



October 31, 2018

DPG 18-200

50-312

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

SUBJECT: RANCHO SECO EMERGENCY PLAN MANUAL UPDATE

The Rancho Seco Nuclear Station is required to maintain an effective Emergency Plan in case of an incident at the nuclear facility. We recently completed a revision to the Emergency Plan and associated implementing procedures. Enclosed is a copy of the revised Plan and procedures so that you can update the copy of the Emergency Plan Manual that is assigned to your office. The enclosed Rancho Seco Procedure Transmittal provides instructions for updating your manual and confirming the update to Rancho Seco staff.

If you have any questions, please feel free to call Sherri Bua at (916) 732-4829 or Brad Gacke at (916) 732-4812.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Tallman", written in a cursive style.

Dan Tallman
Manager, Rancho Seco Assets

Enclosure
Cc: RIC 1F.099

AX45
NRR

RANCHO SECO PROCEDURE TRANSMITTAL

TO: Manual #15 – US NRC Washington DC

DATE: October 31, 2018

FROM: RANCHO SECO SITE DOCUMENT CONTROL

SUBJECT: REVISION TO THE EMERGENCY PLAN MANUAL

Please make the following changes to the manual referenced above.

REMOVE:	REPLACE WITH:
Table of Contents	Updated Table of Contents
RSLBD-020 Rev 0 Emergency Plan	RSLBD-020 Rev 1 Emergency Plan
RSIP-003 Rev 0 Emergency Actions	RSIP-003 Rev 1 Emergency Actions
RSIP-004 Rev 0 Emergency Preparedness Training	RSIP-004 Rev 1 Emergency Preparedness Training
RSIP-005 Rev 0 Emergency Preparedness Surveillance Program	RSIP-005 Rev 1 Emergency Preparedness Surveillance Program

Upon completion:

- 1. Sign and date Revision List located behind the second tab (FOR HARD COPY MANUAL HOLDERS ONLY).**
- 2. Send confirmation of manual receipt and completion of update via email to Sheryl.bua@smud.org.**

If you have questions, contact Sherri Bua at 916-732-4829 or Brad Gacke at 916-732-4812.

EMERGENCY PLAN MANUAL

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DATE	TITLE	REVISION	STATUS	EFFECTIVE DATE
RSLBD-020	EMERGENCY PLAN	1	A	10/31/2018
RSIP-003	EMERGENCY ACTIONS	1	A	10/31/2018
RSIP-004	EMERGENCY PREPAREDNESS TRAINING	1	A	10/31/2018
RSIP-005	EMERGENCY PREPAREDNESS SURVEILLANCE PROGRAM	1	A	10/31/2018

EFFECTIVE DATE: 10/31/2018

REVISION SUMMARY:

Emergency Plan revised to remove requirements related to 10 CFR 50 and incorporate audit recommendations.

REASON FOR CHANGE:

1. Emergency Plan administrative changes such as organization and position titles.
2. Changes to the Emergency Plan which reflect the termination of the 10 CFR Part 50 license include:
 - Renaming to Rancho Seco ISFSI Emergency Plan
 - Deleting references to 10 CFR 50
 - Deleting the Part 50 Emergency Planning Zone
 - Deleting the Part 50 Emergency Action Levels (EALs)
 - Updating Reporting requirements based upon Part 72 only
 - Changed Emergency Communication System Test requirement from quarterly (required under Part 50) to semiannually (required by Part 72)
 - Revised Emergency Classification and EAL from "ISFSI Alert" to "Alert"
3. Updated nearest population center.
4. Clarifying requirements for Drills and Exercises based upon audit recommendation.

**THIS PROCEDURE IS ISSUED FOR INFORMATION ONLY
AND SHALL NOT BE USED FOR WORK OR DESIGN.**

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1.0 INTRODUCTION

This document describes Sacramento Municipal Utility District's (SMUD's) plan for responding to emergencies that may occur at Rancho Seco while the used fuel and the greater than Class C waste (GTCC) are in dry storage at the Independent Spent Fuel Storage Installation (ISFSI).

1.1 SCOPE

This plan outlines response actions necessary to safeguard site personnel and equipment in the event an emergency involves, or potentially involves, the release of radioactive material or creates a site wide personnel safety hazard during activities and emergencies that may occur at Rancho Seco (SFSI).

It is SMUD's policy to maintain all radiation exposure as low as reasonably achievable (ALARA). This concept applies to occupationally exposed personnel and to the general public. The Rancho Seco Emergency Plan has incorporated ALARA practices, and is written to deal with emergency conditions where ALARA concerns could be greater than normal.

Major topics of the plan include:

- Facility and near site description.
- Types and detection of accidents.
- Classification system for emergency events.
- Organizational response to emergencies.
- Assessment and mitigating actions.
- Notification procedures.
- Offsite response organization functions, notification and coordination.
- Emergency facilities and equipment.
- Training drills and exercises.
- Maintaining emergency preparedness.

1.2 REGULATORY REQUIREMENTS

This Plan meets the requirements established by, and described in, **10 CFR Part 72** "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste and Reactor-Related Greater Than Class C Waste," Section 72.32(a), "Emergency Plan".

1.3 STATE OF CALIFORNIA NUCLEAR EMERGENCY PLANNING REQUIREMENTS

California Health And Safety Code, Division 104, Part 9, Chapter 4, , §114650-114685, The Radiation Protection Act of 1999, requires joint Utility, State and Local government emergency planning for plume and ingestion pathways associated with nuclear power plants.

Rancho Seco has all of its spent nuclear fuel and GTCC waste in dry storage at the ISFSI. Therefore, Rancho Seco is not required to meet the requirements of The Radiation Protection Act of 1999.

1.4 HAZARDOUS CHEMICALS – RIGHT TO KNOW

SMUD submits a Hazardous Materials Business Plan for the Rancho Seco facility to Sacramento County Environmental Management Department annually. The submittal includes hazardous material information specific to Rancho Seco. The Hazardous Materials Business Plan is available for use during emergency response activities. The Hazardous Materials Business Plan satisfies the requirements of the Emergency Planning and Community Right-to-Know Act of 1986, Title III, Pub. L. 99-949, with respect to hazardous materials.

1.5 SITE AND NEAR SITE DESCRIPTION

Rancho Seco is located in Sacramento County in the State of California, 25 miles southeast of the City of Sacramento, and 26 miles northeast of the City of Stockton.

The site occupies approximately 14 acres of the SMUD-owned 2480 acres, which is flat to rolling terrain. The Sierra Nevada Mountain Range is located to the east, with the Pacific Coast Range to the west. Rancho Seco is approximately 26 miles north-northeast of Stockton and 25 miles southeast of Sacramento, the two largest cities within a 50-mile radius of the site. The nearest population center of 25,000 or more is the city of Elk Grove, which is about 11 miles northwest of the site. State Route 104 runs north of the site in an east-west direction. Route 104 connects with U.S. Route 99 and Interstate 5 to the west, and State Routes 88 and 12 to the east.

The area near the site is sparsely populated and is used primarily as grazing land and grape vineyards. SMUD also maintains the Cosumnes Power Plant, a gas fired, 500-megawatt facility immediately south of Rancho Seco and a 10-megawatt solar plant located outside of the Industrial Area fence. The only public use facility within a 5-mile radius of the site is the Rancho Seco Reservoir and Recreation Area, which is located approximately 1 mile to the

southeast of the site, and is within the land owned by SMUD.

The climate near Rancho Seco is typical of the central valley of California. No indication of geological faulting is present at the site.

Maps of the site and near site areas are shown in Figures 1-1 and 1-2.

1.6 ISFSI DESCRIPTION

The Rancho Seco ISFSI design provides temporary dry storage for 100% of Rancho Seco's spent fuel and GTCC waste. It is designed with safety features that eliminate the need for an operable spent fuel pool to recover from unlikely accident scenarios. The spent fuel and GTCC waste will be stored in this manner until the Department of Energy accepts it.

The ISFSI Protected Area (PA) consists of a concrete slab approximately 225 feet long, 170 feet wide, and 2 feet thick below the Horizontal Storage Modules (HSM). There are 22 HSMs on the concrete slab. A double security fence surrounds the slab.

The ISFSI PA is bounded by the ISFSI Emergency Planning Zone nuisance fencing surrounding the ISFSI PA at approximately 100 meters in all four directions.

1.7 RELATED PLANS, PROGRAMS AND PROCEDURES

1.7.1 The Rancho Seco Emergency Plan and Emergency Plan implementing procedures (RSIP-003, RSIP-004, and RSIP-005) have been coordinated with the ISFSI Physical Protection Plan to ensure site personnel safety during a security event.

1.7.2 Provisions for radiological control at Rancho Seco are described in the Radiation Control Manual.

1.7.3 Initial mitigating actions for most emergency situations are provided by SMUD response procedures. SMUD response procedures work in conjunction with the Emergency Plan implementing procedures (RSIP-003, RSIP-004, and RSIP-005).

1.7.4 Response to control and cleanup of chemical and hazardous wastes are in accordance with SMUD administrative and departmental procedures.

1.8 GOVERNMENTAL AGENCIES

The following governmental agencies interface with Rancho Seco in the emergency planning process:

1.8.1 Sacramento County Office of Emergency Services (OES)

The Sacramento County OES is the lead emergency response agency within the County and has the role of coordinating emergency activities within Sacramento County as the Sacramento Operational Area.

For significant emergencies the Sacramento Operational Area Emergency Operations Center (EOC) may be activated. Emergency notifications to Sacramento County OES are conducted as specified in Section 5.2 of this Plan.

1.8.2 California Governor's Office of Emergency Services (Cal OES)

Cal OES has authority and responsibility for planning and coordination of the State response to nuclear power plant emergencies.

Responsibilities of Cal OES include providing assistance to local governments by alerting state agencies, coordinating state resources, requesting and coordinating federal assistance identified in the Federal Radiological Emergency Response Plan, and coordinating state radiological monitoring.

Under the Standardized Emergency Management System (SEMS), an emergency may warrant activation of the Regional Emergency Operations Center (REOC) and/or the State Emergency Operations Center (SEOC). Emergency notifications to the State Operations Center are conducted as specified in Section 5.2 of this Plan.

1.8.3 California Department of Health Services

California Department of Health Services has overall responsibility for the state's technical assessment of accidents involving the release of radioactive material from nuclear power plants to the environment within the State. State OES coordinates the activities of California Department of Health Services.

1.8.4 United States Nuclear Regulatory Commission (NRC)

During a radiological emergency the NRC ensures that the public health and safety are protected and may provide technical assistance onsite and assessment information and recommendations to state and local officials. Emergency notifications to the NRC Operations Center are conducted as specified in Section 5.2 of this Plan.

1.8.5 Sacramento County Sheriff's Department (SCSD)

SCSD is the primary local law enforcement agency (LLEA) designated to respond and assist with security incidents at Rancho Seco and the ISFSI.

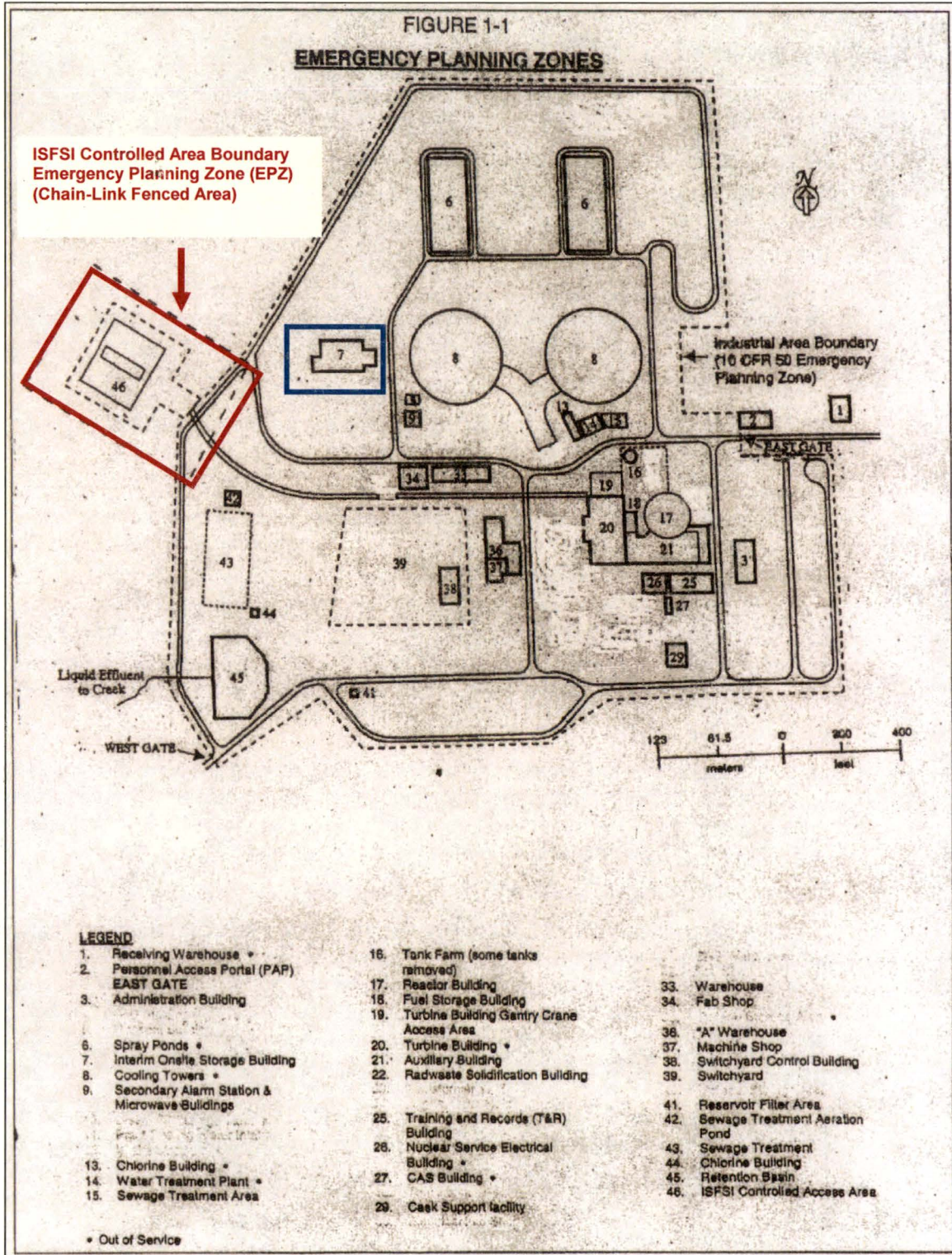
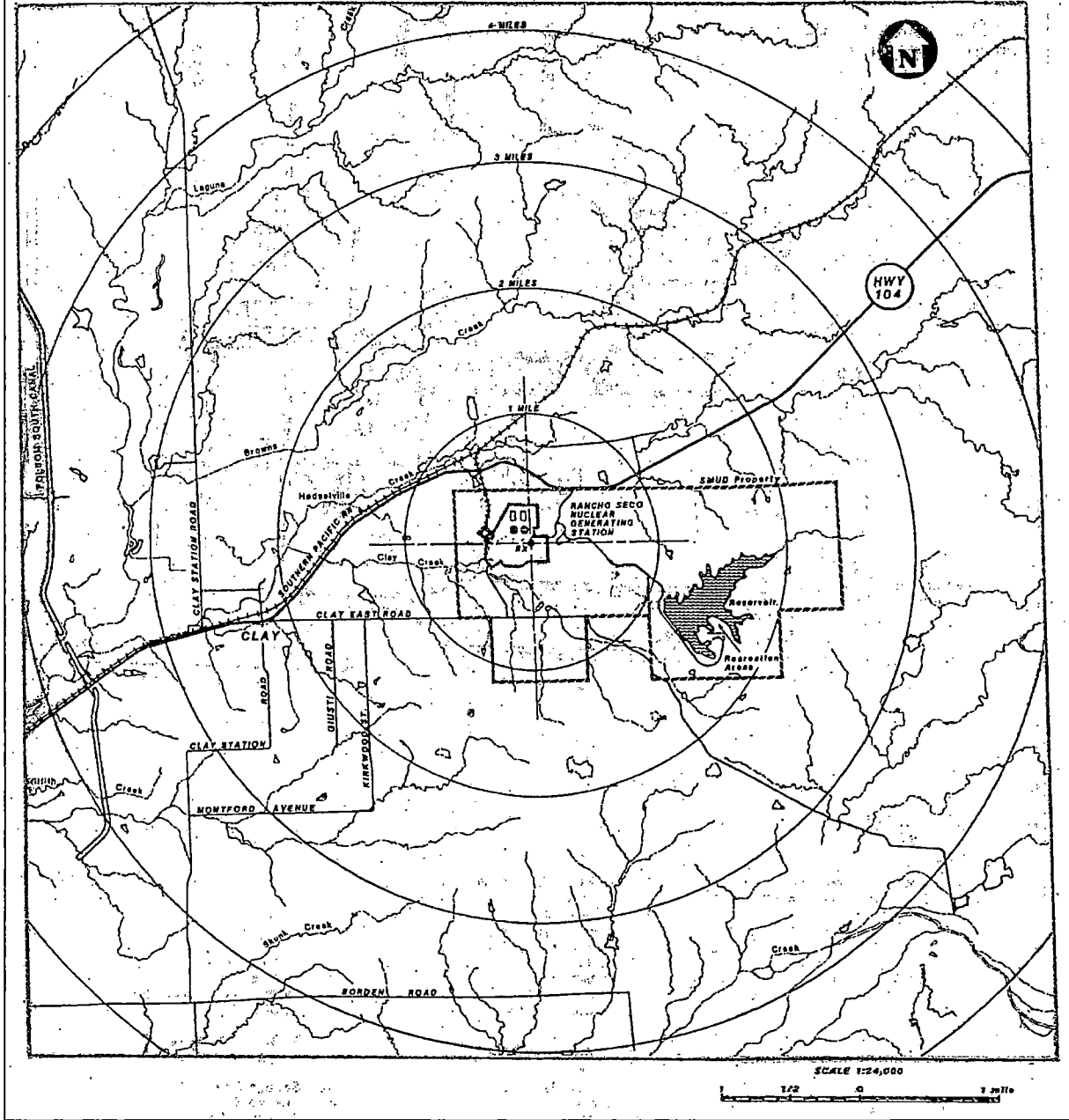


