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PLANT PROCEDURES MANUAL	PCN#: N/A
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DESCRIPTION OF CHANGES

Justification (required for major revision)
<p>1) Revised section 4.3 to describe the recently adopted use of the Automated Process Workflows (APW) process for revising ERO positional checklists in response to CR 390014. (AR-CA 390014-01)</p> <p>2) Revised section 2.2 to clarify applicability to align with the action described in # 1) above.</p>

Page(s)	Description (including summary, reason, initiating document, if applicable)
4	Revised section 2.2 to clarify the types of Emergency Plan supporting documents are governed by this procedure.
6 & 7	Revised section 4.3 to describe the recently adopted use of the Automated Process Workflows (APW) process for revising ERO positional checklists in response to CR 390014. (AR-CA 390014-01) Removed references to the forms that were used to document revisions prior to the adoption of the electronic, APW process. For clarification purposes, added in discussion about the pre-existing use of the 50.54(q) process and internal department instructions associated with the revision of ERO Positional Checklists.
9	Deleted reference to revision process forms that are no longer needed. For clarification, added references to three documents governing pre-existing processes that apply to the revision of ERO Positional Checklists.
12 & 16	Updated AR references to current Model AR numbers. (Editorial)

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1.0 PURPOSE

This procedure identifies the activities necessary to maintain a current emergency preparedness program in accordance with commitments made in the Columbia Generating Station Emergency Plan. {R-5.1} {R-5.3}

2.0 DISCUSSION

2.1 General Program Maintenance

The Emergency Preparedness (EP) Program for Columbia Generating Station has many facets which require ongoing review and assessment to ensure that the Program is maintained. Many of these are attended to by groups outside of the Emergency Preparedness Department. For example, field survey instruments are checked and calibrated by Radiological Services, field team vehicles and emergency diesel generators are maintained by Facilities and Commercial Engineering, pagers and sirens are maintained by Information Services, etc.

If organizations that assist in the process of maintaining the EP Program are not diligent in performing their portion of the effort, the Program could be adversely affected. For this reason, the Emergency Preparedness Department will maintain an oversight role to ensure that all program maintenance requirements are being performed.

2.2 Emergency Plan Documents

Documents (such as Position Checklists and record keeping) are used to provide guidance to members of the Emergency Response Organization to perform actions in support of the Emergency Plan.

This procedure provides additional guidance, beyond Document Control procedures, for the maintenance of these documents to maintain program effectiveness.

3.0 RESPONSIBILITIES

3.1 Manager, Emergency Preparedness

3.1.1 The Manager, Emergency Preparedness has the overall responsibility to maintain the CGS Emergency Plan Program.

3.1.2 The manager is responsible for overseeing maintenance activities conducted by other responsible groups.

3.2 Emergency Preparedness Staff

Perform appropriate actions to ensure Emergency Plan documents, facilities and other program elements are maintained consistent with the Emergency Plan and changes do not reduce the effectiveness of the program.

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3.3 Applicable Energy Northwest Managers

Directing and coordinating activities required to maintain the Emergency Plan Program.

4.0 PROCEDURE

4.1 Manager, Emergency Preparedness

4.1.1 Coordinate, as appropriate, with Energy Northwest managers to implement the requirements of Attachment 7.1, Topics Requiring Periodic Review or Action.

4.1.2 Maintain, prepare, and archive records generated as a result of Emergency Preparedness program implementation in accordance with SWP-REC-01. {R-5.4}

4.1.3 Notify the Manager, Nuclear Security, of any condition which would preclude or interfere with the ability of Energy Northwest to implement the requirements of the Columbia Generating Station Emergency Plan.

4.2 Applicable Energy Northwest Managers

4.2.1 Coordinate, as appropriate, with the Manager, Emergency Preparedness to implement the requirements of Attachment 7.1, Topics Requiring Periodic Review or Action.

4.2.2 Notify the Manager, Emergency Preparedness of any condition which would preclude or interfere with the ability of Energy Northwest to respond to emergency conditions.

