSC DRC Supervisor

   2.3.4.   Two (2) responders are moved from full staff to 75 minute response (-2):

   - TSC NRC Communicator (CNS NRC Communicator)
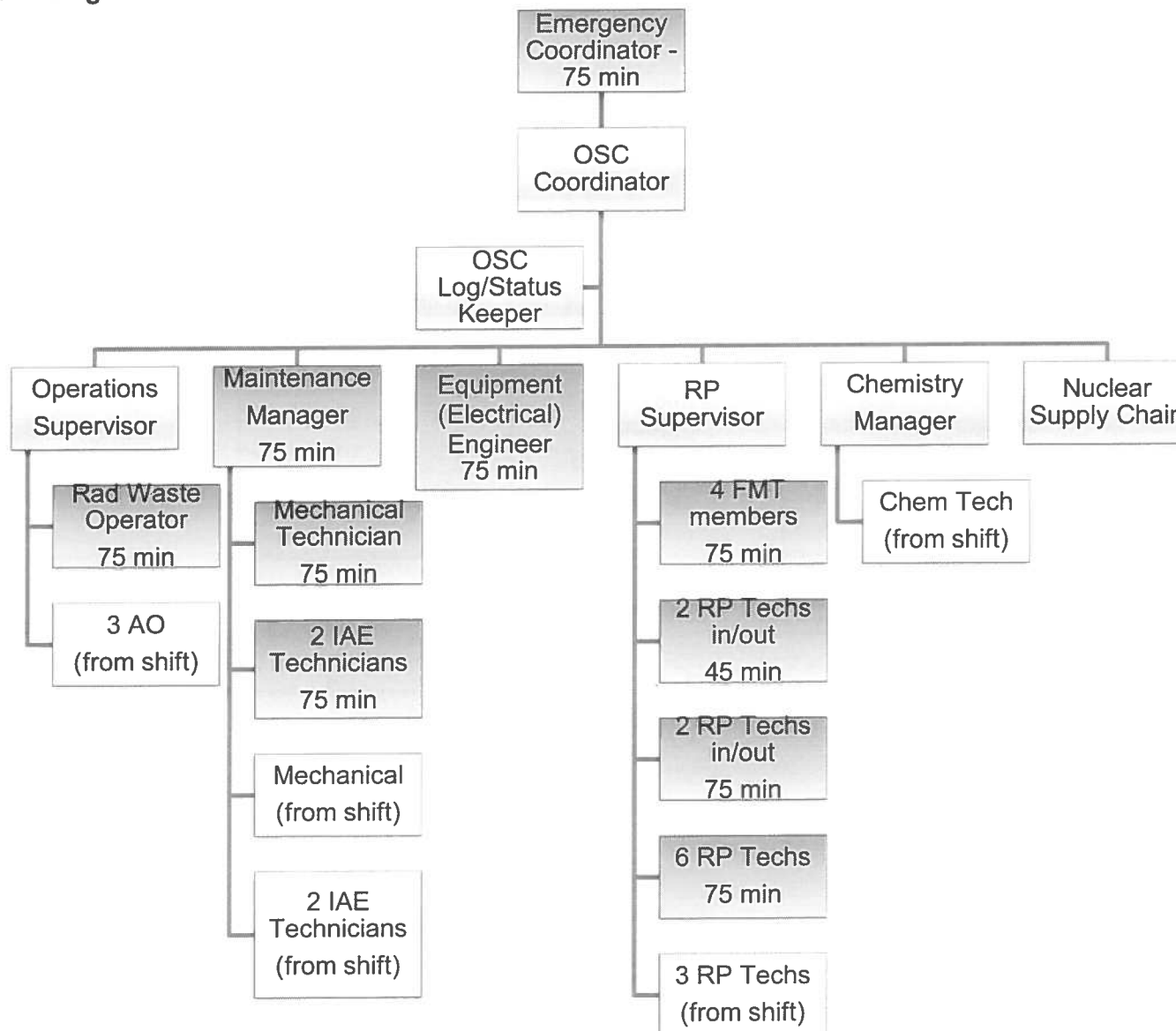
   - OSC Manager (CNS OSC Coordinator)
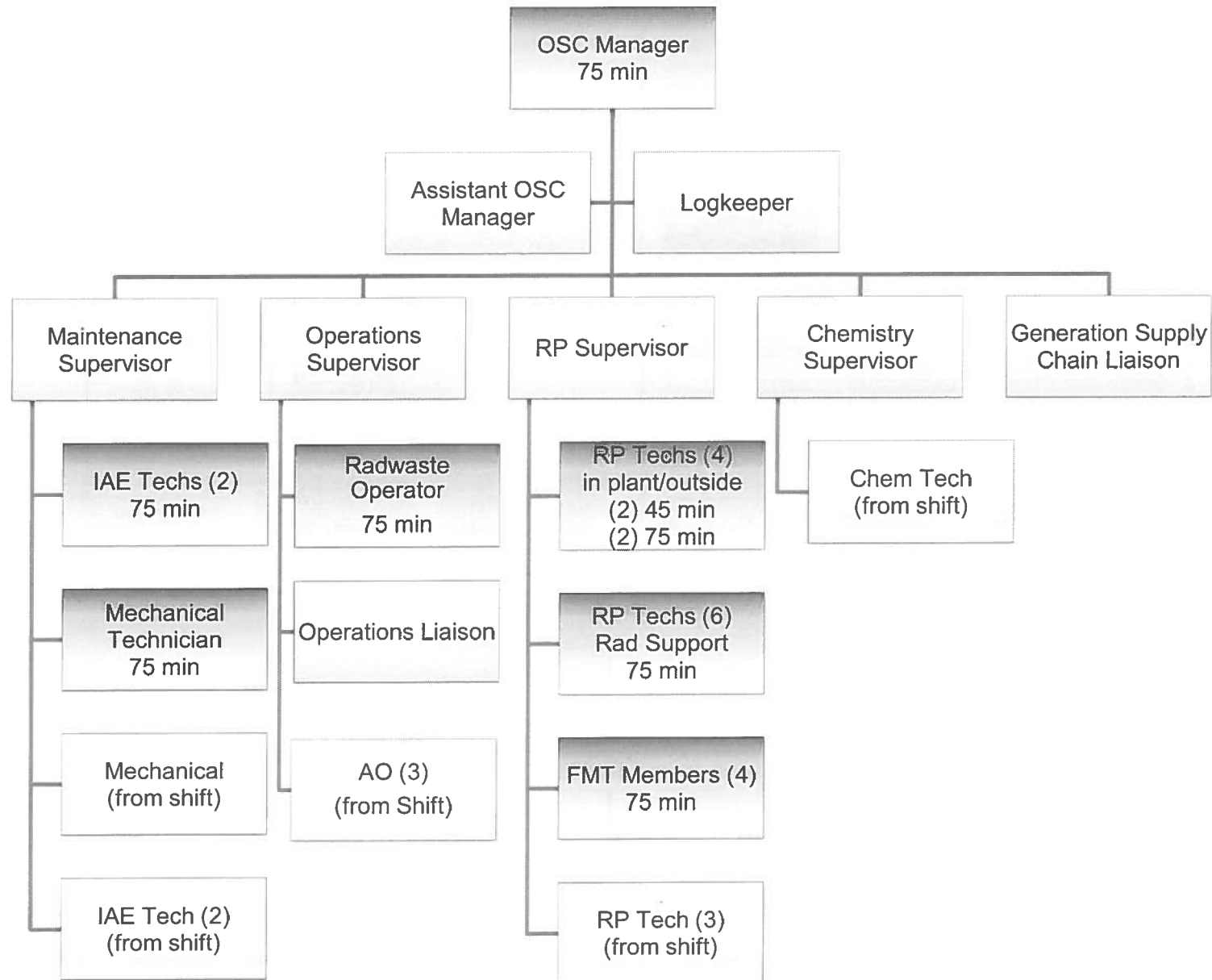
Current Station TSC Organization
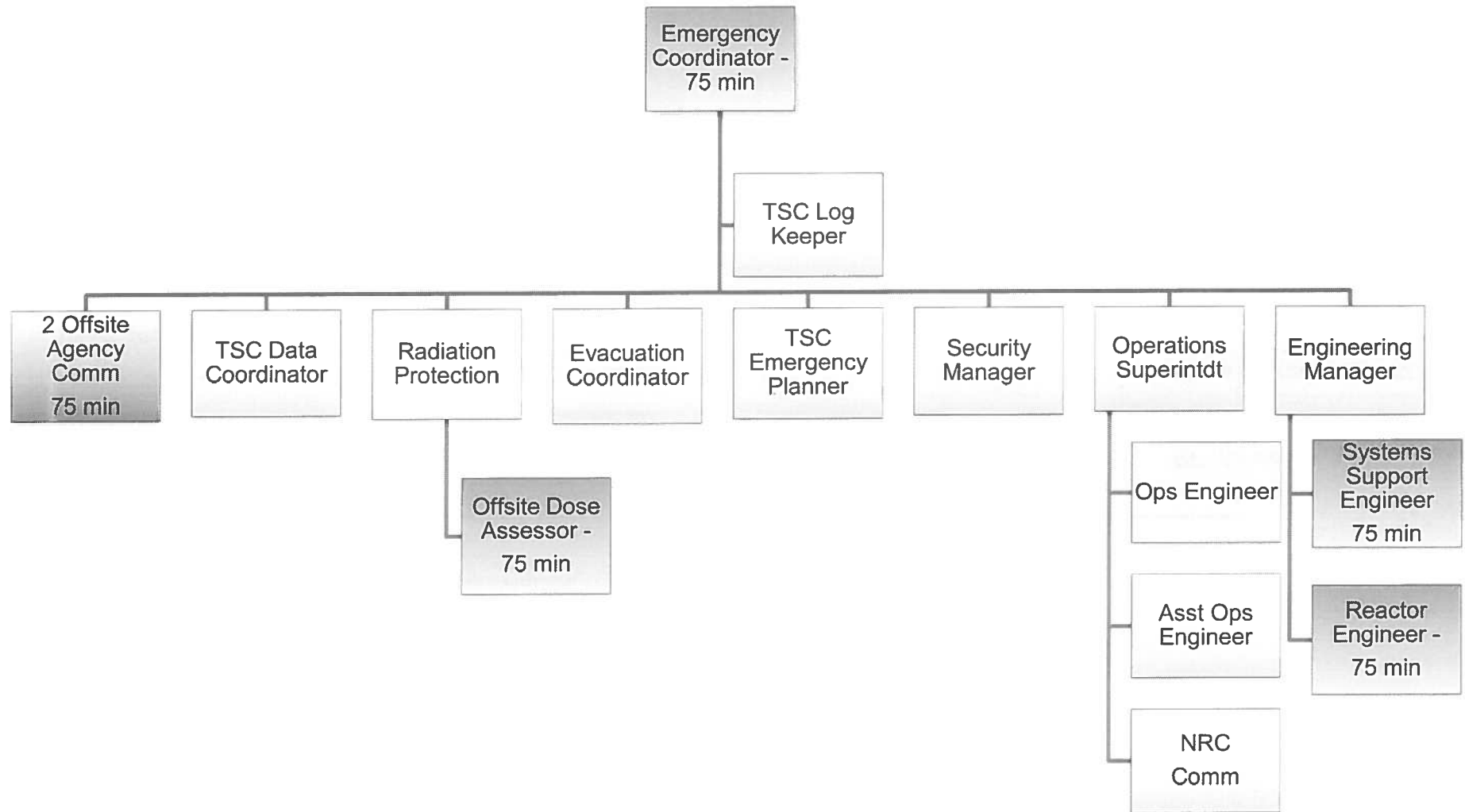
Standard TSC Organization

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                          ┌─────────────────────────┐
                          │  Emergency Coordinator  │
                          │         75 min          │
                          └─────────────────────────┘
                                      │
         ┌────────────────────────┐   │   ┌────────────────────────┐
         │  Offsite Communicator  │───┼───│      Log Keeper        │
         │        75 Min          │   │   │                        │
         └────────────────────────┘   │   └────────────────────────┘
                                      │
         ┌────────────────────────┐   │
         │  Offsite Commuinicator │───┤
         └────────────────────────┘   │
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Assistant Emergency Coordinator	Engineering Manager	Operations Manager	RP Manager
Security Coordinator	Reactor Engineer 75 Min	Assistant Operations Manger	Dose Assessor 75 Min
Site Evacuation Coordinator	Electrical Engineer 75 Min	NRC Communicator 75 Min	
OAC Support	Mechanical Engineer 75 Min	CR Ops Bridge	
IT Support			

Current Station OSC Organization

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                          Emergency
                          Coordinator -
                          75 min
                              |
                          OSC
                          Coordinator
                              |
                          OSC
                          Log/Status
                          Keeper
                              |
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| Operations Supervisor | Maintenance Manager 75 min | Equipment (Electrical) Engineer 75 min | RP Supervisor | Chemistry Manager | Nuclear Supply Chain |

- Operations Supervisor
  - Rad Waste Operator 75 min
  - 3 AO (from shift)
- Maintenance Manager 75 min
  - Mechanical Technician 75 min
  - 2 IAE Technicians 75 min
  - Mechanical (from shift)
  - 2 IAE Technicians (from shift)
- Equipment (Electrical) Engineer 75 min
- RP Supervisor
  - 4 FMT members 75 min
  - 2 RP Techs in/out 45 min
  - 2 RP Techs in/out 75 min
  - 6 RP Techs 75 min
  - 3 RP Techs (from shift)
- Chemistry Manager
  - Chem Tech (from shift)
- Nuclear Supply Chain

Standard OSC Organization

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                              ┌─────────────────┐
                              │   OSC Manager   │
                              │     75 min      │
                              └────────┬────────┘
                                       │
                   ┌───────────────────┴──────────────────┐
          ┌────────────────┐                    ┌─────────────────┐
          │ Assistant OSC  │                    │   Logkeeper     │
          │    Manager     │                    │                 │
          └────────────────┘                    └─────────────────┘
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Maintenance Supervisor	Operations Supervisor	RP Supervisor	Chemistry Supervisor	Generation Supply Chain Liaison

| IAE Techs (2) 75 min | Radwaste Operator 75 min | RP Techs (4) in plant/outside (2) 45 min (2) 75 min | Chem Tech (from shift) | |

| Mechanical Technician 75 min | Operations Liaison | RP Techs (6) Rad Support 75 min | | |

| Mechanical (from shift) | AO (3) (from Shift) | FMT Members (4) 75 min | | |

| IAE Tech (2) (from shift) | | RP Tech (3) (from shift) | | |

Old Title: **Emergency Coordinator (E-Plan B.2; CNS/RP/0/A/5000/020 Enclosure 4.1)**
New Title: **Emergency Coordinator (E-Plan B.2; AD-EP-ALL-0105 Attachment 1)**

Overall Change Impact to the Position

The span of control for this position has been reduced to 7 people. The Emergency Coordinator and the Assistant Emergency Coordinator are equally qualified and are interchangeable. The Assistant Emergency Coordinator typically acts as a TSC manager more in line with industry practices, which allows the Emergency Coordinator greater attention on site response activities in all facilities (TSC, OSC and CR) and less attention on TSC operation and administration.

Deviations created by the addition, removal and modification of tasks to the Emergency Coordinator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

23 tasks were added, 23 were modified and 0 were removed.

Emergency Coordinator   **Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.) AD-EP-ALL-0105 Att 1 Step 3.6	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not specifically include this task although the EC does control coordination with the ICP as a sub-task for overall control of site response. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Establish 24-hour staffing	Verify that the 24 hour staffing list has been completed AD-EP-ALL-0105 Att 1 Step 1.5	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Emergency Coordinator

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate ERO/facility shift turnover AD-EP-ALL-0105 Att 1 Step 1.5	This task has been <u>added</u> and is categorized as a deviation.
		Previous CNS procedures has each facility manager responsible for their groups shift turnover and do not specifically include this task for the EC. Although the EC, as the individual responsible for the site response, does control shift turnover. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as no reduction.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 1 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Assume and establish command and control	Assume/maintain command and control AD-EP-ALL-0105 Att 1 Step 1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Transfer command and control	Transfer command and control AD-EP-ALL-0105 Att 1 Step 1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Set priorities for staff and work actions.	Manage all onsite emergency response activities AD-EP-ALL-0105 Att 1 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Manage facility emergency response activities AD-EP-ALL-0105 Att 1 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role.
		This change is evaluated as no reduction.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 1 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Emergency Coordinator

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate integration of the NRC site team AD-EP-ALL-0105 Att 1 Step 3.8	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role.
		This change is evaluated as no reduction.
	Prioritize and authorize requests for external assistance (technical, craft, admin, etc.) AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation.
		Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, does control prioritization and authorization of requests for external assistance. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
	Approve equipment, supply, and logistics expenditures for response to the event AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation.
		Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, does approve equipment, supply, and logistics expenditures. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.

Emergency Coordinator

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Arrange for equipment and supply resources AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Arrange for logistics support AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Request Federal support and resources AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, does request Federal support and resources. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Classify and declare emergencies	Classify and declare emergencies AD-EP-ALL-0105 Att 1 Step 2.1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Emergency Coordinator   Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Assist with emergency classification AD-EP-ALL-0105 Att 1 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Ensure the performance of offsite notifications	Approve and direct offsite emergency notifications to state and local authorities AD-EP-ALL-0105 Att 1 Step 2.1.a.2.b	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Approve NRC Notifications	Direct notifications and ENS communications with the NRC AD-EP-ALL-0105 Att 1 Step 2.1.10	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Ensure flow of information within and between the emergency response facilities AD-EP-ALL-0105 Att 1 Step 2.1.9	This task has been <u>added</u> and is categorized as a deviation. Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, is responsible for the flow of information. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Perform or direct emergency PA announcements AD-EP-ALL-0105 Att 1 Step 2.1.2.a.4	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.

Emergency Coordinator

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0105 Att 1 Step 1.3.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Determine current/projected staff needs AD-EP-ALL-0105 Att 1 Step 1.3.10,11	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Ensure facility staff is prepared to perform their activities (facility ready) AD-EP-ALL-0105 Att 1 Step 1.3	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Activate TSC and OSC	Activate the facility (facility activated) AD-EP-ALL-0105 Att 1 Step 1.3.9	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Emergency Coordinator

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Direct/coordinate facility relocation AD-EP-ALL-0105 Att 1 Step 3.4	This task has been <u>added</u> and is categorized as a deviation.
		Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, does diect and coordinate facility relocation. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
	Determine and direct site response priorities AD-EP-ALL-0105 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation.
		Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, does determine and direct site response prioritization. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement
	Support determination of site response priorities AD-EP-ALL-0105 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role.
		This change is evaluated as no reduction.
Implement Contingency Actions as required	Determine and direct the actions for mitigation strategies and contingency plans AD-EP-ALL-0105 Att 1 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Identify critical tasks and direct OSC to execute	Coordinate between CR, OSC and TSC to set OSC Team task priorities AD-EP-ALL-0105 Att 1 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Emergency Coordinator

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Direct/support site assembly, accountability and search & rescue activities AD-EP-ALL-0105 Att 1 Step 3.1	This task has been <u>added</u> and is categorized as a deviation. Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for the site response, does direct assembly, accountability and search & rescue activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement
	Establish and maintain facility accountability AD-EP-ALL-0105 Att 1 Step 3.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Authorize site evacuation	Coordinate site evacuation AD-EP-ALL-0105 Att 1 Step 3.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Approve use of KI AD-EP-ALL-0105 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation. Previous CNS procedures do not specifically include this task although the EC, as the individual responsible for authorizing KI. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement
Approve Protective Action Recommendations	Approve offsite Protective Action Recommendations AD-EP-ALL-0105 Att 1 Step 2.1.2.a.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Emergency Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Approve emergency radiation exposures	Approve emergency exposures AD-EP-ALL-0105 Att 1 Step 3.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Ensure habitability is established and maintained for occupied areas AD-EP-ALL-0105 Att 1 Step 1.2.2	This task has been added and is categorized as a deviation. CNS implementing procedures do not specifically include this task although the EC is responsible for habitability actions. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Downgrade or terminate emergencies	Terminate the emergency event AD-EP-ALL-0105 Att 1 Step 3.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Implement Recovery actions	Develop recovery plans AD-EP-ALL-0105 Att 1 Step 3.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure appropriate actions are taken of 54(x) is invoked	Authorize and direct extreme measures (FLEX, EDMG, SAMG, §50.54(x) or security controls) AD-EP-ALL-0105 Att 1 Step 3.7	The steps for this task have been modified for checklist use, which is categorized as a difference.
Conduct TSC staff briefings to update ERF staffs (EOF, OSC, TSC) on a periodic and as-needed basis	Conduct facility briefs and updates AD-EP-ALL-0105 Att 1 Step 2.1.7	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 1 Step 2.1.7	This task has been added and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 1 Step 1.1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.

Emergency Coordinator   **Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 1 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **Assistant Emergency Coordinator (CNS/RP/0/A/5000/020 Enclosure 4.16)**
New Title: **Assistant Emergency Coordinator (AD-EP-ALL-0105 Attachment 1)**

Overall Change Impact to the Position

The span of control for the Assistant Emergency Coordinator has been established at 4 ERO positions. The Emergency Coordinator and the Assistant Emergency Coordinator are equally qualified and are interchangeable. The standard ERO develops the Assistant Emergency Coordinator position as a TSC manager more typical of industry practices. The facility administrative supervisory duties of the old Assistant Emergency Coordinator align with the standard Assistant Emergency Coordinator, although the standard ERO position has additional tasks that expand the role of the position. Tasks added the Assistant Emergency Coordinator position relieve the Emergency Coordinator of TSC facility management duties and allow them to concentrate on overall site emergency response activities. Removed tasks continue to be performed by other more appropriate ERO positions.

Deviations created by the addition, removal or modification of tasks to the Assistant Emergency Coordinator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

36 tasks were added, 8 were modified and 0 were removed.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.) AD-EP-ALL-0105 Att 1 Step 3.6	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not specifically include this task although the EC does control coordination with the ICP as a sub-task for overall control of site response. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Verify that the 24 hour staffing list has been completed AD-EP-ALL-0105 Att 1 Step 1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 1 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Coordinate ERO/facility shift turnover AD-EP-ALL-0105 Att 1 Step 1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Assume/maintain command and control AD-EP-ALL-0105 Att 1 Step 1.4	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction
Assist with the transfer of command and control	Transfer command and control AD-EP-ALL-0105 Att 1 Step 1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Manage all onsite emergency response activities AD-EP-ALL-0105 Att 1 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Manage facility emergency response activities AD-EP-ALL-0105 Att 1 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 1 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Coordinate integration of the NRC site team AD-EP-ALL-0105 Att 1 Step 3.8	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Prioritize and authorize requests for external assistance (technical, craft, admin, etc.) AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Approve equipment, supply, and logistics expenditures for response to the event AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Arrange for equipment and supply resources AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Arrange for logistics support AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Request Federal support and resources AD-EP-ALL-0105 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. This change formally documents the task as a specific activity as the position is elevated to an assistant EC role. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. This change is evaluated as no reduction

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Classify and declare emergencies AD-EP-ALL-0105 Att 1 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Assist with emergency classification AD-EP-ALL-0105 Att 1 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. This change formally documents the task as a specific activity as the position is elevated to an assistant EC role. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification.
		This change is evaluated as no reduction.
Assist with the development of offsite notifications	Approve and direct offsite emergency notifications to state and local authorities AD-EP-ALL-0105 Att 1 Step 2.1.a.2.b	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Direct notifications and ENS communications with the NRC AD-EP-ALL-0105 Att 1 Step 2.1.10	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role.
		This change is evaluated as no reduction.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Ensure flow of information within and between the emergency response facilities AD-EP-ALL-0105 Att 1 Step 2.1.9	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Perform or direct emergency PA announcements AD-EP-ALL-0105 Att 1 Step 2.1.2.a.4	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0105 Att 1 Step 1.3.5	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. The assistant EC is the TSC manager, who ensures min staffing. This change is evaluated as an improvement.
	Determine current/projected staff needs AD-EP-ALL-0105 Att 1 Step 1.3.10,11	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. The assistant EC is the TSC manager, who manages the preparation for facility activation. This change is evaluated as an improvement.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Ensure facility staff is prepared to perform their activities (facility ready) AD-EP-ALL-0105 Att 1 Step 1.3	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. The assistant EC is the TSC manager, who manages the preparation for facility activation. This change is evaluated as an improvement.
Assist with activation of the TSC	Activate the facility (facility activated) AD-EP-ALL-0105 Att 1 Step 1.3.9	Responsibility has been <u>modified</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. The assistant EC is the TSC manager, who can activate the facility, which relieves the EC of the task. This change is evaluated as no reduction
	Direct/coordinate facility relocation AD-EP-ALL-0105 Att 1 Step 3.4	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. The assistant EC is the TSC manager, who manages the preparation for facility activation. This change is evaluated as an improvement.
	Determine and direct site response priorities AD-EP-ALL-0105 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Support determination of site response priorities AD-EP-ALL-0105 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Asssitant EC as the scope of that position did not warrant this activity. This change formally documents the task as a specific activity as the position is elevated to an assistant EC role. This change is evaluated as no reduction.
	Determine and direct the actions for mitigation strategies and contingency plans AD-EP-ALL-0105 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Coordinate between CR, OSC and TSC to set OSC Team task priorities AD-EP-ALL-0105 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not specifically reference event prioritization tasks for positions other than the EC. The assistant EC is the TSC manager, who now is involved in establishing and coordinating TSC priorities, allowing the EC to focus attention on directing the overall priorities for the site. This change is evaluated as no reduction.
	Direct/support site assembly, accountability and search & rescue activities AD-EP-ALL-0105 Att 1 Step 3.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Establish and maintain facility accountability AD-EP-ALL-0105 Att 1 Step 3.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. This change formally documents the task as a specific activity as the position is elevated to an assistant EC role. This change is evaluated as no reduction
	Coordinate site evacuation AD-EP-ALL-0105 Att 1 Step 3.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Approve use of KI AD-EP-ALL-0105 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Approve offsite Protective Action Recommendations AD-EP-ALL-0105 Att 1 Step 2.1.2.a.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Approve emergency exposures AD-EP-ALL-0105 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Ensure habitability is established and maintained for occupied areas AD-EP-ALL-0105 Att 1 Step 1.2.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Terminate the emergency event AD-EP-ALL-0105 Att 1 Step 3.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
	Develop recovery plans AD-EP-ALL-0105 Att 1 Step 3.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.

Assistant Emergency Coordinator   **Assistant Emergency Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Authorize and direct extreme measures (FLEX, EDMG, SAMG, §50.54(x) or security controls) AD-EP-ALL-0105 Att 1 Step 3.7	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Assistant EC as the scope of that position did not warrant this activity. This change formally documents the task as a specific activity as the position is elevated to an assistant EC role. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. This change is evaluated as no reduction.
	Conduct facility briefs and updates AD-EP-ALL-0105 Att 1 Step 2.1.7	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the EC and Assistant EC as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role. This change is evaluated as no reduction.
Prepare routine updates	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 1 Step 2.1.7	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 1 Step 1.1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 1 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Off-Site Agency Communicator (CNS/RP/0/A/5000/020 Enclosure 4.3)**
New Title: **Offsite Communicator (AD-EP-ALL-0105 Attachment 2)**

Overall Change Impact to the Position

Changes to the Offsite Communicator tasks were minor and primarily differences.

Deviations created by the modification of tasks to the Offsite Communicator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 6 were modified and 1 was removed.