FIGURE 1-2
RANCHO SECO - NEAR SITE



2.0 TYPES OF ACCIDENTS

The consequences of potential accidents were considered in the development of the emergency preparedness program for Rancho Seco. These potential accidents are analyzed in the ISFSI Final Safety Analysis Report (ISFSI SAR) and form the basis for the response described in this plan.

- Dry Shielded Canister (DSC) Leakage
 - Vol. I, Section 8.2.2 DSC Leakage, analyzes a DSC leakage accident. The analysis concludes that no credible condition can breach the DCS shell or the double seal welds at each end of the DSC. Therefore, an EAL on DSC leakage is not needed.
- Accident Pressurization of a DSC
 - Vol. I, Section 8.2.3, Accident Pressurization, analyzes an accident pressurization of the DSC. The analysis of the DSCs for the accident pressurization load shows that no significant deformations occur to the DSC which could prevent retrieval from the Horizontal Storage Module (HSM) or, inhibit normal transport or on-site transfer operation. In addition, the DSC pressure boundaries are analyzed to withstand the accident internal pressure to prevent release of any radioactive materials to the environment. Therefore, an EAL for Accident Pressurization is not necessary.
- Earthquake
 - Vol. I, Section 8.2.4; Vol. II, Section 8.3.2 and Vol. III, Section 8.3.2, analyze an earthquake event and all three sections state that overturning due to the design basis seismic event will not occur. Therefore an Earthquake EAL specific to the ISFSI, HSM or DSC is not necessary.
- Fire
 - Vol. I, Section 8.2.5 analyzes the effect of a fire involving 300 gallons of diesel fuel and states that direct engulfment of the HSM or DSC during storage in the HSM is not a credible event. Therefore, a Fire EAL for storage of spent fuel in the HSMs is not necessary.
- Tornado winds and tornado generated missiles
 - Vol. II, Section 8.3.1 and Vol. III., Section 8.3.1 analyze tornado and tornado generated missiles and state that the cask is designed to withstand the tornado wind and tornado missile loads without damage to the containment structure. Therefore, an EAL specific to the ISFSI, HSM or DSC is not necessary.
- Flood
 - Vol. II, Section 8.3.3 and Vol. III., Section 8.3.3 analyze design basis flood and state that no corrective actions are required in the event of a flood. Therefore, an EAL for a flood is not required.

- Lightning effects
 - Vol. II., Section 8.3.4 and Vol. III., Section 8.3.5 analyze lightning events and states the likelihood of lightning striking the HSM and causing an off-normal condition is not considered to be a credible event. Also there are no radiological consequences. Therefore, an EAL specific to the ISFSI, HSM or DSC is not necessary.
- Complete blockage of HSM Air inlet and outlet vents
 - Vol. II, Section 8.3.5, analyzes the consequences of complete blockage of HSM air inlet and outlet vents and causing an off-normal condition is not considered to be a credible event. Therefore, an EAL specific to the blockage of HSM air inlet and outlet vents is not necessary.
- Reduced HSM Air Inlet and Outlet Shielding
 - Vol. II., Section 8.3.6, analyzes the consequences of Reduced HSM Air Inlet and Outlet Shielding. The analysis shows that there are no radiological or thermal consequences. An EAL for reduced HSM air inlet and outlet shielding is not needed.
- Snow and ice loads
 - Vol. II., Section 8.3.7, analyzes the consequences of snow and ice loads. The SAR states that snow and ice loads are not required for Rancho Seco Site. Therefore, an EAL for snow and ice loads is not required.
- Accidental Drop
 - Drop of the MP-187 Cask, containing a DSC, during transfer operations has been evaluated using a bounding 80 inch drop. (Ref. Volume I, Section 8.2.1, ISFSI SAR). DSC integrity is not compromised by the bounding drop. Therefore, an EAL specific to the ISFSI is not necessary. However, conservatively, an EAL for a severe man-made incident is included in the Alert EALs as described in Section 3 of the Plan.

2.1 DETECTING ACCIDENTS

- 2.1.1 Due to the relatively passive status of the facility, detection of abnormal conditions or accidents occurs early by workers involved in and around the tasks being performed, based on visual, audible, and other sensory observations.
- Site personnel notify telephone extension 4311 of abnormal or unsafe conditions. This phone is answered at the Primary Alarm Station. All personnel who are granted unescorted access authorization within the Emergency Planning Zone receive General Employee Training, which stresses telephoning 4311 to report any emergency or abnormal conditions.
- 2.1.2 Fixed and portable instrumentation may be used to detect abnormal conditions.
- 2.1.3 On-shift personnel are made aware of abnormal conditions or of other dangers during long-term storage activities, by the Siemens System indications and

annunciators.

- 2.1.4 The Rancho Seco ISFSI Technical specifications, Section 5.5.2, Radiological Environmental Monitoring Program, states: "Operation of the Rancho Seco ISFSI will not create any radioactive materials or results in any credible liquid or gaseous effluent release." Accordingly, no (effluent) monitoring or alarms are required at the ISFSI. Monitoring Badges will be utilized for monitoring direct radiation at the ISFSI as part of the Radiological Environmental Monitoring Program (REMP).

3.0 EMERGENCY CLASSIFICATION OVERVIEW

The Emergency Plan and Emergency Plan implementing procedures (RSIP-003, RSIP-004, and RSIP-005) have been established to respond to emergencies at Rancho Seco. Actions for classifying emergencies and responding to the emergency conditions through pre-designated actions are conducted in accordance with RSIP-003, "Emergency Actions".

3.1 EMERGENCY CLASSIFICATION SYSTEM

3.1.1 Initiating Conditions

Generic abnormal site events or conditions, which form the basis for initiating specific Emergency Action Levels.

3.1.2 Emergency Action Levels (EALs)

Site specific system, effluent or personnel safety off-normal parameter values that, if exceeded, will initiate an emergency classification.

The accidents described in Section 2.0, "Types of Accidents", of this plan, are used as a basis for specific EALs.

3.1.3 ISFSI Classification Level:

Alert

An incident indicated by abnormal or accident conditions associated with the Rancho Seco ISFSI.

An Alert is an event that affects the integrity of ISFSI structures or creates a safety hazard to personnel, or a security event that has serious consequences.

The primary purpose for declaration of an Alert is to notify internal staff, emergency responders and regulatory agencies that an atypical situation exists. Declaration of an Alert brings SMUD and external agencies to a state of readiness and provides a systematic handling of incident information and decision-making to mitigate the incident.

The EALs for an Alert are listed in Table 3-1.

**TABLE 3-1
EAL -ALERT**

1. A severe man-made incident or natural phenomenon, which affects the integrity of ISFSI structures or creates a significant personnel safety hazard. (For example: explosions or aircraft crash.)
2. Communications with security supervision has confirmed the seriousness or credibility of any of the following events in accordance with the Rancho Seco ISFSI Physical Protection Plan:
 - Bomb attack or terrorist threat made against Rancho Seco
 - Internal or external civil disturbance related to the storage of nuclear materials
 - Actual or probable sabotage
 - Attempted theft of special nuclear material
3. Emergency Coordinator's discretion for other conditions within the ISFSI that require the assistance of external emergency responders to evaluate and mitigate the incident to safeguard the public and environment.

4.0 ORGANIZATIONAL CONTROL OF EMERGENCIES

4.1 SCOPE

This section describes the Emergency Response Organization (ERO), typical staffing, basic duties, responsibilities, and support services during response to an emergency.

4.2 NORMAL SMUD ORGANIZATION

The overall SMUD organization is shown in the ISFSI Final Safety Analysis Report (ISFSI SAR). The Chief Executive Officer & General Manager administers the affairs of SMUD under the policies of the elected Board of Directors. The Chief Executive Officer & General Manager, through the Chief Energy Delivery Officer and Director, Power Generation have corporate responsibility for the overall safety and management of the Rancho Seco ISFSI. Upon request from the Emergency Coordinator, the Chief Executive Officer & General Manager directs SMUD resources to provide support and outside assistance. The Manager, Rancho Seco Assets is responsible for the activities at Rancho Seco and provides policy oversight to the Emergency Coordinators.

4.2.1 Rancho Seco Shift Staffing

4.2.1.1 Security Shift Supervisor

This position is the senior Rancho Seco person on-shift and their responsibilities include:

- ISFSI security oversight
- Supervision of on-site Security Officers
- Rancho Seco Emergency Plan implementation

4.2.1.2 On-shift Security Officers

The on-shift Security Officers report to the Security Shift Supervisor and are responsible for maintaining onsite security in accordance with the Rancho Seco ISFSI Physical Protection Plan.

4.3 EMERGENCY ORGANIZATION

4.3.1 The Emergency Response Organization (ERO) consists of on-shift staff, augmented responders, SMUD resources, and external emergency responders. This organizational structure is described below. The ERO is shown on Figure 4-1 and Figure 4-2.

4.3.1.1 On-shift Emergency Response Organization

- On-shift Security Shift Supervisor
- On-shift Security Officer(s)

- SMUD Security Operations Dispatcher
- Other onsite personnel may be enlisted to assist in responding to the event.

4.3.1.2 Augmented Emergency Response

The augmented ERO staff is notified of the emergency to support and assist the on-shift staff in the response to the activation of the Rancho Seco Emergency Plan. This staff is available to respond and coordinate the Rancho Seco response with internal SMUD resources and external agencies.

The SMUD Emergency Preparedness group maintains an on-call duty officer to coordinate emergency and disaster response for SMUD. When an emergency is declared, the on-call duty officer fulfills the following function:

- Offsite Agency Liaison- responsible for gathering and interpreting information related to the emergency, notification and communications with outside agencies.

4.3.1.3 SMUD Emergency Operations Center (EOC):

The SMUD Emergency Operations Center provides overall direction, support and coordination on-behalf of the SMUD Chief Executive Officer & General Manager.

The SMUD EOC consists of staff from throughout the organization to evaluate, communicate, and mitigate events utilizing the California Standardized Emergency Management System (SEMS) and National Incident Management System (NIMS).

The SMUD EOC is activated once an emergency has been declared, remaining activated until the emergency is closed out.

4.3.1.4 Local Offsite Agency Assistance:

The Sacramento County Sheriff's Department provides the primary local law enforcement response for the area, assuming the role of law enforcement incident commander for criminal events. Through their cooperative and mutual aid agreements, the Sheriff's office is supported by numerous other law enforcement agencies at the local, state, and federal level.

The Herald Fire Protection District provides the primary fire and rescue response for the area, assuming the role of fire incident commander for fire department related events. Through mutual aid agreements, the Herald Fire Protection District is supported by numerous other fire agencies at the local, state, and federal level.

The Cosumnes Community Services District provides the primary medical and hazardous materials team response for the area, assuming

a critical role in emergency medical and hazardous materials related events. Through mutual aid agreements, the Cosumnes Community Services District is supported by numerous other fire, ambulance and hazardous materials resources at the local, state, and federal level.

The University of California, Davis Medical Center provides the primary trauma center and radiological response hospital for the area, assuming the patient care duties.

4.3.2 Emergency Coordinator Delegation of Authority

The Manager, Rancho Seco Assets, as the senior Rancho Seco staff member, serves as the primary Emergency Coordinator for the implementation of the Rancho Seco Emergency Plan.

In the event the Manager, Rancho Seco Assets, is unavailable onsite, the following delegation of authority determines who assumes the role of Emergency Coordinator from those staff available onsite:

1. On-Shift Security Shift Supervisor,
2. Other trained Emergency Coordinator (See the Emergency Response Telephone Directory for delegation list),

4.3.3 Emergency Coordinator Duties

Until relieved by the Manager, Rancho Seco Assets:

- 4.3.3.1 Assume overall control and direction of the incident
- 4.3.3.2 Classify the incident as an emergency.
- 4.3.3.3 Request activation of the Augmented ERO.
- 4.3.3.4 Conduct incident assessment.
- 4.3.3.5 Initiate mitigation and protective measures.
- 4.3.3.6 Request offsite emergency response assistance.
- 4.3.3.7 Direct action to mitigate the consequences of the incident.
- 4.3.3.8 Assume or delegate additional actions as necessary.
- 4.3.3.9 Authorize Emergency Exposure Limits and exemptions for emergency workers, as necessary.
- 4.3.3.10 Initiate Restoration activities, as appropriate.
- 4.3.3.11 Closeout the emergency.

