



May 2, 2019

PG&E Letter DCL-19-042
PG&E Letter DIL-19-009

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

10 CFR 50.54, 10 CFR 72.32

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Docket No. 72-26, Materials License No. SNM-2511
Diablo Canyon Independent Spent Fuel Storage Installation
Emergency Plan Implementing Procedure Update

Dear Commissioners and Staff:

In accordance with the requirements of 10 CFR 50.54(q)(5) and 10 CFR 72.32, Pacific Gas and Electric Company (PG&E) hereby provides a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedure EP G-2, Revision 52, "Interim Emergency Response Organization."

The associated enclosures are listed below:

- Enclosure 1 - Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures.
- Enclosure 2 - Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-2, Revision 52, "Interim Emergency Response Organization."

PG&E evaluated the changes per the requirements of 10 CFR 50.54(q), and concluded that the changes do not reduce the effectiveness of the E-Plan. The E-Plan continues to meet the requirements in Appendix E of 10 CFR 50 and the planning standards of 10 CFR 50.47(b). Therefore, prior NRC approval of the associated changes was not required.

This update does not contain any privacy and proprietary information in accordance with NRC Generic Letter 81-27, "Privacy and Proprietary Material in Emergency Plans."



PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If there are questions regarding this update, please contact me at (805) 545-3446.

Sincerely,

Michael A. Ginn
Emergency Planning Manager

armb/4743/ 51026935

Enclosures

cc/enc: William C. Allen, NMSS Project Manager
Scott A. Morris, NRC Region IV Administrator
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**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

Revision Numbers for Emergency Plan Implementing Procedures

**DIABLO CANYON POWER PLANT EMERGENCY PLAN
IMPLEMENTING PROCEDURES**

<u>Proc. No.</u>	<u>Rev.</u>	<u>Title</u>
OM10.ID1	18	Maintaining Emergency Preparedness
OM10.DC1	10	Emergency Preparedness Drills and Exercises
EP G-1	45	Emergency Classification and Emergency Plan Activation
EP G-2	52*	Interim Emergency Response Organization
EP G-3	60	Emergency Notification of Off-Site Agencies
EP G-4	30	Assembly and Accountability
EP G-5	16	Evacuation of Non-Essential Site Personnel
EP OR-3	10	Emergency Recovery
EP RB-1	8	Personnel Dosimetry
EP RB-2	8	Emergency Exposure Guides
EP RB-3	9	Stable Iodine Thyroid Blocking
EP RB-4	6	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	9	Alternate Personnel Decontamination Facilities
EP RB-8	29	Instructions for Field Monitoring Teams
EP RB-10	21	Protective Action Recommendations
EP RB-12	12	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	10	Core Damage Assessment Procedure
EP RB-14A	3	Initial Detection of Fuel Cladding Damage
EP RB-15	16	Post Accident Sampling System
EP RB-16	16	Operating Instructions for the EARS Computer Program
EP RB-17	2	Operating Instructions for QuickDose
EP R-2	37	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	19	Off-Site Transportation Accidents
EP EF-1	56	Activation and Operation of the Technical Support Center
EP EF-2	41	Activation and Operation of the Operational Support Center
EP EF-3	47	Activation and Operation of the Emergency Operations Facility
EP EF-4	21	Activation of the Off-Site Emergency Laboratory
EP EF-9	13	Backup Emergency Response Facilities
EP EF-10	17	Activation and Operation of the Joint Information Center
EP EF-11	2	Alternate Emergency Response Facilities / Incident Command Post (ICP)

***Revised Document**

**Summary of the Analysis of Changes to
Emergency Plan Implementing Procedure EP G-2, Revision 52
“Interim Emergency Response Organization.”**