Off-Site Agency Communicator   **Offsite Communicator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 2 Step 2.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Ensure off-site agency communicators in the EOF are aware of information affecting offsite agencies even after turnover has occurred		This task has been <u>removed</u> and is categorized as a deviation. The TSC Offsite Communicator performs offsite notifications when the EOF is not performing the task. Upon EOF activiation the EOF performs offsite notifications. The change is evaluated as no reduction.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 2 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Perform off-site notifications using ENF and comm equipment	Perform offsite emergency notifications to state and local authorities AD-EP-ALL-0105 Att 2 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Off-Site Agency Communicator   **Offsite Communicator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide the status of off-site agency notifications to the Emergency Coordinator and staff during TSC update briefings.	Distribute forms, reports, etc. as needed AD-EP-ALL-0105 Att 2 Step 2.1.6	This task has been <u>modified</u> for checklist use and is categorized as a deviation.
		This task related to activities associated with both roles of the TSC Offsite Communicator. First, to distribute completed notification forms to appropriate personnel when the EOF is not performing the task. Second, to distribute other materials as directed by the EC when the EOF is performing offsite notifications.
		The change is evaluated as an improvement.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 2 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 2 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Logkeeper (CNS/RP/0/A/5000/020 Enclosure 4.12)**
New Title: **Log Keeper (AD-EP-ALL-0105 Attachment 3)**

Overall Change Impact to the Position

Changes to the Log Keeper tasks were minor and primarily differences.

Deviations created by the modification of tasks to the Log Keeper position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

1 task was added, 6 were modified and 0 were removed.

Logkeeper   **Log Keeper**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 3 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 3 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Activate data displays in TSC	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 3 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Operate WebEOC	Maintain status and information boards/displays AD-EP-ALL-0105 Att 3 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 3 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 3 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **ICP Liaison (CNS/RP/0/B/5000/034&035 Enclosure 4.1)**
New Title: **ICP Liaison (AD-EP-ALL-0105 Attachments 18, 19 and 20)**

Overall Change Impact to the Position

Changes to the ICP Liaison tasks were minor and primarily differences.

No deviations were created by the addition or modification of tasks to the ICP Liaison position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 5 were modified and 0 were removed.

ICP Liaison   ICP Liaison

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Establish an ICP position log of activities sufficient enough to conduct a turnover for the on-coming shift in an event	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 18 19 & 20 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 18 19 & 20 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Contact the ICP Commander and introduce yourself as the Catawba ICP Liaison.	Communicate with ICP to provide information and coordination AD-EP-ALL-0105 Att 18 19 & 20 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Establish an ICP position log of activities	Maintain event logs, forms and records AD-EP-ALL-0105 Att 18 19 & 20 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference
Restore work area equipment and materials	Restore work area equipment and materials AD-EP-ALL-0105 Att 18 19 & 20 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **Emergency Planner (CNS/RP/0/A/5000/020 Enclosure 4.11)**
New Title: **No Equivalent Position in Standard ERO**

Overall Change Impact to the Position

Position not part of the standard ERO.

All tasks previously assigned to the Emergency Planner position are performed by various other standard ERO staff.

Deviations created by the removal of the Emergency Planner position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

7 tasks are performed by other ERO positions.

Emergency Planner

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Interface with NRC, state and county		This task has been removed and is categorized as a deviation.
		This task is performed by Assistant Emergency Coordinator position with regard to the NRC site team interface. State and County personnel do not respond to the TSC. If they respond, they go to the EOF.
Establish secure comms during security-related events		This task has been removed and is categorized as a deviation.
		This task is performed by Security Coordinator position.
Establish and monitor communications on the EP bridge line.		This task has been removed and is categorized as a deviation.
		This change is result of the removal of the Emergency Planner position from the TSC hence no longer needing a bridge line.
		This change is evaluated as no reduction.
Assist with the development of offsite notifications		This task has been removed and is categorized as a deviation.
		This task is performed by other positions within the TSC ERO (Ops Mgr and Asst Ops Mgr).

Emergency Planner

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Support activation of the TSC		This task has been <u>removed</u> and is categorized as a deviation.
		This task is performed by other positions within the TSC ERO.
Support operation of the TSC		This task has been <u>removed</u> and is categorized as a deviation.
		This task is performed by other positions within the TSC ERO.
Facilitate site evacuation		This task has been <u>removed</u> and is categorized as a deviation.
		This change maintains the capability to conduct a site evacuation because that capability is the responsibility of the Site Evacuation Coordinator.
		This change is evaluated as no reduction.

Old Title: **Engineering Manager (CNS/RP/0/A/5000/020 Enclosure 4.8)**
New Title: **Engineering Manager (AD-EP-ALL-0105 Attachment 8)**

Overall Change Impact to the Position

The span of control for this position has increased from 2 people to 3 people. The Engineering Manager responsibilities have been re-aligned to maintain oversight of emergency-related engineering tasks, and its staff increased to accommodate all the Engineering disciplines and the re-alignment of responsibilities.

Deviations created by the addition, removal or modification of tasks to the Engineering Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

6 tasks were added, 9 were modified and 0 were removed.

Engineering Manager   **Engineering Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 8 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Complete the "Engineering 24 Hour TSC Essential Staffing List."	Develop facility 24 hour staffing list AD-EP-ALL-0105 Att 8 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Manage overall site engineering effort and ensure adequate levels of engineering resources are available to support the TSC and OSC.	Manage assigned group emergency response activities AD-EP-ALL-0105 Att 8 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 8 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Engineering Manager

Engineering Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0105 Att 8 Step 2.1.3	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Engineering Manager does evaluate and coordinate external resources for their area. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0105 Att 8 Step 2.1.3	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Engineering Manager does evaluate and obtain additional resources for their area. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 8 Step 2.1.6	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Engineering Manager does monitor plant status in the execution of assessment related functions. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Complete actions for facility activation	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 8 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Engineering Manager **Engineering Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assess plant conditions and advise TSC EC of potential challenges	Perform event detection and assessment activities AD-EP-ALL-0105 Att 8 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Support determination of site response priorities AD-EP-ALL-0105 Att 8 Step 2..1	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the Engineering Manager does assist with establishing site priorities in the execution of development of mitigation strategies and contingency plans. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 8 Step 2.1.7	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the Engineering Manager does support development of mitigation strategies and contingency plans. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
	Analyze and develop extreme measures actions (FLEX, EDMG, SAMG, §50.54(x)) AD-EP-ALL-0105 Att 8 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		Previous procedures did not specifically reference extreme measures. This change documents the responsibilities for this position to provide better clarity and instruction.
		This change is evaluated as an improvement.
Provide the status of the following items to the Emergency Coordinator staff during update briefings.	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 8 Step 2.2.12	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Engineering Manager　　　　　　　　　　　　　　**Engineering Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 8 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 8 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: Reactor Engineer (CNS/RP/0/A/5000/020 Enclosure 4.9)
New Title: Reactor Engineer (AD-EP-ALL-0105 Attachment 9)

Overall Change Impact to the Position

Changes to the Reactor Engineer tasks were minor and primarily differences. Tasks added to the Reactor Engineer position involves current common undirected actions. Task removed was a non-RERP activity.

Deviations created by the addition or modification of tasks to the Reactor Engineer position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks were added, 8 were modified and 1 was removed.

Reactor Engineer   **Reactor Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 9 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 9 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0105 Att 9 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Reactor Engineer does maintain communications for core damage and effluent related information. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Complete actions for facility activation	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 9 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Reactor Engineer   **Reactor Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform event detection and assessment activities AD-EP-ALL-0105 Att 9 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Reactor Engineer does perform event detection and assessment activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Ensure parameters that support core/spent fuel cooling are monitored, controlled, maintained,	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 9 Step 2.1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Communicate rx status to TSC staff	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 9 Step 2.1.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Evaluate status of reactor and containment (core damage, ECCS status, margins, RPV status)	Provide analysis of core damage and fission product release potential AD-EP-ALL-0105 Att 9 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Ensure control and accountability of Special Nuclear Materials.		This task has been <u>removed</u> and is categorized as a deviation. This is a non-RERP task and therefore not included as a Standard ERO responibility. However, the management of EHS related activities will remain. This change is evaluated as no reduction.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 9 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 9 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Equipment (Electrical) Engineer (CNS/RP/0/A/5000/024 Enclosure 4.5)**
New Title: **Electrical Engineer (AD-EP-ALL-0105 Attachment 10)**

Overall Change Impact to the Position

This position was moved from the OSC to the TSC to consolidate the engineering function. Tasks added to the Electrical Engineer position involves current common undirected actions. Tasks removed are performed by other standard ERO positions.

Deviations created by the addition of tasks to the Electrical Engineer position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

3 tasks were added, 5 were modified and 5 were removed.

Equipment (Electrical) Engineer   **Electrical Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate Equipment Engineer shift rotation		This task has been <u>removed</u> and is categorized as a deviation. The capability to coordinate the shift rotation of the Engineer staff is maintained by the Engineering Manager. It is that positions responsibility to centrally manage the shift rotation of the Engineering staff in the TSC, which sustains the capability. This change is evaluated as no reduction.
Coordinate augmentation of personnel and equipment.		This task has been <u>removed</u> and is categorized as a deviation. The capability to augment personnel and equipment is maintained by the Engineering Manager. It is that positions responsibility to centrally manage that function in the TSC, which sustains the capability. This change is evaluated as no reduction.
Prepare for facility activation (rooms, work area, equipment, etc.)	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 10 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 10 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Equipment (Electrical) Engineer   **Electrical Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 10 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 10 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Electrical Engineer does monitor information systems. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Perform event detection and assessment activities AD-EP-ALL-0105 Att 10 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Electrical Engineer does perform event detection and assessment activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 10 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Electrical Engineer does support development of mitigation strategies and contingency plans. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

Equipment (Electrical) Engineer   **Electrical Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Brief and debrief engineering teams and maintain updates of plant conditions		This task has been removed and is categorized as a deviation. The capability to brief engineering teams and update them on plant conditions is maintained by the Engineering Manager. It is that positions responsibility to centrally manage these functions for the Engineering staff in the TSC, which sustains the capability. This change is evaluated as no reduction.
Implement accountability requirements		This task has been removed and is categorized as a deviation. The capability to implement accountability for the TSC is maintained by the Assistant Emergency Coordinator. It is that positions responsibility to establish and maintain accountability for staff in the TSC, which sustains the capability. This change is evaluated as no reduction.
Inform the OSC RP Manager of any locations outside the OSC or TSC where Engineering personnel are located following a site evacuation		This task has been removed and is categorized as a deviation. The capability to track engineering personnel is maintained by the Assistant Emergency Coordinator and Engineering Manager. It is those positions responsibility to track Engineering staff in the TSC, which sustains the capability. This change is evaluated as no reduction.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 10 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 10 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title:	Systems Support Engineer (CNS/RP/0/A/5000/020 Enclosure 4.10)
New Title:	Mechanical Engineer (AD-EP-ALL-0105 Attachment 11)

Overall Change Impact to the Position

Changes to the Mechanical Engineer tasks were minor and primarily differences. Task added to the Mechanical Engineer position involves current common undirected actions. Task removed is performed by other standard ERO positions.

Deviations created by the addition or modification of tasks to the Mechanical Engineer position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

1 task was added, 7 were modified and 1 was removed.

Systems Support Engineer   **Mechanical Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Communicate information to TSC staff		This task has been <u>removed</u> and is categorized as a deviation.
		The capability to communicate various information to the TSC staff rests with the Engineering Manager. It is that positions responsibility to centrally manage the flow of information to and from the TSC engineering group, which sustains the capability.
		This change is evaluated as no reduction.
Complete actions for facility activation	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 11 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 11 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 11 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Systems Support Engineer   **Mechanical Engineer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 11 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Mechanical Engineer does monitor information systems. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Provide status of primary and secondary systems, electrical systems and containment status	Perform event detection and assessment activities AD-EP-ALL-0105 Att 11 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Advise TSC Engineering Manager on current systems status and accident mitigation strategies.	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 11 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 11 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 11 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: Operations Superintendent (CNS/RP/0/A/5000/020 Enclosure 4.5)
New Title: Operations Manager (AD-EP-ALL-0105 Attachment 12)

Overall Change Impact to the Position

There are no changes to the span of control to this position however there is a realignment of the subordinate ops related communicators.

Deviations created by the addition, removal or modification of tasks to the Operations Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

4 tasks were added, 14 were modified and 0 were removed.

Operations Superintendent   **Operations Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 12 Step 2.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Provide technical expertise regarding solutions to operational problems to the TSC, Control Room, OSC and other members of the ERO as required. Advise Emergency Coordinator on the anticipated course of the event.	Monitor status of the Emergency Operations Procedures AD-EP-ALL-0105 Att 12 Step 2.1.1 & 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 12 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure each operating shift is staffed with adequate personnel to support all emergency situations, augmenting with additional resources as necessary.	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0105 Att 12 Step 1.2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Arrange for equipment and supply resources AD-EP-ALL-0105 Att 12 Step 1.2.3	This task has been added and is categorized as a deviation. The role of the Operations Manager is expanded in the standard ERO to include assisting the EC in identifying and obtaining and ops related equipment and supply resources. This change is evaluated as an improvement.

Operations Superintendent   **Operations Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assist in making decisions on emergency classifications, mitigation strategies, and contingency plans.	Assist with emergency classification AD-EP-ALL-0105 Att 12 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Assist the TSC Off-Site Agency Communicators in completion of the Emergency Notification Forms	Support completion of the ENF to state and local authorities AD-EP-ALL-0105 Att 12 Step 2.1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 12 Step 2.1.3	This task has been added and is categorized as a deviation. Previous procedures did not specifically define the process for monitoring facility displays. This change is evaluated as an improvement.
	Manage assigned group emergency response activities AD-EP-ALL-0105 Att 12 Step 1.2 & 2.1	This task has been added and is categorized as a deviation. CNS implementing procedures do not explicitly include this task for the Operations Manager, although that position was responsible for supervision of subordinates. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. This change is evaluated as an improvement.
Assist in making decisions on emergency classifications, mitigation strategies, and contingency plans.	Support determination of site response priorities AD-EP-ALL-0105 Att 12 Step 2.1.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Evaluate and prioritize requests for information from the TSC staff, EOF staff, NRC and others.	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 12 Step 2.1.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Provide technical expertise regarding solutions to operational problems to the TSC, Control Room, OSC and other members of the ERO as required.	Perform event detection and assessment activities AD-EP-ALL-0105 Att 12 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.

Operations Superintendent   **Operations Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Establish communications with the Control Room, OSC and EOF with the wireless phone/headset via the OPS bridge line.	Coordinate between CR, OSC and TSC to set OSC Team task priorities AD-EP-ALL-0105 Att 12 Step 2.1.5	This task has been <u>modified</u> and is categorized as a deviation. This task wording is modified to explicitly include this task for the Operations Manager. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. This change is evaluated as no reduction
Establish direct communications with SM for the following conditions: A. During all 10CFR50.54x discussions.	Analyze and develop extreme measures actions (FLEX, EDMG, SAMG, §50.54(x)) AD-EP-ALL-0105 Att 12 Step 3.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0105 Att 12 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. The role of the Operations Manager is expanded in the standard ERO to include assisting the EC with the identification of appropriate plant based PARs when the EOF is not available. This change is evaluated as no reduction.
Provide the status of the following items as applicable to the Emergency Coordinator staff duringupdate briefings.	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 12 Step 2.1.9	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records	Maintain event logs, forms and records AD-EP-ALL-0105 Att 12 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 12 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Operations Engineer (CNS/RP/0/A/5000/020 Enclosure 4.6)**
New Title: **Assistant Operations Manager (AD-EP-ALL-0105 Attachment 13)**

Overall Change Impact to the Position

Changes to the Assistant Operations Manager tasks were minor and mostly associated with providing clearer definition of the position in an operations communications role and support of the Operations Manager. Tasks were altered to minimize potential overburden and overlap of actions.

Deviations created by the addition, removal or modification of tasks to the Assistant Operations Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

6 tasks were added, 7 were modified and 4 were removed.

Operations Engineer   **Assistant Operations Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 13 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Consult the EOF for possible solutions if procedural adequacy becomes a concern. Follow Response Procedures (RPs) and ensure completion of appropriate steps.	Monitor status of the Emergency Operations Procedures AD-EP-ALL-0105 Att 13 Step 2.1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 13 Step 21.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Verify that the TSC ventilation system is operable (capable of operating in filter mode).		This task has been <u>removed</u> and is categorized as a deviation. This task is performed by TSC Dose Assessor in the standard ERO. This change is evaluated as no reduction.
Perform recommendations to TSC Ops Superintendent on emergency classifications	Assist with emergency classification AD-EP-ALL-0105 Att 13 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Operations Engineer   **Assistant Operations Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide information to Off-site Agency Communicator and the NRC Communicator as requested regarding changes in plant conditions and protective action recommendations		This task has been <u>removed</u> and is categorized as a deviation. This task is performed by Ops Manager in the standard ERO. This change is evaluated as no reduction.
Establish communications with the Control Room, OSC and EOF with the wireless phone/headset via the OPS bridge line.	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0105 Att 13 Step 1.2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 13 Step 2.1.2 & 2.2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Assistant Operations Manager does monitor plant status in the execution of assessment related functions. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Maintain status and information boards/displays AD-EP-ALL-0105 Att 13 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Assistant Operations Manager does maintain status boards and displays in the execution of assessment related functions. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement

Operations Engineer

Assistant Operations Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 13 Step 2.1.3	This task has been <u>added</u> and is categorized as a deviation. The Assistant Ops Manager will support development of mitigation strategies and contingency plans by support of the Ops Manager. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Perform event detection and assessment activities AD-EP-ALL-0105 Att 13 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. The Assistant Ops Manager will support event detection and assessment by support of the Ops Manager. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Coordinate between CR, OSC and TSC to set OSC Team task priorities AD-EP-ALL-0105 Att 13 Step 2.1.3	This task has been <u>added</u> and is categorized as a deviation. The Assistant Ops Manager will support setting OSC Team prioirites by support of the Ops Manager. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Serve as Lead Evaluators for Severe Accident Management guidelines		This task has been <u>removed</u> and is categorized as a deviation. This task is overseen by Ops Manager in the standard ERO. This change is evaluated as no reduction.

Operations Engineer   **Assistant Operations Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform recommendations to TSC Ops Superintendent on protective actions		This task has been <u>removed</u> and is categorized as a deviation.
		This task is performed by Ops Manager in the standard ERO.
		This change is evaluated as no reduction.
	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 13 Step 2.2.2	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not include this task for the Assistant Operations Manager as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings.
		This change is evaluated as no reduction
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 13 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 13 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **NRC Communicator (CNS/RP/0/A/5000/020 Enclosure 4.4)**
New Title: **NRC Communicator (AD-EP-ALL-0105 Attachment 14)**

Overall Change Impact to the Position

Changes to the NRC Communicator tasks were minor and primarily differences.

Deviations created by the addition of tasks to the NRC Communicator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks were added, 5 was modified and 0 were removed.

NRC Communicator   **NRC Communicator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 14 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 14 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Perform NRC notifications and communications	Provide event data and plant information to the NRC via the ENS AD-EP-ALL-0105 Att 14 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Activate ERDS or confirm ERDS operation AD-EP-ALL-0105 Att 14 Step 1.2.1	This task has been <u>added</u> and is categorized as a deviation. This task was previously performed by IT Support. The IT Support position is not under a response time requirement and has a job focus of addressing computer issues. This task has been moved to a minimum staffing response position to ensure ERDS is operating properly. This change is evaluated as no reduction.

NRC Communicator   **NRC Communicator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 14 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task, although it was performed to facilitate NRC communications. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Maintain event logs, forms and records	Maintain event logs, forms and records AD-EP-ALL-0105 Att 14 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 14 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **CR/TSC Communicator (CNE406)**
New Title: **Control Room OPs Bridge (AD-EP-ALL-0105 Attachment 15)**

Overall Change Impact to the Position

Changes to the Control Room OPs Bridge tasks were minor and primarily differences. Tasks added to the Control Room OPs Bridge position involve current common undirected actions.

Deviations created by the addition of tasks to the Control Room OPs Bridge position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

3 tasks were added, 5 was modified and 0 were removed.

CR/TSC Communicator   **Control Room OPs Bridge**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 15 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 15 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Establish communications with the TSC, OSC and EOF with the wireless phone/headset via the OPS bridge line.	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0105 Att 15 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Communicate the activities of Ops personnel dispatched out of the CR to the OSC AD-EP-ALL-0105 Att 15 Step 2.1	This task has been added and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the CR Ops Bridge does communicate with the OSC. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

CR/TSC Communicator   **Control Room OPs Bridge**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Support development of mitigation strategies and contingency plans AD-EP-ALL-0105 Att 15 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the CR Ops Bridge does support the development of mitigation strategies and contingency plans. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement
	Perform event detection and assessment activities AD-EP-ALL-0105 Att 15 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the CR Ops Bridge does perform event detection and assessment activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 15 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 15 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Radiation Protection Manager (CNS/RP/0/A/5000/020, Enclosure 4.14)**
New Title: **Radiation Protection Manager (AD-EP-ALL-0105 Attachment 16)**

Overall Change Impact to the Position

There is no change to the span of control for this position. The Radiation Protection Manager position now has direct responsibility for TSC dose assessment when the EOF is unavailable. Changes to the Radiation Protection Manager tasks were minor and primarily differences.

Deviations created by the addition, removal and modification of tasks to the Radiation Protection Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

6 tasks were added, 18 were modified and 2 were removed.

Radiation Protection Manager   **Radiation Protection Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate RP shift rotation		This task has been <u>removed</u> and is categorized as a deviation.
		The capability to coordinate the shift rotation of RP technicians is maintained by the RP Supervisor in the OSC. It is that positions responsibility to centrally manage the shift rotation of the RP Technicians to support all RP operations, which sustains the capability.
		This change is evaluated as no reduction.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 16 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Radiation Protection Manager   **Radiation Protection Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Verify that RP Supervisor has provided forms activities in progress in the field	Manage assigned group emergency response activities AD-EP-ALL-0105 Att 16 Step 2.2	This task have been <u>modified</u> and is categorized as a deviation. The steps for this task has been modified since CNS implementing procedures do not explicitly include this step for the RP Manager, although it was performed under the broader task of managing the RP activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 16 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0105 Att 16 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the RP Manager does develop requests for and coordinate external assistance. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0105 Att 16 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the RP Manager does evaluate and obtain additional resources for their area. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

Radiation Protection Manager   **Radiation Protection Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Review RP/0/A/5000/001 (Classification of Emergency) criteria (EMFs, offsite dose, etc.) for emergency classification changes and discuss with OPS Procedure Support position.	Assist with emergency classification AD-EP-ALL-0105 Att 16 Step 3.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Prepare for participating in the ENF review	Support completion of the ENF to state and local authorities AD-EP-ALL-0105 Att 16 Step 2.1.10 & 3.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Maintain status and information boards/displays AD-EP-ALL-0105 Att 16 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task for the RP Manager, although it was performed under the broader task of managing the RP activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Establish communications with RP personnel in the OSC, Shift Lab, and EOF using cell phone,		This task has been <u>removed</u> and is categorized as a deviation. The bridge line Is assigned to the Dose Assessor in the standard TSC ERO. This change is evaluated as no reduction.
Evaluate specific plant conditions, offsite dose projections, field monitoring team data,	Perform event detection and assessment activities AD-EP-ALL-0105 Att 16 Step 2.1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
IF AT ANY TIME conditions degrade where contamination CANNOT be contained within the RCA, establish contamination control in the TSC, OSC, and Control Room	Monitor, evaluate and communicate conditions involving any release of radioactivity AD-EP-ALL-0105 Att 16 Step 2.1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Direct/perform dose assessment AD-EP-ALL-0105 Att 16 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. The dose assessment process has been explicitly included in the TSC in the event that the corporate EOF is unavailable. This change is evaluated as no reduction.

Radiation Protection Manager   **Radiation Protection Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate communications with TSC Dose Assessor or EOF Field Monitoring Coordinator regarding onsite survey teams		This task has been removed and is categorized as a deviation. The capability to coordinate Field Monitoring Team communications is maintained by the RP Supervisor in the OSC or the Dose Assessor in the TSC. This sustains the capability to direct field monitoring teams. This change is evaluated as no reduction.
	Brief and dispatch the onsite/offsite radiation monitoring teams AD-EP-ALL-0105 Att 16 Step 2.2.1	This task has been added and is categorized as a deviation. The TSC will now perform the initial briefing and then turn the FMT over to the EOF. This change is evaluated as no reduction.
IF a release is occurring, evaluate the need to: • Move any assembly points in the release path	Provide support and logistics for site assembly activities AD-EP-ALL-0105 Att 16 Step 3.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
IF a release is occurring, evaluate the need to: • Conduct site relocation or evacuation.	Provide support and logistics for site evacuation activities AD-EP-ALL-0105 Att 16 Step 3.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Evaluate the need to administer Potassium Iodide to emergency workers on site and to Field Monitoring teams Review dose projections to determine if Protective Action Recommendations for KI are required for the General Public.	Evaluate the need for and ensure proper use of KI AD-EP-ALL-0105 Att 16 Step 3.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Evaluate specific plant conditions, offsite dose projections, field monitoring team data, and assess need to update Protective Action Recommendations	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0105 Att 16 Step 3.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Track exposure and authorize emergency doses above normal occupational exposure or exceed dose extension limits	Ensure approved emergency exposure controls are issued AD-EP-ALL-0105 Att 16 Step 3.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure that personnel monitoring is performed in OSC, TSC and Control Room	Direct personnel monitoring and decontamination activities AD-EP-ALL-0105 Att 16 Step 3.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Initiate contamination control requirements	Establish contamination controls for occupied areas AD-EP-ALL-0105 Att 16 Step 3.2	The steps for this task have been modified for checklist use, which is categorized as a difference.

Radiation Protection Manager   **Radiation Protection Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
IF a release occurs after the TSC and OSC personnel were previously permitted to eat and drink in their facilities,suspend eating and drinking	Ensure habitability is established and maintained for occupied areas AD-EP-ALL-0105 Att 16 Step 3.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Support MERT activities AD-EP-ALL-0105 Att 16 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task for the RP Manager, although it was performed under the broader task of managing the RP activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 16 Step 2.1.12	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the RP Manager as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings. This change is evaluated as no reduction.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 16 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 16 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Off-Site Dose Assessor (CNS/RP/0/A/5000/020, Enclosure 4.2)**
New Title: **Dose Assessor (AD-EP-ALL-0105 Attachment 18)**

Overall Change Impact to the Position

Changes to the Dose Assessor tasks were minor and primarily differences. Tasks added to the Dose Assessor position involve current common undirected administrative actions, communications and monitoring activities as well as tasks to be performd in the event the EOF unavailable.

Deviations created by the addition of tasks to the Dose Assessor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

3 tasks were added, 12 were modified and 1 was removed.

Off-Site Dose Assessor   **Dose Assessor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 17 Step 2.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Manage Dose Assessment staff in the TSC		This task has been <u>removed</u> and is categorized as a deviation. This task is performed by the RP Manager in the TSC. This change is evaluated as no reduction.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 17 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Evaluate the Emergency Action Levels (EALs) based on radiological conditions using Dose Assessment	Assist with emergency classification AD-EP-ALL-0105 Att 17 Step 2.1 and AD-EP-ALL-0202	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0105 Att 17 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. Under the standard ERO the Dose Assessor also monitors the RP bridge to obtain RP related information directly from the site. This change is evaluated as an improvement.