4.3.4 Security Officer(s) Duties

Under the direction of the Security Shift Supervisor:

- 4.3.4.1 Maintain physical security per the ISFSI Physical Protection Plan.

- 4.3.4.2 Perform response actions as directed by the Emergency Coordinator with the approval of the Security Supervisor.

4.3.5 Offsite Agency Liaison

Under the direction of the Emergency Coordinator:

- 4.3.5.1 Acquire and maintain necessary equipment and supplies during the emergency.
- 4.3.5.2 Assume responsibilities for required notifications and communications to the State of California, Sacramento County, and NRC.
- 4.3.5.3 Maintain a log and record of all emergency related communications.
- 4.3.5.4 Maintain an open telephone line with the NRC, as requested by the NRC.
- 4.3.5.5 Coordinate and maintain liaison duties with offsite agencies.
- 4.3.5.6 Maintain and document key information related to the emergency response.
- 4.3.5.7 Post incident: gather and package all incident documentation and provide to the Manager, Rancho Seco Assets.

4.3.6 Security Shift Supervisor

Under the direction of the Emergency Coordinator:

- 4.3.6.1 Maintain physical security per the ISFSI Physical Protection Plan.
- 4.3.6.2 Perform response actions as directed by the Sacramento Sheriff's Department and Emergency Coordinator.
- 4.3.6.3 Coordinate the security response to the emergency.

4.3.7 Augmented Emergency Response On-call Requirements

In order to successfully implement the provisions of the Rancho Seco Emergency Plan, the augmented emergency response must be available and fit for duty to conduct assigned activities under this plan. When serving on-call, the augmented ERO must be reachable by the communications mechanism identified in the Emergency Response Telephone Directory, and respond to a declared emergency as follows:

- 4.3.7.1 Within 30 minutes acknowledge the activation and be capable of carrying out duties identified in this plan.
- 4.3.7.2 Within 2 hours respond to the Rancho Seco site, SMUD EOC in Sacramento, or a Command Post in the Herald area, as determined at the time of the incident.

4.4 ISFSI CLOSEOUT AND RESTORATION ACTIVITIES

The Emergency Coordinator is responsible for closeout of emergencies, which includes determining if the incident is under control and the consequences have been mitigated. After closeout, restoration activities are initiated, as required, to return the ISFSI to a safe condition. ISFSI Closeout and Restoration activities are to be conducted in coordination with local, state and federal responders and regulators.

4.5 SUPPORT SERVICES

An emergency will likely warrant the utilization of offsite organizations and agencies. As a result, support service arrangements have been made with specific offsite organizations and agencies to provide aid in the event of an emergency at Rancho Seco.

4.5.1 Local Support services

Resources encompass the local, state and federal agencies located in the area. Under the California Master Mutual Aid Agreement, Rancho Seco has the ability to access these resources for assistance. Local emergency response agencies can be contacted via 9-1-1. Access to local, state, and federal resources is through the California Office of Emergency Services Warning Center.

SMUD is also a participant in the Sacramento County Operational Area Agreement as part of the Standardized Emergency Management System and National Incident Management System, providing additional resources as necessary.

4.5.2 Medical Support

4.5.2.1 Site personnel will call 9-1-1 when helicopter or ambulance and associated Emergency Medical Service assistance is required.

4.5.2.2 Cosumnes Community Services District, located approximately 15 miles southwest of the site, is the primary responder to medical emergencies at Rancho Seco. Initial medical response may be available from the Herald Fire Department, located approximately 8 miles southwest of the site.

4.5.2.3 Site staff will provide radiological information, dosimetry, and escort services to offsite medical assistance personnel upon arrival on site, as necessary.

4.5.3 Fire Suppression Support

4.5.3.1 Site personnel will call 9-1-1 when fire suppression support is required.

4.5.3.2 Herald Fire Protection District, located approximately eight miles southwest of the site, is the primary responder to fires at Rancho Seco.

4.5.3.3 Site staff will provide radiological information, dosimetry, and escorts (as needed) to offsite fire suppression personnel upon arrival on site.

4.5.4 Law Enforcement Support

4.5.4.1 Sacramento County Sheriff's Department, FBI, and/or other law enforcement agencies, may be requested to assist Rancho Seco Security

in accordance with the Rancho Seco ISFSI Physical Protection Plan.

1. The purpose of this document is to provide a detailed description of the physical protection measures for the Rancho Seco ISFSI.

1.1. Physical Protection Measures

- 1.1.1. Access Control: All access to the facility shall be controlled through a secure perimeter fence with a single access point. Access shall be restricted to authorized personnel only.
- 1.1.2. Perimeter Security: The perimeter fence shall be a minimum of 6 feet high and constructed of chain-link fencing. The fence shall be topped with a single strand of barbed wire.
- 1.1.3. Security Patrols: Security personnel shall conduct regular patrols of the perimeter fence and the facility grounds.
- 1.1.4. Surveillance: The facility shall be equipped with a video surveillance system that provides 24-hour coverage of the perimeter and the facility grounds.
- 1.1.5. Alarm System: The facility shall be equipped with an alarm system that detects unauthorized access to the perimeter fence and the facility grounds.
- 1.1.6. Security Personnel: Security personnel shall be trained in the use of firearms and in the handling of emergency situations.
- 1.1.7. Security Procedures: Security personnel shall follow established security procedures, including the use of search dogs and the use of metal detectors.
- 1.1.8. Security Training: Security personnel shall receive regular training in the use of firearms and in the handling of emergency situations.
- 1.1.9. Security Equipment: Security personnel shall be equipped with the necessary equipment, including firearms, radios, and first aid kits.
- 1.1.10. Security Records: Security personnel shall maintain accurate records of all security activities, including access logs, patrol logs, and incident reports.

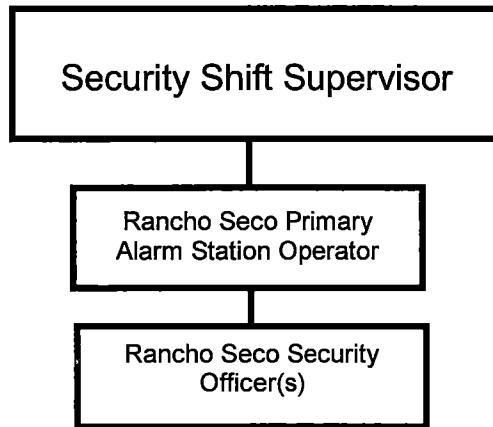
1.2. Emergency Response Procedures

- 1.2.1. Emergency Response Plan: The facility shall have an emergency response plan that outlines the procedures to be followed in the event of an emergency.
- 1.2.2. Emergency Drills: The facility shall conduct regular emergency drills to ensure that all personnel are familiar with the emergency response procedures.
- 1.2.3. Emergency Communication: The facility shall have a reliable communication system that allows for the rapid dissemination of emergency information.
- 1.2.4. Emergency Evacuation: The facility shall have a clear evacuation route and a designated assembly point for all personnel.
- 1.2.5. Emergency Response Team: The facility shall have an emergency response team that is trained in the handling of emergency situations.
- 1.2.6. Emergency Response Equipment: The facility shall be equipped with the necessary equipment for emergency response, including first aid kits, fire extinguishers, and emergency lighting.
- 1.2.7. Emergency Response Training: All personnel shall receive regular training in the handling of emergency situations.
- 1.2.8. Emergency Response Records: The facility shall maintain accurate records of all emergency response activities, including drills, incidents, and equipment maintenance.

FIGURE 4-1

RANCHO SECO ORGANIZATION

ON-SHIFT NORMAL OPERATIONS



RANCHO SECO EMERGENCY RESPONSE OPERATIONS ORGANIZATION

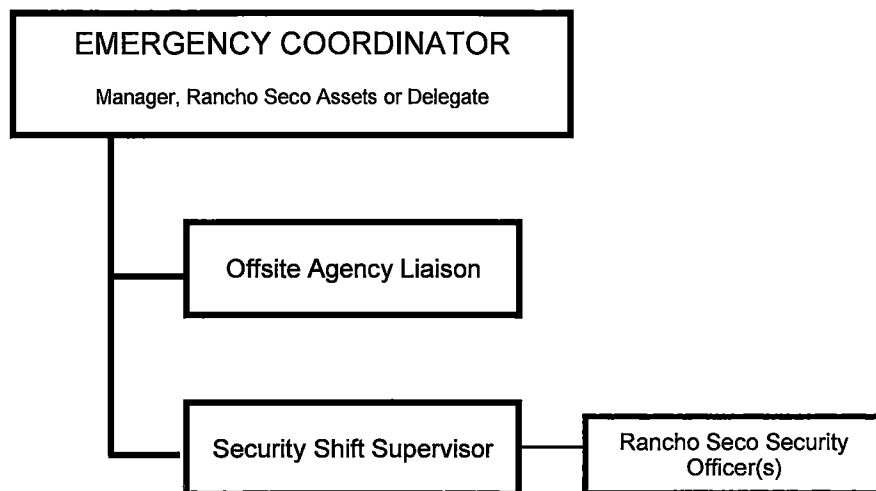
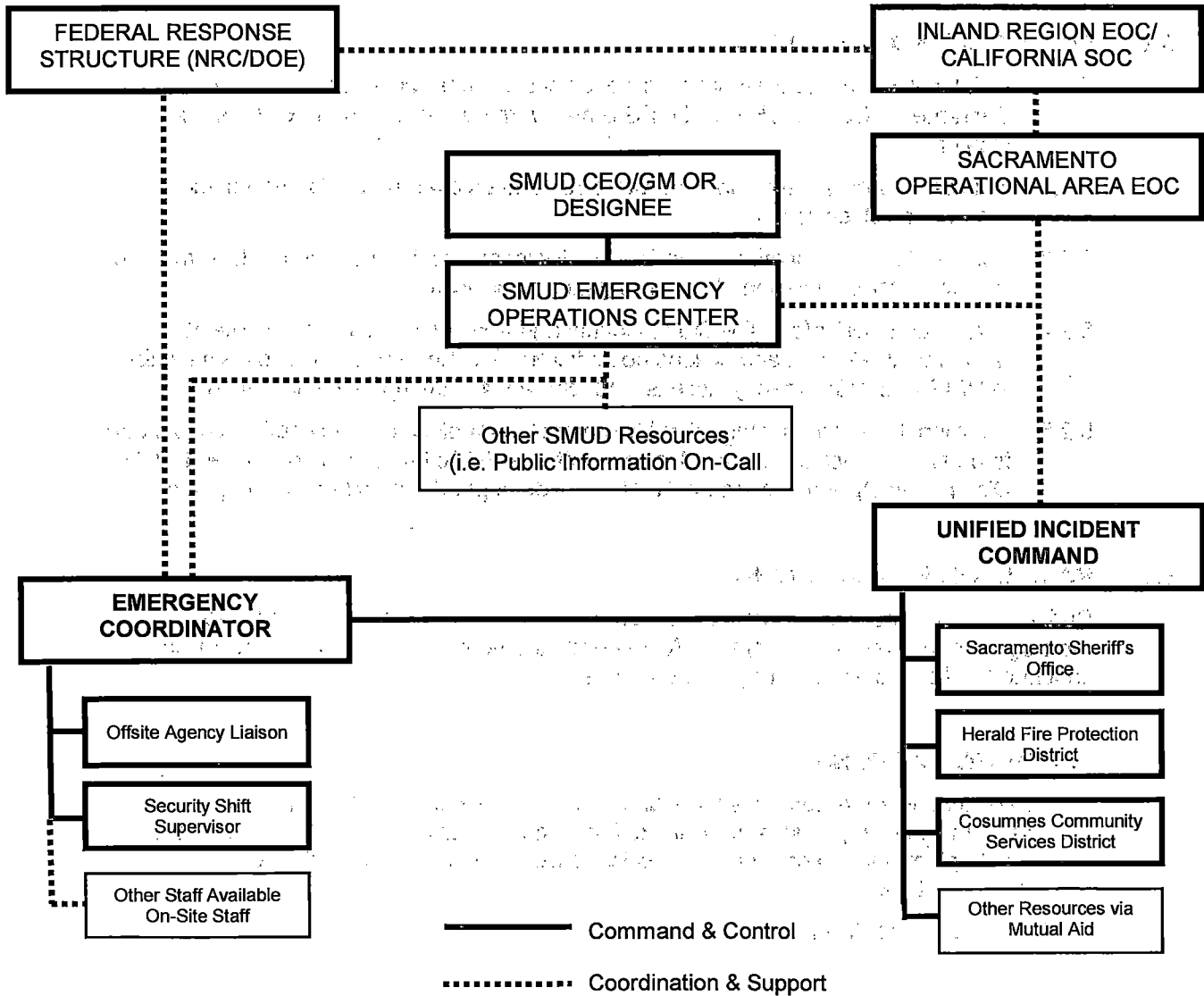


FIGURE 4-2

COORDINATED EMERGENCY RESPONSE STRUCTURE



5.0 EMERGENCY MEASURES

5.1 SCOPE

Emergency measures will be initiated upon classification of an emergency. Initial mitigating response to most events will be in accordance with departmental and SMUD response procedures. The augmented emergency response will be activated as described in Section 4.0.

This section identifies:

- 5.1.1 Methods and procedures for assessment actions.
- 5.1.2 Protective actions to minimize radiological exposure.

5.2 EMERGENCY NOTIFICATIONS

- 5.2.1 Initial, follow-up and closeout emergency notifications will be transmitted to Sacramento County OES, Cal-OES State Warning Center, and NRC Operations Center.
- 5.2.2 Notifications must be completed within 60 minutes after the declaration of the emergency classification.
- 5.2.3 The NRC shall be notified immediately after local jurisdictions, and not later than 60 minutes after declaration of the emergency classification.
- 5.2.4 Notifications will inform the State, County and NRC of the status of the event, radiological releases and actions being taken. The notification process is described in RSIP-003, "Emergency Actions", Attachment 4, "Emergency Notifications".
- 5.2.5 Appropriate SMUD personnel will be contacted for all emergency notifications made to outside agencies. SMUD Management, the Public Information group, and SMUD Distribution Operations are notified to provide support from other SMUD groups.

5.3 RADIOLOGICAL MONITORING

During the initial phase of an emergency, on-shift personnel will review and monitor radiological conditions as warranted. As needed, augmented personnel will accomplish continued radiological monitoring as they arrive.

5.4 PROTECTIVE ACTIONS

Protective actions are emergency measures taken for the purpose of notifying onsite personnel and initiating actions to minimize their exposure to radiological or general safety hazards. Implementation criteria for protective actions are listed in the RSIP-003, "Emergency Actions".

- 5.4.1 Onsite Protective Actions

5.4.1.1 Onsite notification of an emergency

At the declaration of an emergency, a radio system announcement will be broadcast to onsite personnel to notify them of the emergency and any instructions necessary.