4.3 Control of Emergency Preparedness ERO Positional Checklists and Forms

4.3.1 Emergency Plan Implementing Procedures are supplemented by ERO Positional Checklists (for most ERO positions / functions) and function-specific controlled forms.

a. ERO Positional Checklists and ERO-related forms are provided for use by ERO staff positions in position-specific binders, which are controlled copies and the contents of which are maintained in accordance with this procedure.

b. Position-specific binders include a "Binder Tab Index" (on the last page of the Positional Checklist) which lists the desired complement of procedures, checklists, and forms for a given position to be able to perform for two shifts without "re-charging" the binder.

1) Position-specific binders, when specified for an ERO position, are considered complete when they contain at least one, current copy of each required document listed in the Positional Checklist's "Binder Tab Index".

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- c. Emergency Preparedness maintains a comprehensive list of Positional Binders and their contents.

4.3.2 Emergency Preparedness ERO Positional Checklist forms are revised either as major or minor revisions using the Automated Process Workflows (APW) process. (Editorial changes are typically treated as a minor revision and appear as such in Asset Suite).

- a. Use of the APW process ensures consistency with the station's current review expectations for major or minor revisions as applicable.
- b. Proposed Checklist revisions receive a 50.54(q) screen in accordance with EPI-16, 50.54(q) Change Evaluation. When necessary, depending on the revision, EPI-16 guidance may indicate the need for a 50.54(q) evaluation.
- c. ERO Positional Checklists are structured and formatted in accordance with EPI-32, Maintenance of ERO Positional Binders. SWP-PRO-03, Writer's Manual, guidance regarding formatting and structure does not apply to ERO Positional Checklist forms.

4.3.3 Generation of, or revisions to Emergency Preparedness controlled forms are processed using the APW process.

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4.4 Standard Protocol for Maintaining and Completing Model AR Assignments

- 4.4.1 Routine periodic Emergency Preparedness activities that are required to maintain the CGS Emergency Plan are scheduled through Model Action Requests (ARs). These Model ARs are identified in Attachment 7.3 to PPM 13.14.4, and some are also identified in Attachment 7.1 of this procedure.
- 4.4.2 The periodic EP activities based on Model ARs are implemented and documented through daughter ARs and AR assignments generated from the Model ARs. For this reason, the impacts of changes to Model ARs should be clearly understood.
- a. Model ARs are ARs that have Model = checked on the Asset Suite A010 Panel.
 - b. Model ARs will automatically generate daughter ARs and AR assignments on the date and at the frequency specified in the Model AR (Next Date, Period and No. on the Asset Suite A010 Panel). This automatic generation is through a nightly Asset Suite batch process that looks at the Next Date of Model ARs, and backgrounds the Model when the current date = Next Date.
 - c. When the daughter AR and AR assignments are backgrounded from the Model, these will have a Due Date equal to the Due Date on the Model AR and Model AR assignments. For example, if the Model AR has a Due Date = 09/30/12, a Next Date = 06/01/12, Period = M and No. = 3 (for a quarterly frequency), and Model AR Assignment 01 has a Due Date = 07/15/12, then, on 06/01/12, a daughter AR will be generated with a Due Date = 09/30/12 and an AR Assignment 01 with a Due Date = 07/15/12. On the Model AR and AR assignments, the Due Date and Next Date will automatically be reset based on the Period and No. (frequency).
 - d. Daughter ARs and AR assignments are automatically generated by backgrounding the Model AR and assignments. This means that all of the information in the Model (including data from related panels, such as In-Progress Notes, but not Cross-References) will be copied over to the daughter.
 - e. To provide a means of tracking and retrieving daughter ARs, Model ARs should have the following characteristics:
 - 1) Model AR number should be included in the Subject line.
 - 2) In Keywords (Panel A013), Keyword = EPLAN
 - 3) In Attributes (Panel A015), TRACKING CODE = Model AR number
- 4.4.3 Daughter ARs and AR assignments are tracked and completed as follows:
- a. Assignment Due Dates may be rescheduled as necessary, but not beyond the end of the AR Due Date (which is the end of the frequency period; e.g., monthly, quarterly, etc.).