Off-Site Dose Assessor   **Dose Assessor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Inform the NRC of rad conditions and recommended protective actions	Provide event data and plant information to the NRC via the HPN AD-EP-ALL-0105 Att 17 Step 3.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Complete actions for facility activation	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 17 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Monitor status and information boards/displays/systems AD-EP-ALL-0105 Att 17 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Dose Assessor does monitor indications in order to perform dose assessment. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Maintain status and information boards/displays AD-EP-ALL-0105 Att 17 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Dose Assessor does maintain status boards and displays in the execution of assessment related functions. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement
Inform the emergency facilities of rad conditions	Monitor, evaluate and communicate conditions involving any release of radioactivity AD-EP-ALL-0105 Att 17 Step 2.1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Calculate, assess and review off-site dose inputs and projections	Direct/perform dose assessment AD-EP-ALL-0105 Att 17 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Establish communications with EOF Dose Assessment Team and, if applicable, the EOF Field Monitoring Coordinator (FMC).	Direct field monitoring team activities AD-EP-ALL-0105 Att 17 Step 3.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Off-Site Dose Assessor　　　　　　　　　　**Dose Assessor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assess, develop and recommend protective actions	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0105 Att 17 Step 2.2.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain oversight of TSC habitability systems, controls and conditions	Establish facility ventilation and monitoring for habitability controls AD-EP-ALL-0105 Att 17 Step 1.2.4 & 5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 17 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 17 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **Security/HR Manager (CNS/RP/0/A/5000/020, Enclosure 4.15)**
New Title: **Security Coordinator (AD-EP-ALL-0105 Attachment 4)**

Overall Change Impact to the Position

The span of control for this position does not change. Tasks added to the Security Coordinator position involve current common undirected actions, specifying tasks previously implied under more generalized task wording, and participation in OSC dispatch as it applies to security personnel.

Deviations created by the addition of tasks to the Security Coordinator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

10 tasks were added, 10 were modified and 0 were removed.

Security/HR Manager   **Security Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 4 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Manage assigned group emergency response activities AD-EP-ALL-0105 Att 4 Step 2.1	This task has been added and is categorized as a deviation. Previous procedures did not explicitly state the task to manage and coordinate with the site security force. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 4 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Security/HR Manager   **Security Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Request and coordinate emergency activities with law enforcement agencies AD-EP-ALL-0105 Att 4 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly state the task to request and coordinate with the LLEAs. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0105 Att 4 Step 1.2.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Security Coordinator does evaluate and obtain additional resources for their area – including LLEA. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0105 Att 4 Step 1.2.2	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Security Coordinator does evaluate and obtain additional resources for their area. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

Security/HR Manager   Security Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Communicate with ICP to provide information and coordination AD-EP-ALL-0105 Att 4 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. Previous CNS procedures included this task for the EC to communicate directly with the IC. Although the EC, as the individual responsible for the site response, will ensure the necessary resources and support will be provided to the ICP, direct communications was transferred to the Security Coordinator. This change assigns this task to the appropriate individual and alleviates the EC from direct communications. This change is evaluated as an improvement.
	Provide security related information to the NRC AD-EP-ALL-0105 Att 4 Step 1.2.2	This task has been <u>added</u> to the Security Manager procedure. This task was previously performed by the Emeregncy Planner position. This change is evaluated as an improvement.
Complete actions for facility activation	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 4 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Participate with OSC Team dispatch and control AD-EP-ALL-0105 Att 4 Step 2.1.1, 2.1.4 & 2.1.9	This task has been <u>added</u> and is categorized as a deviation. For Security events or search and rescue missions Security personnel will be dispatched with OSC Teams. This change ensures that the Security Coordinator position will be made aware of process to control OSC teams. This change is evaluated as an improvement.

Security/HR Manager | **Security Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate security activities AD-EP-ALL-0105 Att 4 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the Security Coordinator does coordinate security activies as part of his responsibilities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Provide the TSC Emergency Planner with the names of essential personnel associated with your position that would not leave the site should a site evacuation be necessary.	Establish and maintain accountability for security personnel AD-EP-ALL-0105 Att 4 Step 2.1.3 & 3.1	This task has been <u>modified</u> and is categorized as a deviation.
		The procedure did contain some actions to execute this task. The new task builds on those actions by including additional actions coordinated with the overall Security Coordinator responsibilities.
		This change is evaluated as no reduction
Perform actions associated with accountability	Direct/support site assembly, accountability and search & rescue activities AD-EP-ALL-0105 Att 4 Step 3.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Perform actions associated with evacuation	Provide support and logistics for site evacuation activities AD-EP-ALL-0105 Att 4 Step 3.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Direct site access controls activities AD-EP-ALL-0105 Att 4 Step 2.1.7	This task has been <u>added</u> and is categorized as a deviation.
		The procedure did contain some actions to execute this task. The new task builds on those actions by including additional actions coordinated with the overall Security Coordinator responsibilities.
		This change is evaluated as an improvement
Coordinate with the OSC Radiation Protection Manager to control security officer dose in the field.	Ensure radiological conditions are known for occupied areas AD-EP-ALL-0105 Att 4 Step 2.1.	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Security/HR Manager   **Security Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform actions associated with MERT support	Support MERT activities AD-EP-ALL-0105 Att 4 Step 2.1.7	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Provide input for facility briefs and updates AD-EP-ALL-0105 Att 4 Step 2.1.10	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Security Coordinator as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings. This change is evaluated as no reduction.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 4 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 4 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Evacuation Coordinator (CNS/RP/0/A/5000/020, Enclosure 4.17)**
New Title: **Site Evacuation Coordinator (AD-EP-ALL-0105 Attachment 5)**

Overall Change Impact to the Position

Changes to the Site Evacuation Coordinator tasks were minor and primarily differences. Task added to the Site Evacuation Coordinator position involve current common undirected administrative actions.

Deviations created by the addition of tasks to the Site Evacuation Coordinator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

1 task was added, 7 were modified and 0 were removed.

Evacuation Coordinator   **Site Evacuation Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 5 Step 2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Develop facility 24 hour staffing list AD-EP-ALL-0105 Att 5 Step 1.3	This task has been added and is categorized as a deviation. The Site Evacuation Coordinator assists the EC Manager and Assistant ECC Manager with facility staffing as part of tracking personnel. This process has been specifically defined in the standard ERO to include development of the list, which is not performed by the EC Manager This change is evaluated as no reduction.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 5 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Prepare for facility activation (rooms, work area, equipment, etc.).	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 5 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Establish TSC Accountability Log for persons leaving the TSC and their intended destination.	Establish and maintain facility accountability AD-EP-ALL-0105 Att 5 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.

Evacuation Coordinator   **Site Evacuation Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform logistical actions at evacuation site	Coordinate site evacuation AD-EP-ALL-0105 Att 5 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 5 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 5 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: No equivalent position in CNS ERO
New Title: OAC Support (AD-EP-ALL-0105 Attachment 6)

Overall Change Impact to the Position

This standard position is new to the CNS ERO.

Deviations created by the addition of the OAC Support position and its associated tasks did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

6 tasks added.

OAC Support

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 6 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 6 Step 1.1	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Activate ERDS or confirm ERDS operation AD-EP-ALL-0105 Att 6 Step 2.1.4	This task has been <u>added</u> and is categorized as a deviation. OAC Support is expected to be able to troubleshoot ERDS equipment in conjunction with ERFIS. This change is evaluated as an improvement.

OAC Support

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Monitor facility equipment (computer, communications, etc.) for proper operation AD-EP-ALL-0105 Att 6 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. The addition of this task/position will assist in assuring efficient reponse actions. The change is evaluated as an improvement.
	Maintain event logs, forms and records AD-EP-ALL-0105 Att 6 Step 1.1	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Restore work area equipment and materials AD-EP-ALL-0105 Att 6 Step 4.0	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: Data Coordinator (CNS/RP/0/A/5000/020, Enclosure 4.13)
New Title: IT Support (AD-EP-ALL-0105 Attachment 7)

Overall Change Impact to the Position

Changes to the IT Support tasks were differences. Task added to the IT Support position involves current common undirected administrative actions.

Deviations created by the addition of tasks to the IT Support position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

1 task was added, 5 was modified and 1 was removed.

Data Coordinator   **IT Support**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0105 Att 7 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0105 Att 7 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0105 Att 7 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
Verify that TSC and OSC electronic equipment is operating properly	Monitor facility equipment (computer, communications, etc.) for proper operation AD-EP-ALL-0105 Att 7 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Data Coordinator **IT Support**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Verify proper operation of ERDS		This task has been <u>removed</u> and is categorized as a deviation
		The IT Support position is not under a response time requirement and has a job focus of addressing computer issues. This task has been moved to a minimum staffing response position to ensure ERDS is operating properly.
		This change is evaluated as no reduction
Maintain event logs, forms and records.	Maintain event logs, forms and records AD-EP-ALL-0105 Att 7 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0105 Att 7 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Assistant Operations Engineer (CNS/RP/0/A/5000/020 Enclosure 4.7)**
New Title: **No equivalent position in standard ERO**

Overall Change Impact to the Position

Position not part of the standard ERO.

All tasks previously assigned to the Assistant Operations Engineer position are performed by various other standard ERO positions.

Deviations created by the removal of the Assistant Operations Engineer position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks are performed by other ERO positions.

Assistant Operations Engineer

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Support CR and TSC with EOP and RP procedure execution		This task has been _removed_ and is categorized as a deviation.
		The capability to support EOP and RP procedure execution is maintained by the Operations Manager, Assitant Operations Manager, Reactor Engineer, RP Manager and Dose Assessors, which sustains the capability.
Establish communications with the Control Room, OSC and EOF with the wireless phone/headset via the OPS bridge line.		This task has been _removed_ and is categorized as a deviation.
		The capability to support EOP and RP procedure execution is maintained by the Operations Manager, Assitant Operations Manager, Reactor Engineer, RP Manager and Dose Assessors, which sustains the capability.

Old Title: OSC Coordinator (CNS/RP/0/5000/024 Enclosure 4.1)
New Title: OSC Manager (AD-EP-ALL-0106 Attachment 1)

Overall Change Impact to the Position

The span of control for this position has been reduced from 8 to 7 positions, however the OSC Manager now has a dedicated assistant rather than it being staffed as needed. The OSC Manager and the Assistant OSC Manager are equally qualified and are interchangeable. The Assistant OSC Manager typically acts as a OSC manager more in line with industry practices, which allows the OSC Manager greater attention on site response activities in all facilities (TSC, OSC and CR) and less attention on OSC operation and administration.Tasks added to the OSC Manager position involve common undirected administrative actions, specifying tasks previously implied under more generalized task wording, and control of OSC assembly and search & rescue actions.

Deviations created by the addition and removal of tasks to the OSC Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

8 tasks were added, 19 were modified and 2 were removed.

OSC Coordinator	OSC Manager	
Old Responsibility (task)	**New Responsibility (task)**	**Change Evaluation**
Verify that the OSC Log/Status Keeper has obtained a completed 24-hour staffing/essential personnel form from each OSC Manager. During a Beyond Design Basis External Event (BDBEE) or an Extended Loss of AC Power (ELAP) event, work with the Emergency Coordinator and the Emergency Planner in the TSC to establish 24 hour coverage for an extended period (up to 10 days) using a combination of qualified CNS ERO personnel.	Develop facility 24 hour staffing list AD-EP-ALL-0106 Att 1 Step 1.2.10	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Verify that the OSC Log/Status Keeper has obtained a completed 24-hour staffing/essential personnel form from each OSC Manager	Verify that the 24 hour staffing list has been completed AD-EP-ALL-0106 Att 1 Step 1.2.10	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

OSC Coordinator	OSC Manager	
Old Responsibility (task)	**New Responsibility (task)**	**Change Evaluation**
	Coordinate ERO/facility shift turnover AD-EP-ALL-0106 Att 1 Step 2.3	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the OSC Manager does control when the facility conducts a shift turnover. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Contact OSC Operations Supervisor and request turnover of command and control for the OSC	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 1 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Manage facility emergency response activities AD-EP-ALL-0106 Att 1 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the station command and control functions and the other assumes the facility manager and assistant role.
		This change is evaluated as no reduction.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 1 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Call out additional OSC support personnel as needed	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 1 Step 2.1.6	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Call out additional OSC support personnel as needed	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 1 Step 2.1.6	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Inform the TSC Emergency Coordinator of encountered plant conditions and status of emergency actions in progress.	Ensure flow of information within and between the emergency response facilities AD-EP-ALL-0106 Att 1 Step 2.1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Require positions submit completed minimum staffing level forms	Prepare for facility activation (rooms, work area, equipment, etc.)\ AD-EP-ALL-0106 Att 1 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

OSC Coordinator   **OSC Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Declare operational upon completion of all minimum staffing level forms	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0106 Att 1 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Determine current/projected staff needs AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the OSC Manager has responsibility for the overall facility response activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
	Ensure facility staff is prepared to perform their activities (facility ready) AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the OSC Manager has responsibility for the overall facility response activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Declare operational upon completion of all minimum staffing level forms	Activate the facility (facility activated) AD-EP-ALL-0106 Att 1 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Relocate to the Alternate OSC if OSC uninhabitable	Direct/coordinate facility relocation AD-EP-ALL-0106 Att 1 Step 3.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Support facility relocation AD-EP-ALL-0106 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation.
		Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role.
		This change is evaluated as an improvement.

OSC Coordinator   OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Ensure team activities are prioritized and in agreement with TSC established priorities.	Support determination of site response priorities AD-EP-ALL-0106 Att 1 Step 2.1.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure team activities are prioritized and in agreement with TSC	Coordinate between CR, OSC and TSC to set OSC Team task priorities AD-EP-ALL-0106 Att 1 Step 2.2.7	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate Assessment and Repair Team dispatch and control. Evaluate the completed OSC Task Work Sheets collected by the OSC Log/Status Keeper to determine if any in-progress work should be discontinued.	Coordinate OSC Team dispatch and control AD-EP-ALL-0106 Att 1 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 1 Step 2.2	This task has been added and is categorized as a deviation. The procedure did contain some actions to execute this task. The new task builds on those actions by including additional actions coordinated with the overall OSC Manager's responsibilities. This change is evaluated as an improvement.
	Direct/support site assembly, accountability and search & rescue activities AD-EP-ALL-0106 Att 1 Step 3.1	his task has been added and is categorized as a deviation. The procedure did contain some actions to execute this task. The new task builds on those actions by including additional actions coordinated with the overall OSC Manager's responsibilities. This change is evaluated as an improvement.
Implement accountability requirements	Establish and maintain facility accountability AD-EP-ALL-0106 Att 1 Step 3.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Announce when non-essential personnel are to be evacuated from the site		This task has been removed and is categorized as a deviation. This change maintains the capability to conduct a site evacuation because that capability is the responsibility of the Site Evacuation Coordinator. Hence the capability is sustained. This change is evaluated as no reduction.

OSC Coordinator   **OSC Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Inform the TSC Emergency Coordinator if the RP Manager issues a Blanket Dose Extension for the event		This task has been <u>removed</u> and is categorized as a deviation. The capability to authorize and utilize emergency dose limits is proceduralized in the Radiation Protection Managers procedure, and the site-specific emergency dose extension procedure. This maintains the capability. This change is evaluated as no reduction.
Ensure OSC habitability	Ensure habitability is established and maintained for occupied areas AD-EP-ALL-0106 Att 1 Step 1.2.1.b, 2.1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Conduct a briefing and updates every 30-minutes	Conduct facility briefs and updates AD-EP-ALL-0106 Att 1 Step 2.1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Provide input for facility briefs and updates AD-EP-ALL-0106 Att 1 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the OSC Manager as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings. This change is evaluated as an improvement.
Maintain event logs, forms and record	Maintain event logs, forms and records AD-EP-ALL-0106 Att 1 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0106 Att 1 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **No Equivalent Position in CNS ERO**
New Title: **Assistant OSC Manager (AD-EP-ALL-0106 Attachment 1)**

Overall Change Impact to the Position

This standard position is new to the CNS ERO.

This positon does not have an organizational span of control. The OSC Manager and the Assistant OSC Manager are equally qualified and are interchangeable. The Assistant OSC Manager typically acts as a OSC manager more in line with industry practices, which allows the OSC Manager greater attention on site response activities in all facilities (TSC, OSC and CR) and less attention on OSC operation and administration.

Deviations created by the addition of the Assistant OSC Manager position and its associated tasks did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

27 tasks added.

<div align="center">Assistant OSC Manager</div>

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Develop facility 24 hour staffing list AD-EP-ALL-0106 Att 1 Step 1.2.10	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement..
	Verify that the 24 hour staffing list has been completed AD-EP-ALL-0106 Att 1 Step 1.2.10	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 1 Step 2.3	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 1 Step 1.1	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Coordinate ERO/facility shift turnover AD-EP-ALL-0106 Att 1 Step 2.3	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Manage facility emergency response activities AD-EP-ALL-0106 Att 1 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 1 Step 2.1.6	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 1 Step 2.1.6	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Ensure flow of information within and between the emergency response facilities AD-EP-ALL-0106 Att 1 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Prepare for facility activation (rooms, work area, equipment, etc.)\ AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Determine current/projected staff needs AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Ensure facility staff is prepared to perform their activities (facility ready) AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Activate the facility (facility activated) AD-EP-ALL-0106 Att 1 Step 1.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement..

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Direct/coordinate facility relocation AD-EP-ALL-0106 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Support facility relocation AD-EP-ALL-0106 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Support determination of site response priorities AD-EP-ALL-0106 Att 1 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement..
	Coordinate between CR, OSC and TSC to set OSC Team task priorities AD-EP-ALL-0106 Att 1 Step 2.2.7	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement..

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate OSC Team dispatch and control AD-EP-ALL-0106 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 1 Step 2.2	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Direct/support site assembly, accountability and search & rescue activities AD-EP-ALL-0106 Att 1 Step 3.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Establish and maintain facility accountability AD-EP-ALL-0106 Att 1 Step 3.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Ensure habitability is established and maintained for occupied areas AD-EP-ALL-0106 Att 1 Step 1.2.1.b, 2.1.4	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Conduct facility briefs and updates AD-EP-ALL-0106 Att 1 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated an improvement.
	Provide input for facility briefs and updates AD-EP-ALL-0106 Att 1 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. Standard ERO established the OSC Manager and Assistant OSC Manager as equivalent positions having a single qualification. One individual assumes the facility manager and the other assumes an assistant role. This change is evaluated as an improvement.
	Maintain event logs, forms and records AD-EP-ALL-0106 Att 1 Step 1.1	This task has been <u>added</u> and is categorized as a deviation. It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement

Assistant OSC Manager

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Restore work area equipment and materials AD-EP-ALL-0106 Att 1 Step 4.0	This task has been <u>added</u> and is categorized as a deviation.
		It was previously an undirected administrative action now specified in all appropriate ERO checklists to bring formality and consistency to the task.
		This change is evaluated as an improvement

Old Title: **Log/Status Keeper (CNS/RP/0/A/5000/024 Enclosure 4.8)**
New Title: **Log Keeper (AD-EP-ALL-0106 Attachment 2)**

Overall Change Impact to the Position

Changes to the OSC Log Keeper tasks were minor and primarily differences. Removed task involves facility access controls which are now individual position actions and the team dispatch process.

Deviations created by the addition, modification and removal of tasks to the Log Keeper position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 9 were modified and 1 was removed.

Log/Status Keeper   **Log Keeper**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate OSC Log/Status Keeper shift rotation and augmentation of personnel and equipment	Develop facility 24 hour staffing list AD-EP-ALL-0106 Att 2 Step 1.2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 2 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 2 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Prepare for facility activation (rooms, work area, equipment, etc.).	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0106 Att 2 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Determine OSC minimum staffing levels from collect group staffing forms	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0106 Att 2 Step 1.2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Establish an OSC log (WebEOC or manual) and maintain event classification posting	Maintain status and information boards/displays AD-EP-ALL-0106 Att 2 Step 2.1.6	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain status tracking of OSC teams	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 2 Step 2.1.4 & 7	The steps for this task have been modified for checklist use, which is categorized as a difference.

Log/Status Keeper   **Log Keeper**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Implement accountability requirements		This task has been <u>removed</u> and is categorized as a deviation.
		The standard ERO uses a continuous accountability log in each facility and the OSC team dispatch process for accountability of teams sent outside the OSC.
		This change is evaluated as no reduction.
Maintain event logs, forms and record	Maintain event logs, forms and records AD-EP-ALL-0106 Att 2 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide all logs and records to Emergency Preparedness upon termination of the emergency.	Restore work area equipment and materials AD-EP-ALL-0106 Att 2 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **OSC Maintenance Manager (CNS/RP/0/A/5000/024 Enclosure 4.6)**
New Title: **Maintenance Supervisor (AD-EP-ALL-0106 Attachment 3)**

Overall Change Impact to the Position

Changes to the Maintenance Supervisor tasks were minor and primarily differences.

The tasks added to the Maintenance Supervisor position involve common undirected administrative actions. The removed tasks involve facility access controls which are now performed within the OSC team dispatch process and 24 hour staffing maintained by the OSC Manager and Assistant OSC Manager.

Deviations created by the addition and removal of tasks to the Maintenance Supervisor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

3 responsibility were added, 7 were modified and 3 were removed.

OSC Maintenance Manager   **Maintenance Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 3 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Complete a "Maintenance 24 Hour Staffing/Site Essential Personnel" form		This task has been <u>removed</u> and is categorized as a deviation. The task for 24 hour staffing is maintained by the OSC Manager/Assistant OSC Manager which sustains the capability. This change is evaluated as no reduction.
	Manage assigned group emergency response activities AD-EP-ALL-0106 Att 3 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Maintenance Supervisor has the responsibility for the overall maintenance activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

OSC Maintenance Manager   **Maintenance Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 3 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate Maintenance augmentation of personnel and equipment	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 3 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 3 Step 2.1	This task has been added and is categorized as a deviation. The Maintenance Supervisor has the responsibility for the overall maintenance activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Prepare for facility activation (rooms, work area, equipment, etc.).	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0106 Att 3 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Brief and debrief maintenance teams for dispatched activities	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 3 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Implement accountability requirements		This task has been removed and is categorized as a deviation. With regard to this position, accountability is related to the OSC teams sent out of the facility and is inherent to the 'Participate with OSC Team dispatch and control' task. This change is evaluated as no reduction.
Inform the OSC RP Manager of any locations outside the OSC where Maintenance personnel are located following a site evacuation		This task has been removed and is categorized as a deviation. With regard to this position, accountability is related to the OSC teams sent out of the facility and is inherent to the 'Participate with OSC Team dispatch and control' task. This change is evaluated as no reduction.

OSC Maintenance Manager   **Maintenance Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Provide input for facility briefs and updates AD-EP-ALL-0106 Att 3 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not include this task for the Maintenance Supervisor as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings.
		This change is evaluated as no reduction.
Maintain event logs, forms and record	Maintain event logs, forms and records AD-EP-ALL-0106 Att 3 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide all logs and records to Emergency Preparedness upon termination of the emergency.	Restore work area equipment and materials AD-EP-ALL-0106 Att 3 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Operations Supervisor (CNS/RP/0/A/5000/024 Enclosure 4.4)**
New Title: **Operations Supervisor (AD-EP-ALL-0106 Attachment 4)**

Overall Change Impact to the Position

Changes to the Operations Supervisor tasks were minor and primarily differences.

The tasks added to the Operations Supervisor position involve common undirected administrative actions. The removed tasks involve facility access controls which are now performed within the OSC team dispatch process, 24 hour staffing maintained by the OSC Manager and Assistant OSC Manager and communications which is now assigned to the Operations Liaison. The need for the Operations Supervisor to assume the role of OSC Manager no longer exists.

Deviations created by the addition and removal of tasks to the Operations Supervisor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

5 tasks were added, 6 were modified and 4 were removed.

Operations Supervisor   **Operations Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Complete "Operations 24 Hour Staffing/Site Essential Personnel" form		This task has been removed and is categorized as a deviation.
		The task for 24 hour staffing is maintained by the OSC Manager/Assistant OSC Manager which sustains the capability.
		This change is evaluated as no reduction.

Operations Supervisor   **Operations Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assume the OSC Coordinator position until properly relieved by a qualified OSC Coordinator		This task has been <u>removed</u> and is categorized as a deviation. The capability to provide command and control to the OSC resides with the OSC Manager and Assistant OSC Manager. These two positions are required to be staffed within 75 minutes, while the Ops Supervisor position is required for full staffing, possibly taking greater than 75 minutes to respond. Since the OSC and Assistant OSC Mangers can reasonably be expected to arrive within 75 minutes, the capability of OSC command and control is maintained with the required timeframe. This change is evaluated as no reduction.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 4 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Manage assigned group emergency response activities AD-EP-ALL-0106 Att 4 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. The Operations Supervisor has the responsibility for the overall operations repair activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 4 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 4 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. The Operations Supervisor has the responsibility for the overall operations repair activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

Operations Supervisor   **Operations Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 4 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		The Operations Supervisor has the responsibility for the overall operations repair activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Establish communications with Control Room, TSC and EOF with the phone/headset via the Operations Bridge Line		This task has been <u>removed</u> and is categorized as a deviation.
		This task is now assigned to the Ops Liaison which is a new position to the CNS OSC ERO which improves the ability to monitor operations communications and provide updates and support OSC response activities.
		This change is evaluated as an improvement.
Prepare for facility activation (rooms, work area, equipment, etc.).	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0106 Att 4 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Monitor status and information boards/displays/systems AD-EP-ALL-0106 Att 4 Step 2.1.8	This task has been <u>added</u> and is categorized as a deviation.
		The Operations Supervisor monitors plant status in the execution of event mitigation activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Establish communications with Operations personnel deployed from the OSC including fire brigade	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 4 Step 2.1.4-6	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Operations Supervisor

Operations Supervisor

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Inform the OSC RP Manager of any locations outside the OSC where Operations personnel are located following a site evacuation		This task has been <u>removed</u> and is categorized as a deviation.
		With regard to this position, accountability is related to the OSC teams sent out of the facility and is inherent to the 'Participate with OSC Team dispatch and control' task.
		This change is evaluated as no reduction.
	Provide input for facility briefs and updates AD-EP-ALL-0106 Att 4 Step 2.1.2	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures did not include this task for the OpS Supervisor as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings.
		This change is evaluated as an improvement.
Maintain event logs, forms and record Ensure all "OSC Team Work Sheets" initiated by Ops are completed, closed out and submitted.	Maintain event logs, forms and records AD-EP-ALL-0106 Att 4 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide all logs and records to Emergency Preparedness upon termination of the emergency. Ensure all "OSC Team Work Sheets" initiated by Ops are completed, closed out and submitted.	Restore work area equipment and materials AD-EP-ALL-0106 Att 4 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **No equivalent position in CNS ERO**
New Title: **Operations Liaison (AD-EP-ALL-0106 Attachment 5)**

Overall Change Impact to the Position

This standard position is new to the CNS ERO.

Deviations created by the addition of the Operations Liaison position and its associated tasks did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

7 tasks were added.

Operations Liaison

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 5 Step 2.2	This task has been added and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 5 Step 1.1	This task has been added and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0106 Att 5 Step 1.2.3 & 2.1.2	This task has been added and is categorized as a deviation. The Operations Liaison cummunicates plant status in the execution of event mitigation activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.

Operations Liaison

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Monitor status and information boards/displays/systems AD-EP-ALL-0106 Att 5 Step 2.1.8	This task has been <u>added</u> and is categorized as a deviation. The Operations Liaison monitors plant status in the execution of event mitigation activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 5 Step 2.1.5 & 6	This task has been <u>added</u> and is categorized as a deviation. This task is added to the Ops Liaison role to ensure Ops personnel dispatched from the CR or OSC are coordinated / communicated with the shift. This change is evaluated as an improvement.
	Maintain event logs, forms and records AD-EP-ALL-0106 Att 5 Step 1.1	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Restore work area equipment and materials AD-EP-ALL-0106 Att 5 Step 4.0	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: **RP Supervisor (CNS/RP/0/5000/024, Enclosure 4.2)**
New Title: **RP Supervisor (AD-EP-ALL-0106 Attachment 6)**

Overall Change Impact to the Position

The span of control for this position is the pool of RP Technicians in the OSC, which does not change. Tasks added to the RP Supervisor position involve current common undirected administrative actions and survey/monitoring actions. The removed tasks involves 24 hour staffing maintained by the OSC Manager and Assistant OSC Manager, recovery activities which will be assigned the EC, if needed and dispatch of FMT team members which is now the responsibility of the FMT Coordinator in the EOF.