5.4.1.2 Site Dismissal during Emergencies

A Dismissal is the evacuation process of directing non-emergency response personnel to leave site when their safety is of concern. A Dismissal may be conducted at the discretion of the Emergency Coordinator as a protective or precautionary measure due to existing, or potential emergencies, including: radiological hazards, physical safety hazards, terrorism incident, or a hazardous material release resulting from an emergency event.

Personnel will be Dismissed out the East gate and remain in the parking area for further instructions.

5.4.1.3 Accountability during Emergencies

Accountability of onsite personnel must be performed when a Dismissal has been conducted. When accountability is complete, Search and Rescue Teams will be assembled and dispatched to locate any personnel who are identified as missing.

5.4.2 Radiation Exposure Control

Normal administrative radiation exposure limits established in RSNAP-303, Exposure Limits and Extensions will be used for emergency response except as specified below:

5.4.2.1 Radiation Protection Exemptions during emergencies:

If the Manager, Rancho Seco Assets is present, Radiation Protection Exemptions may be implemented with the approval of the Emergency Coordinator/Incident Commander for Emergency Response personnel.

These exemptions allow varying from certain aspects of established radiological controls procedures under the direction and control of the Manager, Rancho Seco Assets. Radiation Protection Exemptions are implemented as specified in RSIP-003, "Emergency Actions", Attachment 6, "Radiation Protection Exemptions".

5.4.2.2 Emergency Exposure Limits

The Emergency Coordinator may authorize emergency exposure limits for Emergency Response personnel, in accordance with the RSIP-003, "Emergency Actions", Attachment 7 "Emergency Exposures".

5.4.3 Fire

Responses to fires will be performed as described in SMUD procedures.

5.4.4 Security Contingency

Response to security contingencies is conducted in accordance with the Rancho Seco Emergency Plan, SMUD Security Procedures, and the Rancho Seco ISFSI Physical Protection Plan. Security response and emergency response are coordinated to protect personnel during response activities.

5.4.5 Medical

Response to injuries to personnel onsite that require first aid will be conducted in accordance with departmental response procedures.

5.4.5.1 If the injury involves radioactive contamination, radiation monitoring personnel will be dispatched in accordance with RSIP-003, "Emergency Actions".

5.4.5.2 Emergency medical supplies are available at various locations throughout Rancho Seco for response to medical emergencies.

5.4.5.3 Medical support will be requested from offsite support agencies as specified in SMUD procedures.

5.5 REPORTS

A written follow-up report may need to be submitted to NRC within 60 days following an Initial Emergency Notification, as specified in RSNAP-093, External Plant Reports and Posting of Notices.

6.0 EMERGENCY FACILITIES AND EQUIPMENT

6.1 SCOPE

This section describes the onsite facilities, equipment and supplies that are maintained for use during response to an emergency.

6.2 ONSITE EMERGENCY RESPONSE FACILITIES AND EQUIPMENT

6.2.1 Primary Alarm Station (PAS)

The Primary Alarm Station (PAS) is located near the ISFSI, and contains communications equipment used for making emergency notifications.

6.2.1.1 Procedure manuals are accessible (as necessary) in the Primary Alarm Station.

Examples include:

- Emergency Plan and Implementing Procedures
- Operating Procedures Manuals

6.2.2 Technical Support Center

The Technical Support Center is available for use when an emergency is declared. The TSC is maintained by Emergency Preparedness staff.

6.2.3 Radiation Monitoring Instruments and supplies are located onsite. The equipment is reserved for emergency response use only.

6.2.4 Medical Supplies and Equipment:

6.2.4.1 Medical supplies and equipment for first aid are located throughout the facility and are clearly identified.

6.3 OFFSITE EMERGENCY RESPONSE FACILITIES

6.3.1 Emergency Operations Center

SMUD maintains an Emergency Operations Center (EOC) for coordination of SMUD-wide emergencies. This organization is tasked with overall direction and information management for major emergencies in accordance with the Standardized Emergency Management System (SEMS) used in California to direct and coordinate emergencies by participating agencies.

6.4 ONSITE WARNING SYSTEMS

6.4.1 Emergency Alert Notification

A number of communications systems may be utilized to alert site workers. These systems include, but are not limited to: portable radios, pagers, portable megaphones, building fire alarms, vehicle public address systems, and/or word-of-mouth notification.

6.5 MISCELLANEOUS MONITORING SYSTEMS

6.5.1 Siemens System

The Siemens System displays and annunciates site-monitoring data.

6.5.2 Fire Protection Devices

Fire protection at the Rancho Seco facility is provided in accordance with the SMUD fire protection program.

6.5.3 Seismic Data

Seismic data is obtained from State or Federal agencies.

7.0 MAINTAINING EMERGENCY PREPAREDNESS

7.1 SCOPE

To assure the maintenance of emergency preparedness, an integrated program has been developed and includes:

- Training, drills, and exercises
- Emergency Plan and Rancho Seco implementing procedures (RSIP-003, 004, 005) reviews and revisions
- Surveillance program
- Biennial audits

Maintaining and updating the emergency preparedness program is the responsibility of the Director, Facilities and Security Operations.

7.2 TRAINING

The Emergency Preparedness Group is responsible for developing, scheduling, and conducting emergency response training.

7.2.1 General Training

All personnel who are granted unescorted access authorization to the licensed area receive initial and annual emergency preparedness overview training in General Employee Training.

SMUD may also provide training to offsite agencies or support organizations that may be called upon to provide assistance during emergencies.

7.2.2 Emergency Response Organization (ERO) Training

Designated ERO personnel receive training specific to their assignments.

The objectives of the training program are:

- To familiarize personnel with the emergency preparedness program.
- To familiarize personnel with their assignments and responsibilities during an emergency.
- To familiarize personnel with the external emergency response process.

7.2.3 First Aid

Rancho Seco's First Aid responders are provided first aid and cardio-pulmonary resuscitation (CPR) training, and recertification in accordance with general industrial standards (i.e. American Red Cross, American Heart Association).

7.3 DRILLS AND EXERCISES

7.3.1 General

The Emergency Preparedness Group is responsible for developing, planning,

scheduling and conducting drills and exercises.

Drills and Exercises are conducted and evaluated in accordance with the RSIP-004, "Emergency Preparedness Training".

A critique must be conducted following all required Exercises. Deficiencies identified must be evaluated and corrected.

Drills and Exercises may be combined so that more than one functional area is performed during an individual drill/exercise.

7.3.2 Drill and Exercise Objectives.

7.3.2.1 To test the adequacy, effectiveness, and content of the Emergency Plan and implementing procedures (RSIP-003, 004, & 005).

7.3.2.2 To test emergency equipment, supplies, and facilities.

7.3.2.3 To test the readiness of emergency response organization personnel, thereby evaluating training effectiveness.

7.3.2.4 To familiarize personnel with their duties, assignments, and equipment under simulated emergency conditions.

7.3.3 Fire Drill

Annually, a fire drill shall be conducted with participation by off-site fire suppression assistance when possible, and shall be conducted in accordance with SMUD procedures.

7.3.4 Medical Drill

Annually, a medical drill shall be conducted. The Site's First Aid Responders will participate in the drill. Offsite emergency responders will be invited to participate in the drill.

7.3.5 Radiological/Health Physics Drill

Annually, a radiological/health physics drill shall be conducted.

7.3.6 Biennial Exercise

Biennially, an exercise shall be conducted which simulates emergencies affecting the entire site. This exercise may include health physics, radiological monitoring, security, site dismissal and accountability, and may involve offsite agencies. Local response agencies shall be invited to participate in the biennial exercise.

7.4 REVIEW AND REVISION OF PLANS AND PROCEDURES

The Emergency Plan and implementing procedures (RSIP-003, 004, and 005) shall be

reviewed by the Rancho Seco staff and/or SMUD Emergency Preparedness personnel every 2 years in accordance with RSNAP-010, "Nuclear Procedure Administration" and shall be updated as necessary. Changes to the Plan or EALs will be reviewed with the State OES and Sacramento County OES, as necessary.

7.5 AUDITS

An independent audit of the Long-term storage Emergency Planning Program will be conducted biennially in accordance with the Rancho Seco Quality Manual. The Quality Audit will review the following:

- 7.5.1 Emergency Plan and implementing procedures
- 7.5.2 Emergency Preparedness Program organization and administration
- 7.5.3 Emergency Response Organization Training
- 7.5.4 Records of Surveillances on emergency facilities, equipment and supplies
- 7.5.5 Records associated with offsite agency response meetings, training and letters of agreement
- 7.5.6 Records for drills, communication system test and any associated corrective actions
- 7.5.7 Activation of the Emergency Plan since last audit.

7.6 EMERGENCY PREPAREDNESS ROUTINE TEST PROGRAM

7.6.1 Emergency Communication System Test

- Semi-annually, a test of the Emergency Communications System shall be conducted to test and verify the operability of communication equipment as specified in RSIP-005, "Emergency Preparedness Surveillance Program".

7.6.2 Emergency Equipment and Supplies

- 7.6.2.1 Equipment and supplies that are used at the site on a routine basis, and may be used during an emergency, are maintained by site procedures.
- 7.6.2.2 Dedicated emergency equipment and supplies (held in reserve only for use in emergencies) will be periodically checked and calibrated. Inspection intervals shall be in accordance with the RSIP-005, Emergency Preparedness Surveillance Program".
Instruments and equipment shall be calibrated in accordance with station procedures.
- 7.6.2.3 Any equipment or supplies found to be defective or inoperable during inventories and checks are repaired or replaced as soon as possible.

7.7 UPDATES OF TELEPHONE LISTS, EMERGENCY ASSIGNMENTS AND SUPPORT AGREEMENTS

7.7.1 Telephone Lists and Emergency Assignments

Emergency telephone numbers are located in the Emergency Response Telephone Directory, which is verified and updated semiannually. The Emergency Response Telephone Directory contains the list of qualified ERO personnel and their emergency assignments.

7.7.2 Support Group Agreements

As necessary, Rancho Seco enters into agreements with off-site individuals, groups, and agencies that support Rancho Seco during emergency conditions. These agreements may be established and maintained via contracts, Letters of Agreement or Memoranda of Understanding. All such agreements are to be reviewed annually and the results documented.

8.0 REFERENCES, DEFINITIONS AND ACRONYMS

8.1 SCOPE

This section provides the references, definitions of terms and acronyms that are used throughout the Emergency Plan and Emergency Plan implementing procedures (RSIP-003, RSIP-004, and RSIP-005).

8.2 REFERENCES

Regulatory guidance on emergency planning is intended to address planning for accidents with potential for public exposure to radioactive releases exceeding Environmental Protection Agency recommended limits. Some references are not specifically applicable to Rancho Seco and are listed because they provided useful insights into the purpose and intent of emergency plans.

- 8.2.1 10 CFR 20 - "Standards for Protection Against Radiation."
- 8.2.2 10 CFR 30, Rules of General Applicability to Domestic Licensing of Byproduct Material.
- 8.2.3 10 CFR 72 - Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High Level Radioactive Waste".
- 8.2.4 Spent Fuel Project Office Interim Staff Guidance – 16 Emergency Planning
- 8.2.5 EPA-400-R-92-001 – Manual of Protective Action Guides and Protective Actions for Nuclear Incidents
- 8.2.6 Rancho Seco Independent Spent Fuel Storage Installation Safety Analysis Report.
- 8.2.7 Rancho Seco Independent Spent Fuel Storage Installation Technical Specifications.
- 8.2.8 Rancho Seco Radiation Control Manual
- 8.2.9 Rancho Seco Dosimetry Manual
- 8.2.10 Rancho Seco Quality Manual
- 8.2.11 Rancho Seco Administrative Procedures.
- 8.2.12 Rancho Seco ISFSI Physical Protection Plan
- 8.2.13 California Code of Regulations, Title 19, Division 2

8.3 DEFINITIONS

- 8.3.1 Accountability - The process of identifying missing on-site personnel after a Dismissal has been conducted.
- 8.3.2 Close out – The process of verifying that the circumstances, which initiated an emergency declaration, have been terminated and the effected system, components and/or area have been restored to a safe condition.
- 8.3.3 Dismissal - The process of releasing non-emergency response personnel when

safety of the general site population is of concern due to general safety hazards, radiological hazards or hazardous material releases during a declared emergency.

- 8.3.4 Emergency Action Level – Specific values related to off-normal conditions, which, if exceeded, will initiate an emergency classification.
- 8.3.5 Emergency Planning Zone (EPZ) - The geographic area within which provisions are established for responding to postulated emergencies.
- 8.3.6 First Aid Team – A team of personnel trained in first aid that are dispatched to provide response to personnel injuries.
- 8.3.7 Incident - An undesirable or unexpected event that may result in radiological exposure to personnel, physical injury to personnel, physical damage to property, or a potential for an uncontrolled release of radioactive material to the environment.
- 8.3.8 Independent Spent Fuel Storage Installation (ISFSI) - The facility for dry storage of spent reactor fuel.
- 8.3.9 Industrial Area - The area of Rancho Seco that is enclosed by security fences and contains the Reactor Building, Auxiliary Building, Turbine Building, Nuclear Service Electric Building, and other facilities.
- 8.3.10 Nuclear Regulatory Commission (NRC) - The agency of the Federal government with primary responsibility to coordinate emergency response with SMUD.
- 8.3.11 Offsite - The area outside of the ISFSI EPZ (100 meter fence)
- 8.3.12 Protected Area - As defined in the ISFSI Physical Security Protection Plan, the ISFSI area enclosed by a double chain link fence.
- 8.3.13 Protective Actions - Emergency measures taken to prevent or minimize radiological exposure or physical harm to individuals.
- 8.3.14 Rancho Seco Administrative Exposure Limits – Exposure limits established by SMUD for Rancho Seco radiation workers during routine operations.
- 8.3.15 Security Shift Supervisor – The senior person on-shift responsible for maintaining site security and coordination of NRC licensed activities at Rancho Seco on a 24/7 basis. The on-duty Security Shift Supervisor acts as the Emergency Coordinator until relieved.

8.4 ACRONYMS

ALARA -As Low As Reasonably Achievable

Cal-OES – California Office of Emergency Services

CFR - Code of Federal Regulations

EAL - Emergency Action Level

EOC – Emergency Operations Center

EPA - Environmental Protection Agency

EPZ - Emergency Planning Zone

ERO – Emergency Response Organization

IC – Incident Commander

ICS – Incident Command System

ISFSI - Independent Spent Fuel Storage Installation

NIMS – National Incident Management System

NRC - Nuclear Regulatory Commission

PAS- Primary Alarm Station

RSIP – Rancho Seco Implementing Procedure

RWP - Radiation Work Permit

SAR - Safety Analysis Report

SEMS – Standardized Emergency Management System

SMUD - Sacramento Municipal Utility District

Tech Specs - Technical Specifications

TSC – Technical Support Center

EFFECTIVE DATE: 10/31/18

REVISION SUMMARY:

Emergency Plan revised to remove requirements related to 10 CFR 50.