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
1	1.1 This procedure provides emergency response actions to be taken by the interim emergency response organization (ERO) in the Control Room during a declared emergency. ^{T36223}	1.1 This procedure provides emergency response actions to be taken by the interim emergency response organization (ERO) in the Control Room during a declared emergency. ^{T36201/T36223}	Modified content Added in a missing procedure commitment database identifier. No change in procedure actions. This change does not affect how the current Emergency Plan (E-Plan) meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
2	2.11 While it is not necessary to complete Form 361 prior to notifying the NRC, the Headquarters Operations Officer will expect information for all pertinent blocks.	2.11 While it is not necessary to complete Form 361 prior to notifying the NRC, the Headquarters Operations Officer will expect information for all applicable blocks.	Modified content Changed the word “pertinent” to “applicable.” The words are synonymous with no change in intent. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
3	3.4.2 Control Room Personnel Dispatch accountability using Attachment 5, if required.	3.4.2 Dispatching and maintaining accountability of Control Room Personnel using Attachment 5.	Modified content Reformatted the responsibility to provide alignment with formatting of other responsibilities. Removed “if required” because tracking operators and other personnel dispatched from the Control Room (CR)

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>during a declared emergency is always required.</p> <p>The responsibilities remain assigned to the same position with no change in scope or frequency.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
4	<p>6.1.1</p> <p>Upon declaration of an emergency, assume overall command and control and initiate Attachment 1 (Form 69-20644), "Shift Manager Checklist." "T36200/T04336/T04337"</p>	<p>6.1.1</p> <p>Upon declaration of an emergency, assume overall command and control and initiate Attachment 1 (Form 69-20644), "Shift Manager Checklist." "T36200/T36204/T04336/T04337"</p>	<p>Modified content</p> <p>Added in a missing procedure commitment database identifier.</p> <p>No change in procedure actions.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
5	<p>Attachment 1 (pg. 1)</p> <p>NOTE: Steps in this checklist may need to be performed in an order other than listed based on sequence of events.</p>	<p>Attachment 1 (pg. 1)</p> <p>NOTE: Steps in this checklist may be performed in an order other than listed based on sequence of events.</p>	<p>Modified content</p> <p>Removed "need to" as the words were extraneous.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
6	N/A – added new content	Attachment 1	Added content