Deviations created by the addition and removal of tasks to the RP Supervisor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

7 tasks were added, 12 were modified and 4 were removed.

RP Supervisor   **RP Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 6 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 6 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide information for Radiation Protection 24 Hour Staffing/Site Essential Personnel		This task has been <u>removed</u> and is categorized as a deviation. The task for 24 hour staffing is maintained by the OSC Manager/Assistant OSC Manager which sustains the capability. This change is evaluated as no reduction.

RP Supervisor

RP Supervisor

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Manage assigned group emergency response activities AD-EP-ALL-0106 Att 6 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the RP Supervisor has the responsibility for the overall RP activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 6 Step listed in tasks	This task has been <u>added</u> and is categorized as a deviation. The RP Supervisor has the responsibility for the overall RP activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 6 listed in tasks	This task has been <u>added</u> and is categorized as a deviation. The RP Supervisor has the responsibility for the overall RP activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Establish communications with TSC RP Manager and/or TSC Dose Assessors.	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0106 Att 6 Step 2.1.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Continuously monitor plant radiological status.	Monitor status and information boards/displays/systems AD-EP-ALL-0106 Att 6 Step 2.1.10	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Prepare for facility activation (rooms, work area, equipment, etc.)	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0106 Att 6 Step 2.1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

RP Supervisor   **RP Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Activate, prepare and dispatch Field Monitoring Teams (FMTs)		This task has been <u>removed</u> and is categorized as a deviation. Previous procedures directed the OSC RP Supervisor to brief the FMT members prior to dispatch. This task can be done by the FMT Coordinator from the EOF now to expedite dispatch and allow OSC personnel to focus on on-site and in plant teams in the revised procedures. This change is evaluated as no reduction.
Provide immediate support and RP job coverage	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 6 Step 2.1.6 & 7	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide RP personnel support of assembly and accountability	Establish and maintain facility accountability AD-EP-ALL-0106 Att 6 Step 2.1.8	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Track emergency worker exposure and evaluate the need for dose extensions AD-EP-ALL-0106 Att 6 Step 2.1.10	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the RP Supervisor does track emergency worker exposure and evaluate the need for dose extensions. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as no reduction.
Implement personnel vehicle contamination monitoring	Coordinate the monitoring of site evacuees AD-EP-ALL-0106 Att 6 Step 3.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Monitor radiation conditions for OSC habitability to determine if relocation is necessary	Ensure habitability is established and maintained for occupied areas AD-EP-ALL-0106 Att 6 Step 2.1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

RP Supervisor

RP Supervisor

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform radiological sampling and surveys AD-EP-ALL-0106 Att 6 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. OSC RP Supervisors are capable of performing survey and sample tasks in the standard ERO in order to support habitability tasks and for supervision of RP personnel. This change is evaluated as an improvement.
	Record/review radiological sampling and survey data AD-EP-ALL-0106 Att 6 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the RP Supervisor does record/review radiological sampling and survey data. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Monitor OSC contamination levels	Establish and maintain facility accountability AD-EP-ALL-0106 Att 6 Step 2.1.8	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Provide input for facility briefs and updates AD-EP-ALL-0106 Att 6 Step 2.1.4	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the RP Supervisor as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings. This change is evaluated as no reduction.
Participate in OSC critique following the event		This task has been <u>removed</u> and is categorized as a deviation. The capability to conduct a critique does not require this action step. It is the responsibility of the OSC Manager to lead post-event critiques, which sustains the capability. This change is evaluated as no reduction.

RP Supervisor

RP Supervisor

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assist OSC Coordinator in forming re-entry and recovery plans		This task has been <u>removed</u> and is categorized as a deviation.
		The recovery process requires the EC to determine the appropriate ERO positions used to develop recovery plans as dictated by the extent of the particular event. Thus, this task may or may not be assigned to the RP Supervisor position and does not need to be specified in their checklist. This change has no impact on the recovery process.
		This change is evaluated as no reduction.
Maintain event logs, forms and record	Maintain event logs, forms and records AD-EP-ALL-0106 Att 6 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0106 Att 6 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Field Monitoring Team (E-Plan I.7/I.8; CNS/HP/0/B/1009/003)**
New Title: **Field Monitoring Team (E-Plan I.7/I.8; AD-EP-ALL-0203 Attachment 6)**

Overall Change Impact to the Position

Changes to the Field Monitoring Team tasks were minor and primarily differences. Task added to the Field Monitoring Team position involve explicit assignment of actions that were performed but absent or implied in previous procedures.

Deviations created by the addition of tasks to the Field Monitoring Team position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

1 tasks was added, 6 were modified and 0 were removed.

Field Monitoring Team   **Field Monitoring Team**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Respond as directed when notified of an event (sign in, get materials, etc.) CNS/HP/0/B/1009/003, Encl. 5.1	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0203 Att 6 Step 1.0 AD-EP-BNP-0203	The steps for this task have been modified for checklist use, which is categorized as a difference.
Use 800 MHz radio system for FMT communications CNS/HP/0/B/1009/003, Step 4.1.2	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0203 Att 6 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Offsite Surveys CNS/HP/0/B/1009/003, Step 4.3 Field Air Samples CNS/HP/0/B/1009/003, Step 4.4 Field Sampling CNS/HP/0/B/1009/003, Step 4.5	Perform radiological sampling and surveys AD-EP-ALL-0203 Att 6 Step 2.0-9.0	The steps for this task have been modified for checklist use, which is categorized as a difference.
IF requested by FMC, analyze air samples for Iodine • Report air sample analysis results to FMC. CNS/HP/0/B/1009/003, Step 4.4.2.D	Record/review radiological sampling and survey data AD-EP-ALL-0203 Att 6 Step 2.0-9.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Field Monitoring Team

Field Monitoring Team

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Participate with OSC Team dispatch and control AD-EP-ALL-0203 Att 6 Step 1.1	This task has been <u>added</u> and is categorized as a deviation.
		Previous procedures do not explicitly include this task although FMT personnel received briefings under the OSC dispatch process. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Document survey results CNS/HP/0/B/1009/003, Step 4.3.8	Maintain event logs, forms and records AD-EP-ALL-0203 Att 6 Step 2.0-9.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
WHEN event is over, inventory Emergency Kits. Restock items and return all emergency equipment to appropriate storage location after event is terminated. CNS/HP/0/B/1009/003, Encl. 5.1	Restore work area equipment and materials AD-EP-ALL-0203 Att 6 Step 11	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: Chemistry Manager (CNS/RP/0/5000/024, Enclosure 4.3)
New Title: Chemistry Supervisor (AD-EP-ALL-0106 Attachment 7)

Overall Change Impact to the Position

The span of control for this position is the pool of Chemistry Technicians in the OSC, which does not change. Tasks added to the Chemistry Supervisor position involve current common undirected administrative actions and sampling actions. The removed tasks involve facility access controls which are now performed within the OSC team dispatch process and 24 hour staffing maintained by the OSC Manager and Assistant OSC Manager.

Deviations created by the addition of tasks to the Chemistry Supervisor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

7 tasks were added, 6 were modified and 2 were removed.

Chemistry Manager   **Chemistry Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate 24 hour staffing of the chemistry function		This task has been <u>removed</u> and is categorized as a deviation.
		The task for 24 hour staffing is maintained by the OSC Manager/Assistant OSC Manager which sustains the capability.
		This change is evaluated as no reduction.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 7 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Manage assigned group emergency response activities AD-EP-ALL-0106 Att 7 Step 2.1	This task has been <u>added</u> and is categorized as a deviation.
		CNS implementing procedures do not explicitly include this task although the Chem Supervisor has the responsibility for the overall chemistry activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.

Chemistry Manager   **Chemistry Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 7 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 7 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. The Chem Supervisor has the responsibility for the overall chemistry activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 7 Step 2.1	This task has been <u>added</u> and is categorized as a deviation. The Chem Supervisor has the responsibility for the overall chemistry activities. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Prepare for facility activation (rooms, work area, equipment, etc.)	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0106 Att 7 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Perform event detection and assessment activities AD-EP-ALL-0106 Att 7 Step 2.1.3	This task has been <u>added</u> and is categorized as a deviation. OSC Chemistry Supervisors are capable of performing event detection and assessment tasks in the standard ERO in order to support EOP and technical specification actions. This change is evaluated as an improvement.

Chemistry Manager   **Chemistry Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform chemical sampling and analysis AD-EP-ALL-0106 Att 7, Section 2.1	This task has been <u>added</u> and is categorized as a deviation. OSC Chemistry Supervisors are capable of performing sample tasks in the standard ERO in order to support EOP and technical specification actions. This change is evaluated as an improvement.
	Record/review chemical sampling and analysis AD-EP-ALL-0106 Att 7 Step 2.1.8	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not explicitly include this task although the Chemistry Supervisor does review sample analyses. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as no reduction.
Brief and debrief chemistry teams for sampling activities	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 7 Step 2.1.3 & 4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Implement accountability requirements		This task has been <u>removed</u> and is categorized as a deviation. With regard to this position, accountability is related to the OSC teams sent out of the facility and is inherent to the 'Participate with OSC Team dispatch and control' task. This change is evaluated as no reduction.
	Provide input for facility briefs and updates AD-EP-ALL-0106 Att 7 Step 2.1.5	This task has been <u>added</u> and is categorized as a deviation. CNS implementing procedures do not include this task for the Chemistry Supervisor as all positions could be called upon to provide input during a briefing. Positions that have this task specifically called out are expected to contribute during all or most briefings. This change is evaluated as no reduction.

Chemistry Manager   **Chemistry Supervisor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Maintain event logs, forms and record	Maintain event logs, forms and records AD-EP-ALL-0106 Att 7 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide all logs and records to Emergency Preparedness upon termination of the emergency.	Restore work area equipment and materials AD-EP-ALL-0106 Att 7 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Nuclear Supply Chain Manager (CNS/RP/0/A/5000/024 Enclosure 4.7)**
New Title: **Generation Supply Chain Liaison (AD-EP-ALL-0106 Attachment 8)**

Overall Change Impact to the Position

Changes to the Generation Supply Chain Liaison tasks were minor and primarily differences. The tasks removed from the Generation Supply Chain Liaison position involve facility accountabilty controls,24 hour staffing maintained by the OSC Manager and Assistant OSC Manager and communications with the EOF which would occur in the coordination of logistics and resource support. The task additions involve current common undirected actions including being the point of contact for SAFER and FLEX.

Deviations created by the addition and removal of tasks to the Generation Supply Chain Liaison position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 10 were modified and 3 were removed.

Nuclear Supply Chain Manager   **Generation Supply Chain Liaison**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate Nuclear Supply Chain shift rotation and augmentation of personnel and equipment.		This task has been <u>removed</u> from the Nuclear Supply Chain Manager procedure.
		The capability to sufficiently staff the OSC with Nuclear Supply Chain staff resides with the OSC Manager and Assistant OSC Manager. It is the responsibility of these positions to take or assign action for Nuclear Supply Chain staffing, which sustains the capability.
		The change is evaluated as no reduction.
Perform position turnover when a shift change occurs.	Perform position turnover when a shift change occurs AD-EP-ALL-0106 Att 8 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.).	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0106 Att 8 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Coordinate acquisition of materials, parts, equipment and services both from warehouse and by procurement	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0106 Att 8 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Coordinate acquisition of materials, parts, equipment and services both from warehouse and by procurement	Arrange for equipment and supply resources AD-EP-ALL-0106 Att 8 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Nuclear Supply Chain Manager   **Generation Supply Chain Liaison**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Communicate with EOF Services Manager		This task has been <u>removed</u> and is categorized as a deviation.
		The capability to support the OSC with resources and logistics continues to reside with Nuclear Supply Chain. Communications with the EOF describes an action that is subsumed into the core task of this position, thus maintaining the capability.
		The change is evaluated as no reduction.
Prepare for facility activation (rooms, work area, equipment, etc	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0106 Att 8 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Inventory OSC equipment and supplies following OSC activation	Arrange for logistics support AD-EP-ALL-0106 Att 8 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Assist OSC responders in repair of OSC communications or other equipment		This task has been <u>removed</u> and is categorized as a deviation.
		The capability to assist in the repair of OSC equipment continues to reside with Nuclear Supply Chain. The old responsibility describes an action that is subsumed into the core task of this position, thus maintaining the capability.
		The change is evaluated as no reduction.
Ensure all "OSC Team Work Sheets" initiated by supply chain work group are completed, closed out and submitted.	Participate with OSC Team dispatch and control AD-EP-ALL-0106 Att 8 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Serve as primary point of contact for SAFER and FLEX support AD-EP-ALL-0106 Att 8 Step 2.1.7	This task has been <u>added</u> and is categorized as a deviation.
		Task not previously assigned within the CNS ERO. This change provides a dedicated common fleet ERO position for SAFER and FLEX activities.
		The change is evaluated as an improvement.
Maintain event logs, forms and records	Maintain event logs, forms and records AD-EP-ALL-0106 Att 8 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Nuclear Supply Chain Manager   **Generation Supply Chain Liaison**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Turn in logs/forms and restore area/materials upon event termination.	Restore work area equipment and materials AD-EP-ALL-0106 Att 8 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.
Implement accountability requirements		This task has been removed and is categorized as a deviation. The task to implement accountability is maintained by the OSC Manager/Assistant OSC Manager which sustains the capability. This change is evaluated as no reduction.

Old Title: **DRC Supervisor (CNS RP/0/A/5000/024)**
New Title: **No equivalent position in the Standard ERO**

Overall Change Impact to the Position

Position not part of the standard ERO.

All tasks previously assigned to the DRC Supervisor position are performed by various other standard ERO staff.

Deviations created by the removal of the DRC Supervisor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks are performed by other ERO positions.

DRC Supervisor

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Complete actions for facility activation, turnover, dosimetry, log keeping and emergency staffing		This task has been <u>removed</u> and is categorized as a deviation.
		The capability to activate the OSC is maintained by the OSC Manager.
Ensure proper emergency exposure controls are taken for personnel.		This task has been <u>removed</u> and is categorized as a deviation.
		The capability to ensure adequate exposure controls is maintained by the RP Supervisor.

The changes to the ERO were evaluated from three distinct perspectives. First, changes to the physical number and response time requirements of the ERO positions were evaluated. Second, changes to the ERO chain of command and reporting relationships were evaluated. Lastly, the changes to the addition, alteration or removal of responsibilities (tasks) for each ERO position were evaluated.

1. Changes to the ERO Staffing Numbers

    This evaluation was performed to assess whether any changes to the number of ERO positions were made (total and by response time) and to determine whether those changes impacted the licensing bases, capability or timeliness of the ERO response and performance of functions.

    The addition of an ERO position is considered a deviation. The addition of an ERO position is considered an improvement due to having additional staff to perform the work, provided it does not overload the next level supervisor/manager position.

    The alteration of a position from a specific time requirement into another time requirement is considered a deviation. The acceptability of the deviation is assessed by evaluation of the assigned tasks in Step 3 below.

    The deletion of a position is considered a deviation. The acceptability of the deviation is assessed by evaluation of the assigned tasks in Step 3 below.

2. Changes to the ERO Hierarchy / Reporting Relationships

    This evaluation was performed to assess whether any changes to the structural hierarchy or reporting relationships were made and to determine whether those changes impacted capability or timeliness of the ERO response and performance of functions.

3. Changes to an ERO Position's Responsibilities (tasks)

    Tasks for each ERO position in the current Emergency Plan and implementing procedures are matched to a standard ERO task list based on planning standard, function and element terminology (or identified as station specific tasks and given a unique task ID). Tasks that may have been stated in the E-Plan or procedures in general terms such as *provide engineering support* or *manage radiological personnel* may be associated with more specific task descriptions.

    Tasks for each ERO position in the new organization are identified and assigned from the same task list used for the current ERO as described above.

    The tasks for each ERO position are organized in a table for individual comparison. Changes to an ERO position can involve adding, removing or modifying a task.

    Added task – involves moving an existing task from a different ERO position, assigning a task previously performed as an undirected action (such as an inherent administrative expectation), or assigning a task that is entirely new (typically limited to when process or equipment changes are being implemented in conjunction).

    Removed task – involves moving an existing task to a different ERO position or eliminating it entirely (typically limited to when process or equipment changes are being implemented in conjunction).

    Modified task – involves changes in wording or sequencing that potentially affect the capability or timeliness of the task.

Since all ERO procedures are being converted to a checklist format for improved human factors design, all task wording has been modified to some extent. Task modifications limited to checklist format changes where step wording and sequence remains essentially unchanged are defined as differences.

Following table alignment of the added, removed and altered tasks, each comparison is categorized as a no change, difference or deviation.

Added and removed tasks are automatically categorized as deviations with regard to their impact on the ERO position in order to force further evaluation and conclusion documentation.

Modified tasks may be categorized as a difference or a deviation.

Difference

A difference only applies to modified tasks where the change to the wording (of either the task or its steps) does not alter the capability and/or timeliness of the function for which the task was performed.

Any change that is determined to be a difference requires no further evaluation.

Deviation

A deviation is defined as a change to the wording of a task or its steps that does alter the capability and/or timeliness of the function for which the task was performed.

All added tasks and those removed tasks that are fully eliminated (no longer performed by any position) must be further evaluated in the change evaluation column to establish whether the change improved, maintained, reduced or lost the ability to perform the function.

Removed tasks that are transferred to another ERO position are evaluated as an added task. Thus, only the ERO position that the task is being moved to needs to be documented in the change evaluation column.

Modified tasks categorized as deviations must be further evaluated in the change evaluation column to establish whether the change improved, maintained, reduced or lost the ability to perform the function.

For all task changes categorized as deviations, further evaluation is performed to determine the impact on the qualities (attributes) of capability and timeliness.

- Capability is defined as the quality (attribute) of being able or capable to perform the task. In order to determine an impact to capability the actions accomplished by the task must be known (what the task does).

  For example; assume the Steps in an existing procedure for the task to classify an event establish the actions for initial event declaration, upgrade and downgrade. The Steps in the standard procedures for the classification task include the actions for initial event declaration and upgrade. Therefore, a deviation is created by the removal of an action (downgrading) of the task in the original procedure.

- Timeliness is defined as the quality (attribute) of task duration. The impact to timeliness can sometimes be determined by evaluating the changes to the steps, such as when one or more steps are added or removed. In other cases it may be necessary to perform the task, such as in a drill or exercise, and observe whether the change impacted the timeliness of the task.

4. Completing a Comparison Table for Each ERO Position

    A. Identify and list the current tasks performed by the ERO position (sources can include the E-Plan, positional procedures, functional procedures, forms, etc.).

    B. Identify, list and align the new tasks performed by the ERO position to each of the current tasks.

       1) If a new task can be correlated to a current task, list it in the same row in the comparison table.

       2) If a new task cannot be correlated to a current task, list it in a separate row in the comparison table.

    C. Where a current task does not align with a new task identify whether the task was added or removed and document as a deviation in the Change Evaluation column.

       1) For added tasks and those removed tasks that are fully eliminated (no longer performed by any position), document an explanation and evaluation of the addition or removal that justifies the change and explicitly states whether it improves, maintains, degrades or loses the ability to perform the function.

       2) For removed tasks that are transferred to another ERO position, document which position the task has been transferred to.

    D. Where a current task does align with a new task identify whether the task was not changed or modified in the Change Evaluation column.

    E. For each modified tasks identify whether the change is a difference or a deviation.

       1) Review the Steps and identifying the actions that the current task <u>does</u>.

       2) Review the Steps and identifying the actions that the new task <u>does</u>.

       NOTE: Changes to informational wording in current tasks that don't "do" anything (content that is not actionable) do not affect the actions of the task.

       3) Compare the list of actions to determine whether the new task <u>does</u> more or less than the current task.

          A. If the new task <u>does</u> more or less (has more or fewer actions) as compared to the current task, then categorize the change as a deviation (due to an alteration in the capability).

          B. If the new task does the same actions as compared to the current task, then categorize the change as a difference.

NOTE: In the case where the current procedure simply states the task and the new task has added performance steps, and in consideration that there has been no change in how the actual task is performed, it is acceptable to conclude that the timeliness has not been altered.

4) Compare the steps to determine whether the new task takes more or less time to accomplish than the current task.

   a. If the new task takes more or less time to accomplish as compared to the current task, then categorize the change as a deviation (due to an alteration in the timeliness).

   b. If the new task takes the same amount of time to accomplish as compared to the standard task, then categorize the change as a difference.

   c. If it is not possible to determine whether the standard task can be accomplished in more or less time than the current task, note that further evaluation is necessary.

F. For each modified task identified as a difference, provide a brief statement for why it is considered such.

G. For each modified task identified as a deviation, document an explanation and evaluation of the addition or removal that justifies the change and explicitly states whether it improves, maintains, degrades or loses the ability to perform the function.

5. Overall Change to a Position

A summary of the overall impact of the task changes is documented above the comparison table for each position. Information included in the summary is as follows:

A. Span of control change description for positions that manage or supervise other positions (as applicable).

B. Description of overall change impact to position.

C. Summary of task deviations.

D. Evaluation statement explicitly documenting:

1) That the deviation did not degrade the capability or timeliness to perform an associated function.

2) That no site specific commitments are adversely altered by changes to tasks assigned to this position (this statement is able to be made in the comparison document based on the results of the commitment search recorded on the §50.54(q) evaluation form).

3) That the changes do not reduce the effectiveness of the emergency plan.

Enclosure 2

CNS ERO Position Comparison and Evaluation – JIC

Catawba Nuclear Station (CNS)

Duke Energy ERO Standardization

JIC ERO Position Comparison and Evaluation

Revision 0

Table of Contents

Revision 0

1. PURPOSE

Identify differences and deviations between the current CNS ERO and the Duke standard ERO for the Joint Information Center (JIC).

Evaluate all deviations to determine whether they create a reduction in effectiveness (RIE) in the current station Emergency Preparedness Program.

2. DISCUSSION

A program initiative has been undertaken by Duke Energy personnel to standardize the ERO positions, functions and responsibilities (tasks) across the fleet. This involves changes to the current ERO, which for this evaluation is based upon those responder titles and numbers identified in emergency plan and the implementing procedures.

It is recognized that any changes to the ERO structure and the implementing procedures require a detailed §50.54(q) effectiveness evaluation. Regulatory Guide 1.219 provides the following information related specifically to this type of change:

> [C.1.1.b] Some changes that a licensee may make to its approved emergency plan warrant prior NRC approval to ensure that the changes would not adversely affect the NRC's reasonable assurance determination. However, other general types of changes may have such a minimal effect on this determination that they would not warrant prior NRC approval. For example, changes that reduce the number of personnel available to respond to emergencies or lengthen the time it takes to staff and activate emergency response facilities (ERFs) could affect the NRC's reasonable assurance determination and would require prior NRC staff approval. Minor administrative changes, such as correcting position titles and spelling errors and updating document numbers, would not warrant prior NRC staff review." Between these extremes is a range of possible changes for which the licensee is required to perform and document a detailed, objective evaluation.

> [C.1.4.a] …. Proposed changes that could delay emergency declarations, notifications, or PARs may reduce the effectiveness of the emergency plan in that subsequent emergency response actions may not be timely and emergency response personnel, facilities, and equipment may not be in position if it becomes necessary to carry out measures to protect the public health and safety. Generally, the licensee should view any change that could delay an activity or relax a timeliness criterion for the activity as a potential reduction in effectiveness and should evaluate it accordingly.

Due to the scope of changes being made, this position to position and task to task comparison evaluation has been developed to document the effectiveness review. Attachment 4 documents the methods used to conduct this evaluation.

3.   **SUMMARY OF CHANGES**

3.1   <u>Comparison of ERO Positions, Responders and Response Times</u>

The total number of responders filling JIC ERO positions in the current CNS ERO is 5 and the total number of responders filling positions in the standard JIC ERO is 5 (no change to ERO responders).

Current CNS	Duke Standard	Difference
5	5	0

3.1.1   <u>Numeric Change to the Augmented ERO</u>

One position – Media Center Coordinator - was added to the CNS Media Center ERO in adopting the Duke Standard ERO. The addition of this position improves overall performance.

The Nuclear Communications Staff Person (an "as-needed" position staffed by an extra Media Liaison or other individual) position was removed from the CNS JIC ERO in adopting the Duke Standard ERO. The reduction of this "as-needed" position does not reduce the overall performance. The tasks for the Nuclear Communications Staff Person tasks are performed by other JIC personnel.

3.1.2   <u>Response Time Impact to the Augmented ERO</u>

No changes in response time of JIC ERO responders occurred when adopting the Duke Standard ERO.

3.2   <u>Comparison of the ERO Hierarchy / Reporting Relationships</u>

There are no changes to the reporting hierarchy or reporting relationships as a result in adopting the Duke Standard ERO.

3.3   <u>Comparison of the ERO Responsibilities by Position</u>

No tasks were removed from JIC response. Changes to task assignments do not overburden any position.
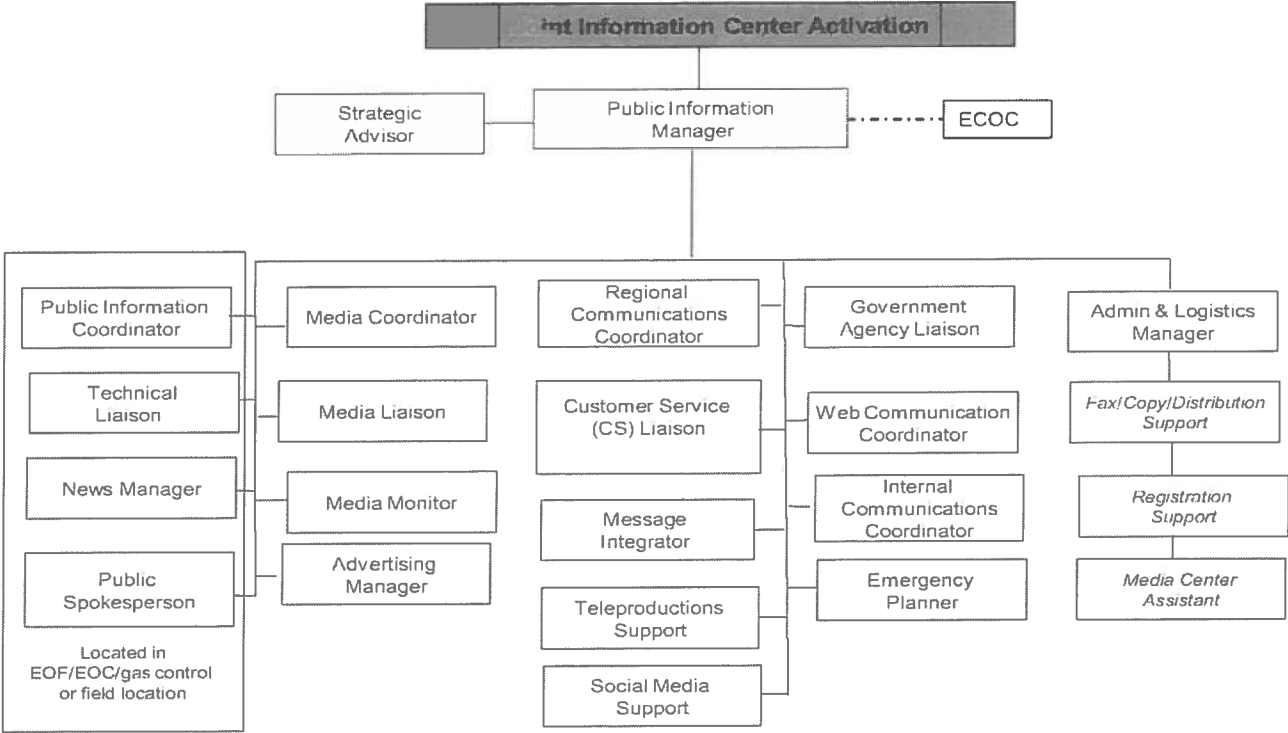
Refer to Attachment 3 for specific disposition of each task for each position.