REASON FOR CHANGE:

1. Emergency Plan administrative changes such as organization and position titles, rewording for clarity, and correction of typographical errors.
2. The changes to the Emergency Plan reflect the termination of the 10 CFR Part 50 license and include:
 - Deleting references to 10 CFR 50
 - Deleting the Part 50 Emergency Planning Zone
 - Deleting the Part 50 Emergency Action Levels (EALs)
 - Updating Reporting requirements based upon Part 72 only
 - Revised Emergency Classification and EAL from "ISFSI Alert" to "Alert"

**THIS PROCEDURE IS ISSUED FOR INFORMATION ONLY AND
SHALL NOT BE USED FOR WORK OR DESIGN.**

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1.0 PURPOSE

Identify the emergency actions and responsibilities of the Emergency Response Organization personnel upon declaration of an emergency.

2.0 SCOPE

- 2.1 This Emergency Plan implementing procedure includes emergency actions for the Rancho Seco ISFSI.
- 2.2 The Manager, Rancho Seco Assets or other person designated as the Emergency Coordinator, may declare an emergency. At the declaration of an emergency, the senior person listed in the Emergency Response Telephone Directory assumes and/or relieves the leadership functions, and is responsible for initiating/continuing emergency actions. This procedure directs the Emergency Coordinator to accomplish actions to respond to the incident and provides a checklist of those actions.

3.0 REFERENCES/COMMITMENT DOCUMENT**3.1 References**

- 3.1.1 10 CFR 20, Sections 2202 and 2203
- 3.1.2 EPA 400-R-92-1 10, Manual of Protective Actions Guides.
- 3.1.3 Rancho Seco Independent Spent Fuel Storage Installation Safety Analysis Report.
- 3.1.4 Rancho Seco Radiation Control Manual
- 3.1.5 Rancho Seco Dosimetry Manual
- 3.1.6 Rancho Seco ISFSI Physical Protection Plan
- 3.1.7 Emergency Response Telephone Directory
- 3.1.8 Rancho Seco Nuclear Administrative Procedures
- 3.1.9 California Standardized Emergency Management System
- 3.1.10 10 CFR 72 - Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High Level Radioactive Waste".
- 3.1.11 Rancho Seco Independent Spent Fuel Storage Installation Technical Specifications.

3.4 Commitment Documents

None

4.0 PROCEDURE**4.1 Emergency Coordinator:**

- 4.1.1 Perform actions specified on the Emergency Coordinator Emergency Actions Checklist, (RSF-120).
- 4.1.2 Document actions using the ERO Position Log Sheet, (RSF-135).
- 4.1.3 Review incoming information for possible reclassification of the event.
- 4.1.4 Closeout the incident in accordance with the Closeout Checklist, (RSF-121).
- 4.1.5 Perform restoration activities, as required to restore the facility to a safe condition.

4.2 Security Officer Duties

Under the direction of the Security Shift Supervisor:

- 4.2.1 Maintain physical security per the ISFSI Physical Protection Plan.
- 4.2.2 Perform response actions as directed by the Emergency Coordinator with the approval of the Security Shift Supervisor.

4.3 Offsite Agency Liaison

Under the direction of the Emergency Coordinator:

- 4.3.1 Acquire and maintain necessary equipment and supplies during the emergency.
- 4.3.2 Assume responsibilities for required notifications and communications to the State of California, Sacramento County, and NRC.
- 4.3.3 Maintain a log and record of all emergency related communications.
- 4.3.4 Maintain an open telephone line with the NRC as requested by the NRC.
- 4.3.5 Coordinate and maintain liaison duties with offsite agencies.
- 4.3.6 Maintain and document key information related to the emergency response.
- 4.3.7 Post incident: gather and package all incident documentation and provide to the Manager, Rancho Seco Assets.

4.4 Security Shift Supervisor

Under the direction of the Emergency Coordinator:

- 4.4.1 Maintain physical security per the ISFSI Physical Protection Plan.
- 4.4.2 Perform response actions as directed by the Sacramento Sheriff's Department and Emergency Coordinator.
- 4.4.3 Coordinate the security response to the emergency.

4.6 On-shift Personnel, Contractors, and Visitors

Follow the instructions of the Emergency Coordinator.

4.7 Onsite Emergency Response Organization Personnel


Report to the Emergency Coordinator for assignment or release.

5.0 RECORDS


All individual/ packaged documents and related correspondence completed as a result of this procedure are records. They shall be transmitted to Records Management in accordance with RSAP-0601.

6.0 ENCLOSURES


- 6.1 Emergency Coordinator (EC) Emergency Action Checklist, (RSF-120)
- 6.2 ERO Position Log Sheet, (RSF-135)
- 6.3 Closeout Checklist, (RSF-121)
- 6.4 Security Shift Supervisor Checklist, (RSF-122)
- 6.5 Security Officer Checklist, (RSF-123)
- 6.6 Offsite Agency Liaison (OAL) Checklist, (RSF-124)
- 6.7 Personnel Accountability Log-out Form, (RSF-125)
- 6.8 Rancho Seco Incident Notification Form, (RSF-126)
- 6.9 Emergency Exposure Authorization Form, (RSF-127)

		RSF-120 Page 1 of 2
Emergency Coordinator Emergency Action Checklist		
Enter Time Complete or N/A	As necessary, request law, fire, or medical emergency assistance via the PAS at x4311 or directly (9-) 9-1-1	
DISCRETIONARY ACTIONS		
	If the Initiating Conditions for the classification are no longer met prior to performing all the required actions in accordance with this checklist, the Emergency Coordinator may decide <u>not</u> to perform some steps on this checklist. BUT , Emergency Notifications must be performed (Attachment 4) AND , Closeout must be conducted (Form RSF-121)	
RESPONSE ACTIONS		
	CREATE AND MAINTAIN AN ERO POSITION LOG > Use the ERO Position Log, Form RSF-135, to document relevant information and actions during the emergency.	
	CLASSIFY AND DECLARE THE EVENT > Classify the incident in accordance with Attachment 1, "Classification of Emergencies".	
	NOTIFICATIONS > As necessary, request immediate emergency assistance by calling 9-1-1. > Perform NRC required notifications as specified in Attachment 4.	
	DISMISSAL AND ACCOUNTABILITY: Conduct a Dismissal and Accountability (Attachment 3) as a corrective or precautionary action, if the safety of site personnel is of concern due to: • General safety hazards • Radiological hazards > Notify the PAS that Dismissal and Accountability are going to be conducted. > Notify the PAS of all workgroups that may be working on-site.	
	EMERGENCY ANNOUNCEMENT: > Direct the PAS to conduct an Emergency Radio Announcement in accordance with Attachment 2.	
	DETERMINE OPERATIONS LOCATION: Determine location where to conduct operations. This may be at the TSC, SMUD EOC, Field Incident Command post, etc. Advise Security Operations of selected location to notify the Augmented ERO and other responders. > Verify that the Augmented ERO members and SMUD management have been notified > Brief responders on the incident, actions taken, and location to meet at.	
	INCIDENT COORDINATION: Given the reduced level of on-site expertise, greater communication and coordination will be needed with outside agencies and emergency responders. > Determine who the Incident Commander with the offsite emergency responders. When possible, establish a Unified Command to coordinate activities. > As requested, provide a liaison and technical support for the offsite responders. > Jointly determine with offsite responders the incident objectives and priorities. > Provide technical expertise to off-site responders on site conditions and hazards. > If activated, establish and maintain communication and coordination with the SMUD EOC.	
OVER		

RSF-120, Rev. 0


	Emergency Coordinator (EC) Emergency Action Checklist	RSF-120 Page 2 of 2				
Enter Time Complete	(continued)					
	TRANSPORTATION OF CONTAMINATED INJURED PERSONNEL:					
	➤ Take action in accordance with Attachment 7.5.					
	MITIGATING ACTIONS:					
	➤ In coordination with offsite responders, take actions in accordance with: <ul style="list-style-type: none"> • Departmental response procedures • Radiation Control Manual • Other applicable procedures 					
	RADIOLOGICAL AND HAZARDOUS MATERIALS RELEASES:					
	➤ As appropriate, take actions in coordination with offsite responders to reduce and contain and the spread of radiological and hazardous materials contamination into the environment.					
	MONITOR INCIDENT STATUS:					
	➤ Update responders and management as conditions change or warrant.					
	RADIOLOGICAL PROTECTION (RP) EXEMPTIONS:					
	➤ If the Manager, Rancho Seco Assets is present, RP Exemptions may be implemented (Attachment 6).					
	DISPATCH RESPONSE TEAMS:					
	➤ As necessary, dispatch response teams to mitigate the emergency in coordination with offsite responders. <ul style="list-style-type: none"> • Response teams should consist of at least 2 members each. • For Search and Rescue at least one member must be qualified in first aid. • When possible, assign a Rancho Seco responder to offsite agencies response teams. 					
	TURNOVER OF EMERGENCY COORDINATOR DUTIES:					
	➤ Use this checklist and EC's ERO Position Log to provide a turnover briefing to the relieving Emergency Coordinator, on the following information: <ul style="list-style-type: none"> • Event initiating conditions, • Site conditions and status, • Procedures implemented, • Response actions taken, • Any additional relevant information. 					
	CLOSEOUT:					
	➤ When the emergency has been mitigated, complete the Closeout Checklist (RSF-121).					
<table border="0" style="width: 100%;"> <tr> <td style="width: 50%; border-bottom: 1px solid black;">Name</td> <td style="width: 50%; border-bottom: 1px solid black;">Date/Time Assuming EC Duties</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Relieved by</td> <td style="border-bottom: 1px solid black;">Date/Time Relieved or Incident Closed Out</td> </tr> </table>			Name	Date/Time Assuming EC Duties	Relieved by	Date/Time Relieved or Incident Closed Out
Name	Date/Time Assuming EC Duties					
Relieved by	Date/Time Relieved or Incident Closed Out					

RSF-120, Rev. 0

 Closeout Checklist (Completed by the Emergency Coordinator)		RSF-121 Page 1 of 1
Criteria Met?	Criteria	
YES	Initialing Condition is known A, D: a. Under control (Stabilized), OR b. Corrected, OR c. No longer an-EAL	
	Radiation levels and airborne concentration or other hazardous materials releases in all areas are determined to be stable or decreasing.	
	Fires are extinguished, flooding conditions are under control, and/or any site damage is stabilized.	
	Contaminated injured personnel have been transported to the hospital and a report from the Radiation Protection personnel at the hospital has been received, and all contamination has been contained, in accordance with RSIP-003, "Transportation of Contaminated Injured Personnel", Attachment 5.	
	When possible, seek concurrence for closeout of the emergency with the Manager, Rancho Seco Assets, SMUD EOC, Emergency Preparedness Liaison, and/or SMUD Management, prior to closing out the emergency.	
	Other (specify):	
	Evaluate the need for Reentry and Recovery, as specified in RSIP-003, Attachment 8, "Reentry and Recovery".	
	Notification of Closeout made in accordance with RSIP-003, Attachment 4, "Emergency Notification". Date _____ Time _____ By _____	
	Closeout Notification made in accordance with RSIP-003, Attachment 2, "Emergency Radio Announcements". Date _____ Time _____ By _____	
All items above have been completed, "YES" or marked not applicable, "N/A" prior to signing below: _____ Emergency Coordinator Date/Time		


AT THE END OF THE EMERGENCY RETURN ALL PAPERWORK TO THE OFFSITE AGENCY LIAISON

RSF-121 Rev. 0


 Security Shift Supervisor Checklist		RSF-122 Page 1 of 1
Error Time Complete SEMHA	Under the direction of the Emergency Coordinator	
RESPONSE ACTIONS		
	CREATE AND MAINTAIN AN ERO POSITION LOG ➤ Use the ERO Position Log, RSF-135, to document relevant information and actions during the emergency.	
	OBTAIN BRIEFING FROM THE EMERGENCY COORDINATOR ➤ Obtain a briefing from the Emergency Coordinator on the situation and actions to take.	
	DETERMINE THE SECURITY HAZARDS ASSOCIATED WITH THE INCIDENT ➤ Determine the Security hazards associated with the emergency. ➤ Take actions in accordance with the ISFSI Physical Protection Plan.	
	LAW ENFORCEMENT COORDINATION: ➤ If the incident involves a law enforcement response, contact law enforcement responders and coordinate the Security response with offsite agency efforts. ➤ Serve as the law enforcement liaison for Rancho Seco.	
	SMUD SECURITY COORDINATION: ➤ Establish and maintain communication and coordination with the SMUD Security Shift Supervisor.	
	DISMISSAL AND ACCOUNTABILITY: ➤ If Dismissal and Accountability is required, protect personnel onsite, when possible, assign a Security Officer to assist with the evacuation efforts at the EPZ boundary.	
	EMERGENCY RESPONSE AND EMERGENCY ASSISTANCE: ➤ As necessary, when possible, have a Security Officer escort offsite emergency responders to the incident scene.	
	TRANSPORTATION OF CONTAMINATED INJURED PERSONNEL: ➤ Support actions in accordance with Attachment 5.	
	TURNOVER OF SECURITY COORDINATOR DUTIES: ➤ Use this checklist and the ERO Position Log to provide a turnover briefing to the relieving Security Supervisor, on the following information: <ul style="list-style-type: none"> • Event initiating conditions, • Site conditions and status, • Procedures implemented, • Response actions taken, • Any additional relevant information. 	
Name _____		Date/Time Assuming Security Shift Supervisor Duties _____
Relieved by _____		Date/Time Relieved or Incident Closed Out _____

AT THE END OF THE EMERGENCY RETURN ALL PAPERWORK TO THE OFFSITE AGENCY LIAISON

RSF-122, Rev. 0

		<h3>Security Officer Checklist</h3>	RSF-123 Page 1 of 1
Under the direction of the Security Shift Supervisor			
EMERGENCY ACTIONS			
	CREATE AND MAINTAIN AN ERO POSITION LOG Use the ERO Position Log, RSF-135, to document relevant information and actions during the emergency.		
	OBTAIN BRIEFING Obtain a briefing from the Emergency Coordinator and/or Security Shift Supervisor on the situation and actions to take.		
	DETERMINE THE SECURITY HAZARDS ASSOCIATED WITH THE INCIDENT Observe and report security hazards associated with the emergency. Take actions in accordance with the ISFSI Physical Protection Plan.		
	NOTIFICATION OF ERO RESPONDERS AND SMUD PERSONNEL: As directed by the Emergency Coordinator, make appropriate notifications utilizing the Emergency Response Telephone Directory (ERTD).		
	LAW ENFORCEMENT COORDINATION: If the incident involves a law enforcement response, contact law enforcement responders and coordinate the Security response with offsite agency efforts until relieved by the Security Shift Supervisor. Support law enforcement activities of the responding agency.		
	DISMISSAL AND ACCOUNTABILITY: If Dismissal and Accountability is called for, provide assistance on site, when possible, assist with the evacuation efforts at the EPZ boundary.		
	EMERGENCY REQUIRING OFF-SITE AGENCY ASSISTANCE: As necessary, provide assistance, including identification badges and escort offsite emergency responders to the incident.		
	TRANSPORTATION OF MONTAINED INJURED PERSONNEL: Support actions in accordance with Attachment 5.		
	TURNOVER OF OFF-SITE AGENCY LIAISON DUTIES: Use this checklist and this ERO Position Log to provide a turnover briefing to the relieving Offsite Agency Communicator, on the following information: <ul style="list-style-type: none"> • Event initiating conditions, • Site conditions and status, • Procedures implemented, • Response actions taken, • Any additional relevant information. 		
Name _____		Date/Time Assuming Security Officer Duties _____	
Relieved by _____		Date/Time Relieved or Incident Closed Out _____	