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
		<p>1.b.1)</p> <p>NOTE 2: Once VANS is activated for an Alert or higher it does not need to be activated again if the classification level is upgraded.</p>	<p>Added note to clarify VANS does not need to be activated again once it has been activated for the alert or higher level.</p> <p>This change does not alter the assignment of responsibility or the process for activating voice activated notification system (VANS).</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
7	<p>Attachment 1</p> <p>1.b.1)</p> <p>Direct Communicator #2 or other qualified operator to activate VANS per Attachment 3.</p>	<p>Attachment 1</p> <p>1.b.1)</p> <p>Direct qualified operator to activate VANS per Attachment 3.</p>	<p>Modified content</p> <p>Removed "Communicator #2 or other."</p> <p>This change will have no impact on how the operating crew mans the on-shift watch bill per Diablo Canyon Power Plant (DCPP) Departmental Administrative Procedure OP1.DC37, "Plant Logs," which directs the crew to identify qualified individuals to fill required E-Plan functions.</p> <p>This change will have no impact on the assignment of responsibilities as all E-Plan required functions/tasks will continue to be performed by qualified personnel as directed by the Shift Manager (SM).</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
8	<p>Attachment 1</p> <p>1.d.1)a)</p> <p>Direct Communicator #1 or other qualified operator to complete the Emergency Notification Form (ENF) for approval per Attachment 2.^{T30899}</p>	<p>Attachment 1</p> <p>1.d.1)a)</p> <p>Direct qualified operator to complete the ENF for approval per Attachment 2.^{T30899}</p>	<p>Modified content</p> <p>Removed “Communicator #1 or other.”</p> <p>This change will have no impact on how the operating crew mans the on-shift watch bill per OP1.DC37, which directs the crew to identify qualified individuals to fill required E-Plan functions</p> <p>This change will have no impact on the assignment of responsibilities as all E-Plan required functions/tasks will continue to be performed by qualified personnel as directed by the SM.</p> <p>Removed “emergency notification form” prior to the ENF acronym as the acronym had already been spelled out in previous steps of the procedure.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
9	<p>Attachment 1</p> <p>1.d.1)b)</p>	<p>Attachment 1</p> <p>1.d.1)b)</p>	<p>Modified content</p> <p>Added in a missing procedure commitment database identifier. No change in procedure actions.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
	Direct Shift Phone Talker or other qualified operator to make offsite verbal notifications to the County and State per Attachment 11. ^{T04380}	Direct qualified operator to make offsite verbal notifications to the County and State per Attachment 11. ^{T04380/T04385}	<p>Removed "Shift Phone Talker or other."</p> <p>This change will have no impact on how the operating crew mans the on-shift watch bill per OP1.DC37, which directs the crew to identify qualified individuals to fill required E-Plan functions</p> <p>This change will have no impact on the assignment of responsibilities as all E-Plan required functions/tasks will continue to be performed by qualified personnel as directed by the SM.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
10	N/A – added new content	<p>Attachment 1</p> <p>1.d.1)b)(1)</p> <p>Ensure individual has a copy of EP G-3, Attachment 6 (Form 69-22200), "Instructions for Making Notification Phone Calls."</p>	<p>Added content</p> <p>Added in new step to ensure that SM hands out the attachment in DCCP Emergency Plan Implementing Procedure (EPIP) EP G-3, "Emergency Notification of Off-Site Agencies," for how to make phone calls to offsite agencies once the ENF is approved.</p> <p>This change does not alter the assignment of responsibility or the process for performing offsite notifications.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
11	<p>Attachment 1</p> <p>2.i.</p> <p>Command and Control Turnover</p>	<p>Attachment 1</p> <p>2.i.</p> <p>Command and Control Turnover^{T36203/T36204}</p>	<p>Modified content</p> <p>Added in a missing procedure commitment database identifiers.</p> <p>No change in procedure actions.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
12	<p>Attachment 2 (pg. 1)</p> <p>NOTE 1: Steps in this checklist may need to be performed in an order other than listed based on sequence of events.</p>	<p>Attachment 2 (pg. 1)</p> <p>NOTE 1: Steps in this checklist may be performed in an order other than listed based on sequence of events.</p>	<p>Modified content</p> <p>Removed “need to” as the words were extraneous.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
13	<p>Attachment 2</p> <p>1.c.2)</p> <p>NOTE: The following step constitutes completion of the NRC one-hour notification as required by 10CFR50.72(b).</p>	<p>Attachment 2</p> <p>1.c.</p> <p>NOTE 2: The following step constitutes completion of the NRC one-hour notification as required by 10CFR50.72(b).</p>	<p>Relocated content</p> <p>Moved the note up a couple steps to improve use as the note is supposed to be prior to the step it is applicable to.</p> <p>This change does not alter the assignment of responsibility or the</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>performance aspects of NRC notifications.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
14	<p>Attachment 2</p> <p>1.c.</p> <p>Notify the NRC immediately after completion of the SLO County and State notifications, and not later than 60 minutes after the time of declaration written on the DCPD ENF.</p>	<p>Attachment 2</p> <p>1.c.</p> <p>Notify the NRC immediately after completing notifications to SLO County, the State, and the Coast Guard (if applicable), and <u>not later than 60 minutes</u> after the time of declaration written on the DCPD ENF.</p>	<p>Modified content</p> <p>Reformatted the language in the step to improve readability.</p> <p>Added in “and the Coast Guard (if applicable)” as an offsite agency requiring notification prior to the NRC to align instructions in DCPD EPIP EP G-2, “Interim Emergency Response Organization,” with existing guidance in EP G-3, which has Coast Guard notifications occurring prior to NRC based on potential protective action recommendations needing to be issued for the ocean.</p> <p>This change does not alter the offsite notification process including any time requirements, assignment of responsibilities, or content of offsite emergency notifications.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