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- b. Assignments should be completed as per the instructions in the Assignment Notes and In-Progress Notes, as applicable.
- c. Document completion of Assignment in the Completion Notes.
- d. Documents generated as a result of the Assignment should be scanned and uploaded to the EDMS of the AR.
- e. Submit originals of documents generated as a result of the Assignment to the EP Records Coordinator for retention.

5.0 REFERENCES

- 5.1 EP-01, Emergency Plan
- 5.2 10 CFR 50.54(q), Condition of Licenses
- 5.3 10 CFR 50.54(t), Conditions of Licenses, (audits)
- 5.4 NUREG-0654, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants
- 5.5 10 CFR 50 Appendix E, IV and V
- 5.6 10 CFR 72.44, License Conditions
- 5.7 10 CFR 50.47(b), Emergency Plans
- 5.8 OQAPD, Appendix III
- 5.9 SWP-LIC-03, Licensing Document Change Process
- 5.10 PPM 13.14.4, Emergency Equipment
- 5.11 PERA 201-1793-02
- 5.12 PERA 202-0098-23
- 5.13 PERA 202-0430-03
- 5.14 PERA 202-0558-03
- 5.15 PERA 202-0635-01
- 5.16 PERA 202-0684-02
- 5.17 PERA 202-0728-06

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- 5.18 AR-CR 226805, Model AR process for EP routines not working as intended
- 5.19 Ventyx Asset Suite Action Tracking, Specifications with Revision Marks, Release 6.0.0, June 2007
- 5.20 SWP-LIC-02, Licensing Basis Impact Determinations
- 5.21 SWP-PRO-02, Preparation, Review, Approval, and Distribution of Procedures
- 5.22 GBP-DOC-03, Forms Control Process
- 5.23 SWP-PRO-03, Writer's Manual
- 5.24 EPI-16, 50.54(q) Change Evaluation
- 5.25 EPI-32, Maintenance of ERO Positional Binders
- 6.0 DOCUMENTATION
- 6.1 Positional Checklist revisions are submitted to the Permanent Plant File. At a minimum, the record should consist of the following documents:
 - Copy of the revised checklist
 - Procedure Revision form and associated paperwork (for major revisions)
 - Marked up pages with printed name, signature, and date (for editorial changes)
- 7.0 ATTACHMENTS
- 7.1 Topics Requiring Periodic Review or Action

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TOPICS REQUIRING PERIODIC REVIEW OR ACTION

<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
1. Columbia Generating Station Emergency Plan Review (Model AR 249408-01)	Manager, Emergency Preparedness {R-5.1}	Annually	<p>A. Utilize guidance from SWP-LIC-03, to coordinate review, revision, approval, and issuance of the plan to incorporate changes resulting from new regulations, critiques of drills/exercises, audit findings, and comments from personnel or agencies inside and outside Energy Northwest.</p> <p>B. For Emergency Plan changes that involve changes to the EAL scheme, ensure that the Washington State Emergency Management, the Benton and Franklin County Departments of Emergency Management, and the Department of Energy-Richland Operations are contacted early in the review/revision process and that their comments are solicited and considered for input into the process. Document this portion of the review.</p> <p>C. Ensure a Licensing Basis Impact review is performed as required by SWP-LIC-03.</p> <p>D. Ensure the supporting documentation is submitted for POC review consistent with the proposed change.</p> <p>E. Ensure a report of Emergency Plan changes is sent to the NRC per 10CFR50.4(b)(5) within 30 days of making the changes and/or per 10CFR72.44(f) within six months after the change is made. {R-5.2, R-5.5 , R-5.6}</p> <p>F. Ensure Emergency Plan is reviewed, revised, and approved per 10CFR50 Appendix E, V. {R-5.5}</p>