Augmented ERO Comparison by Function

Functional Area	Major Tasks	CNS ERO Emergency Positions	Full Staff	Support	Standard ERO Emergency Positions	Full Staff	Support
9. Public Information	Public Information				Lead PIO		1
		Public Spokesperson (JIC)	1		Company Spokesperson (JIC/MC)	1	
		Nuclear Comm Staff Person (MC)	1				
					Media Center Coordinator (MC)	1	
		Technical Liaison (EOF/JIC)	1		EOF Technical Liaison (EOF)	1	
		News Manager (JIC/MC)	1		Info Gathering Lead (JIC/MC)	1	
		Public Information Coordinator (JIC)	1		News Writer (EOF)	1	
		TOTAL:	5	0	**TOTAL:**	5	1

Current Station JIC Organization

FIGURE G-2

Corporate Communications
Emergency Response Organization

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                        ┌──────────────────────────────────────┐
                        │  Joint Information Center Activation  │
                        └──────────────────────────────────────┘

   ┌─────────────┐        ┌─────────────────┐
   │  Strategic  │────────│ Public Information│ ─·─·─·─  ┌──────┐
   │   Advisor   │        │     Manager       │          │ ECOC │
   └─────────────┘        └─────────────────┘          └──────┘
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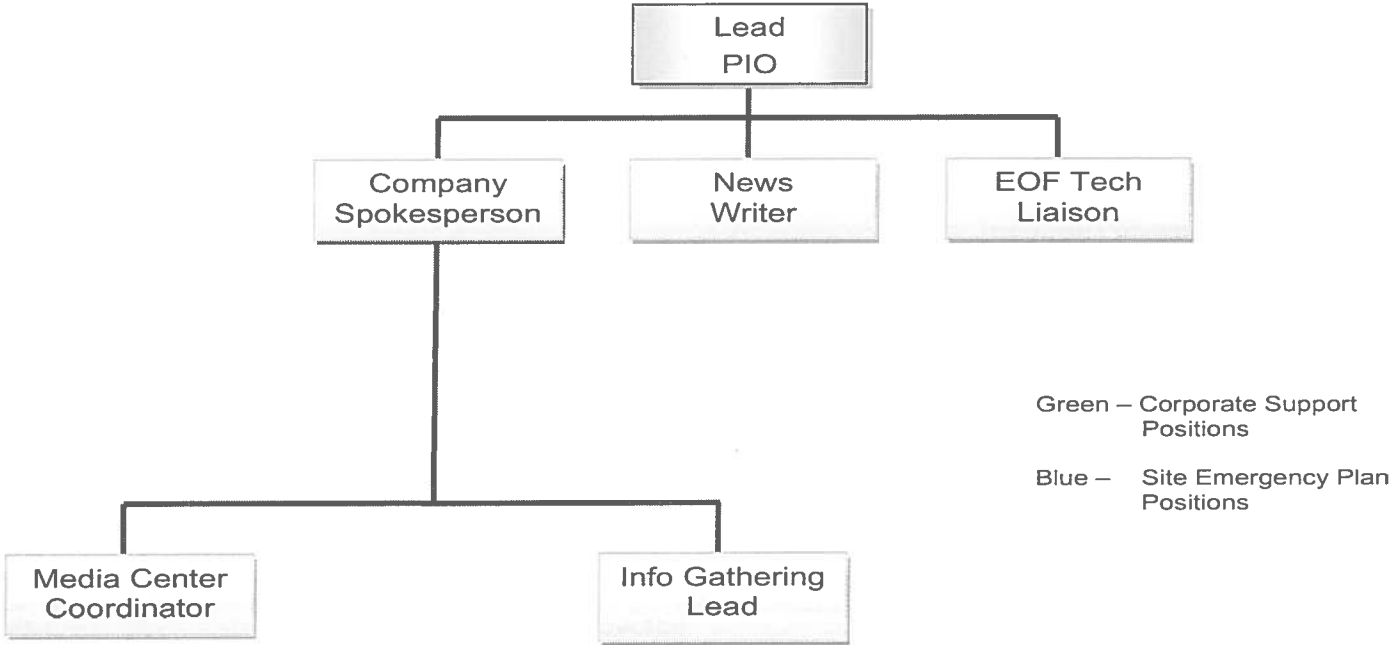| Public Information Coordinator | Media Coordinator | Regional Communications Coordinator | Government Agency Liaison | Admin & Logistics Manager |
Technical Liaison	Media Liaison	Customer Service (CS) Liaison	Web Communication Coordinator	*Fax/Copy/Distribution Support*
News Manager	Media Monitor	Message Integrator	Internal Communications Coordinator	*Registration Support*
Public Spokesperson	Advertising Manager	Teleproductions Support	Emergency Planner	*Media Center Assistant*
Located in EOF/EOC/gas control or field location		Social Media Support		

DUKE ENERGY.

The above positions plus one individual to assist with setup are staffed at the site's Near-Site Media Center