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15	<p>Attachment 2</p> <p>1.c.1)</p> <p>Obtain NRC Form 361 for reference (located in the position binder).</p> <p>1.c.2)</p> <p>Provide the NRC with the Emergency Classification, time of classification, and name of the Facility.</p> <p>1.c.2)a)</p> <p>Enter the date and time of the notification on the ENF.</p> <p>1.c.3)</p> <p>Provide data fields from NRC Form 361 as requested.</p>	<p>Attachment 2</p> <p>1.c.1)</p> <p>Complete NRC notification per EP G-3, Attachment 6, (Form 69-22200), "Instructions for Making Notification Phone Calls."</p>	<p>Modified content</p> <p>Removed duplicate instructions from EP G-2 that already exist in EP G-3.</p> <p>This change provides the user with a concise direction on which procedure to use to perform NRC notifications.</p> <p>This change does not alter the offsite notification process including any time requirements, assignment of responsibilities, or content of offsite emergency notifications.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
16	<p>N/A – added new content</p>	<p>Attachment 2</p> <p>1.c.2)</p> <p>Ensure all required 50.72 / 50.73 event notifications are completed (e.g. security deviations, TS deviations, ECCS actuations).</p>	<p>Added content</p> <p>Added in a new step to ensure all applicable notifications to the NRC are completed.</p> <p>This change ensures NRC notifications are made in accordance with 10 CFR 50.72 and 10 CFR 50.73.</p> <p>This change does not alter the offsite notification process including any time requirements, assignment of</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>responsibilities, or content of offsite emergency notifications.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
17	<p>Attachment 2</p> <p>1.c.4)</p> <p>Maintain an open line (continuous communication if requested by the NRC)</p>	<p>Attachment 2</p> <p>1.c.3)</p> <p>Maintain an open line (if requested by the NRC).</p>	<p>Modified content</p> <p>Removed "continuous communication" as it was extraneous.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
18	<p>N/A – added new content</p>	<p>Attachment 2</p> <p>2.a.5)</p> <p>Ensure follow-up verbal notifications to the NRC are completed per EP G-3, Attachment 6, (Form 69-22200), "Instructions for Making Notification Phone Calls."</p>	<p>Added content</p> <p>Added a step to ensure verbal follow-up notifications are performed using the correct attachment.</p> <p>This change provides the user with a concise direction on which procedure to use to perform follow-up NRC notifications.</p> <p>This change does not alter the offsite notification process including any time requirements, assignment of responsibilities, or content of offsite emergency notifications.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
19	<p>Attachment 3 (pg. 1)</p> <p>NOTE: Steps in this checklist may need to be performed in an order other than listed based on sequence of events.</p>	<p>Attachment 3 (pg. 1)</p> <p>NOTE: Steps in this checklist may be performed in an order other than listed based on sequence of events.</p>	<p>Modified content</p> <p>Removed “need to” as the words were extraneous.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
20	<p>Attachment 3</p> <p>Template 1</p> <p>At (time declared) _____ an UNUSUAL EVENT was declared at Diablo Canyon Unit 1 / 2 / 1&2 due to:</p> <p>There IS A / IS NO radioactive release to the environment above normal operating limits.</p> <p>Radiation levels ARE / ARE NOT above background at the site boundary.</p> <p><u>SELECT ONE:</u></p> <p><input type="checkbox"/> No further action is necessary at this time</p>	<p>Attachment 3</p> <p>Template 1</p> <p>At (time declared) _____ an UNUSUAL EVENT was declared at Diablo Canyon due to:</p> <p><u>SELECT ONE:</u></p> <p><input type="checkbox"/> No further action is necessary at this time</p>	<p>Modified content</p> <p>Removed the following items from the on the fly script:</p> <ul style="list-style-type: none"> • Unit 1 / 2 / 1&2 • There IS A / IS NO radioactive release to the environment above normal operating limits. • Radiation levels ARE / ARE NOT above background at the site boundary. <p>This information is readily available through other means of approved sources such as the initial and follow-up ENFs which are electronically retrievable in all emergency response facilities.</p> <p>This change will streamline process of activating the ERO call out system which</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
	<p>[] All emergency response organization (ERO) personnel report to your emergency response facility</p>	<p>[] All emergency response organization (ERO) personnel report to your emergency response facility</p>	<p>should result in improved ERO response times.</p> <p>This change was documented in 50.54(q) Evaluation 2019-08, which concluded prior NRC approval was not required.</p>
<p>21</p>	<p>Attachment 3</p> <p>Template 2</p> <p>At (time declared) _____ an emergency was declared at Diablo Canyon Unit 1 / 2 / 1&2 at the [] ALERT [] SITE AREA EMERGENCY [] GENERAL EMERGENCY</p> <p>level due to:</p> <p>There IS A / IS NO radioactive release to the environment above normal operating limits.</p> <p>Radiation levels ARE / ARE NOT above background at the site boundary.</p> <p>All emergency response organization (ERO) personnel report to your emergency response facility.</p>	<p>Attachment 3</p> <p>Template 2</p> <p>At (time declared) _____ a(n) ALERT / SITE AREA EMERGENCY / GENERAL EMERGENCY was declared at Diablo Canyon due to:</p> <p>All emergency response organization (ERO) personnel report to your emergency response facility.</p>	<p>Modified content</p> <p>Removed the following items from the on the fly script:</p> <ul style="list-style-type: none"> • Unit 1 / 2 / 1&2 • There IS A / IS NO radioactive release to the environment above normal operating limits. • Radiation levels ARE / ARE NOT above background at the site boundary. <p>This information is readily available through other means of approved sources such as the initial and follow-up ENFs which are electronically retrievable in all emergency response facilities.</p> <p>This change will streamline process of activating the ERO call out system which should result in improved ERO response times.</p> <p>This change was documented in 50.54(q) Evaluation 2019-08, which concluded prior NRC approval was not required.</p>
<p>22</p>	<p>Attachment 3</p>	<p>Attachment 3</p>	<p>Modified content</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
	<p>Template 3</p> <p>At (time declared) _____ a security emergency was declared at Diablo Canyon Units 1&2 at the</p> <p><input type="checkbox"/> UNUSUAL EVENT <input type="checkbox"/> ALERT <input type="checkbox"/> SITE AREA EMERGENCY <input type="checkbox"/> GENERAL EMERGENCY level, due to</p> <p>There IS A / IS NO radioactive release to the environment above normal operating limits.</p> <p>Radiation levels ARE / ARE NOT above background at the site boundary.</p> <p>TSC and OSC personnel that are currently offsite, report to your alternate facilities.</p> <p>EOF personnel that are currently offsite report to the EOF.</p> <p>JIC personnel that are currently offsite, report to the JIC.</p> <p>All ERO personnel currently onsite follow security directions.</p>	<p>Template 3</p> <p>At (time declared)_____ a security emergency was declared at Diablo Canyon at the</p> <p><input type="checkbox"/> UNUSUAL EVENT <input type="checkbox"/> ALERT <input type="checkbox"/> SITE AREA EMERGENCY <input type="checkbox"/> GENERAL EMERGENCY level, due to:</p> <p>TSC and OSC personnel that are currently offsite, report to your alternate facilities.</p> <p>EOF personnel that are currently offsite report to the EOF.</p> <p>JIC personnel that are currently offsite, report to the JIC.</p> <p>All ERO personnel currently onsite follow security directions.</p>	<p>Removed the following items from the on the fly script:</p> <ul style="list-style-type: none"> • Units 1&2 • There IS A / IS NO radioactive release to the environment above normal operating limits. • Radiation levels ARE / ARE NOT above background at the site boundary. <p>This change will streamline process of activating the ERO call out system which should result in improved ERO response times.</p> <p>This change was documented in 50.54(q) Evaluation 2019-08, which concluded prior NRC approval was not required.</p>
23	<p>Attachment 3</p> <p>Template 4</p>	<p>Attachment 3</p> <p>Template 4</p>	<p>Modified content</p> <p>Removed the following items from the on the fly script:</p> <ul style="list-style-type: none"> • Unit 1 / 2 / 1&2