RSF-123 Rev. 0

	Offsite Agency Liaison Checklist	RSF-124 Page 1 of 1
RESPONSE ACTIONS		
	<p>CREATE AND MAINTAIN AN ERO POSITION LOG</p> <ul style="list-style-type: none"> ➤ Use the ERO Position Log, RSF-135, to document relevant information and actions during the emergency. 	
	<p>OBTAIN BRIEFING FROM THE COORDINATOR</p> <ul style="list-style-type: none"> ➤ Obtain a briefing from the Emergency Coordinator on the situation and actions to take. 	
	<p>NOTIFICATIONS</p> <ul style="list-style-type: none"> ➤ Make notifications as specified in Attachment 4. ➤ When possible, have the Emergency Coordinator review and sign the notification form(s). ➤ Report back when notifications are complete. 	
	<p>LIAISON DUTIES:</p> <ul style="list-style-type: none"> ➤ Contact and coordinate activities with the SMUD EOC when activated. ➤ As necessary, liaison with offsite agencies. ➤ Contact and coordinate communications with the SMUD Public Information Officer. 	
	<p>DOCUMENTATION TRACKING:</p> <ul style="list-style-type: none"> ➤ As necessary, assist in the tracking of incident information with the Emergency Coordinator. ➤ As necessary, collect and maintain documentation on the incident. 	
	<p>TURNOVER OF OFFSITE AGENCY LIAISON DUTIES:</p> <ul style="list-style-type: none"> ➤ Use this checklist and the ERO Position Log to provide a turnover briefing to the relieving Offsite Agency Liaison, on the following information: <ul style="list-style-type: none"> • Event initiating conditions, • Site conditions and status, • Procedures implemented, • Response actions taken, • Notification and communications made, • Points of contact with outside agencies, • Any additional relevant information. 	
Name _____		Date/Time Assuming OAL Duties _____
Relieved by _____		Date/Time Relieved or Incident Closed Out _____

AT THE END OF THE EMERGENCY RETURN ALL PAPERWORK TO THE OFFSITE AGENCY LIAISON

RSF-124, Rev. 0

ENTRY TO EPZ		EXIT FROM EPZ		EMPLOYEE/VISITOR NAME	EMPLOYEE/ VISITOR NUMBER
DATE	TIME	DATE	TIME		

Personnel Not Accounted For (Immediately report any missing personnel to the PAS x4311):
 When the Dismissal is complete notify the Emergency Coordinator. Give this form to the Offsite Agency Liaison.

RSF-125, Rev. 0





**RANCHO SECO
INCIDENT NOTIFICATION FORM**

Sacramento Municipal Utility District,
Rancho Seco Independent Spent Fuel
Storage Installation
14440 Twin Cities Road
Herald, CA 95638-9799

EMERGENCY CLASSIFICATION													
Emergency Classification	<input checked="" type="checkbox"/> THIS IS AN ACTUAL EMERGENCY			<input type="checkbox"/> THIS IS A DRILL									
Notification Type	10 CFR 50 Emergencies ¹ : <input checked="" type="checkbox"/> UNUSUAL EVENT			10 CFR 72 Emergencies ² : <input type="checkbox"/> ISFSI ALERT									
	¹ Former Rancho Seco Nuclear Plant			² Independent Spent Fuel Storage Installation									
Emergency Declared	Emergency Declared at _____ on _____		by _____		24-Hour Time Date Emergency Coordinator								
EAL TAB No.'s (Cause/Reason)													
RADIOLOGICAL RELEASE/CONTAMINATION INFORMATION													
Radiological Release?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	Release Type	<input type="checkbox"/> AIR	<input type="checkbox"/> WATER	<input type="checkbox"/> GROUND <input type="checkbox"/> CONTAMINATED PERSON							
Release Info													
OFFSITE AGENCIES REQUESTED													
Agencies Requested to Provide Assistance													
SMUD INCIDENT FACILITIES ACTIVATED													
<input type="checkbox"/> Technical Support Center Rancho Seco	<input checked="" type="checkbox"/> SMUD EOC HQ Campus		<input type="checkbox"/> OTHER										
Status of the Response	<input type="checkbox"/> UNCONTROLLED		<input type="checkbox"/> STABILIZING		<input type="checkbox"/> UNDER CONTROL <input type="checkbox"/> TERMINATED								
INCIDENT SUMMARY													
Typical													
ADDITIONAL ATTACHED													
RECIPIENT CONTACT INFORMATION													
Incident Liaison (Offsite Agency Communicator)				Callback Cellular Phone Number									
Callback Telephone Number				FAX Number									
Pager Number				After Incident Office Phone Number									
Incident Commander				Emergency Coordinator Approval									
RANCHO SECO USE													
Report By	Update Number	Report Date	Report Time	State OES	Sac CIV Cont	Sac CIV OEN							

EMERGENCY CONTACT: Rancho Seco Security (24 hr) (209) 732-4872

		Emergency Exposure Authorization Form		RSF-127 Page 1 of 1	
<i>Under the direction and approval of the Manager, Rancho Seco Assets</i>					
Name of Individual					
Sex					
Age					
Social Security Number					
Employee Number					
Present Accumulated Dose (TEDE)				Rem	
Expected Dose During this Emergency Operation				Rem	
Respiratory Protection Needed?		<input type="checkbox"/> YES <input type="checkbox"/> NO		List:	
Dosimetry Required?		<input type="checkbox"/> YES <input type="checkbox"/> NO			
Description of Duties					
Limitations					
<p>I volunteer to perform the duties described above during this emergency knowing that I may receive the doses stated. I am familiar with the possible consequences of this exposure.</p>					
Print Volunteer Name		Signature		Date	
Witness:					
Print Name		Signature		Date	
Approved by:					
Print Name <i>Manager, Rancho Seco Assets</i>		Signature		Date	

RSF-127 Rev. 0

7.0 ATTACHMENTS

- 1 Classification of Emergencies
- 2 Emergency Radio Announcements
- 3 Dismissal and Accountability
- 4 Emergency Notifications
- 5 Radiation Protection Exemptions
- 6 Emergency Exposures
- 7 Callout of the Emergency Response Organization (ERO)

CLASSIFICATION OF EMERGENCIES

CLASSIFICATION OF EMERGENCIES

1.0 PURPOSE

This attachment is to be used for Initial classification of an incident.

2.0 CLASSIFICATION PROCESS

Use the Primary method, Back-up method, or EC's discretion to classify an incident. If the event is not classifiable, exit this procedure.

2.1 Primary Method

2.1.1 Determine the type of incident from EAL Tab Index (Below).

2.1.2 Compare the incident conditions with the EAL criteria listed in the appropriate EAL Tab and determine if the incident meets the criteria for classification as an emergency.

2.1.3 If the incident does not meet the EAL criteria, but you think the incident may be warrant classification, use the "Back-up Method" to categorize the incident.

2.2 Back-up Method

2.2.1 Review the Definitions and Purposes of Emergency Classifications to determine if the incident warrants Emergency Plan activation.

ISFSI TAB INDEX

Tab Number	Title
1	Damage to the ISFSI
2	Security Compromise
3	Emergency Coordinator's discretion

EAL TAB 1

DAMAGE TO THE ISFSI

DECLARE AN ALERT IF:

A severe man-made incident or natural phenomenon, which compromises or affects the integrity of ISFSI structures or components containing radioactive material (For example: explosions or aircraft crash).

EAL TAB 2

SECURITY COMPROMISE

DECLARE AN ALERT IF:

Communications with security supervision has confirmed the seriousness or credibility of any of the following events in accordance with the Rancho Seco ISFSI Physical Protection Plan:

- Bomb or attack threat
- Internal or external civil disturbance
- Increased security effort
- Actual or attempted Sabotage
- Attempted theft of nuclear material

EAL TAB 3

EMERGENCY COORDINATOR'S DISCRETION

DECLARE AN ALERT IF:

The Emergency Coordinator determines, based on the situation and the rationale for implementing an Alert, a situation warrants the declaration of an emergency at the Alert level.

3.0 DEFINITION AND PURPOSE OF ISFSI EMERGENCY CLASSIFICATION

3.1 ALERT

Purpose and Definition

An incident indicated by abnormal or accident conditions associated with the Rancho Seco ISFSI.

An Alert is an event that affects the integrity of ISFSI structures or creates a safety hazard to personnel, or a security event that has serious consequences.

The primary purpose for declaration of an Alert is to notify internal staff, emergency responders and regulatory agencies that an atypical situation exists. Declaration of an Alert brings SMUD and external agencies to a state of readiness and provides a systematic handling of incident information and decision-making to mitigate the incident.

EMERGENCY RADIO ANNOUNCEMENTS

ANNOUNCEMENT #1: ALERT

1. Make the following radio announcement:

**ATTENTION ALL PERSONNEL, ATTENTION ALL PERSONNEL,
AN ALERT HAS BEEN DECLARED FOR THE ISFSI AREA.**

ALL PERSONNEL WITHIN THE ISFSI BOUNDARY REPORT YOUR STATUS.

Include any appropriate personnel safety precautions.

**ALL PERSONNEL ACKNOWLEDGE YOU HAVE RECEIVED THE MESSAGE AND
STAND BY FOR UPDATES VIA THIS RADIO.**

2. Repeat message as necessary until all personnel confirm they have received the message.
3. Document each person's status and report to the Emergency Coordinator.

ANNOUNCEMENT #2: CLOSEOUT OF THE EMERGENCY

1. Make the following radio announcement:

**ATTENTION ALL PERSONNEL, ATTENTION ALL PERSONNEL.
THE ALERT HAS BEEN TERMINATED.**


Include any appropriate personnel safety precautions.

2. Repeat message as necessary until all personnel confirm they have received the message.
3. Document each person's status and report to the Emergency Coordinator.

DISMISSAL AND ACCOUNTABILITY

1.0 DISMISSAL AND ACCOUNTABILITY PROCESS- NORMAL WORKING HOURS

- 1.1 Emergency Coordinator
 - 1.1.1 Initiate a Dismissal [Emergency Coordinator Emergency Actions Checklist (RSF-120)].
 - 1.1.2 If any personnel are unaccounted for during Accountability, initiate search and rescue or notify emergency responders as appropriate.
- 1.2 Security Shift Supervisor– Normal Working Hours
 - 1.2.1 When possible, direct security personnel to perform the following:
 - Assist in the evacuation of the Emergency Planning Zone.
 - Control site access in accordance with "Site Access Controls During Emergencies Posted Procedure".
- 1.3 Site supervisors – Normal Working Hours
 - 1.3.1 Verify employees leave the Emergency Planning Zone. Use the "Personnel Accountability Log-Out Form", (RSF-125), or similar process to account for employees.
 - 1.3.2 Conduct Accountability via radio or face-to-face.
 - 1.3.3 When Accountability is complete, inform the Emergency Coordinator.
Accountability must be complete within 30 minutes of initiation of the Dismissal.
- 1.4 Non-ERO Personnel
 - 1.4.1 Upon notification a dismissal is in progress, contact your supervisor or Emergency Coordinator for further instructions.

 **SITE ACCESS CONTROLS
DURING EMERGENCIES
(Posted Procedure)**

1. NORMAL SITE ACCESS:
When an emergency has been declared and a dismissal has not been initiated.

2. RESTRICTED SITE ACCESS:
During Accountability, all personnel are restricted from EPZ access, unless Authorized by the Emergency Coordinator during Accountability.

3. LIMITED SITE ACCESS:
After Accountability is complete, EPZ access is limited to ERO personnel, Unless authorized by the Emergency Coordinator.
Limited access may be terminated with Emergency Coordinator concurrence.

4. ERO PERSONNEL:

- Personnel listed in the Emergency Response Telephone Directory as:
ERO Personnel
- Personnel whose Rancho Seco Badge position title is:
Security Shift Supervisor
Security Officer
- Offsite Emergency Response Personnel:
Fire, medical, and law agencies
- Nuclear Regulatory Commission Personnel

TYPICAL

Updated 2/26/2010

EMERGENCY NOTIFICATIONS

1.0 PURPOSE

This procedure covers the required notifications to the Nuclear Regulatory Commission, the State of California, Sacramento County, and SMUD personnel for an emergency incident.

2.0 NOTIFICATION PROCESS

2.1 Emergency Coordinator

2.1.1 If the duration of the incident is such that the incident is terminated prior to the initial notification, the initial and closeout notifications may be made on the same notification.

2.1.2 When possible review and sign the Incident Notification Worksheet, NRC Form 361 and the Rancho Seco Incident Notification Form, (RSF-126) before notifications are conducted.

2.2 Offsite Agency Liaison

NOTE: Emergency calls take priority over notifications.

2.2.1 Maintain a log of all actions using the ERO Position Log Sheet, (RSF-135).

2.2.2 Conduct State, County and NRC notifications in accordance with the Facsimile and Telephone Notification Posted Procedures.

2.2.2.1 For State and County notifications fill out a Rancho Seco Incident Notification Form and obtain the Emergency Coordinator's review and approval.

2.2.2.2 For NRC notifications fill out an Incident Notification Worksheet, NRC Form 361, and have the form reviewed and obtain the Emergency Coordinator review and approval.

2.2.2.3 Make State, County, and NRC notifications within 1 hour from the time the classification was formally declared for the following notifications:

10 CFR 72 Notifications

- Initial emergency declaration

- 2.2.2.4 When the incident conditions change and do not involve a classification change, conduct Update Notifications as soon as practical.
- 2.2.2.5 Conduct Closeout notifications when directed by the Emergency Coordinator.
- 2.2.3 Conduct notifications to SMUD personnel as soon as practical after NRC notification is complete, in accordance with the "Notification Posted Procedure", for initial declaration and closeout only.
- 2.2.4 Inform the Emergency Coordinator when notifications are complete.

EMERGENCY NOTIFICATIONS EQUIPMENT

PRIMARY NOTIFICATIONS EQUIPMENT

- 1. General Office Telephones that are connected to the SMUD's telephone switch, Area Code 916.
- 2. Facsimile connected to the Pacific Bell Telephone lines, Area Code 209.

BACKUP NOTIFICATIONS EQUIPMENT

- 1. Herald Tie Line, connected to Pacific Bell Telephone lines, Area Code 209
- 2. Cellular Telephone

**FACSIMILE NOTIFICATION PROCEDURE
(POSTED PROCEDURE)**

1. Place the Rancho Seco Incident Notification Form (RSF-126) face down in the document tray of the facsimile machine.
2. Fax the Incident Notification Form to the California Office of Emergency Services, Sacramento County Communications Center and the Sacramento County Office of Emergency Operations.
3. Attach the "transmission reports" to the Incident Notification Form.
4. Conduct telephone notifications in accordance with the "TELEPHONE NOTIFICATIONS" posted procedure.

Facsimile Failure/Unavailable

If the programmed numbers fail, transmit notifications using the fax numbers located in the Emergency Response Telephone Directory.

If the facsimile transmission fails, attempt to transmit again. If the second attempt is unsuccessful, call the agencies using the "Telephone Notifications (Posted Procedure)".