G-4

Rev. 16-2
April. 2016

Standard Near-Site Media Center Organization

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                        ┌──────────────┐
                        │     Lead     │
                        │     PIO      │
                        └──────┬───────┘
          ┌────────────────────┼────────────────────┐
  ┌───────┴────────┐   ┌───────┴──────┐     ┌────────┴───────┐
  │    Company     │   │     News     │     │   EOF Tech     │
  │  Spokesperson  │   │    Writer    │     │   Liaison      │
  └───────┬────────┘   └──────────────┘     └────────────────┘
          │
   ┌──────┴───────────────────────┐
┌──┴──────────────┐      ┌─────────┴────────┐
│  Media Center   │      │  Info Gathering  │
│   Coordinator   │      │      Lead        │
└─────────────────┘      └──────────────────┘
```

Green – Corporate Support
            Positions

Blue –   Site Emergency Plan
            Positions

Old Title: **Public Spokesperson (E-Plan G.4.a)**
New Title: **Company Spokesperson (E-Plan G.4.a; AD-EP-ALL-0108 Attachment 3)**

Overall Change Impact to the Position

There is no change to the span of control to this position.

Deviations created by the addition, removal and modification of tasks to the Company Spokesperson position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

3 tasks were added, 7 were modified and 4 were removed.

Public Spokesperson   **Company Spokesperson**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs. SR 0 A 2000 001 Encl. 6.2, Step 1.12	Perform position turnover when a shift change occurs. AD-EP-ALL-0108 Att 3 Step 17	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.). SR 0 A 2000 001 Encl. 6.2, Steps 1.1-1.3	Respond as directed when notified of an event (sign in, get materials, etc.). AD-EP-ALL-0108 Att 3 Steps 1-4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain contact with Public Spokesperson at visitor's center or CNS Joint Information Center (JIC) SR 0 A 2000 001 Encl. 6.2, Steps 1.7		This task has been <u>removed</u> and is categorized as a deviation. The Lead PIO has the overall responsibility for the coordinating of information between the Company Spokespersons. This change is evaluated as no reduction
Coordinate with Public Spokespersons at other locations SR 0 A 2000 001 Encl. 6.2, Step 1.8		This task has been <u>removed</u> and is categorized as a deviation. The Lead PIO has the overall responsibility for the coordinating of information between the Company Spokespersons. This change is evaluated as no reduction

Public Spokesperson | **Company Spokesperson**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Provide input for facility briefs and updates AD-EP-ALL-0108 Att 3 Step 14	This task has been added and is categorized as a deviation.
		The change is considered a deviation however it does not reduce the ability of the Company Spokesperson perform assigned functions during declared event.
		This change is evaluated as an improvement.
Prepare for news conference SR 0 A 2000 001 Encl. 6.2, Step 1.8		This task has been removed and is categorized as a deviation.
		This task is considered a part of the performance of media conferences and interviews and coordinate information with government officials/agencies tasks.
		This change is evaluated as no reduction.
Provide brief update to state and county PIOs at pre-news conference briefing. SR 0 A 2000 001 Encl. 6.2, Step 1.9.6		This task has been removed and is categorized as a deviation.
		This task is assigned to the Government Liaison. In the standard ERO the Government Liaison.is responsible for providing updates to the state and county PIOs. Assigning this task to Government Liaison allows the spokesperson to better perform their functions.
		This change is evaluated as no reduction.
	Perform media briefings and interviews AD-EP-ALL-0108 Att 3 Step 13	Task has been added and is categorized as a deviation.
		Position would have always supported this as part of serving as the Company Spokesperson. Adding this step clarifies the task.
		This change is evaluated as an improvement.
	Coordinate information to the Incident Response Team AD-EP-ALL-0108 Att 3 Step 15	This task has been added and is categorized as a deviation.
		This change ensures Duke Enterprise is kept informed on public information activities. This change is evaluated as an improvement.

Public Spokesperson   **Company Spokesperson**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Consult with Public Information Manager in JIC to obtain most current information for rumors, status of news releases, etc. SR 0 A 2000 001 Encl. 6.2, Step 1.9.5 ADDRESS significant rumors about plant status and/or any misinformation revealed by media questions. RP 0 B 5000 028 Encl. 4.2	Corrects rumors in media briefings and interviews AD-EP-ALL-0108 Att 3 Step 10	The steps for this task have been modified for checklist use, which is categorized as a difference.
Review and approve news releases/bulleted updates. SR 0 A 2000 001 Encl. 6.2, Step 1.6	Approve/review all news releases, statements and messages. AD-EP-ALL-0108 Att 3 Step 8	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate information with government officials/agencies, owner's Groups, and ECOC SR 0 A 2000 001 Encl. 6.2, Step 1.10	Coordinate information with government officials/agencies. AD-EP-ALL-0108 Att 3 Step 15	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR 0 A 2000 001 Encl. 6.2, Step 1.11	Maintain event logs, forms and records. AD-EP-ALL-0108 Step 5.3 and Att 3 Step 17	The steps for this task have been modified for checklist use, which is categorized as a difference.
Restore work area equipment and materials SR 0 A 2000 001 Encl. 6.2, Step 1.13	Restore work area equipment and materials AD-EP-ALL-0108 Att 3 Step 18	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: Nuclear Communications Staff Person (RP 0 B 5000 028)
New Title: No Equivalent Position in Standard ERO

Overall Change Impact to the Position

Position not part of the standard ERO.

The position of Nuclear Communications Staff Person is eliminated in the Standard ERO. This position was an "as-needed" position if there was a need to open a Near-Site media center. In that occurrence, an extra Media Liaison (or other individual) would open the media center to manage any media that arrive. This position is not referenced in the CNS Emergency Plan or JIC Organization Chart because it is a communications process to be use as needed – depending on the event and staffing availability.

Deviations created by the removal of tasks from the Nuclear Communications Staff Person position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 0 were modified and 10 were removed.

Nuclear Communications

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Respond as directed when notified of an event (sign in, get materials, etc.). RP 0 B 5000 028 Encl. 4.3		This task has been <u>removed</u> and is categorized as a deviation. This task is performed by all JIC staff members for their position. This change is evaluated as no reduction.
ASSIGN activation activities to available staff. ENSURE Onsite Media Center Staff area is setup for staff use. RP 0 B 5000 028 Encl. 4.3		This task has been <u>removed</u> and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to assign to Media Center staff upon their arrival. This change is evaluated as no reduction.
ENSURE media are logged in, properly identified, and given assistance, as needed. RP 0 B 5000 028 Encl. 4.3		This task has been <u>removed</u> and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to assign to Media Center staff upon their arrival. This change is evaluated as no reduction.

Nuclear Communications

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
ENSURE Security understands where to route media. RP 0 B 5000 028 Encl. 4.3		This task has been removed and is categorized as a deviation. The Information Gathering Lead has the overall responsibility for this task and will assign to Media Center staff upon their arrival. This change is evaluated as no reduction.
ENSURE information is available for the media. ENSURE event status board is updated as needed. RP 0 B 5000 028 Encl. 4.3		This task has been removed and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to perform this task and assign to Media Center staff upon their arrival. This change is evaluated as no reduction.
SERVE as News Manager until Nuclear Communications Manager arrives, or if the Nuclear Communications Manager is not available. RP 0 B 5000 028 Encl. 4.3		This task has been removed and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to perform this task and assign to Media Center staff upon their arrival. This change is evaluated as no reduction.
ESTABLISH communications with the TSC AND EOF RP 0 B 5000 028 Encl. 4.3		This task has been removed and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to perform this task and assign to Media Center staff upon their arrival. This change is evaluated as no reduction.
ENSURE all visitor center phones are forwarded to the Customer Contact Center (CCC) at the News Manager's discretion RP 0 B 5000 028 Encl. 4.3		This task has been removed and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to perform this task and assign to Media Center staff upon their arrival. This change is evaluated as no reduction.
ENSURE auditorium is setup for onsite media interactions if directed by News Manager. RP 0 B 5000 028 Encl. 4.3		This task has been removed and is categorized as a deviation. The Information Gathering Lead has the overall responsibility to perform this task and assign to Media Center staff upon their arrival. This change is evaluated as no reduction.

Nuclear Communications

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Maintain event logs, forms and records. RP 0 B 5000 028 Encl. 4.3		This task has been <u>removed</u> and is categorized as a deviation. This task is performed by all JIC staff members for their position. This change is evaluated as no reduction

Old Title: **No Equivalent Position in Previous CNS ERO**
New Title: **Media Center Coordinator (AD-EP-ALL 0108 Attachment 10)**

Overall Change Impact to the Position

This standard position is new to the CNS ERO.

The Media Center Coordinator is responsible for assigning and performing work to ensure the Media Center operates efficiently.

Deviations created by the addition of the Media Center Coordinator position and its associated tasks did not degrade the capability or timeliness to perform an associated function. No site-specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

11 tasks were added, 0 were modified and 0 were removed.

<div align="center">Media Center Coordinator</div>

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Perform position turnover when a shift change occurs. AD-EP-ALL-0108 Att 10 Step 13	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Respond as directed when notified of an event (sign in, get materials, etc.). AD-EP-ALL-0108 Att 10 Steps 1-4	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0108 Att 10 Steps 9 & 10	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Media Center Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Register personnel at the assigned location AD-EP-ALL-0108 Att 10 Step 5	This task has been <u>added</u> and is categorized as a deviation.
		This task was previously performed by the Registration Support position. This change moves the task to the Media Center Coordinator and Registration Liaison.
		The change is evaluated as an improvement.
	Monitor facility entrance areas. AD-EP-ALL-0108 Att 10 Steps 6-8	This task has been <u>added</u> and is categorized as a deviation.
		This task was previously performed by the Registration Support position. This change moves the task to the Media Center Coordinator and Registration Liaison.
		The change is evaluated as an improvement.
	Arrange for equipment and supply resources. AD-EP-ALL-0108 Att 10 Step 12	This task has been <u>added</u> and is categorized as a deviation.
		The Media Center Coordinator is a new position in the Standard ERO and is responsible for assigning and performing work to ensure the Media Center operates efficiently.
		The change is evaluated as an improvement.
	Arrange for logistical support. AD-EP-ALL-0108 Att 10 Step 12	This task has been <u>added</u> and is categorized as a deviation.
		The Media Center Coordinator is a new position in the Standard ERO and is responsible for assigning and performing work to ensure the Media Center operates efficiently.
		The change is evaluated as an improvement.
	Coordinate distribution of news releases, statements and messages. AD-EP-ALL-0108 Att 10 Step 10	This task has been <u>added</u> and is categorized as a deviation.
		The Media Center Coordinator is a new position in the Standard ERO and is responsible for assigning and performing work to ensure the Media Center operates efficiently.
		The change is evaluated as an improvement.

Media Center Coordinator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Coordinate accommodation of news media personnel AD-EP-ALL-0108 Att 10 Step 12	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Maintain event logs, forms and records. AD-EP-ALL-0108 Step 5.3	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.
	Restore work area equipment and materials AD-EP-ALL-0108 Att 10 Step 14	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: EOF Technical Liaison (SR 0 A 2000 001)
New Title: EOF Technical Liaison (AD-EP-ALL-0108 Attachment 4)

Overall Change Impact to the Position

This EOF Technical Liaison reports to the EOF. There are no changes to the span of control to this position. The primary tasks of the EOF Technical Liaison remain the same.

Deviations created by the addition, removal and modification of tasks to the EOF Technical Liaison position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 8 were modified and 6 were removed.

EOF Technical Liaison   **EOF Technical Liaison**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs. SR 0 A 2000 001 Encl. 6.4, Step 1.28	Perform position turnover when a shift change occurs. AD-EP-ALL-0108 Att 4 Step 34	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.). SR 0 A 2000 001 Encl. 6.4, Steps 1.1-1.2	Respond as directed when notified of an event (sign in, get materials, etc.). AD-EP-ALL-0108 Att 4 Steps 1-4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Support either PI Coord, Public Spokesperson, or man JIC/EOF conference bridge SR 0 A 2000 001 Encl. 6.4, Step 1.3 Access JIC/EOF conference bridge. SR 0 A 2000 001 Encl. 6.4, Step 1.5	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0108 Att 4 Steps 9-12	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Support the Public Spokesperson. SR 0 A 2000 001 Encl. 6.4, Step 1.13 Update regional communications coordinator on JIC bridge as conditions change, SR 0 A 2000 001 Encl. 6.4, Step 1.16 Assist public information coordinator to understand information on Emergency Notification Forms (ENF) and logs. SR 0 A 2000 001 Encl. 6.4, Step 1.14 Notify Public Spokesperson immediately of any significant changes, such as changes in emergency classifications. SR 0 A 2000 001 Encl. 6.4, Step 1.25	Provide site event and response information for public information staff. AD-EP-ALL-0108 Att 4 Step 21	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

EOF Technical Liaison   **EOF Technical Liaison**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide dose comparison information to Public Information Coordinator. SR 0 A 2000 001 Encl. 6.4, Step 1.21 Request assistance from EOF Rad Assessment Manager or designee in obtaining Site Boundary dose information and use for proper dose comparisons for news releases/bulleted updates SR 0 A 2000 001 Encl. 6.4, Step 1.18 Monitor and update radiological release information SR 0 A 2000 001 Encl. 6.4, Step 1.22	Provide technical assistance for the development of news releases and statements AD-EP-ALL-0108 Att 4 Steps 8 & 27	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Coordinate with State and County Liaisons SR 0 A 2000 001 Encl. 6.4, Step 1.8 Assist Regional Communications Coordinator and State/County EOC Liaisons by obtaining information to dispel rumors: SR 0 A 2000 001 Encl. 6.4, Step 1.24		Task has been <u>removed</u> and is categorized as a deviation. This task is performed by the EOF Emergency Planner at the EOF. This change is evaluated as no reduction
Verify sounding of sirens with State Liaison in EOF or with State/County EOC Liaison and share this information with JIC Regional Communicator Coordinator. SR 0 A 2000 001 Encl. 6.4, Step 1.17		This task has been <u>removed</u> and is categorized as a deviation. The status of the sirens is monitored continuously by both station and offsite agency personnel. The need for an individual to monitor the siren system from the JIC during an event is not viewed as necessary. There is no longer a JIC Regional Communicator Coordinator in the standard ERO. This change is evaluated as no reduction.
Review document "Questions Corporate Communications May Ask." SR 0 A 2000 001 Encl. 6.4, Step 1.11		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Data Coordinator and Information Gathering Lead in the Corporate JIC. This change is evaluated as no reduction.
Maintain "rumor/question/issue log" to keep all technical liaisons apprised of issues. SR 0 A 2000 001 Encl. 6.4, Step 1.12		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Data Coordinator in the Corporate JIC. This change is evaluated as no reduction.

EOF Technical Liaison   EOF Technical Liaison

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide information in EOF Briefings concerning rumors being addressed. SR 0 A 2000 001 Encl. 6.4, Step 1.27		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Data Coordinator in the Corporate JIC. This change is evaluated as no reduction.
Provide input for facility briefs and updates SR 0 A 2000 001 Encl. 6.4, Step 1.26		This task has been <u>removed</u> and is categorized as a deviation. Task is the responsibility of the JIC Technical Liaison. This change is evaluated as no reduction.
Gather technical information on event and document on EOF log sheets. SR 0 A 2000 001 Encl. 6.4, Step 1.10	Maintain event logs, forms and records. AD-EP-ALL-0108 Step 5.3 and Att 4 Step 14	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Restore work area equipment and materials. SR 0 A 2000 001 Encl. 6.4, Step 1.10	Restore work area equipment and materials AD-EP-ALL-0108 Att 4 Step 35	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **News Manager (SR 0 A 2000 001, RP 0 B 5000 028)**
New Title: **Information Gathering Lead (AD-EP-ALL-0108 Attachment 2)**

Overall Change Impact to the Position

There are changes to the span of control to this position as the Company Spokesperson, Data Coordinator, Media Monitor, News Writer and Technical Liaison now report to the Information Gathering Lead in the new Standard JIC ERO.

Deviations created by the addition, removal and modification of tasks to the Information Gathering Lead position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

3 tasks were added, 8 were modified and 4 were removed

News Manager   **Information Gathering Lead**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs. SR 0 A 2000 001 Encl. 6.1, Step 1.15	Perform position turnover when a shift change occurs. AD-EP-ALL-0108 Att 2 Step 25	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.). SR 0 A 2000 001 Encl. 6.1, Steps 1.1-1.3	Respond as directed when notified of an event (sign in, get materials, etc.). AD-EP-ALL-0108 Att 2 Steps 1-3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Prepare Public Spokesperson for news conference SR 0 A 2000 001 Encl. 6.1, Step 1.4	Assist the Company Spokesperson in gathering information for media briefings and interviews AD-EP-ALL-0108 Att 2 Step 18	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Coordinate development of a communications strategy AD-EP-ALL-0108 Att 2 Step 4	This task has been added and is categorized as a deviation. The Lead PIO at the Corporate JIC has the overall responsibility for coordinating the development of a communications strategy and will coordinate with appropriate public information personnel. This change is evaluated as an improvement.

News Manager   **Information Gathering Lead**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide Spokesperson's talking points/message block to Public Information Coordinator and the Public Information Manager or Media SR 0 A 2000 001 Encl. 6.1, Step 1.5 Prepare for news conferences with state and county Public Information Officers (PIOs): SR 0 A 2000 001 Encl. 6.1, Step 1.8 & 1.9	Coordinate information flow to the media and public between the utility, Corporate JIC and Federal, State & local PIOs AD-EP-ALL-0108 Att 2 Steps 21 & 22	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Coordinate the distribution of news releases, statements and messages AD-EP-ALL-0108 Att 2 Step 21	This task has been <u>added</u> and is categorized as a deviation. The Information Gathering Lead is responsible for managing the Information Gathering Team and coordinates with Company Spokesperson, EOF Technical Liaisons, and News Writer to coordinate distribution of messages and news releases. This change is evaluated as an improvement.
	Manage assigned group emergency response activities AD-EP-ALL-0108 Att 2 Step 6	This task has been <u>added</u> and is categorized as a deviation. The Information Gathering Lead has the overall responsibility for the information gathering team. Adding this task specifies that responsibility. This change is evaluated as an improvement.
Escort and assist Public Spokesperson during all news briefings, news conferences and interviews. SR 0 A 2000 001 Encl. 6.1, Step 1.7 Perform news conference moderator/facilitator function SR 0 A 2000 001 Encl. 6.1, Step 1.10	Coordinate the conduct of media briefings and interviews AD-EP-ALL-0108 Att 2 Step 21	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Contact NRC representatives in EOF to update them on communication activities. SR 0 A 2000 001 Encl. 6.1, Step 1.12		This task has been <u>removed</u> and is categorized as a deviation. This task is assigned to the Government Liaison. This change is evaluated as no reduction

News Manager   **Information Gathering Lead**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide information in EOF Briefings SR 0 A 2000 001 Encl. 6.1, Step 1.13		This task has been removed and is categorized as a deviation. The Corporate JIC personnel as well as the EOF Technical Liaison will provide information regarding JIC activities to the EOF. This change is evaluated as no reduction
Determine 24 hr staffing requirements RP 0 B 5000 028 Encl. 4.1		This task has been removed and is categorized as a deviation. This task is the responsibility of the Logistics Lead. This change is evaluated as no reduction.
SERVE as Company Spokesperson for media exchanges until relieved by the Onsite Public Spokesperson/alternate. RP 0 B 5000 028 Encl. 4.1		This task has been removed and is categorized as a deviation. A qualified Company Spokesperson will speak on behalf of Duke Energy. This change is evaluated as no reduction
ESTABLISH communication with technical liaison Bridge Line to resolve rumors identified during media briefings and interviews. RP 0 B 5000 028 Encl. 4.1	Perform rumor control activities AD-EP-ALL-0108 Att 2 Step 6	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain personal event logs, forms and records. SR 0 A 2000 001 Encl. 6.1, Step 1.14	Maintain personal event logs, forms and records. AD-EP-ALL-0108 Step 5.3 and Att 2 Step 24	The steps for this task have been modified for checklist use, which is categorized as a difference.
Restore work area equipment and materials. SR 0 A 2000 001 Encl. 6.1, Step 1.16	Restore work area equipment and materials AD-EP-ALL-0108 Att 2 Step 26	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **Public Information Coordinator (SR 0 A 2000 001)**
New Title: **News Writer (AD-EP-ALL-0108 Attachment 12)**

Overall Change Impact to the Position

There are no changes to the span of control to this position. The primary tasks of the News Writer remain the same.

Deviations created by the addition, removal and modification of tasks to the News Writer position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS emergency plan.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 6 were modified and 11 were removed

Public Information Coordinator   **News Writer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs. SR 0 A 2000 001 Encl. 6.3, Step 1.26	Perform position turnover when a shift change occurs. AD-EP-ALL-0108 Att 12 Step 18	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.). SR 0 A 2000 001 Encl. 6.3, Step 1.1-1.3	Respond as directed when notified of an event (sign in, get materials, etc.). AD-EP-ALL-0108 Att 12 Steps 1-3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Access JIC media bridge line SR 0 A 2000 001 Encl. 6.3, Step 1.5		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Information Dissemination Lead. This change is evaluated as no reduction.
IF additional computers are needed to support public affairs EOF response, THEN contact JIC Admin & Logistics Manager SR 0 A 2000 001 Encl. 6.3, Step 1.6		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Logistics Lead at the Corporate JIC. This change is evaluated as no reduction.

Public Information Coordinator   **News Writer**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Print initial news release SR 0 A 2000 001 Encl. 6.3, Step 1.11		This task has been <u>removed</u> and is categorized as a deviation. The task of printing the initial news release is considered a part of the develop news releases, statements and messages task below. Removing it as a separate task does not change the overall responsibilities of position. This change is evaluated as an improvement
Request EOF Services Admin/Commissary make copies of initial news release and distribute copies to EOF SR 0 A 2000 001 Encl. 6.3, Step 1.12		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Information Dissemination Lead and Products Lead at the Corporate JIC. This change is evaluated as no reduction.
Access e-mail and maintain open path for emails to NRC and Charlotte JIC. SR 0 A 2000 001 Encl. 6.3, Step 1.13		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Information Dissemination Lead at the Corporate JIC. This change is evaluated as no reduction.
Prepare news releases and bulleted updates by working with News Manager, Technical Liaison, and Public Spokesperson, SR 0 A 2000 001 Encl. 6.3, Step 1.14	Develop news releases, statements and messages AD-EP-ALL-0108 Att 12 Step 12-14	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Have Technical Liaison verify technical information provided in news releases. SR 0 A 2000 001 Encl. 6.3, Step 1.16		This task has been <u>removed</u> and is categorized as a deviation. This task is considered a part of the develop news releases, statements and messages task above. Removing it as a separate task does not change the overall responsibilities of position. This change is evaluated as no reduction.
Coordinate with Spokesperson or EOF Director to ensure on-site incident command center or security reviews news release/updates. SR 0 A 2000 001 Encl. 6.3, Step 1.17		This task has been <u>removed</u> and is categorized as a deviation. This task is the responsibility of the Lead and Deputy PIOs at the Corporate JIC. This change is evaluated as no reduction.

Public Information Coordinator   News Writer

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Provide news release/bulleted updates to Public Spokesperson (or EOF Director, if Spokesperson not available) for review and approval SR 0 A 2000 001 Encl. 6.3, Step 1.18		This task has been removed and is categorized as a deviation. This task is the responsibility of the Information Gathering Lead at the Corporate JIC. This change is evaluated as no reduction.
Distribute news release/bulleted update to PI Manager and NRC SR 0 A 2000 001 Encl. 6.3, Step 1.19		This task has been removed and is categorized as a deviation. This task is the responsibility of the Information Dissemination Lead and Products Lead at the Corporate JIC. This change is evaluated as no reduction.
Coordinate with EOF Services Admin/Commissary to ensure all news releases and bulleted updates are copied and distributed within EOF: SR 0 A 2000 001 Encl. 6.3, Step 1.22	Coordinate distribution of news releases, statements and messages AD-EP-ALL-0108 Att 12 Step 15	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure Media Coordinator knows name and location of file. SR 0 A 2000 001 Encl. 6.3, Step 1.21		This task has been removed and is categorized as a deviation. This task is the responsibility of the Information Dissemination Lead at the Corporate JIC. This change is evaluated as no reduction.
Prepare Charlotte Public Spokesperson for news conference. SR 0 A 2000 001 Encl. 6.3, Step 1.24		This task has been removed and is categorized as a deviation. This task is the responsibility of the Information Gathering Lead at the Corporate JIC. This change is evaluated as no reduction.
Maintain personal event logs, forms and records. SR 0 A 2000 001 Encl. 6.3, Step 1.25	Maintain event logs, forms and records. AD-EP-ALL-0108 Step 5.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Restore work area equipment and materials SR 0 A 2000 001 Encl. 6.3, Step 1.29	Restore work area equipment and materials AD-EP-ALL-0108 Att 12 Step 19	The steps for this task have been modified for checklist use, which is categorized as a difference.

The changes to the ERO were evaluated from three distinct perspectives. First, changes to the physical number and response time requirements of the ERO positions were evaluated. Second, changes to the ERO chain of command and reporting relationships were evaluated. Lastly, the changes to the addition, alteration or removal of responsibilities (tasks) for each ERO position were evaluated.

1. <u>Changes to the ERO Staffing Numbers</u>

   This evaluation was performed to assess whether any changes to the number of ERO positions were made (total and by response time) and to determine whether those changes impacted the licensing bases, capability or timeliness of the ERO response and performance of functions.

   The addition of an ERO position is considered a deviation. The addition of an ERO position is considered an improvement due to having additional staff to perform the work, provided it does not overload the next level supervisor/manager position.

   The alteration of a position from a specific time requirement into another time requirement is considered a deviation. The acceptability of the deviation is assessed by evaluation of the assigned tasks in Step 3 below.

   The deletion of a position is considered a deviation. The acceptability of the deviation is assessed by evaluation of the assigned tasks in Step 3 below.

2. <u>Changes to the ERO Hierarchy / Reporting Relationships</u>

   This evaluation was performed to assess whether any changes to the structural hierarchy or reporting relationships were made and to determine whether those changes impacted capability or timeliness of the ERO response and performance of functions.

3. <u>Changes to an ERO Position's Responsibilities (tasks)</u>

   Tasks for each ERO position in the current Emergency Plan and implementing procedures are matched to a standard ERO task list based on planning standard, function and element terminology (or identified as station specific tasks and given a unique task ID). Tasks that may have been stated in the E-Plan or procedures in general terms such as *provide engineering support* or *manage radiological personnel* may be associated with more specific task descriptions.

   Tasks for each ERO position in the new organization are identified and assigned from the same task list used for the current ERO as described above.

   The tasks for each ERO position are organized in a table for individual comparison. Changes to an ERO position can involve adding, removing or modifying a task.

   Added task – involves moving an existing task from a different ERO position, assigning a task previously performed as an undirected action (such as an inherent administrative expectation), or assigning a task that is entirely new (typically limited to when process or equipment changes are being implemented in conjunction).

   Removed task – involves moving an existing task to a different ERO position or eliminating it entirely (typically limited to when process or equipment changes are being implemented in conjunction).

   Modified task – involves changes in wording or sequencing that potentially affect the capability or timeliness of the task.

Since all ERO procedures are being converted to a checklist format for improved human factors design, all task wording has been modified to some extent. Task modifications limited to checklist format changes where step wording and sequence remains essentially unchanged are defined as differences.

Following table alignment of the added, removed and altered tasks, each comparison is categorized as a no change, difference or deviation.

Added and removed tasks are automatically categorized as deviations with regard to their impact on the ERO position in order to force further evaluation and conclusion documentation.

Modified tasks may be categorized as a difference or a deviation.

Difference

A difference only applies to modified tasks where the change to the wording (of either the task or its steps) does not alter the capability and/or timeliness of the function for which the task was performed.

Any change that is determined to be a difference requires no further evaluation.

Deviation

A deviation is defined as a change to the wording of a task or its steps that does alter the capability and/or timeliness of the function for which the task was performed.

All added tasks and those removed tasks that are fully eliminated (no longer performed by any position) must be further evaluated in the change evaluation column to establish whether the change improved, maintained, reduced or lost the ability to perform the function.

Removed tasks that are transferred to another ERO position are evaluated as an added task. Thus, only the ERO position that the task is being moved to needs to be documented in the change evaluation column.

Modified tasks categorized as deviations must be further evaluated in the change evaluation column to establish whether the change improved, maintained, reduced or lost the ability to perform the function.

For all task changes categorized as deviations, further evaluated further evaluation is performed to determine the impact on the qualities (attributes) of capability and timeliness.

- Capability is defined as the quality (attribute) of being able or capable to perform the task. In order to determine an impact to capability the actions accomplished by the task must be known (what the task does).

  For example; assume the Steps in an existing procedure for the task to classify an event establish the actions for initial event declaration, upgrade and downgrade. The Steps in the standard procedures for the classification task include the actions for initial event declaration and upgrade. Therefore, a deviation is created by the removal of an action (downgrading) of the task in the original procedure.

- Timeliness is defined as the quality (attribute) of task duration. The impact to timeliness can sometimes be determined by evaluating the changes to the steps, such as when one or more steps are added or removed. In other cases it may be necessary to perform the task, such as in a drill or exercise, and observe whether the change impacted the timeliness of the task.

4. <u>Completing a Comparison Table for Each ERO Position</u>

    A. Identify and list the current tasks performed by the ERO position (sources can include the E-Plan, positional procedures, functional procedures, forms, etc.).

    B. Identify, list and align the new tasks performed by the ERO position to each of the current tasks.

        1) If a new task can be correlated to a current task, list it in the same row in the comparison table.

        2) If a new task cannot be correlated to a current task, list it in a separate row in the comparison table.

    C. Where a current task does not align with a new task identify whether the task was added or removed and document as a deviation in the Change Evaluation column.

        1) For added tasks and those removed tasks that are fully eliminated (no longer performed by any position), document an explanation and evaluation of the addition or removal that justifies the change and explicitly states whether it improves, maintains, degrades or loses the ability to perform the function.

        2) For removed tasks that are transferred to another ERO position, document which position the task has been transferred to.

    D. Where a current task does align with a new task identify whether the task was not changed or modified in the Change Evaluation column.

    E. For each modified tasks identify whether the change is a difference or a deviation.

        1) Review the Steps and identifying the actions that the current task <u>does</u>.

        2) Review the Steps and identifying the actions that the new task <u>does</u>.

        NOTE: Changes to informational wording in current tasks that don't "do" anything (content that is not actionable) do not affect the actions of the task.

        3) Compare the list of actions to determine whether the new task <u>does</u> more or less than the current task.

            A. If the new task <u>does</u> more or less (has more or fewer actions) as compared to the current task, then categorize the change as a deviation (due to an alteration in the capability).

            B. If the new task does the same actions as compared to the current task, then categorize the change as a difference.

NOTE: In the case where the current procedure simply states the task and the new
           task has added performance steps, and in consideration that there has been no
           change in how the actual task is performed, it is acceptable to conclude that
           the timeliness has not been altered.

4) Compare the steps to determine whether the new task takes more or less time to
   accomplish than the current task.

   a. If the new task takes more or less time to accomplish as compared to the current
      task, then categorize the change as a deviation (due to an alteration in the
      timeliness).

   b. If the new task takes the same amount of time to accomplish as compared to the
      standard task, then categorize the change as a difference.

   c. If it is not possible to determine whether the standard task can be accomplished in
      more or less time than the current task, note that further evaluation is necessary.

F. For each modified task identified as a difference, provide a brief statement for why it is
   considered such.

G. For each modified task identified as a deviation, document an explanation and
   evaluation of the addition or removal that justifies the change and explicitly states
   whether it improves, maintains, degrades or loses the ability to perform the function.

5. Overall Change to a Position

A summary of the overall impact of the task changes is documented above the comparison
table for each position. Information included in the summary is as follows:

A.   Span of control change description for positions that manage or supervise other
     positions (as applicable).

B.   Description of overall change impact to position.

C.   Summary of task deviations.

D.   Evaluation statement explicitly documenting:

   1)   That the deviation did not degrade the capability or timeliness to perform an
        associated function.

   2)   That no site specific commitments are adversely altered by changes to tasks
        assigned to this position (this statement is able to be made in the comparison
        document based on the results of the commitment search recorded on the
        §50.54(q) evaluation form).

   3)   That the changes do not reduce the effectiveness of the emergency plan.

Enclosure 3

EOF ERO Position Comparison and Evaluation

Corporate Emergency Operations Facility (CEOF)

Duke Energy ERO Standardization

EOF ERO Position Comparison and Evaluation

Revision 0

Table of Contents

1   PURPOSE

Identify differences and deviations between the current EOF ERO and the Duke standard ERO from the EOF.

Evaluate all deviations to determine whether they create a reduction in effectiveness (RIE) in the current station Emergency Preparedness Program.

2   DISCUSSION

A program initiative has been undertaken by Duke Energy personnel to standardize the ERO positions, functions and responsibilities (tasks) across the fleet. This involves changes to the current ERO, which for this evaluation is based upon those responder titles and numbers identified in emergency plan and the implementing procedures.

It is recognized that any changes to the ERO structure and the implementing procedures require a detailed §50.54(q) effectiveness evaluation. Regulatory Guide 1.219 provides the following information related specifically to this type of change:

> *[C.1.1.b] Some changes that a licensee may make to its approved emergency plan warrant prior NRC approval to ensure that the changes would not adversely affect the NRC's reasonable assurance determination. However, other general types of changes may have such a minimal effect on this determination that they would not warrant prior NRC approval. For example, changes that reduce the number of personnel available to respond to emergencies or lengthen the time it takes to staff and activate emergency response facilities (ERFs) could affect the NRC's reasonable assurance determination and would require prior NRC staff approval. Minor administrative changes, such as correcting position titles and spelling errors and updating document numbers, would not warrant prior NRC staff review." Between these extremes is a range of possible changes for which the licensee is required to perform and document a detailed, objective evaluation.*

> *[C.1.4.a] …. Proposed changes that could delay emergency declarations, notifications, or PARs may reduce the effectiveness of the emergency plan in that subsequent emergency response actions may not be timely and emergency response personnel, facilities, and equipment may not be in position if it becomes necessary to carry out measures to protect the public health and safety. Generally, the licensee should view any change that could delay an activity or relax a timeliness criterion for the activity as a potential reduction in effectiveness and should evaluate it accordingly.*

Due to the scope of changes being made, this position to position and task to task comparison evaluation has been developed to document the effectiveness review. Attachment 4 documents the methods used to conduct this evaluation.

3   SUMMARY OF CHANGES

3.1   Comparison of ERO Positions, Responders and Response Times

The total number of responders filling augmented ERO positions in the current EOF ERO is 16 and the total number of responders filling augmented ERO positions in the standard ERO is 16 (no difference).

- 75 Minute ERO Responders: The current augmented EOF ERO has five (5) 75 minute responders and the standard augmented EOF ERO has five (5) 75 minute responders (no difference).

- Full Staffing ERO Responders: The current augmented EOF ERO has eleven (11) fixed full staff responders and the standard augmented EOF ERO has eleven (11) fixed full staff responders (no difference). The number of EOC Liaisons is dependent upon the site (personnel are sent to each risk county and state EOC).

	Current EOF	Duke Standard	Difference
75 Minute	5	5	0
Full Staffing	11	11	0
Total	16	16	0

3.1.1   Numeric Change Impact to the Augmented ERO

There is no change to the numeric EOF ERO responders.

- The Ops Interface, a full staff position, is removed.

- An additional Dose Assessor is added as a full staff position.

3.1.2   Response Time Impact to the Augmented ERO

The change results in same number of 75 minute responder.

- The Accident Assessment Manager position is changed from a full staffing to a 75 minute position.

- The Dose Assessor position is changed from a 75 minute to a full staffing position.

The change results in same number of full staffing responders.

In practice, all ERO members are called out at the same time and respond as soon as possible. This provides for the quickest response and offers the ability to adjust ERO personnel resources as the specific conditions of the event warrant.

The numeric and response time changes resulting from the adoption of the standard ERO establish a closer relationship between risk significant / key functions and the positions assigned those responsibilities. The objective of these changes is to ensure those functions and their processes are linked directly to the augmented minimum staffing positions to allow for optimum relief of on shift personnel and less complicated response execution following facility activation.

Collectively and individually the changes to the EOF ERO in the adoption of the Duke standard ERO do not decrease the capability or the timeliness of the ERO to perform their assigned tasks. No site specific commitments regarding particular ERO positions, tasks or their response time were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Refer to Attachment 1 for a position-by-position comparison of the current and standard EOF ERO responders sorted by title and by function.

3.2   Comparison of the ERO Hierarchy / Reporting Relationships

In the adoption of the standard ERO, EOF facility staffing continues to be grouped by major functions. In general, each of the directors, managers and supervisors/coordinators in the standard ERO maintain their span of control.

Summary descriptions of the changes to the EOF ERO reporting hierarchy are as follows:

- All risk significant functions (classification, notification, protective actions and assessment) are assigned to minimum staffing positions aligned within the hierarchy.

- The Assistant EOF Director position has been formalized. This allows the facility lead to maintain an oversight and coordination role while the assistant's focus can be on facility operations.

The organizational/hierarchical changes improve the reporting relationships and management levels of the ERO and streamline the process path for risk significant functions. The organizational/hierarchical changes do not overload the next level supervisor/manager positions. The organizational/hierarchical changes do not decrease the capability or the timeliness of the ERO to perform their assigned tasks. No site specific commitments regarding a particular ERO hierarchy were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Refer to Attachment 2 for a comparison of the organization charts illustrating the current augmented EOF ERO and the standard augmented EOF ERO.

3.3   Comparison of ERO Responsibilities by Position

Deviations created by the addition, removal or modification of a task to a particular ERO position did not degraded the capability or timeliness to perform that associated function. No site specific commitments regarding a particular ERO task assignment were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Refer to Attachment 3 for comparisons and evaluations of added, removed and modified tasks between the current augmented EOF ERO and the Duke standard augmented EOF ERO.

Augmented EOF ERO Comparison by Facility

Current EOF ERO Position Title	75	Full	Standard EOF ERO Position Title	75	Full
EOF Director	1		EOF Director	1	
Assistant EOF Director		1	Assistant EOF Director		1
Offsite Agency Communicator	2		Offsite Communicator	2	
Log Recorder		1	Log Keeper		1
Data Coordinator		1	Data Coordinator		1
Emergency Planner		1	Emergency Planner		1
State & County EOC Liaisons		(a)	State & County EOC Liaisons		(a)
Accident Assessment Manager		1	Accident Assessment Manager	1	
Accident Assessment Interface		1	Accident Assessment Interface		1
Ops Interface		1			
Rad Assessment Manager	1		Rad Assessment Manager	1	
Dose Assessor	1		Dose Assessor		2
EOF Director		1	FMT Coordinator		2
Radio Operator		1			
Services Manager		1	Services Manager		1
Services Admin/Commissary		1	Services Admin/Commissary		1
Total Augmenting EOF ERO	**5**	**11**		**5**	**11**

(a) Number of EOC Liaisons is dependent on the site (personnel are sent to each of the at risk county and state EOCs)

Augmented EOF ERO Comparison by Function

Functional Area	Major Tasks	Current ERO Emergency Positions	75 Min.	Full Staff	Standard ERO Emergency Positions	75 Min.	Full Staff
2. Direction and Control	Command and Control	EOF Director (EOF)	1		EOF Director (EOF)	1	
	Facility Control	Assistant EOF Director (EOF)		1	Assistant EOF Director (EOF)		1
Function 2 Totals:			**1**	**1**		**1**	**1**
3. Notification & Comm.	Emergency Communications	Offsite Agency Communicator (EOF)	2		Offsite Communicator (EOF)	2	
	Plant Status & Technical Activities	State & County EOC Liaisons (EOF)		(a)	State & County EOC Liaisons (EOF)		(a)
Function 3 Totals:			**2**			**2**	
4. Radiological Assessment	Offsite Dose Assessment	Dose Assessor (EOF)	1		Dose Assessor (EOF)		2
	Offsite Surveys	FMT Coordinator (EOF)		1	FMT Coordinator (EOF)		2
		Radio Operator (EOF)		1			
	RP Supervisory	Rad Assessment Manager (EOF)	1		Rad Assessment Manager (EOF)	1	
Function 4 Totals:			**2**	**2**		**1**	**4**
5. Plant System Eng, Repair, and Corrective Actions	Technical Support / Accident Analysis	Accident Assessment Manager (EOF)		1	Accident Assessment Manager (EOF)	1	
		Accident Assessment Interface (EOF)		1	Accident Assessment Interface (EOF)		1
		Operations Interface (EOF)		1			
Function 5 Totals:			**0**	**3**		**1**	**1**
8. Resource Allocation and Admin	Administration	Log Recorder (EOF)		1	Log Keeper (EOF)		1
		Services Manager (EOF)		1	Services Manager (EOF)		1
	Facility Operations	Emergency Planner (EOF)		1	Emergency Planner (EOF)		1
		Data Coordinator (EOF)		1	Data Coordinator (EOF)		1
		Services Admin/Commissary (EOF)		1	Services Admin/Commissary (EOF)		1
Function 8 Totals:			**0**	**5**		**0**	**5**
TOTAL:			**5**	**11**		**5**	**11**

(a) Number of EOC Liaisons is dependent on the site (personnel are sent to each of the at risk county and state EOCs)

1.   Addition and Removal of Positions and Responders

1.1.   The total number of responders filling augmented ERO positions in the current EOF ERO is 16 and the total number of responders filling augmented ERO positions in the standard ERO is 16 (no difference).

      1.1.1. One (1) responder is added to the EOF ERO.

            1)   Dose Assessor (full staff)

      1.1.2. One (1) responder is removed from the EOF ERO.

            1)   Ops Interface (full staff)

2.   Alteration of ERO Response Times

2.1.   <u>75 Minute Response:</u> The current augmented EOF ERO has five (5) 75 minute responders and the standard augmented EOF ERO has five (5) 75 minute responders (no difference).

      2.1.1. One (1) responder is moved from full staff to 75 minute response (+1):

- Accident Assessment Manager

      2.1.2. One (1) responder is moved from 75 minute to full staff response (-1):

- Dose Assessor

2.2.   <u>Full Staffing:</u> The current augmented EOF ERO has eleven (11) full staff responders and the standard augmented ERO has eleven (11) full staff responders (no difference).
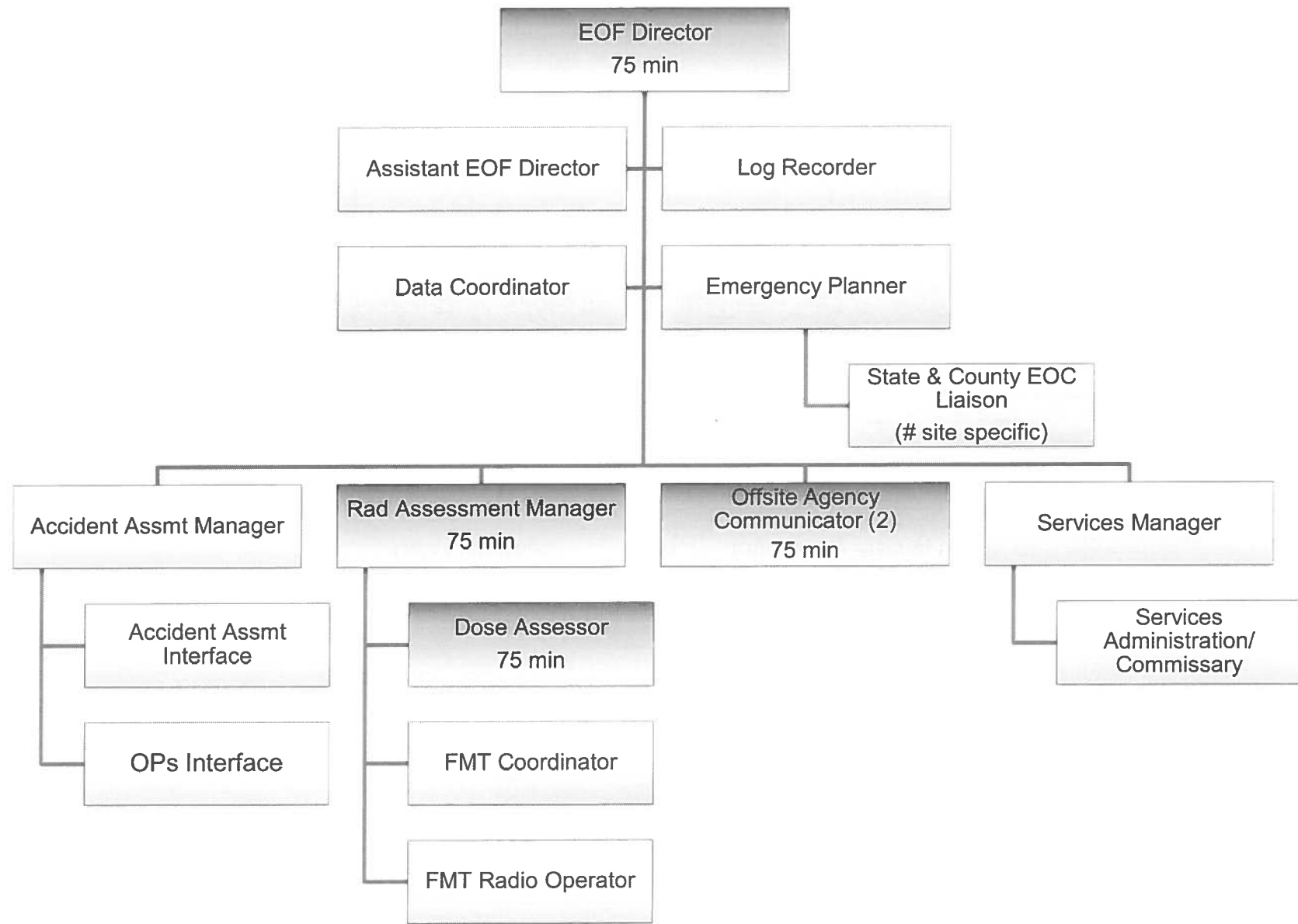
      2.2.1. One (1) responder is moved from 75 minute to full staff response (+1):
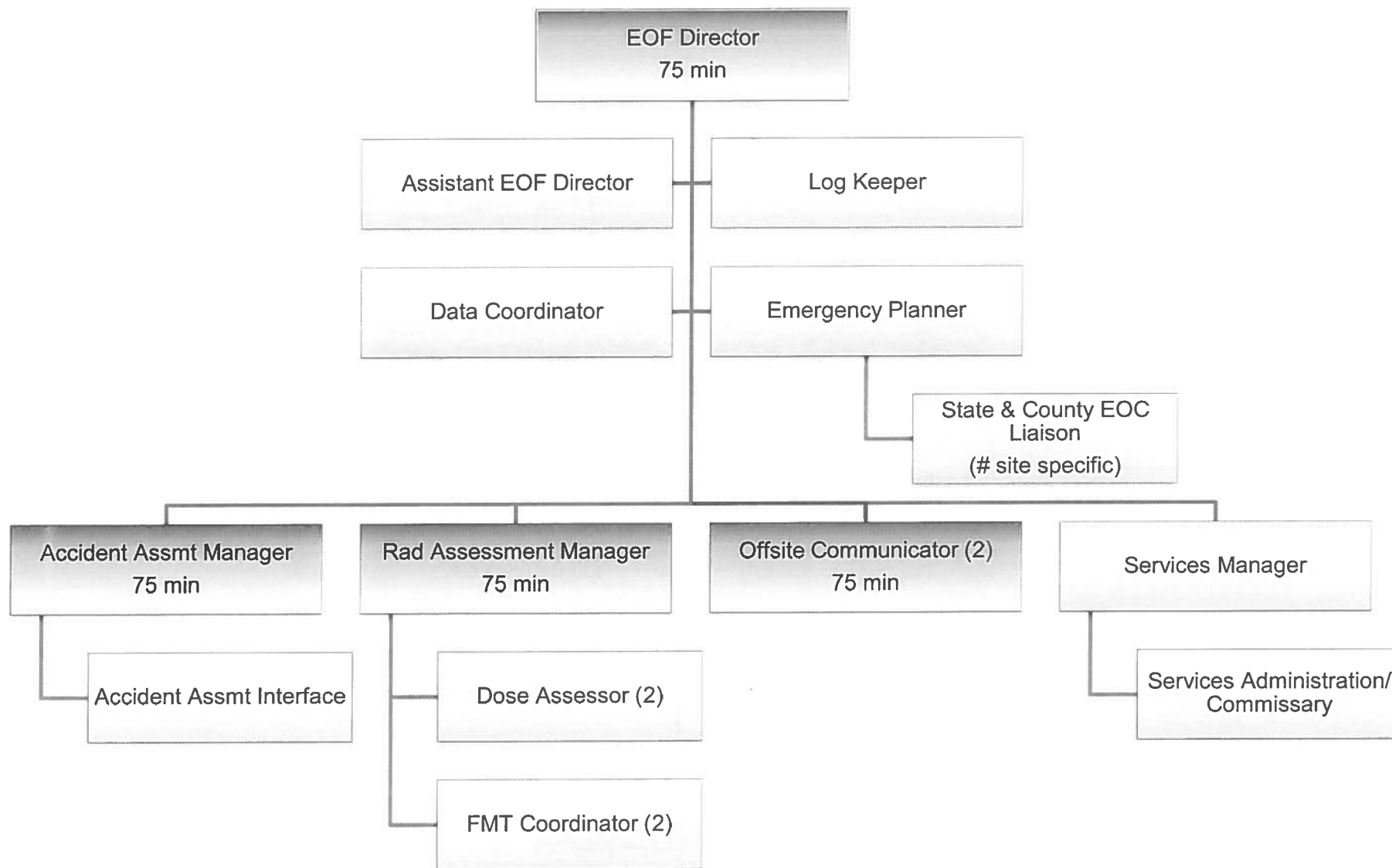
- Dose Assessor

      2.2.2. One (1) responder is removed by the elimination of one full staff position (-1):

- Ops Interface

Current Corporate EOF Organization

Standard EOF Organization

```
                          ┌─────────────────────┐
                          │     EOF Director     │
                          │        75 min        │
                          └──────────┬──────────┘
                                     │
         ┌───────────────────────┬───┴────────────────────┐
         │                       │                         │
┌─────────────────────┐  ┌─────────────────────┐
│ Assistant EOF Director│  │      Log Keeper      │
└─────────────────────┘  └─────────────────────┘