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
	<p>As of (time) _____ the emergency at Diablo Canyon Unit 1 / 2 / 1&2 has been terminated.</p> <p>There IS A / IS NO radioactive release to the environment above normal operating limits.</p> <p>Radiation levels ARE / ARE NOT above background at the site boundary.</p>	<p>As of (time) _____ the emergency at Diablo Canyon has been terminated.</p>	<ul style="list-style-type: none"> • There IS A / IS NO radioactive release to the environment above normal operating limits. • Radiation levels ARE / ARE NOT above background at the site boundary. <p>This information is readily available through other means of approved sources such as the initial and follow-up ENFs which are electronically retrievable in all emergency response facilities.</p> <p>This change was documented in 50.54(q) Evaluation 2019-08, which concluded prior NRC approval was not required.</p>
24	<p>Attachment 4 (pg. 1)</p> <p>NOTE: Steps in this checklist may need to be performed in an order other than listed based on sequence of events.</p>	<p>Attachment 4 (pg. 1)</p> <p>NOTE: Steps in this checklist may be performed in an order other than listed based on sequence of events.</p>	<p>Modified content</p> <p>Removed “need to” as the words were extraneous.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
25	<p>Attachment 4</p> <p>1.d.</p> <p>Compare the EP R-2 calculation results with EP G-1 EALs.</p>	<p>Attachment 4</p> <p>1.d.</p> <p>Compare EP R-2 calculation results against EALs per EP G-1.</p>	<p>Modified content</p> <p>Reworded step to improve readability. This change does not alter the timing of the step or the actions taken in the step.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
26	Attachment 5 - Control Room Personnel Dispatch	Attachment 5 – Control Room Operator / Team Dispatch	<p>specific commitments. No additional evaluation required.</p> <p>Modified content</p> <p>Changed the title of Attachment 5 to reflect the actual scope of the attachment which is the dispatch of all personnel by the CR (operators and other teams).</p> <p>This change is a change in title only and does not later the scope, timing, or assignment of responsibility for the dispatch function.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
27	N/A – added new content.	<p>Attachment 5 (pg. 1)</p> <p>NOTE: The Shift Manager has the authority to approve deviations from established administrative controls, to protect public health and safety, per AD2.ID1 during declared emergencies.</p>	<p>Added content</p> <p>Added note to ensure CR personnel were aware of the existing processes in place for waiving administrative controls during emergencies. .</p> <p>This change ensures the CR has the necessary information readily available to be able to determine if normal work practices are hindering emergency response efforts.</p> <p>This change does not establish any new authorities, responsibilities, or processes that did not already exist at DCPP.</p>