If a facsimile is unavailable, call the agencies using the "Telephone Notifications (Posted Procedure)".

- Inform the agencies of the facsimile unavailability.
- Ask them to get a blank copy of the Rancho Seco Incident Notification Form, RSF-126.
- Read the approved Rancho Seco Incident Notification Form, RSF-126, to them.

**TELEPHONE NOTIFICATION
(POSTED PROCEDURE)**

Notes:

1. Use the numbers listed in the Emergency Response Telephone Directory (ERTD).
2. If the general office telephones fail, use the Herald Tie Line telephone or a cellular phone.

STATE / COUNTY TELEPHONE NOTIFICATION PROCEDURE

1. Call the California Office of Emergency Services.

Give/ask them the following: (if applicable, say, "THIS IS A DRILL")

- "This is (your name and ERO position) at Rancho Seco. We have declared an emergency and are making Emergency Notifications."
- "What is your name?" (Enter their name and time at the bottom of the Incident Notification Form, RSIP-126)
- "I faxed the Rancho Seco Incident Notification Form to you. Is the fax legible?"
- "Do you have any questions?" (Answer their questions)
- Provide callback telephone, cellular, and/or fax number.

2. Repeat step 1 for the Sacramento County Communications Center and the Sacramento County Office of Emergency Services.

NRC NOTIFICATION PROCEDURE

Call the NRC Headquarters using the button labeled "NRC HQ". Provide information from the NRC Worksheet, NRC Form 361.

SMUD PERSONNEL NOTIFICATION PROCEDURE

1. Call the following SMUD personnel/groups listed in the Emergency Response Telephone Directory (ERTD) in the order listed:
 - a. Manager, Rancho Seco Assets (unless made by Emergency Coordinator)
 - b. Director, Power Generation (unless made by Emergency Coordinator)
 - c. Public Information/Media Services Representative
 - d. Distribution Systems Operations (x5955).
2. Inform them that: "This is an actual incident/drill. A (Classification level) was declared at (time).
3. Provide them with a brief description of the situation and answer any questions.
4. Provide callback telephone, cellular, and/or fax number.

RADIATION PROTECTION EXEMPTIONS

NOTE:

Radiation Protection Exemptions may only be implemented when the Manager, Rancho Seco Assets has responded.

Radiation Protection Exemptions are terminated when the event is closed out.

Procedure	Exemption
RSAP-1101	Formal ALARA evaluations and documented exposure planning may be suspended. Emergency response activities will receive ALARA reviews/evaluations by the Emergency Coordinator.
RSNAP-300	All Radiation Work Permits may be suspended, and replaced by continuous monitoring by personnel trained in RP practices OR as directed by the Emergency Coordinator.
RSIP-309	Normal posting requirements may be discontinued
RSIP-312	Normal Routine Area Surveys may be discontinued.
RSNAP-303	Exposure Limits may be extended to the Administrative Limits listed below: Whole Body = 3.0 Rem/Yr. Extremities = 30 Rem/Yr. Skin = 30 Rem/Yr.

EMERGENCY EXPOSURES

1.0 PURPOSE

Provide guidance on authorization and implementation of emergency exposure limits for emergency response personnel at Rancho Seco during a radiological emergency.

2.0 SCOPE

- 2.1 Emergency exposure limits as defined in this procedure may be used only during a declared emergency.
- 2.2 The Manager, Rancho Seco Assets has sole responsibility for authorizing personnel to receive emergency exposures when radiological conditions warrant.

3.0 PROCESS

3.1 Manager, Rancho Seco Assets

- 3.1.1 Prior to recommending personnel to perform activities requiring emergency exposures, evaluate the following criteria:
 - 3.1.1.1 Emergency Exposure above 5 Rem should not be authorized unless absolutely necessary.
 - 3.1.1.2 Persons assigned to emergency response activities that may involve a dose > 25 Rem must be volunteers who are familiar with the consequences of such exposures.
 - 3.1.1.3 Evaluate the radiological conditions resulting from the emergency incident and the need for emergency exposure, using ALARA principles, prior to authorization.
 - 3.1.1.4 Pregnant women must not be authorized emergency exposures.
- 3.1.2 Ensure an Emergency Exposure Authorization Form (RSF-127) is completed and signed by each individual and approved by the Emergency Coordinator, prior to their receiving the exposure.
- 3.1.3 Persons receiving emergency exposures above 5 Rem should be sent to the hospital for examination.
- 3.1.4 Refer to 10 CFR 20, Sections 2202 and 2203, for NRC reporting requirements.
- 3.1.5 Maintain original Emergency Exposure Authorization Forms for inclusion in the individual's Personnel Occupational Radiation Exposure History File.

- 3.1.6 Review the radiological conditions and the need for emergency exposure provided during the incident prior to authorization.
- 3.1.7 Authorize emergency exposures, as discretion dictates, by signing the Emergency Exposure Authorization Form.
- 3.2 Emergency Exposure Limits, as adapted from EPA 400-R-92-001.

Dose Limit (REM)*	Activity	Condition
5	All	
10	Take actions to prevent a radiological release that could jeopardize the health and safety of plant personnel or the general public	Lower is not practicable
25	Lifesaving or protection of large populations	Lower is not practicable
>25	Lifesaving or protection of large populations	Only on a voluntary basis to persons fully aware of the risks involved

* REM is the sum of external effective dose equivalent and committed effective equivalent to non-pregnant adults from exposure and intake during an emergency situation. In addition to the limits listed, dose to workers performing services during the emergency phase of the incident should be limited to the following:

1. Lens of the eye; three times the value listed.
2. Any other organ (including skin and extremities); ten times the value listed
3. The dose to workers performing emergency services may be treated as once-in-a-lifetime exposure, and not added to occupational exposure accumulated under non-emergency conditions.

4.0 RECORD

Forward all completed forms and documentation to Manager, Rancho Seco Assets for retention.

RECOVERY / RESTORATION PLAN OUTLINE

I. INTRODUCTION

A brief description of the incident, status of the incident consequences, and the goal of recovery operations.

II. OBJECTIVES

List of objectives for the recovery operation. Objectives should be performance based and relate directly to the goal of recovery operations.

III. RECOVERY ORGANIZATION

Describe the Recovery Organization. The positions, responsibilities and names of individuals should be identified.

IV. RECOVERY SCHEDULE AND COST ESTIMATES

As a management tool, schedules and cost estimates for the Recovery Operation should be developed.

V. RECOVERY ACTIONS

Identify the specific actions necessary to accomplish the objectives of Recovery.

CRITIQUE OF DECLARED EMERGENCIES

Reports of the incident must be submitted to the State, Sacramento County, and the NRC.

Each time the emergency plan is implemented for an emergency, (not a drill or exercise) the initiating event and emergency response should be thoroughly evaluated. Evaluation of an emergency should consist of critiques and a written report.

CRITIQUES

1. Critique of initiating event and initial response.

This critique will include the initiating event and initial response, until the emergency plan was implemented. Representatives of SMUD management, the person(s) directly involved in the initiating event and initial response, and their supervisor(s), should conduct the critique.

2. Critique of emergency response

This critique will include the emergency response actions. Representatives from SMUD management or designee, and ERO personnel that responded to the event should conduct the critique.

CRITIQUE GUIDELINES

A critique is a fact-finding meeting. The person(s) involved should be asked to describe what happened and what actions were taken. The critique should be held as soon as possible after the event. Conclusions should not be drawn at the critique, nor should individual criticism or discipline be discussed at the critique. If, after further evaluation, additional questions are raised, another critique should be held. Above all, a critique should be conducted fairly and impartially. All persons should be given the opportunity to discuss the event fully.

ROOT CAUSE, DEFICIENCIES AND CORRECTIVE ACTIONS

Based upon the data from the critiques, the following should be determined:

1. Event root cause
2. Strengths in equipment and personnel responses
3. Deficiencies and associated corrective actions

EVENT REPORT

1. The report should contain the following:
 - a. The facts associated with the initiating conditions and response actions.
 - b. A timeline of the event and response.
 - c. The root cause(s) of the initiating event.
 - d. Deficiencies identified and corrective actions.
2. SMUD management should review the report.
3. Identified deficiencies should be assigned to appropriate personnel.

CALLOUT OF THE EMERGENCY RESPONSE ORGANIZATION (ERO)

The Emergency Coordinator directs the PAS personnel to conduct the following actions to activate the ERO:

1. Use the Emergency Response Telephone Directory (ERTD) to notify appropriate personnel via telephone, pager or similar method.
2. At a minimum, notifications are to be made to the following:
 - Manager, Rancho Seco Assets or designee,
 - On-call Emergency Preparedness responder (Offsite Agency Liaison),
 - Distribution Services System Operations (DSO).
3. Notify other responders as requested or needed for the incident.
4. Advise the Emergency Coordinator after the on-call ERO responders confirm their response and/or any positions where a responder cannot be located to respond.
5. Notifications are to be made immediately upon request of the Emergency Coordinator.

EFFECTIVE DATE: 10/31/2018

REVISION SUMMARY:

Emergency Plan revised to remove requirements related to 10 CFR 50.

REASON FOR CHANGE:

1. Emergency Plan administrative changes such as organization and position titles, rewording for clarity, and correction of typographical errors.
2. Deleting references and requirements that were related to 10 CFR 50 to reflect the termination of the 10 CFR Part 50 license.
3. Clarify differences between drill and exercise based upon Audit 18-A-001 Recommendation #2.
4. Clarify ERO Training requirements based upon Audit 18-A-001 Recommendation #2.

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1.0 PURPOSE

- 1.1 Define the responsibilities for the administration of the Emergency Preparedness Training Program.
- 1.2 Describe the process of conducting Emergency Preparedness Training.
- 1.3 Specify the initial and requalification training requirements for Emergency Response Organization (ERO).
- 1.4 To ensure compliance with Rancho Seco Quality Manual Appendix A and procedural requirements for training records maintenance.
- 1.5 Describe maintenance of the ERO Training Records.
- 1.6 Provide guidance for conducting and documenting drills and exercises.

2.0 REFERENCES/COMMITMENT DOCUMENT

2.1 References

- 2.1.1 Rancho Seco Emergency Plan
- 2.1.2 RSLBD-010 - RSQM, Appendix A
- 2.1.3 10 CFR 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste

2.2 Commitment Documents

None

3.0 DEFINITIONS

- 3.1 Annual Training - 12 months (with a maximum of 15 months) since the last training.
- 3.2 Initial Training - Formally Documented Training that is required for initial qualification and assignment to an Emergency Response function.
- 3.3 Non-emergency Response Personnel - Personnel that are not assigned a specific Emergency Response function.
- 3.4 Regualification Training - Annual Training requirements for continued assignment to an ERO function. This training may be conducted as formally documented training, group briefings, or reading assignments.
- 3.5 Revision Training - Training to familiarize ERO personnel with revisions or changes to the Emergency Plan, implementing procedures, or facilities. This training may be conducted as formally documented training, group briefings, or reading assignments.

4.0 PROCEDURE

- 4.1 Manager, Rancho Seco Assets
- 4.1.1 Ensure the personnel conducting the Emergency Preparedness Training Program have the expertise consistent with the material being presented.
 - 4.1.2 Direct the performance of drills and exercises as described in Attachment 3, "Drill and Exercise Guidelines".
 - 4.1.3 Ensure that the Decommissioning Emergency Preparedness Training Program is conducted in accordance with this procedure.
- 4.2 Emergency Preparedness Personnel
- 4.2.1 Conduct Emergency Preparedness Training in accordance with this RSIP.
 - 4.2.2 Document ERO training exemptions; based upon performance during a drill, actual emergency, individual training, or a job function, providing:
 - 4.2.2.1 Performance is satisfactory, and;
 - 4.2.2.2 If the exemption is based upon drill or actual emergency performance, the individual must have been a player or controller for their ERO function.
 - 4.2.2.3 Ensure that the ERO is not exempted from training more than two consecutive years.
 - 4.2.3 Schedule training, drills, and exercises.
 - 4.2.4 Provide orientation tours and/or radiological emergency response training for fire department, Sheriff's department, medical and ambulance, California Office of Emergency Services, and County Office of Emergency Services personnel, as requested.
 - 4.2.4.1 Tour or training content will be based upon the service provided by the organization and their needs.
 - 4.2.5 Ensure that only personnel who meet initial and requalification training requirements are assigned ERO functions.
 - 4.2.6 Ensure SMUD maintains a record of ERO Training.
 - 4.2.6.1 The records should indicate the following information:
 - Name
 - Employee Number
 - ERO function
 - Date Training completed
 - 4.2.7 Ensure training records are submitted to RIC in accordance with RSAP-0601.
 - 4.2.8 Develop drill and exercise scenarios. Obtain approval for drill or exercise scenarios from the Manager, Rancho Seco Assets.
 - 4.2.9 Schedule, conduct, and evaluate drills and exercises as specified in Attachment 3, Drill and Exercise Guidelines.

4.2.10 Develop and revise training materials

4.2.11 Conduct ERO training, as described in Attachment 2, Training Matrix.

4.2.12 Grade tests

When tests are given:

- The minimum passing score is 70%.
- Administer remedial instruction to individuals who fail tests as soon as practical.
- Re-test individuals immediately after remedial instruction.
- Individuals who fail the re-test after remedial training must be disqualified from the ERO, until they pass initial training.

5.0 RECORDS

Individual/Packaged documents and related correspondence completed as a result of this procedure are records and are maintained in accordance with RSAP-0601, Nuclear Records Management.

6.0 ATTACHMENTS

- 1 Lesson Descriptions
- 2 Training Matrix
- 3 Drill and Exercise Guidelines

ATTACHMENT 1
LESSON DESCRIPTIONS

ER 01 A 0100:

EMERGENCY RESPONSE ORGANIZATION

Present the Emergency Response Organization's (ERO) duties and responsibilities and an overview of response actions to all ERO Personnel identified in Emergency Plan Figure 4-1.

EMERGENCY ACTIONS

Provide instruction to Emergency Coordinators on RSIP-003 and all attachments.

EMERGENCY NOTIFICATIONS

Provide instruction, to all ERO personnel that may be assigned to perform notifications on RSIP-003, Attachment 4, Emergency Notifications.

RADIOLOGICAL RESPONSE TO EMERGENCIES

Provide instruction on the following portions of RSIP-003, Emergency Actions:

- Attachment 5, Radiation Protection Exemptions
- Attachment 6, Emergency Exposures.

SECURITY DURING EMERGENCIES

Provide instruction to contract Security staff on the security responsibilities of RSIP-003.

ATTACHMENT 2

TRAINING MATRIX

	01A
Emergency Coordinator	XO
Offsite Agency Liaison	XO
Security Officer(s)	XO

X = Initial Training

O = Requalification Training

FIRST AID RESPONSE TEAM TRAINING

Training is conducted in accordance with SMUD procedures.

GENERAL EMPLOYEE TRAINING

ERO personnel identified in Emergency Plan Figure 4-1 and site workers who routinely access the Part 72 licensed area receive generic ERO training in the General Employee Training, (Category I).

ERO personnel and site workers classified as Radiation Workers also receive Radiological Controlled Area Training (Category II).