┌─────────────────────┐  ┌─────────────────────┐
│   Data Coordinator   │  │   Emergency Planner  │
└─────────────────────┘  └──────────┬──────────┘
                                    │
                          ┌─────────────────────┐
                          │  State & County EOC  │
                          │        Liaison       │
                          │    (# site specific) │
                          └─────────────────────┘
```

Accident Assmt Manager 75 min	Rad Assessment Manager 75 min	Offsite Communicator (2) 75 min	Services Manager
Accident Assmt Interface	Dose Assessor (2)		Services Administration/ Commissary
	FMT Coordinator (2)		

Old Title: **EOF Director (SR/0/A/2000/003 R14 Enclosure 6.1)**
New Title: **EOF Director (AD-EP-ALL-0103 Attachment 1)**

Overall Change Impact to the Position

The span of control for this position did not change. The EOF Director and the Assistant EOF Director are equally qualified and are interchangeable. The Assistant EOF Director typically acts as an EOF manager more typical of industry practices, which allows the EOF Director greater attention on overall response activities in all facilities (site, JIC and EOF) and less attention on EOF operation and administration.

Deviations created by the addition, removal or modification of tasks to the EOF Director position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

4 tasks were added, 25 were modified and 2 were removed.

EOF Director   **EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.)	Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.) AD-EP-ALL-0103 Att 1 Step 3.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Verify that the 24 hour staffing list has been completed	Verify that the 24 hour staffing list has been completed AD-EP-ALL-0103 Att 1 Step 2.1.12	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate ERO/facility shift turnover	Coordinate ERO/facility shift turnover AD-EP-ALL-0103 Att 1 Step 2.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 1 Step 2.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Assume/maintain command and control	Assume/maintain command and control AD-EP-ALL-0103 Att 1 Step 1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Transfer command and control	Transfer command and control AD-EP-ALL-0103 Att 1 Step 1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Manage facility emergency response activities	Manage facility emergency response activities AD-EP-ALL-0103 Att 1 Step 1.3, 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Director

EOF Director

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 1 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate integration of the NRC site team	Coordinate integration of the NRC site team AD-EP-ALL-0103 Att 1 Step 2.1.15	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Prioritize and authorize requests for external assistance (technical, craft, admin, etc.) AD-EP-ALL-0103 Att 1 Step 2.1.18	This task has been added and is categorized as a deviation. Current implementing procedures do not explicitly include this task although the EOF Director, as the individual responsible for the overall response, does control prioritization and authorization of requests for external assistance. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Approve equipment, supply, and logistics expenditures for response to the event AD-EP-ALL-0103 Att 1 Step 2.1.4	This task has been added and is categorized as a deviation. Current implementing procedures do not explicitly include this task although the EOF Director, as the individual responsible for the overall response, does control prioritization and authorization of requests for external assistance. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Request Federal support and resources	Request Federal support and resources AD-EP-ALL-0103 Att 1 Step 2.1.18	The steps for this task have been modified for checklist use, which is categorized as a difference.
Assist with emergency classification	Assist with emergency classification AD-EP-ALL-0103 Att 1 Step 2.1.8	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Director

EOF Director

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Approve and direct offsite emergency notifications to state and local authorities	Approve and direct offsite emergency notifications to state and local authorities AD-EP-ALL-0103 Att 1 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Establish communications with Emergency Coordinator or Assistant Emergency Coordinator in the TSC Communicate plant status to County Directors of Emergency Management , State Liaisons or State Directors	Ensure flow of information within and between the emergency response facilities AD-EP-ALL-0103 Att 1 Step 2.1.8	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform or direct emergency PA announcements	Perform or direct emergency PA announcements AD-EP-ALL-0103 Att 1 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Provide technical assistance for the development of news releases and statements	Provide technical assistance for the development of news releases and statements AD-EP-ALL-0103 Att 1 Step 2.1.10	The steps for this task have been modified for checklist use, which is categorized as a difference.
Verify EOF minimum staffing positions are prepared to assume their EOF duties.	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Determine current/projected staff needs	Determine current/projected staff needs AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure facility staff is prepared to perform their activities (facility ready)	Ensure facility staff is prepared to perform their activities (facility ready) AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Activate the facility (facility activated)	Activate the facility (facility activated) AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Director

EOF Director

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Direct/coordinate facility relocation AD-EP-ALL-0103 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation. Current implementing procedures do not explicitly include this task although the EOF Director, as the individual responsible for the overall response, they would make decision of facility relocation. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Determine and direct the actions for mitigation strategies and contingency plans	Determine and direct the actions for mitigation strategies and contingency plans AD-EP-ALL-0103 Att 1 Step 2.1.8	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Approve offsite Protective Action Recommendations	Approve offsite Protective Action Recommendations AD-EP-ALL-0103 Att 1 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Terminate the emergency event	Terminate the emergency event 0PEP-02.6.27, Step 2.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Develop recovery plans	Develop recovery plans 0PEP-02.6.27, Step 2.4 AD-EP-ALL-0110	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Conduct facility briefs and updates	Conduct facility briefs and updates 0PEP-02.6.27, Step 2.1.9	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 1 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Restore work area equipment and materials AD-EP-ALL-0103 Att 1 Step 4.0	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

EOF Director   **EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Maintain status and information boards/displays		This task has been <u>removed</u> and is categorized as a deviation.
		Maintaining status boards is an administrative task assigned to several subordinates.
		This change is evaluated as an improvement.
Authorize emergency worker extensions if the radiation exposure doses are expected to exceed the blanket dose extension limits		This task has been <u>removed</u> and is categorized as a deviation.
		Approval of emergency exposures remains with the site Emergency Coordinator. Personnel performing FMT activities are assigned by the site.
		This change is evaluated as an improvement.

Old Title: **Assistant EOF Director (SR/0/A/2000/003 R14 Enclosure 6.1)**
New Title: **Assistant EOF Director (AD-EP-ALL-0103 Attachment 1)**

Overall Change Impact to the Position

This positon does not have an organizational span of control.

The EOF Director and the Assistant EOF Director are equally qualified and are interchangeable. The standard ERO develops the Assistant EOF Director position as an EOF manager more typical of industry practices. Tasks added to the Assistant EOF Director position involve specifying tasks previously implied under more generalized task wording and EOF Director equivalent tasks.

Deviations created by the addition, removal and modification of tasks to the Assistant EOF Director position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

4 tasks were added, 25 were modified and 2 were removed.

EOF Director   **Assistant EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.)	Coordinate response activities with offsite response agencies (EM, ICP, Field Mon, etc.) AD-EP-ALL-0103 Att 1 Step 3.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Verify that the 24 hour staffing list has been completed	Verify that the 24 hour staffing list has been completed AD-EP-ALL-0103 Att 1 Step 2.1.12	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate ERO/facility shift turnover	Coordinate ERO/facility shift turnover AD-EP-ALL-0103 Att 1 Step 2.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 1 Step 2.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Assume/maintain command and control	Assume/maintain command and control AD-EP-ALL-0103 Att 1 Step 1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Transfer command and control	Transfer command and control AD-EP-ALL-0103 Att 1 Step 1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Director   **Assistant EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Manage facility emergency response activities	Manage facility emergency response activities AD-EP-ALL-0103 Att 1 Step 1.3, 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 1 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate integration of the NRC site team	Coordinate integration of the NRC site team AD-EP-ALL-0103 Att 1 Step 2.1.15	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Prioritize and authorize requests for external assistance (technical, craft, admin, etc.) AD-EP-ALL-0103 Att 1 Step 2.1.18	This task has been added and is categorized as a deviation. Current implementing procedures do not explicitly include this task although the EOF Director, as the individual responsible for the overall response, does control prioritization and authorization of requests for external assistance. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
	Approve equipment, supply, and logistics expenditures for response to the event AD-EP-ALL-0103 Att 1 Step 2.1.4	This task has been added and is categorized as a deviation. Current implementing procedures do not explicitly include this task although the EOF Director, as the individual responsible for the overall response, does control prioritization and authorization of requests for external assistance. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities. This change is evaluated as an improvement.
Request Federal support and resources	Request Federal support and resources AD-EP-ALL-0103 Att 1 Step 2.1.18	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Director   **Assistant EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assist with emergency classification	Assist with emergency classification AD-EP-ALL-0103 Att 1 Step 2.1.8	The steps for this task have been modified for checklist use, which is categorized as a difference.
Approve and direct offsite emergency notifications to state and local authorities	Approve and direct offsite emergency notifications to state and local authorities AD-EP-ALL-0103 Att 1 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Establish communications with Emergency Coordinator or Assistant Emergency Coordinator in the TSCF	Ensure flow of information within and between the emergency response facilities AD-EP-ALL-0103 Att 1 Step 2.1.8	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform or direct emergency PA announcements	Perform or direct emergency PA announcements AD-EP-ALL-0103 Att 1 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Provide technical assistance for the development of news releases and statements	Provide technical assistance for the development of news releases and statements AD-EP-ALL-0103 Att 1 Step 2.1.10	The steps for this task have been modified for checklist use, which is categorized as a difference.
Verify EOF minimum staffing positions are prepared to assume their EOF duties.	Ensure minimum staff is available (facility staffed) AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Determine current/projected staff needs	Determine current/projected staff needs AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Ensure facility staff is prepared to perform their activities (facility ready)	Ensure facility staff is prepared to perform their activities (facility ready) AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Activate the facility (facility activated)	Activate the facility (facility activated) AD-EP-ALL-0103 Att 1 Step 1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Director   **Assistant EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Direct/coordinate facility relocation AD-EP-ALL-0103 Att 1 Step 3.3	This task has been <u>added</u> and is categorized as a deviation.
		Current implementing procedures do not explicitly include this task although the EOF Director, as the individual responsible for the overall response, they would make decision of facility relocation. This change formally documents the task as a specific activity to improve checklist detail and task training clarity. It does not change the execution of response activities.
		This change is evaluated as an improvement.
Determine and direct the actions for mitigation strategies and contingency plans	Determine and direct the actions for mitigation strategies and contingency plans AD-EP-ALL-0103 Att 1 Step 2.1.8	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Approve offsite Protective Action Recommendations	Approve offsite Protective Action Recommendations AD-EP-ALL-0103 Att 1 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Terminate the emergency event	Terminate the emergency event 0PEP-02.6.27, Step 2.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Develop recovery plans	Develop recovery plans 0PEP-02.6.27, Step 2.4 AD-EP-ALL-0110	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Conduct facility briefs and updates	Conduct facility briefs and updates 0PEP-02.6.27, Step 2.1.9	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 1 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Restore work area equipment and materials AD-EP-ALL-0103 Att 1 Step 4.0	This task has been <u>added</u> and is categorized as a deviation.
		This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task.
		This change is evaluated as an improvement.

EOF Director   **Assistant EOF Director**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Maintain status and information boards/displays		This task has been <u>removed</u> and is categorized as a deviation.
		Maintaining status boards is an administrative task now assigned to several subordinates.
		This change is evaluated as an improvement.
Authorize emergency worker extensions if the radiation exposure doses are expected to exceed the blanket dose extension limits		This task has been <u>removed</u> and is categorized as a deviation.
		Approval of emergency exposures remains with the site Emergency Coordinator. Personnel performing FMT activities are assigned by the site.
		This change is evaluated as an improvement.

Old Title: Log Recorder (SR/0/A/2000/003 R14 Enclosure 6.16)
New Title: Log Keeper (AD-EP-ALL-0103 Attachment 10)

Overall Change Impact to the Position

Changes to the Log Keeper tasks were minor and primarily differences.

Deviations created by the modification of tasks to the Log Keeper position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

1 tasks were added, 6 were modified and 0 were removed.

Log Recorder   Log Keeper

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 10 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 10 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Prepare for facility activation (rooms, work area, equipment, etc.)	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0103 Att 10 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Distribute forms, reports, etc. as needed AD-EP-ALL-0103 Att 10 Step 2.1	This task has been added and is categorized as a deviation.
		This administrative action is now specified. Log Keeper provides information electronically and may be called on to distribute information through alternate media.
		This change is evaluated as an improvement.
Maintain status and information boards/displays	Maintain status and information boards/displays AD-EP-ALL-0103 Att 10 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records	Maintain event logs, forms and records AD-EP-ALL-0103 Att 10 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Log Recorder   **Log Keeper**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Restore work area equipment and materials	Restore work area equipment and materials AD-EP-ALL-0103 Att 10 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Old Title: **Data Coordinator (SR/0/A/2000/003 R14 Enclosure 6.17)**
New Title: **Data Coordinator (AD-EP-ALL-0103 Attachment 11)**

Overall Change Impact to the Position

Changes to the Data Coordinator tasks were differences.

No deviations were created by the modification of tasks to the Data Coordinator position. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 5 were modified and 0 were removed.

Data Coordinator   **Data Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 11 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 11 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor facility equipment (computer, communications, etc.) for proper operation	Monitor facility equipment (computer, communications, etc.) for proper operation AD-EP-ALL-0103 Att 11 Step 1.2 and 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 11 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Restore work area equipment and materials	Restore work area equipment and materials AD-EP-ALL-0103 Att 11 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **Emergency Planner (SR/0/A/2000/003 R14 Enclosure 6.15)**
New Title: **Emergency Planner (AD-EP-ALL-0103 Attachment 9)**

Overall Change Impact to the Position

Changes to the Emergency Planner tasks were minor and primarily differences. Previous procedures had very general actions for the Emergency Preparedness Representative in the EOF to provide support and ensure procedure compliance in the facility. The new task list is more specific, but the position performs the same functions in assisting the EOF Director with key EP functions. Tasks added to the Emergency Planner position involve current common undirected administrative actions, specifying tasks previously implied under more generalized task wording, and NRC site team interface.

Deviations created by the addition of tasks to the Emergency Planner position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks were added, 8 were modified and 1 were removed.

Emergency Planner

Emergency Planner

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 9 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 9 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Interface with federal, state and local agencies	Coordinate information and activities with offsite agency personnel in the facility AD-EP-ALL-0103 Att 9 Step 2.1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Coordinate integration of the NRC site team AD-EP-ALL-0103 Att 9 Step 3.1	This task has been added and is categorized as a deviation. Emergency Planner now assist the EOF Director and Assistant EOF Director with this task This change is evaluated as an improvement.

Emergency Planner

Emergency Planner

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Support State/County EOC Liaisons AD-EP-ALL-0103 Att 9 Step 2.1.4	This task has been <u>added</u> and is categorized as a deviation.
		Emergency Planner now primary point of contact for EOC Liaisons. Previous procedures did not specify who communicated with liaisons.
		This change is evaluated as an improvement.
Support completion of the ENF to state and local authorities	Support completion of the ENF to state and local authorities AD-EP-ALL-0103 Att 9 Step 2.1.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Prepare for facility activation (rooms, work area, equipment, etc.)	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0103 Att 9 Step 1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide input for facility briefs and updates	Provide input for facility briefs and updates AD-EP-ALL-0103 Att 9 Step 2.1.8	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 9 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Restore work area equipment and materials	Restore work area equipment and materials AD-EP-ALL-0103 Att 9 Step 4.0	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Complete 24 Hour Position Staffing Log		This task has been <u>removed</u> and is categorized as a deviation.
		Task has been transferred to the Services Admin / Commissary position.

Old Title: **State & County EOC Liaisons**
New Title: **State & County EOC Liaisons (AD-EP-ALL-0103 Attachment 17)**

Overall Change Impact to the Position

No task changes were made to the CNS, MNS and ONS State & County EOC Liaisons as part of the adoption of Standard ERO.

Old Title: **Accident Assessment Manager (SR/0/A/2000/003 R14 Enclosure 6.12)**
New Title: **Accident Assessment Manager (AD-EP-ALL-0103 Attachment 7)**

Overall Change Impact to the Position

Changes to the Accident Assessment Manager tasks were minor and primarily differences.

Deviations created by the addition of tasks to the Accident Assessment Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

3 tasks were added, 7 were modified and 0 were removed.

Accident Assessment Manager   **Accident Assessment Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 7 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 7 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0103 Att 7 Step 2.1.6	This task has been added and is categorized as a deviation. This administrative action to assist in obtaining needed assistance from outside sources. This change is evaluated as an improvement.
	Arrange for equipment and supply resources AD-EP-ALL-0103 Att 7 Step 2.1.6	This task has been added and is categorized as a deviation. This administrative action is to obtain any needed supplies to perform assigned tasks. This change is evaluated as an improvement.
Assist with emergency classification	Assist with emergency classification AD-EP-ALL-0103 Att 7 Step 1.2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform event detection and assessment activities	Perform event detection and assessment activities AD-EP-ALL-0103 Att 7 Step 2.1.5	The steps for this task have been modified for checklist use, which is categorized as a difference.

Accident Assessment Manager   **Accident Assessment Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Evaluate conditions and develop offsite Protective Action Recommendations	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0103 Att 7 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Provide input for facility briefs and updates	Provide input for facility briefs and updates AD-EP-ALL-0103 Att 7 Step 2.1.7	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 7 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Restore work area equipment and materials AD-EP-ALL-0103 Att 7 Step 4.0	This task has been added and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: **Accident Assessment Interface (SR/0/A/2000/003 R14 Enclosure 6.13)**
New Title: **Accident Assessment Interface (AD-EP-ALL-0103 Attachment 8)**

Overall Change Impact to the Position

Changes to the Accident Assessment Interface tasks were minor and mostly associated with providing clearer definition of the position in an operations related communications role. Tasks added to the Accident Assessment Interface position involve current common undirected administrative actions and BDB support actions.

Deviations created by the addition of tasks to the Accident Assessment Interface position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks were added, 11 were modified and 0 were removed.

Accident Assessment Interface   **Accident Assessment Interface**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 8 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor status of the Emergency Operations Procedures	Monitor status of the Emergency Operations Procedures AD-EP-ALL-0103 Att 8 Step 2.1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 8 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Assist with emergency classification	Assist with emergency classification AD-EP-ALL-0103 Att 8 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Communicate on assigned communication line and provide information to facility staff	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0103 Att 8 Step 1.2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor status and information boards/displays/systems	Monitor status and information boards/displays/systems AD-EP-ALL-0103 Att 8 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain status and information boards/displays	Maintain status and information boards/displays AD-EP-ALL-0103 Att 8 Step 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Accident Assessment Interface

Accident Assessment Interface

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform event detection and assessment activities	Perform event detection and assessment activities AD-EP-ALL-0103 Att 8 Step 2.1	The steps for this task have been _modified_ for checklist use, which is categorized as a difference.
Perform event detection and assessment activities	Provide analysis of core damage and fission product release potential AD-EP-ALL-0103 Att 8 Step 2.1.2	The steps for this task have been _modified_ for checklist use, which is categorized as a difference.
	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0103 Att 8 Step 2.1.7	This task has been _added_ and is categorized as a deviation. Accident Assessment Interface works with Accident Assessment Manager to assist EOF Director in determining PAR. This task was not previously identified in procedure. This change is evaluated as an improvement.
Analyze and develop extreme measures actions (FLEX, EDMG, SAMG, §50.54(x))	Analyze and develop extreme measures actions (FLEX, EDMG, SAMG, §50.54(x)) AD-EP-ALL-0103 Att 8 Step 2.1.6	The steps for this task have been _modified_ for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 8 Step 1.1	The steps for this task have been _modified_ for checklist use, which is categorized as a difference.
	Restore work area equipment and materials AD-EP-ALL-0103 Att 8 Step 4.0	This task has been _added_ and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: Ops Interface (SR/0/A/2000/003 R14, Enclosure 6.14)
New Title: No equivalent position in the standard ERO

Overall Change Impact to the Position

Position not part of the standard ERO.

All tasks previously assigned to the Ops Interface position are performed by other positions.

Deviations created by the removal of the Ops Interface position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS and MNS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks was transferred, 5 are performed by other ERO positions, and 4 were common task eliminated with the position.

Ops Interface

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.		Common Task for all ERO Members
Respond as directed when notified of an event (sign in, get materials, etc.).		Common Task for all ERO Members
Establish and monitor communications on the Ops bridge line and provide updates.		This task has been removed and is categorized as a deviation. Task performed by Accident Assessment Interface.
Monitor status of the Emergency Operations Procedures.		This task has been removed and is categorized as a deviation. Task performed by Accident Assessment Interface.
Assist with emergency classification.		This task has been removed and is categorized as a deviation. Task performed by Accident Assessment Manager and Accident Assessment Interface
Provide support for accident detection and assessment.		This task has been removed and is categorized as a deviation. Task performed by Accident Assessment Manager and Accident Assessment Interface

Ops Interface

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Assist in the development of mitigative strategies based on assessment of the event.		This task has been <u>removed</u> and is categorized as a deviation.
		Task performed by Accident Assessment Manager and Accident Assessment Interface
Maintain personal event logs, forms and records.		Common Task for all ERO Members
Turn in logs/forms and restore area/materials upon event termination.		Common Task for all ERO Members

Old Title: Radiological Assessment Manager (SR/0/A/2000/003 R14 Enclosure 6.6)
New Title: Radiological Assessment Manager (AD-EP-ALL-0103 Attachment 2)

Overall Change Impact to the Position

The span of control for this position changes from 3 to 4 ERO positions. The task added to the Radiological Assessment Manager position involves post plume environmental survey and sample activities. The tasks removed involved radiological actions not applicable to the corporate EOF.

Deviations created by the addition, removal and modification of tasks to the Radiological Assessment Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

4 tasks were added, 11 were modified and 0 were removed.

Radiological Controls Manager   **Radiological Assessment Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 2 Step 2.4	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Manage assigned group emergency response activities	Manage assigned group emergency response activities AD-EP-ALL-0103 Att 2 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 2 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0103 Att 2 Step 2.1.8	This task has been <u>added</u> and is categorized as a deviation. This administrative action to obtain needed assistance from outside sources to perform radiological assessment activities. This change is evaluated as an improvement.
Assist with emergency classification	Assist with emergency classification AD-EP-ALL-0103 Att 2 Step 2.1.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Support completion of the ENF to state and local authorities	Support completion of the ENF to state and local authorities AD-EP-ALL-0103 Att 2 Step 2.3	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Radiological Controls Manager   **Radiological Assessment Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Communicate on assigned communication line and provide information to facility staff	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0103 Att 2 Step 2.1.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor status and information boards/displays/systems	Monitor status and information boards/displays/systems AD-EP-ALL-0103 Att 2 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform event detection and assessment activities	Perform event detection and assessment activities AD-EP-ALL-0103 Att 2 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor, evaluate and communicate conditions involving any release of radioactivity	Monitor, evaluate and communicate conditions involving any release of radioactivity AD-EP-ALL-0103 Att 2 Step 2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Direct and review dose assessment activities	Direct/perform dose assessment AD-EP-ALL-0103 Att 2 Step 2.1.6	The steps for this task have been modified, position is now specifically task with performing dose assessment if Dose Assessors are not present. This change is categorized as a deviation. The Rad Assessment Manager is a minimum staff position. Having them trained and tasks with performing dose assessments assures that capability is available as soon as possible. This is considered and improvement.
Brief and dispatch the onsite/offsite radiation monitoring teams	Brief and dispatch the onsite/offsite radiation monitoring teams AD-EP-ALL-0103 Att 2 Step 1.2.2 & 3	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Provide support and logistics for site evacuation activities AD-EP-ALL-0103 Att 2 Step 2.1.9	This task has been added and is categorized as a deviation. The purpose of adding this task if the Rad Assessment Manager is working with offsite radiological personnel and assisting with any needed logistics for site evacuation would have been and still is performed by this position. This change is evaluated as an improvement.
Evaluate conditions and develop offsite Protective Action Recommendations	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0103 Att 2 Step 2.1.6.c	The steps for this task have been modified for checklist use, which is categorized as a difference.

Radiological Controls Manager   **Radiological Assessment Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Direct post-accident environmental sampling and exposure activities AD-EP-ALL-0103 Att 2 Section 4.0	This task has been <u>added</u> and is categorized as a deviation. Previous procedure did not address post event actions. Adding task ensures position is aware this may be a required action. This change is evaluated as an improvement.
Provide input for facility briefs and updates	Provide input for facility briefs and updates AD-EP-ALL-0103 Att 2 Step 2.1.7	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 2 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Restore work area equipment and materials AD-EP-ALL-0103 Att 2 Step 4.0	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: **EOF Dose Assessor (SR/0/A/2000/003 R14 Enclosure 6.7)**
New Title: **EOF Dose Assessor (AD-EP-ALL-0103 Attachment 3)**

Overall Change Impact to the Position

Changes to the Dose Assessor tasks were minor and primarily differences. Tasks added to the Dose Assessor position involve current common undirected administrative actions, communications and monitoring activities.

An additional Dose Assessor (total of 2) will also be called out in procedures as part of overall EOF staff ensuring listed responsibilities can be performed in a timely manner.

Deviations created by the addition of tasks to the Dose Assessor position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

2 tasks were added, 11 were modified and 0 were removed.

Dose Projection Coordinator   **EOF Dose Assessor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 3 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 3 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
	Assist with emergency classification AD-EP-ALL-0103 Att 3 Step 2.1.4 AD-EP-ALL-0202	This task has been added and is categorized as a deviation. Task added to ensure Dose Assessor is aware of EALs based on dose projections. This change is evaluated as an improvement.
	Support completion of the ENF to state and local authorities AD-EP-ALL-0103 Att 3 Step 2.1.4 AD-EP-ALL-0202	This task has been added and is categorized as a deviation. Task added to ensure Dose Assessor is aware of how dose projection information is used in notifications to offsite authorities. This change is evaluated as an improvement.