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			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
28	<p>Attachment 5</p> <p>1.e.</p> <p>Dispatch operators per the flowchart on the next page.</p>	<p>Attachment 5</p> <p>1.a.</p> <p><u>WHEN</u> operators, emergency repair teams, or troubleshooting teams are needed, <u>THEN</u> dispatch per the flowchart in step 2 of this attachment.</p>	<p>Modified content</p> <p>Revised step to improve use and understanding of the scope of dispatching personnel from the CR.</p> <p>This change does not establish any new responsibilities or alter any performance aspects associated with briefing, dispatching, or tracking personnel from the CR.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
29	<p>N/A – added new content.</p>	<p>Attachment 5</p> <p>1.b.</p> <p>During a security event, work with the DCPW Watch Commander to determine if a security officer needs to escort the team.</p>	<p>Added content</p> <p>Added in step to coordinate response efforts with security during security events.</p> <p>This change does not establish any new responsibilities. Coordinating with security is an existing expectation. This change clarifies the expectation in the procedure.</p> <p>This change does not affect how the current E-Plan meets any planning</p>

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30	N/A – added new content.	Attachment 5 1.c. During a radiological event: 1) Work with the RP Access Senior or the OSC to determine if a C&RP tech needs to be assigned to the team to provide job coverage. 2) Work with the Shift Manager or the OSC to determine if emergency exposure controls are required per EP RB-2. 3) Work with the Shift Manager or the OSC to determine if KI is required per EP RB-3.	<p>standard functions, elements, or site-specific commitments. No additional evaluation required.</p> Added content Added in step to coordinate response efforts with Radiation Protection (RP) during radiological events. Added in triggers for the individual performing this attachment to coordinate with the SM or the OSC on the need for emergency exposure controls and KI as applicable. This change does not establish any new responsibilities. Coordinating with RP, the SM, and the Operational Support Center (OSC) are all existing expectations. This change clarifies these expectations in the procedure. This change does not establish any new responsibilities or alter any performance aspects associated with emergency exposure controls or worker protection as these responsibilities are already assigned to the SM and the OSC. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
31	N/A – added new content.	Attachment 5	Added content