ATTACHMENT 3

DRILL AND EXERCISE GUIDELINES

- 1.0 The Drill and Exercise Guidelines provide guidelines for drill and exercise documentation and describes the functions of personnel involved in conducting and evaluating drills or exercises. These guidelines are in accordance with the Rancho Seco Emergency Plan, Section 7, Maintaining Emergency Preparedness.
- 2.0 Purpose of drills and exercises are to:
 - 2.1 Test the adequacy, effectiveness and content of the Emergency Plan and RSIPs.
 - 2.2 Test emergency equipment, supplies and facilities.
 - 2.3 Test the readiness of the augmented ERO.
 - 2.4 To familiarize personnel with their duties, assignments, and equipment under simulated emergency conditions.
 - 2.5 Drills are intended to test one function at a time (i.e. fire or medical or radiological) but may combine functions (i.e. fire and medical).
 - 2.6 Exercises are intended to address site-wide integrated response to emergency events and may include off-site response agencies.
- 3.0 Required drills and exercises.
 - 3.1 Fire Drill
Annually, a fire drill is required for ISFSI operations. When possible, off-site fire suppression assistance will participate in each of the drills. The Fire drills will be conducted in accordance with SMUD procedures.
 - 3.2 Medical Drill
Annually, a medical drill shall be conducted. The Site's First Aid Responders and, when possible, off-site emergency responders, will participate in the drill.
 - 3.3 Radiological/Health Physics Drill
Annually, a radiological/health physics drill shall be conducted.
 - 3.4 Biennial Exercise
Biennially, an exercise shall be conducted which simulates emergencies affecting the entire site. This exercise may include health physics, radiological monitoring, security, site dismissal and accountability, and may involve off-site agencies.
Local response agencies shall be invited to participate in the biennial exercise.

DRILL AND EXERCISE GUIDELINES (Continued)**4.0 Drill/Exercise Documentation****4.1 Scenario Package****4.1.1 Introduction and Scope**

Describe the purpose, training and/or evaluation aspects of the drill/exercise, and organizations participating.

4.1.2 Drill/Exercise Objectives

A list of performance objectives that must be demonstrated during the drill or exercise.

4.1.3 Participant Instructions

Specific instructions and precautions for players and controller/evaluators involved in the drill/exercise.

4.1.4 Event Scenario

An event scenario is a narration overview of the drill/exercise, including; initial conditions, initiating event, and expected actions by the players in response to the simulated emergency.

The scenario should be as realistic as possible, be of sufficient depth to accomplish all drill/exercise objectives and include well-defined criteria for drill/exercise termination.

4.1.5 Timeline

The timeline is the time-based framework of the drill or exercise. It provides the time for controlled drill/exercise events and messages to occur.

4.1.6 Drill/Exercise Messages

Messages are used to initiate events, convey data and control the progress of the drill/ exercise.

4.1.7 Evaluation Criteria

Evaluation Criteria are based upon drill/exercise objectives and are used by controller/evaluators in evaluating player performance and in determining if the drill/exercise objectives were met.

4.1.8 List of controller /evaluators and players.**4.2 Biennial Exercise report****4.2.1 A detailed report which provides a description of the performance during the exercise, including:**

- An overview of the performance during the exercise, including overall performance, strengths and weaknesses.

- The Event Scenario
- Actual timeline as it occurred
- Evaluation of each objective and identified deficiencies.
- List of controller/evaluators and players.

4.2.2 A copy of the exercise report must be sent to the Manager, Rancho Seco Assets for assignment of actions to evaluate and, if necessary, correct deficiencies identified in the exercise.

4.3 Drill Report

4.3.1 A summary report of the performance during the drill, including:

- Overall performance, strengths and weaknesses
- Event Scenario overview
- Evaluation of each objective and identified deficiencies
- List of controller/evaluators and players

4.3.2 A copy of the drill report must be sent to the Manager, Rancho Seco Assets for assignment of actions to evaluate and, if necessary, correct deficiencies identified in the drill.

5.0 Pre-drill/exercise briefings

5.1 All drill/exercise players, controllers and evaluators must be briefed prior to their participation in the drill or exercise. The briefing must include ISFSI initial conditions and participant instructions, as specified in the drill/exercise scenario.

6.0 Exercise critique

6.1 A critique must be conducted after each exercise with players, controllers and evaluators. Evaluation of drill/exercise objectives, including strengths and weaknesses should be discussed.

6.2 A person not having direct implementation responsibility for conducting the exercise must conduct the critique for the Biennial Exercise.

EFFECTIVE DATE: 10/31/2018

REVISION SUMMARY:

Emergency Plan revised to remove requirements related to 10 CFR 50.

REASON FOR CHANGE:

1. Emergency Plan administrative changes such as organization and position titles, typographical and editorial corrections.
2. Updating the renewal of contracts/MOUs to reflect current practices.
3. Clarify the review requirements for Emergency Plan revisions.
4. Deleting references to 10 CFR 50 to reflect the termination of the 10 CFR Part 50 license.

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1.0 PURPOSE

Specify the requirements and responsibilities for the performance of routine surveillances within the Rancho Seco Emergency Preparedness program.

Provide guidance using NRC RIS 2005-02, Revision 1, when making Emergency Plan changes, to evaluate if the revision is a "Decrease of Effectiveness".

2.0 SCOPE

This procedure applies to the Rancho Seco Emergency Preparedness program - equipment, emergency communication equipment, supplies, procedures, Emergency Response Telephone Directory, emergency support contracts, and Emergency Plan Revisions.

3.0 REFERENCES/COMMITMENT DOCUMENTS

3.1 References

- 3.1.1 Rancho Seco ISFSI Emergency Plan
- 3.1.2 10 CFR 72 - Licensing Requirements for the Independent Storage of Spent Nuclear Fuel and High Level Radioactive Waste".

3.2 Commitment Documents

- 3.2.1 NRC Regulatory Issue Summary (RIS) 2005-02, Revision 1: Clarifying the Process for Making Emergency Plan Changes

4.0 DEFINITIONS

None

5.0 PROCEDURE

5.1 Manager, Rancho Seco Assets

- 5.1.1 Review "Emergency Planning Surveillance and Review Requirements", Attachment 1, to ensure proper completion.
- 5.1.2 Maintain a record of performed surveillance, to ensure that the actions are completed in accordance with the specified time period.

- 5.1.3 Coordinate with other groups that perform surveillances in accordance with this procedure.
- 5.1.4 For Emergency Plan revisions, conduct an evaluation per 10 CFR 72.44(f) to determine if the revision is a "Decrease of Effectiveness" in the Emergency Plan. NRC RIS 2005-02, Revision 1, provides guidelines for this review.
- 5.2 Surveillance Performer
 - 5.2.1 Perform surveillance in accordance with the frequencies listed on Attachment 1, Emergency Planning Surveillance and Review Requirements.
 - 5.2.1.1 Obtain copies of the most recent revision of the surveillance procedure.
 - 5.2.1.2 Perform the Surveillance as indicated in the procedure.
 - 5.2.1.3 Forward completed Surveillance form to RP Supervision for review and approval
 - 5.2.2 Emergency Kit/Locker Entry Form, RSF-128, is required to be used any time that a locker has been entered.

6.0 RECORDS

Forward all completed forms and documentation to Site Document Control in accordance with RSAP-0601, Nuclear Records Management.

7.0 ATTACHMENTS

1. Emergency Planning Surveillance and Review Requirements
2. Emergency Locker/Kit Entry (RSF-128)
3. Emergency Plan Facility Inspection (RSF-129)
4. Portable Emergency Radiation Instrument Check (RSF-130)
5. Emergency Communications Test Guide (RSF-131)
6. Emergency Communications Test Record Form (RSF-132)
7. Facsimile Test Sheet (RSF-133)
8. NRC RIS 2005-02, Rev. 1, Attachment 1, 50.54(q) Flowchart

**EMERGENCY PLANNING SURVEILLANCE
AND REVIEW REQUIREMENTS**

Surveillance Item	Monthly	Semi-annual	Annual	Biennial
FACILITY INSPECTION <ul style="list-style-type: none"> Primary (PAS) Alarm Station 		X		
ONSITE INVENTORY: <ul style="list-style-type: none"> Portable Instrument Check Dosimeters 	X(1)		X(1)	
EMERG. COMM. SYSTEM TESTS		X		
DOCUMENT REVIEW <ul style="list-style-type: none"> Independent Review (QA Audit) Emergency Plan And RSIP Review Contract/MOU Review Emergency Response Telephone Directory Update 		X	X	X

(1) Or when calibration is due

NOTE: Time periods may be extended a maximum of 25% of the specified interval to accommodate scheduling.

EMERGENCY LOCKER/KIT ENTRY

NOTE: This form is to be used when entering an Emergency Locker or Kit for anything other than a routine scheduled surveillance.

Locker/Kit: _____

Performed by: _____ Date: / /

Reason for Entry: _____

RECORD ALL ITEMS REMOVED FROM AND/OR INSERTED INTO THE LOCKER OR KIT:

Typical

(Record document name, instrument serial number, calibration due dates, number of items, etc.)

Comments: _____

Reviewed by: _____ Date: / /

EMERGENCY PLAN FACILITY INSPECTION

PRIMARY ALARM STATION (PAS) _____
ON-SITE TSC _____ OTHER: _____

ITEM	QUANTITY	FOUND/ LEFT
MANUALS		
Emergency Response Telephone Directory	2	/
O TSC Emergency Plan and RSIP's	2	/
R PAS Emergency Plan and RSIP's	1	/
Forms Book (EP Forms)		
OTHER (TSC Only)		
Position Checklists	1 set	1 set

General Facility Condition (Circle) Satisfactory Unsatisfactory

Comments: _____

Typical

Completed By: _____ Date: ____/____/____

Reviewed by: _____ Date: ____/____/____

PORTABLE EMERGENCY RADIATION INSTRUMENT CHECK

Performed by: _____ Date: _____

Location: PAP Bldg Other _____

QTY	INSTRUMENT MODEL (or equivalent)	INSTRUMENT SERIAL #	CALIBRATION DUE DATE	BATTERY CHECK (Check One)	RESPONSE CHECK * (Check One)
1	Ludlum-12 or PRM-6			SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>	SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>
1	Ludlum-12 or PRM-6			SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>	SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>
1	RO-2			SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>	SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>
1	RO-2			SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>	SAT <input type="checkbox"/> UNSAT <input type="checkbox"/>
1	H809V1 Air Sampler			N/A	N/A
1	H809V1 Air Sampler			N/A	N/A
				DOSIMETER ZEROED (Check One)	
1	Dosimeter			YES <input type="checkbox"/> NO <input type="checkbox"/>	N/A
1	Dosimeter			YES <input type="checkbox"/> NO <input type="checkbox"/>	N/A
1	Dosimeter			YES <input type="checkbox"/> NO <input type="checkbox"/>	N/A
1	Dosimeter			YES <input type="checkbox"/> NO <input type="checkbox"/>	N/A
1	Dosimeter			YES <input type="checkbox"/> NO <input type="checkbox"/>	N/A
1	Dosimeter			YES <input type="checkbox"/> NO <input type="checkbox"/>	N/A
1	Dosimeter Charger		N/A	N/A	N/A

Typical

***RESPONSE CHECK USING THE PYROTRONICS SMOKE DETECTOR**

****RECORD ALL OVERDUE INSTRUMENT CALIBRATION DATES, UNSATISFACTORY BATTERY OR SOURCE CHECKS, AND CORRECTIVE ACTION TAKEN:**

Reviewed by: _____ Date: _____

EMERGENCY COMMUNICATIONS TEST GUIDE

1.0 PURPOSE

To provide guidance for testing the Rancho Seco emergency communications equipment.

2.0 SCOPE

This Test Guide verifies the operability of the communication equipment listed in RSIP-003, Attachment 4, "Emergency Notifications"

2.1 The following communications equipment is tested by this guide:

- Notification telephone to Sacramento County and the California Office of Emergency Services (OES) State Warning Center
- Facsimile machine

2.2 The following communications equipment is verified operable by being used on a routine basis or is tested by another process:

- General office telephones -- routine usage
- Site radio - routine usage by on-shift personnel

3.0 TEST RECORD RESULTS & RETESTING

Record all test results on Attachment 6, Emergency Communications Test Record Form. If any tests are unsatisfactory, repeat the test. If the test is still unsatisfactory, record all symptoms associated with the unsatisfactory test and initiate corrective action and retest as necessary.

4.0 PROCEDURE

Call the Sacramento County Office of Emergency Services and California Office of Emergency Services State Warning Center prior to conducting this test. Request that Sacramento County staff the Emergency Operation Center (EOC) for the test.

4.1 Facsimile Machine Test

4.1.1 Fax the Facsimile Test Sheet to the California OES State Warning Center. Note the results of the test on the Emergency Communications Test Record Form

4.1.2 Verify that the transmission report has the correct information for the following:

- Location sent from
- Location sent to
- Results

4.1.3 Repeat steps 4.1.1 and 4.1.2 for Sacramento County Communication Center.

EMERGENCY COMMUNICATIONS TEST GUIDE (Continued)

4.1.4 Repeat steps 4.1.1 and 4.1.2 for Sacramento County EOC.

4.2 Notification Telephone Test

4.2.1 Call the California OES State Warning Center on the Notification Phone.

Tell them the following:

- "This is (your name) at Rancho Seco, I am conducting the Semi-Annual test of the Rancho Seco Emergency Notification System.
- "Testing the Notification Phone from the Control Room. How do you hear me?"
- Did you receive a Test Fax sheet, and is it legible?

4.2.2 Repeat step 4.2.1 for the Notification Phone test to Sacramento County Communications Center.

4.2.3 Repeat Step 4.2.1 for the Notification Phone test to Sacramento County EOC.

4.3 Herald Tie Line Test (Dial tone test)

4.4.1 Test the Herald Tie Line telephone by listening for a dial tone.

5.0 Test Completion Calls

5.1 Call Sacramento County Office of Emergency Services and California Office of Emergency Services State Warning Center. Inform them that the test is complete and was satisfactory or anything that was unsatisfactory.

6.0 Test Completion Report

6.1 Prepare an Emergency Communications Test Completion letter in accordance with RSNAP-093, "External Plant Reports and Posting of Notices."

**EMERGENCY COMMUNICATIONS
TEST RECORD FORM**

ITEMS TO CHECK	PAS		ON-SITE TSC	
	Sat	Unsat	Sat	Unsat
NOTIFICATION FACSIMILE TEST (SECTION 4.1)				
State Warning Center				
Sacramento County Comm. Center				
Sacramento County EO				
NOTIFICATION TELEPHONE TEST (SECTION 4.2)				
State Warning Center				
Sacramento County Comm. Center				
Sacramento County EOC				
HERALD TIE LINE DIAL TONE TEST (SECTION 4.3)				
Dial Tone Test				

COMMENTS: (required for any unsatisfactory test)

Typical

Test Completion Calls Conducted (Section 5.0): _____
Initials / Time

Test Performed by: _____
Name / Date

Reviewed by: _____
Name / Date

RANCHO SECO

FACSIMILE

NOTIFICATION

TEST SHEET

- Rancho Seco Technical Support Center
- Primary Alarm Station

Typical

RIS-2005-02 Rev. 1 10 CFR 50.54 (q) Flowchart