Provide event data and plant information to the NRC via the HPN	Provide event data and plant information to the NRC via the HPN AD-EP-ALL-0103 Att 3 Step 3.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Dose Projection Coordinator   **EOF Dose Assessor**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Communicate on assigned communication line and provide information to facility staff	Communicate on assigned communication line and provide information to facility staff AD-EP-ALL-0103 Att 3 Step 1.2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor status and information boards/displays/systems	Monitor status and information boards/displays/systems AD-EP-ALL-0103 Att 3 Step 2.1.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Prepare for facility activation (rooms, work area, equipment, etc.)	Prepare for facility activation (rooms, work area, equipment, etc.) AD-EP-ALL-0103 Att 3 Step 1.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Monitor, evaluate and communicate conditions involving any release of radioactivity	Monitor, evaluate and communicate conditions involving any release of radioactivity AD-EP-ALL-0103 Att 3 Step 2.1.1 & 4 AD-EP-ALL-0202	The steps for this task have been modified for checklist use, which is categorized as a difference.
Direct/perform dose assessment	Direct/perform dose assessment AD-EP-ALL-0103 Att 3 Step 2.1.4 AD-EP-ALL-0202	The steps for this task have been modified for checklist use, which is categorized as a difference.
Evaluate conditions and develop offsite Protective Action Recommendations	Evaluate conditions and develop offsite Protective Action Recommendations AD-EP-ALL-0103 Att 3 Step 2.1.6	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 3 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Restore work area equipment and materials	Restore work area equipment and materials AD-EP-ALL-0103 Att 3 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **Field Monitoring Coordinator (SR/0/A/2000/003 R14 Enclosure 6.8)**
New Title: **Field Monitoring Coordinator (AD-EP-ALL-0103 Attachment 4)**

Overall Change Impact to the Position

Changes to the Field Monitoring Team Coordinator tasks were minor and primarily differences. Tasks added to the Field Monitoring Team Coordinator position involve current common undirected administrative actions and FMT briefing.

Deviations created by the addition of tasks to the Field Monitoring Team Coordinator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

0 tasks were added, 10 were modified and 0 were removed.

Field Monitoring Coordinator   **Field Monitoring Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 4 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 4 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain status and information boards/displays	Maintain status and information boards/displays AD-EP-ALL-0103 Att 4 Section 2.1 AD-EP-ALL-0203	The steps for this task have been modified for checklist use, which is categorized as a difference.
Brief and dispatch the onsite/offsite radiation monitoring teams	Brief and dispatch the onsite/offsite radiation monitoring teams AD-EP-ALL-0103 Att 4 Section 2.1 AD-EP-ALL-0203	The steps for this task have been modified for checklist use, which is categorized as a difference.
Direct field monitoring team activities	Direct field monitoring team activities AD-EP-ALL-0103 Att 4 Section 2.1 AD-EP-ALL-0203	This task has been modified and is categorized as a deviation. The Radio Operator position is being eliminated. A FMT Coordinator now communicates with the FMTs directly. An Additional FMT Coordinator is now staffed. This is considered an improvement.

Field Monitoring Coordinator   **Field Monitoring Coordinator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Coordinate activities with the external agency field monitoring teams.	Coordinate activities with the external agency field monitoring teams. AD-EP-ALL-0103 Att 4 Section 2.1 AD-EP-ALL-0203	The steps for this task have been modified for checklist use, which is categorized as a difference.
Coordinate the receipt, analysis, storage and transfer of field monitoring samples	Coordinate the receipt, analysis, storage and transfer of field monitoring samples AD-EP-ALL-0103 Att 4 Section 2.1 AD-EP-ALL-0203	The steps for this task have been modified for checklist use, which is categorized as a difference.
Record/review radiological sampling and survey data	Record/review radiological sampling and survey data AD-EP-ALL-0103 Att 4 Section 2.1 AD-EP-ALL-0203	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 4 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Restore work area equipment and materials	Restore work area equipment and materials AD-EP-ALL-0103 Att 4 Step 4.0	The steps for this task have been modified for checklist use, which is categorized as a difference.

Old Title: **FMT Radio Operator (SR/0/A/2000/003 R14 Enclosure 6.9)**
New Title: **No equivalent position in the standard ERO**

Overall Change Impact to the Position

Position not part of the standard ERO.

All tasks previously assigned to the FMT Radio Operator position are performed by one to of the two Field Monitoring Coordinators.

Deviations created by the removal of the FMT Radio Operator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS and MNS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

1 tasks was transferred, 1 is now performed by other ERO positions, and 4 was eliminated with the position.

FMT Radio Operator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs.		Common Task for all ERO Members
Respond as directed when notified of an event (sign in, get materials, etc.).		Common Task for all ERO Members
Establish and maintain OMT communications.		Task transferred to FMT Coordinator. There are now 2 FMT Coordinators trained to perform all required tasks.
Maintain personal event logs, forms and records.		Common Task for all ERO Members
Turn in logs/forms and restore area/materials upon event termination.		Common Task for all ERO Members

Old Title: **Offsite Agency Communicator (SR/0/A/2000/003 R14 Enclosure 6.10)**
New Title: **Offsite Communicator (AD-EP-ALL-0103 Attachment 5)**

Overall Change Impact to the Position

Changes to the Offsite Communicator tasks were minor and primarily differences.

The deviation created by the addition of a task to the Offsite Communicator position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

1 tasks were added, 7 were modified and 0 were removed.

Offsite Communicator   **Offsite Communicator**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 5 Step 2.5	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 5 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Notify INPO for an Alert, Site Area Emergency, General Emergency, or any event expected to require significant industry support.	Provide event notification/information to industry groups (INPO, ANI, etc.) AD-EP-ALL-0103 Att 5 Step 2.4	The steps for this task have been modified for checklist use, which is categorized as a difference.
Perform offsite emergency notifications to state and local authorities	Perform offsite emergency notifications to state and local authorities AD-EP-ALL-0103 Att 5 Step 2.3 AD-EP-ALL-0304	The steps for this task have been modified for checklist use, which is categorized as a difference.
Support completion of the ENF to state and local authorities	Support completion of the ENF to state and local authorities AD-EP-ALL-0103 Att 5 Step 2.2 AD-EP-ALL-0304	The steps for this task have been modified for checklist use, which is categorized as a difference.
Distribute forms, reports, etc. as needed	Distribute forms, reports, etc. as needed AD-EP-ALL-0103 Att 5 Step 2.2 AD-EP-ALL-0304	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 5 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

Offsite Communicator

Offsite Communicator

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Restore work area equipment and materials AD-EP-ALL-0103 Att 5 Step 4.0	This task has been <u>added</u> and is categorized as a deviation.
		This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task.
		This change is evaluated as an improvement.

Old Title: **EOF Services Manager (SR/0/A/2000/003 R14 Enclosure 6.18)**
New Title: **EOF Services Manager (AD-EP-ALL-0103 Attachment 12)**

Overall Change Impact to the Position

The span of control for this position remains unchanged. The tasks removed from the Services Manager position involve shift relief coordination actions performed by the EOF Director position in the standard ERO, admin and logistics actions performed by the EOF Services Administration / Commissary position.

Deviations created by the addition of tasks to the EOF Services Manager position did not degraded the capability or timeliness to perform an associated function. No site specific commitments are adversely altered by changes to tasks assigned this position. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

Specific (one-for-one) Responsibility (task) Comparison

1 tasks were added, 6 were modified and 0 were removed.

EOF Services Manager   **EOF Services Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 12 Step 2.3	The steps for this task have been modified for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 12 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Develop requests and coordinate external assistance (technical, craft, admin, etc.)	Develop requests and coordinate external assistance (technical, craft, admin, etc.) AD-EP-ALL-0103 Att 12 Step 1.2 and Section 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Arrange for equipment and supply resources	Arrange for equipment and supply resources AD-EP-ALL-0103 Att 12 Step 1.2 and Section 2.1	The steps for this task have been modified for checklist use, which is categorized as a difference.
Notify ANI at 9-1-877-680-2644 within 120 minutes of an Alert or higher event declaration	Provide event notification/information to industry groups (INPO, ANI, etc.) AD-EP-ALL-0103 Att 12 Step 2.2	The steps for this task have been modified for checklist use, which is categorized as a difference.
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 12 Step 1.1	The steps for this task have been modified for checklist use, which is categorized as a difference.

EOF Services Manager   **EOF Services Manager**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Restore work area equipment and materials AD-EP-ALL-0103 Att 12 Step 4.0	This task has been <u>added</u> and is categorized as a deviation. This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task. This change is evaluated as an improvement.

Old Title: Services Admin/Commissary (SR/0/A/2000/003 R14 Enclosure 6.11)
New Title: Services Administration / Commissary (AD-EP-ALL-0103 Attachment 6)

<u>Overall Change Impact to the Position</u>

Deviations created by the addition of the Services Administration / Commissary position and its associated tasks did not degraded the capability or timeliness to perform an associated function. No site specific commitments regarding tasks assigned to the Services Administration / Commissary were adversely altered by the adoption of the standard ERO. These changes do not reduce the effectiveness of the CNS, MNS and ONS emergency plans.

<u>Specific (one-for-one) Responsibility (task) Comparison</u>

2 tasks were added, 7 were modified and 0 were removed.

Services Administration / Commissary   **Services Administration / Commissary**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
	Develop facility 24 hour staffing list AD-EP-ALL-0103 Att 6 Step 2.1.1	This task has been <u>added</u> and is categorized as a deviation. Task has been transferred from the Emergency Planner position. Transfer of task does no reduce effectiveness of planning effort.
Perform position turnover when a shift change occurs	Perform position turnover when a shift change occurs AD-EP-ALL-0103 Att 6 Step 2.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Manage assigned group emergency response activities	Manage assigned group emergency response activities AD-EP-ALL-0103 Att 6 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Respond as directed when notified of an event (sign in, get materials, etc.)	Respond as directed when notified of an event (sign in, get materials, etc.) AD-EP-ALL-0103 Att 6 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Arrange for logistics support	Arrange for logistics support AD-EP-ALL-0103 Att 6 Step 2.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Provide administrative support for facility operation	Provide administrative support for facility operation AD-EP-ALL-0103 Att 6 Step 2.1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
Distribute forms, reports, etc. as needed	Distribute forms, reports, etc. as needed AD-EP-ALL-0103 Att 6 Step 2.1.2	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.

Services Administration / Commissary **Services Administration / Commissary**

Old Responsibility (task)	New Responsibility (task)	Change Evaluation
Maintain event logs, forms and records SR/0/A/2000/003 Step 3.1.1	Maintain event logs, forms and records AD-EP-ALL-0103 Att 6 Step 1.1	The steps for this task have been <u>modified</u> for checklist use, which is categorized as a difference.
	Restore work area equipment and materials AD-EP-ALL-0103 Att 6 Step 4.0	This task has been <u>added</u> and is categorized as a deviation.
		This administrative action is now specified in all appropriate ERO checklists to bring formality and consistency to the task.
		This change is evaluated as an improvement.

The changes to the ERO were evaluated from three distinct perspectives. First, changes to the physical number and response time requirements of the ERO positions were evaluated. Second, changes to the ERO chain of command and reporting relationships were evaluated. Lastly, the changes to the addition, alteration or removal of responsibilities (tasks) for each ERO position were evaluated.

1. Changes to the ERO Staffing Numbers

    This evaluation was performed to assess whether any changes to the number of ERO positions were made (total and by response time) and to determine whether those changes impacted the licensing bases, capability or timeliness of the ERO response and performance of functions.

    The addition of an ERO position is considered a deviation. The addition of an ERO position is considered an improvement due to having additional staff to perform the work, provided it does not overload the next level supervisor/manager position.

    The alteration of a position from a specific time requirement into another time requirement is considered a deviation. The acceptability of the deviation is assessed by evaluation of the assigned tasks in Step 3 below.

    The deletion of a position is considered a deviation. The acceptability of the deviation is assessed by evaluation of the assigned tasks in Step 3 below.

2. Changes to the ERO Hierarchy / Reporting Relationships

    This evaluation was performed to assess whether any changes to the structural hierarchy or reporting relationships were made and to determine whether those changes impacted capability or timeliness of the ERO response and performance of functions.

3. Changes to an ERO Position's Responsibilities (tasks)

    Tasks for each ERO position in the current Emergency Plan and implementing procedures are matched to a standard ERO task list based on planning standard, function and element terminology (or identified as station specific tasks and given a unique task ID). Tasks that may have been stated in the E-Plan or procedures in general terms such as *provide engineering support* or *manage radiological personnel* may be associated with more specific task descriptions.

    Tasks for each ERO position in the new organization are identified and assigned from the same task list used for the current ERO as described above.

    The tasks for each ERO position are organized in a table for individual comparison. Changes to an ERO position can involve adding, removing or modifying a task.

    Added task – involves moving an existing task from a different ERO position, assigning a task previously performed as an undirected action (such as an inherent administrative expectation), or assigning a task that is entirely new (typically limited to when process or equipment changes are being implemented in conjunction).

    Removed task – involves moving an existing task to a different ERO position or eliminating it entirely (typically limited to when process or equipment changes are being implemented in conjunction).

Modified task – involves changes in wording or sequencing that potentially affect the capability or timeliness of the task.

Since all ERO procedures are being converted to a checklist format for improved human factors design, all task wording has been modified to some extent. Task modifications limited to checklist format changes where step wording and sequence remains essentially unchanged are defined as differences.

Following table alignment of the added, removed and altered tasks, each comparison is categorized as a no change, difference or deviation.

Added and removed tasks are automatically categorized as deviations with regard to their impact on the ERO position in order to force further evaluation and conclusion documentation.

Modified tasks may be categorized as a difference or a deviation.

Difference

A difference only applies to modified tasks where the change to the wording (of either the task or its steps) does not alter the capability and/or timeliness of the function for which the task was performed.

Any change that is determined to be a difference requires no further evaluation.

Deviation

A deviation is defined as a change to the wording of a task or its steps that does alter the capability and/or timeliness of the function for which the task was performed.

All added tasks and those removed tasks that are fully eliminated (no longer performed by any position) must be further evaluated in the change evaluation column to establish whether the change improved, maintained, reduced or lost the ability to perform the function.

Removed tasks that are transferred to another ERO position are evaluated as an added task. Thus, only the ERO position that the task is being moved to needs to be documented in the change evaluation column.

Modified tasks categorized as deviations must be further evaluated in the change evaluation column to establish whether the change improved, maintained, reduced or lost the ability to perform the function.

For all task changes categorized as deviations, further evaluated further evaluation is performed to determine the impact on the qualities (attributes) of capability and timeliness.

- Capability is defined as the quality (attribute) of being able or capable to perform the task. In order to determine an impact to capability the actions accomplished by the task must be known (what the task does).

  For example; assume the Steps in an existing procedure for the task to classify an event establish the actions for initial event declaration, upgrade and downgrade. The Steps in the standard procedures for the classification task include the actions for initial event declaration and upgrade. Therefore, a deviation is created by the removal of an action (downgrading) of the task in the original procedure.

- Timeliness is defined as the quality (attribute) of task duration. The impact to timeliness can sometimes be determined by evaluating the changes to the steps, such as when one or more steps are added or removed. In other cases it may be necessary to perform the task, such as in a drill or exercise, and observe whether the change impacted the timeliness of the task.

4. Completing a Comparison Table for Each ERO Position

   A. Identify and list the current tasks performed by the ERO position (sources can include the E-Plan, positional procedures, functional procedures, forms, etc.).

   B. Identify, list and align the new tasks performed by the ERO position to each of the current tasks.

      1) If a new task can be correlated to a current task, list it in the same row in the comparison table.

      2) If a new task cannot be correlated to a current task, list it in a separate row in the comparison table.

   C. Where a current task does not align with a new task identify whether the task was added or removed and document as a deviation in the Change Evaluation column.

      1) For added tasks and those removed tasks that are fully eliminated (no longer performed by any position), document an explanation and evaluation of the addition or removal that justifies the change and explicitly states whether it improves, maintains, degrades or loses the ability to perform the function.

      2) For removed tasks that are transferred to another ERO position, document which position the task has been transferred to.

   D. Where a current task does align with a new task identify whether the task was not changed or modified in the Change Evaluation column.

   E. For each modified tasks identify whether the change is a difference or a deviation.

      1) Review the Steps and identifying the actions that the current task <u>does</u>.

      2) Review the Steps and identifying the actions that the new task <u>does</u>.

      NOTE: Changes to informational wording in current tasks that don't "do" anything (content that is not actionable) do not affect the actions of the task.

      3) Compare the list of actions to determine whether the new task <u>does</u> more or less than the current task.

         A. If the new task <u>does</u> more or less (has more or fewer actions) as compared to the current task, then categorize the change as a deviation (due to an alteration in the capability).

         B. If the new task does the same actions as compared to the current task, then categorize the change as a difference.

> **NOTE:** In the case where the current procedure simply states the task and the new task has added performance steps, and in consideration that there has been no change in how the actual task is performed, it is acceptable to conclude that the timeliness has not been altered.

   4) Compare the steps to determine whether the new task takes more or less time to accomplish than the current task.

      a. If the new task takes more or less time to accomplish as compared to the current task, then categorize the change as a deviation (due to an alteration in the timeliness).

      b. If the new task takes the same amount of time to accomplish as compared to the standard task, then categorize the change as a difference.

      c. If it is not possible to determine whether the standard task can be accomplished in more or less time than the current task, note that further evaluation is necessary.

   F. For each modified task identified as a difference, provide a brief statement for why it is considered such.

   G. For each modified task identified as a deviation, document an explanation and evaluation of the addition or removal that justifies the change and explicitly states whether it improves, maintains, degrades or loses the ability to perform the function.

5. Overall Change to a Position

   A summary of the overall impact of the task changes is documented above the comparison table for each position. Information included in the summary is as follows:

   A. Span of control change description for positions that manage or supervise other positions (as applicable).

   B. Description of overall change impact to position.

   C. Summary of task deviations.

   D. Evaluation statement explicitly documenting:

      1) That the deviation did not degrade the capability or timeliness to perform an associated function.

      2) That no site specific commitments are adversely altered by changes to tasks assigned to this position (this statement is able to be made in the comparison document based on the results of the commitment search recorded on the §50.54(q) evaluation form).

      3) That the changes do not reduce the effectiveness of the emergency plan.

Enclosure 4

Summary of the Emergency Plan changes

Activity Description for EPA A (CNS Emergency Plan Section A-Assignment of Responsibility) Rev 150

Changed rev number from 149 to 150; changed date from March 2017 to September 2017

Section A.1.c
- Updated as follows to reflect revised tables/figures from EPA B.
  - "See Table B-1a and B-1b and Figures B-1, B-2, B-3, B-4, B-5a and B-5b"

Activity Description for EPA B (CNS Emergency Plan Section B-Site Emergency Organization) Rev 163

Changed rev number from 162 to 163; changed date from September 2016 to September 2017

Section B.2
- Changed "Operations Shift Manager" to "Shift Manager" in first and second sentences. (new title)

Section B.4
- Changed "Operations Shift Manager" to "Shift Manager" in second sentence. (new title)

Section B.6
- Changed references to Figure 5a and 5b.

Section B-8
- Page B-3 (State of South Carolina) added Robinson to Oconee and Catawba.

Table B-1b
- Changed title to "Augmented ERO Staffing for Emergencies"
- Figure revised to reflect new staffing assignments and titles
- Page 2 of 2 (Notes)
  - Deleted first paragraph related to 75 minute clock
  - Deleted third paragraph related to augmentation by local support
  - Deleted last sentence in fourth paragraph related to FMT qualifications
  - Numbered remaining paragraphs (1-3)

Figure B-1
- Added (TSC) to the title
- Revised the entire figure to reflect new (TSC) titles and assignments with response times as applicable

Figure B-2
- Change title to Site Emergency Organization (OSC)
- Revised the entire figure to reflect new (OSC) titles and assignments with response times as applicable

Figure B-3
- Changed Title to Emergency Operations Facility (EOF)

Figure B-4
- New figure with Media Center Organization

Figure B-5a
- New revised figure with inter-relationships

Figure B-5b
- New revised figure with inter-relationships

Activity Description for EPA E (CNS Emergency Plan Section E - Notification Methodology) Rev 148

Changes to section E are editorial as defined in AD-EP-ALL-0602 because they are changes to update references that are being implemented to support the Standard ERO Project.

Changed rev number from 147 to 148; changed date from September 2016 to September 2017

Section E2
- Deleted references to procedures RP/0/A/5000/006 B and SR/0/A/2000/004
- Added new procedure reference AD-EP-ALL-0304, State and County Notifications

Section E.2.a
- Note changed to add procedure AD-EP-ALL-0101, Emergency Classification

Section E.2.b
- Note changed to add procedure AD-EP-ALL-0101, Emergency Classification
- Page E-3, added "or AD-EP-ALL-0301, Activation of the Emergency Response Organization Notification System (ERONS)" added after "RP/0/A/5000/003, Alert"

Section E.2.c
- Note changed to add procedure AD-EP-ALL-0101, Emergency Classification
- Page E-5, added "or AD-EP-ALL-0301, Activation of the Emergency Response Organization Notification System (ERONS)" after "RP/0/A/5000/004, Site Area Emergency"
- Page E-5, added "or AD-EP-ALL-0101, Emergency Classification" after "RP/0/A/5000/004, Site Area Emergency" at the bottom of the page.

Section E.2.d
- Note changed to add procedure AD-EP-ALL-0101, Emergency Classification
- Page E-6, added "or AD-EP-ALL-0301, Activation of the Emergency Response Organization Notification System (ERONS)" after "RP/0/A/5000/005, General Emergency"
- Page E-7, added "or AD-EP-ALL-0109, Offsite Protective Actions Recommendations" after "RP/0/A/5000/005, General Emergency" at the bottom of the page.

Activity Description for EPA G (CNS Emergency Plan Section G - Public Education and Information) Rev 161

Changed rev number from 14-3 to 161; change date from June 2014 to September 2017

Section G.2
- Changed emergency "planning" to emergency "preparedness"

Section G.3
- Capitalized "Media Center" and "News Releases"
- In the last sentence, first paragraph - changed "news manager and public spokesperson" to "A company spokesperson"
- In the last sentence, second paragraph - deleted references to SR/0/A/2000/001 and RP/0/B/5000/028. Replaced with "the Joint information Center (JIC) implements media procedures"

Section G.4
- Changed "Pubic Spokesperson" to "Company Spokesperson"; deleted capitalization for "site" VPs.

Section G.4.c
- Reordered county, state, and federal in logical order
- Added "or via JIS"
- Deleted capitalization of "portal"
- Corrected spelling of government

Activity Description for EPA H (CNS Emergency Plan Section H - Emergency Facilities and Equipment) Rev 149

Changes to section H are editorial as defined in AD-EP-ALL-0602 because they are changes to update references that are being implemented to support the Standard ERO Project.

Changed Rev number from 16-1 to 149; changed date from March 2016 to September 2017

Section H.1.b
- Replaced RP/0/B/5000/020 with new procedure reference AD-EP-ALL-0105 Activation and Operation of the Technical Support Center (TSC)

Activity Description for EPA I (CNS Emergency Plan Section I - Accident Assessment) Rev 147

Changes to section I.3, I.7, and I.8 are editorial as defined in AD-EP-ALL-0602 because they are changes to update references that are being implemented to support the Standard ERO Project.

Change rev number from 146 to 147. Changed date from May 2015 to September 2017

Section I.1
- Added basis information from EPA D discussion section on the CNS NEI 99-01 Rev 6 EAL upgrade.
- Added AD-EP-ALL-0101 and NEI 99-01 Revision 6 EAL Wallboard as references for determining emergency condition.

Section I.3.a/I.3.b
- Deleted references to HP/0/B/1009/004 and HP/0/B/1009/026, which have been superseded.
- Added new procedures AD-EP-ALL-0203 and AD-EP-CNS-0203

Section I.7/I.8
- Deleted HP/0/B/1009/004, which was superseded
- Added AD-EP-ALL-0203, Field Monitoring During an Emergency, and AD-EP-CNS-0203, CNS Site Specific Field Monitoring Information

Section I.9 Detect and Measure Radioiodine Concentration in EPZ
- Added the following to the end of the paragraph "OR a count rate meter utilizing direct corrected count rate (ccpm) of the Silver Zeolite or equivalent cartridge cross-referenced against an estimated Iodine-131 microCi/cc concentration attachment."

Activity Description for EPA J (CNS Emergency Plan Section J - Protective Response) Rev 147

Changes to section J are editorial as defined in AD-EP-ALL-0602 because they are changes to update references and position titles that are being implemented to support the Standard ERO Project and a correction to a referenced procedure title.

Change rev number from 146 to 147. Changed date from May 2015 to September 2017.

Section J.6
- For TSC positions:
    - Changed "Operations Superintendent, Operations Engineer" to "Operations Manager"
    - Changed "Assistant Operations Engineer" to "Assistant Operations Manager"
    - Changed "Systems Engineer" to "Mechanical Engineer, Electrical Engineer"

- For OSC positions:
    - Changed "OSC Log/Status Keeper" to "OSC Log Keeper"

Section J.7
- Added "General Emergency" to RP/0/A/5000/005
- Deleted SR/0/A/2000/003 and replaced with AD-EP-ALL-0109, Off Site Protective Actions Recommendations.

Activity Description for EPA K (CNS Emergency Plan Section K - Radiological Exposure Control) Rev 144

Changes to section K are editorial as defined in AD-EP-ALL-0602 because they are changes to update position titles that are being implemented to support the Standard ERO Project and one typographical correction that does not change intent of the Emergency Plan.

Change rev number from 14-3 to 144. Changed date from June 2014 to September 2017 2017.

Section K.2
- Last sentence: Changed "Procedures" to "Site procedures"

Section K.6.b
- Changed "OSC Nuclear Supply Chain Manager/designee" to "OSC Generation Supply Chain Liaison/designee"

Activity Description for EPA M (CNS Emergency Plan Section M - Recovery and Re-entry Planning and Post -Accident Operations) Rev 161

Changed rev number from 13-1 to 161; Changed date from August 2013 to September 2017.

Section M.1
- Replaced RP/0/B/5000/025, Recovery and Reentry procedure with AD-EP-ALL-0110, Recovery

Section M.2
- Replaced "EOF Director" with "Recovery Manager"
- Replace "Coordination" with "High level coordination"
- Deleted Work Control Manager and description
- Added Onsite Recovery Director -Directs the recovery activities onsite to restore the plant to pre-incident conditions.
- Added Offsite Recovery Director-Directs interface with Federal, State, and local agencies during the recovery process.
- Add condition (if needed) for Radiological Assessment Manager
- Deleted Engineering Support Manger, Public Information Manager, and EOF Services Manager
- Added Company Spokesperson-Directs the Public Information Program during the recovery process.
- Added Other Support-Other individuals or groups assigned specific tasks to support activities during the Recovery Phase

Section M.3
- #2 Replaced Public Information Manager with "either JIC Director or Company Spokesperson"
- Figure M-1 Replaced with chart with the revised positions and descriptions.

Activity Description for EPA O (CNS Emergency Plan Section O-Radiological Emergency Response Training) Rev 144

Changes to section O are editorial as defined in AD-EP-ALL-0602 because they are changes to update references that are being implemented to support the Standard ERO Project and correcting a reference title.

Changed rev number from 143 to 144; changed date from June 2014 to September 2017

Section O.1.a
- Replace CNS Addendum 7111.0 with new procedure AD-EP-ALL-0500, Emergency Response Training.

Section O.2.a
- Replace EP Group Manual Guideline 5.4.1 with AD-EP-ALL-0500 (first sentence)
- Replace EP Group Manual Guideline 5.4.1, ETQS 7111.00 and CNS Addendum 7111.0 with AD-EP-ALL-0500 (last sentence)

Section O.2.c

- Replaced Nuclear System Directive 112 and CNS Training Addendum 7111.0 with AD-TQ-ALL-0086, Fire Brigade and HAZMAT Training

Section O.2.d
- Corrected title for PT/0/B/4600/006 by adding "Exercises and".

Section O.3
- Replaced Nuclear System Directive 119 with AD-SY-ALL-0280, Medical Emergency Response Team (MERT) and Technical Rescue Training.

Activity Description for EPA P (CNS Emergency Plan Section P - Responsibility for the Planning Effort) Rev 147

Changes to section P are editorial as defined in AD-EP-ALL-0602 because they are changes to update references that are being implemented to support the Standard ERO Project and correcting telephone numbers.

Changed Rev number from 146 to 147; changed date from May 2015 to September 2017

Section P.10
- Telephone Number Updates (PRR#02073026/02147671)
- Deleted reference to procedure ST/0/A/4600/086 and replaced with TE-EP-ALL-0407 (Periodic Verification of EOF Communication Equipment Operation and Equipment/ Supply Inventory).

Figure P-2 (PRR# 02019725/02147671)
- Revised table to delete and add procedures as a result of the Fleet Standard ERO Project and JIC procedures. Reordered table in alpha-numeric order.

Procedures added/Revised

Procedure	Title	Emergency Plan Section Implemented
AD-EP-ALL-0101	Emergency Classifications	D, E, I.1
AD-EP-ALL-0103	Activation and Operation of the Emergency Operations Facility (EOF)	B, C, H
AD-EP-ALL-0104	ERO Common Guidelines and Forms	B, E, F, G, I, K, M
AD-EP-ALL-0105	Activation and Operations of the Technical Support Center (TSC)	B, H, E
AD-EP-CNS-0105	CNS Site Specific TSC Support	B, H
AD-EP-ALL-0106	Activation and Operations of the Operations Support Center (OSC)	B, H
AD-EP-ALL-0108	Joint Information System Support	G
AD-EP-ALL-0109	Protective Action	J.7

	Recommendations	
AD-EP-ALL-0110	Recovery	M
AD-EP-ALL-0203	Field Monitoring During an Emergency*	D, I, H.6.b
AD-EP-CNS-0203	CNS Site Specific Field Monitoring Information	I
AD-EP-ALL-0205	Emergency Exposure Controls	K.2
AD-EP-ALL-0304	State and County Notifications	E, J.7

*Title changed

Procedures marked as deleted:
RP/0/A/5000/006 B
RP/0/A/5000/018
RP/0/A/5000/020
RP/0/A/5000/024
RP/0/A/5000/025
HP/0/B/1009/004
SR/0/A/2000/001
SR/0/A/2000/003
SR/0/A/2000/004