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
		1.d. Perform a pre-job brief for the team via telephone, radio, or in person on the following items as applicable: <ul style="list-style-type: none"> • Industrial hazards • Radiological hazards (e.g. release in progress, high dose rate areas) • RP coordination (i.e. does RP need to go with them) • Security coordination (i.e. does Security need to go with them) • Tools, PPE, keys, protective clothing • Respiratory protection • Admin controls in place (i.e. normal work controls or SM approved emergency work controls) 	Added in guidance for the individual performing this attachment to provide a framework for what the pre-job briefs should cover. This change does not establish any new responsibilities associated with briefing, dispatching, or tracking personnel from the CR. Performing a pre-job brief is an existing expectation. This change clarifies the expectation in the procedure. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
32	N/A – added new content.	Attachment 5 1.e. <u>WHEN</u> the team is ready to be dispatched, <u>THEN</u> ensure the OSC is informed for tracking purposes (if applicable).	Added content This change does not establish any new responsibilities. It has always been an expectation that the CR tell the OSC when personnel leave or return to the CR. This change clarifies the expectation in the procedure. This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.
33	N/A – added new content.	Attachment 5 1.f.	Added content Added in a specific step to dispatch the team.

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
		Dispatch the team.	<p>This change does not establish any new responsibilities or alter any performance aspects associated with briefing, dispatching, or tracking personnel from the CR.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
34	N/A – added new content.	<p>Attachment 5</p> <p>1.g.</p> <p>Track the team using the table in step 3 of this attachment.</p>	<p>Added content</p> <p>Added in a specific step to track the team using the table provided.</p> <p>This change does not establish any new responsibilities or alter any performance aspects associated with briefing, dispatching, or tracking personnel from the CR.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
35	N/A – added new content.	<p>Attachment 5</p> <p>1.h.</p> <p><u>I</u>F normal administrative controls detract from emergency response efforts or increase the hazard to plant personnel or the public,</p>	<p>Added content</p> <p>Added content to ensure CR personnel were aware of the existing processes in place for waiving administrative controls during emergencies.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
		<p><u>THEN</u> request the SM to grant authority to deviate from established administrative controls to protect public health and safety per AD2.ID1.</p> <p>1) Prior to approving a deviation from normal administrative controls, ensure the SM understands what is being bypassed, and what the associated risks are to personnel and equipment.</p> <p>2) Make a log entry to document the decision to deviate from administrative controls.</p> <p>3) Refer to EP EF-2 Attachment 14 (Form 69-22032), "Normal Work Process Deviation Tracking Sheet" for additional guidance.</p>	<p>This change ensures the CR has the necessary information readily available to be able to determine if normal work practices are hindering emergency response efforts.</p> <p>This change does not establish any new authorities, responsibilities, or processes at DCPP.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
36	<p>Attachment 5</p> <p>Control Room Dispatch Flowchart</p>	<p>Attachment 5</p> <p>2. Team Dispatch Flowchart</p>	<p>Modified content</p> <p>Reformatted the flowchart to improve human factors.</p> <p>Expanded conditions under which the work control lead (WCL) contacts personnel dispatched from the CR to include changes in plant conditions in addition to when assembly and accountability is called for.</p> <p>Added a step to have the WCL debrief teams that complete their work prior to OSC activation.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>Removed the decision block about whether the team needed to perform an Operations procedure action or not. The decision block was extraneous – i.e. the outcome of the decision was the same.</p> <p>Added in a specific step for the WCL to notify the OSC when a team leaves the CR.</p> <p>Added in a step at the end of each pathway to return to the start so that the user has a way to repeat the process. This was done as an enhancement.</p> <p>This change does not establish any new responsibilities associated with briefing, dispatching, or tracking personnel from the CR. The updated flowchart provides improved alignment between the procedure and the existing performance expectations.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
37	<p>Attachment 5</p> <p>1. Instructions</p> <p>a. List all personnel in the field dispatched by the Control Room (including operators and other emergency responders).</p>	<p>Attachment 5</p> <p>3. Team Tracking Log</p> <p>a. List all personnel in the field dispatched by the Control Room (including operators and other emergency responders).</p>	<p>Modified content</p> <p>Reformatted and renumbered step 1.b. to break out multiple embedded steps into individual distinct steps.</p> <p>Reformatted and renumbered step 1.c. to make it a conditional step.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
	<p>b. If an individual changes locations, mark the time the change occurred in the return column and enter a new line for the new location.</p> <p>NOTE: The OSC needs to know about all operators dispatched from the Control Room, even after the OSC has taken control of tracking teams.</p> <p>c. When the OSC is activated, control and tracking of teams should be turned over to the OSC.</p> <p>d. OSC contact number: x2664</p>	<p>b. <u>IF</u> an individual changes locations, <u>THEN:</u></p> <p>1) Mark the time the change occurred in the return column.</p> <p>2) Enter a new line for the new location.</p> <p>NOTE: The OSC needs to know about all operators dispatched from the Control Room, even after the OSC has taken control of tracking teams.</p> <p>c. <u>WHEN</u> the OSC is activated, <u>THEN</u> turn over control and tracking of operators and teams to the OSC.</p> <p>1) OSC contact number: x2664</p>	<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
38	N/A – added new content.	<p>Attachment 5</p> <p>3.d. Contact all teams being tracked by the Control Room when any of the following occur:</p> <ul style="list-style-type: none"> • Assembly and Accountability is initiated • Change in plant conditions that may impact a team's assigned task • Change in plant or radiological conditions that may impact the safety of a team 	<p>Added content</p> <p>Expanded conditions under which the WCL contacts personnel dispatched from the CR to include changes in plant conditions in addition to when assembly and accountability is called for.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
39	Attachment 5	Attachment 5	<p>Modified content</p> <p>Reformatted and modified the content of the dispatch log to align more closely with the one used by the OSC.</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>Removed “#” column and “keycard” column as they provided little value to the process of tracking personnel.</p> <p>Added in “KI Issued” and “KI Ingested” as an enhancement to make it easier to identify which personnel have been issued KI and which personnel have ingested KI.</p> <p>This change does not establish any new responsibilities associated with briefing, dispatching, or tracking personnel from the CR.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
40	<p>Attachment 6</p> <p>Template A</p> <p>Attention plant personnel. An UNUSUAL EVENT has been declared on Unit___ due to:</p>	<p>Attachment 6</p> <p>Template A</p> <p>Attention plant personnel. An UNUSUAL EVENT has been declared due to:</p>	<p>Modified content</p> <p>Removed “on Unit” from the PA template script as it is unnecessary for the purpose of the PA which is to notify plant personnel that an emergency has been declared and that ERO response may be needed.</p> <p>This change does not establish any new responsibilities or alter any performance aspects associated with mobilizing the ERO or alerting plant personnel of the declared emergency.</p>

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			<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site specific commitments. No additional evaluation required.</p>
41	<p>Attachment 6</p> <p>Template B</p> <p>Attention plant personnel. An ALERT has been declared on Unit__ due to:</p>	<p>Attachment 6</p> <p>Template B</p> <p>Attention plant personnel. An ALERT has been declared due to:</p>	<p>Modified content</p> <p>Removed "on Unit" from the public address system (PA) template script as it is unnecessary for the purpose of the PA which is to notify plant personnel that an emergency has been declared and that ERO response may be needed.</p> <p>This change does not establish any new responsibilities or alter any performance aspects associated with mobilizing the ERO or alerting plant personnel of the declared emergency.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
42	<p>Attachment 6</p> <p>Template C</p> <p>Attention plant personnel. A Site Area Emergency / General Emergency has been declared on Unit__ due to:</p>	<p>Attachment 6</p> <p>Template C</p> <p>Attention plant personnel. A Site Area Emergency / General Emergency has been declared due to:</p>	<p>Modified content</p> <p>Removed "on Unit" from the PA template script as it is unnecessary for the purpose of the PA which is to notify plant personnel that an emergency has been declared and that ERO response may be needed.</p> <p>This change does not establish any new responsibilities or alter any performance</p>

Change	Original Content (Revision 51)	Revised Content (Revision 52)	Description of Change
			<p>aspects associated with mobilizing the ERO or alerting plant personnel of the declared emergency.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
43	<p>Attachment 6</p> <p>Template D</p> <p>Attention plant personnel. A Site Area Emergency / General Emergency has been declared on Unit__ due to:</p>	<p>Attachment 6</p> <p>Template D</p> <p>Attention plant personnel. A Site Area Emergency / General Emergency has been declared due to:</p>	<p>Modified content</p> <p>Removed “on Unit” from the PA template script as it is unnecessary for the purpose of the PA which is to notify plant personnel that an emergency has been declared and that ERO response may be needed.</p> <p>This change does not establish any new responsibilities or alter any performance aspects associated with mobilizing the ERO or alerting plant personnel of the declared emergency.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>