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	<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
2.	Columbia Generating Station Emergency Plan Implementing Procedures (EIPs)	Manager, Emergency Preparedness	As Necessary	<p>A. Utilize guidance from SWP-PR0-02 to coordinate reviews, revisions, and deviations required by revisions to the Emergency Plan or other requirements.</p> <p>B. Ensure Licensing Basis Impact reviews are completed as required by SWP-LIC-02.</p> <p>C. Ensure documentation is submitted for POC review, as required and approved changes are placed in locations where they are likely to be used. {R-5.8}</p> <p>D. Ensure that revisions affecting offsite response are coordinated with the appropriate agencies.</p>
3.	Columbia Generating Station EIPs Telephone Numbers (Model AR 236166)	Manager, Emergency Preparedness	Quarterly	<p>A. Review telephone numbers listed in the Emergency Phone Directory and EIPs, and change as required.</p>
4.	National Weather Service (Model AR 235576)	Manager, Emergency Preparedness	Monthly	<p>A. Check communications with the NWS first order station and NWS forecasting station to ensure routine meteorological observations and forecasts can be accessed. Refer to NUREG-0654, Annex 1 to Appendix 2, (3)(i).</p>
5.	Emergency Action Level (EAL) Review (Model AR 249408-06)	Manager, Emergency Preparedness	Annually {R-5.5}	<p>A. Ensure officials from the State of Washington, Benton and Franklin Counties, and DOE-RL are afforded the opportunity to review EAL classification scheme. {R-5.5}</p>
6.	Letters Of Agreement	Manager, Emergency Preparedness	Annually	<p>A. Refer to Emergency Plan Appendix 4 for the list of Letters of Agreement.</p>

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<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
7. Plans And/Or Contracts	Manager, Emergency Preparedness	Annually	A. Refer to Emergency Plan Appendix 1 for the list of Supporting Plans And/Or Contracts.
8. Emergency Response Organization (ERO) Assignment List (Model AR 236241-01)	Manager, Emergency Preparedness	Quarterly (or after substantial change)	A. Maintain and coordinate an Emergency Response Organization position assignment list that meets Emergency Plan Section 2 requirements for review, revision, approval, and issuance of current list.
9. ERO Training (Model AR 249408-09 and 249408-12)	Manager, Emergency Preparedness	Monthly	A. Review status of Emergency Response Organization personnel in the training database to ensure emergency position qualifications are being met by assigned personnel.
		As Necessary	B. Review and approve new or revised Emergency Training lessons.
		Annually	C. Ensure that a radiological training program is made available to local services personnel such as fire company and hospital personnel. {R-5.5}
		Annually	D. Ensure that a radiological training program is made available to state and county agencies, and personnel involved with the emergency preparedness effort, at least annually.
		Annually	E. Conduct a review of GET materials and provide comments, forward to Technical Training.

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<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
10. Emergency Equipment and Supplies (Asset Suite Model ARs and PMIDs)	Manager, Emergency Preparedness	Monthly, Quarterly, Semi-Annually, or Annually (as required)	A. Ensure tasks are performed as required by PPM 13.14.4.
		Annually	B. Review EP maintenance and testing activities in Asset Suite. Verify that Emergency Plan and EPIP maintenance and testing activities are effectively scheduled and tracked.
11. Emergency Facilities (Model AR 236207)	Manager, Emergency Preparedness ¹	As Necessary	A. Ensure facilities are maintained and that modifications to any of Energy Northwest's Emergency Centers are documented and approved by the Manager, Emergency Preparedness.
12. Emergency Phone Directory/ERO Phone List/Duty Rosters (for pager carriers) (Model AR 236166)	Manager, Emergency Preparedness	Quarterly	A. Verify listed numbers in the emergency phone directory are current. Ensure Parts A & C phone numbers are correct. Revise as needed and make appropriate distribution. Verify phone numbers in EPIPs are accurate. If changes are made, inform SCC to ensure Parts A & C are updated.
13. EP Program Audit (AR 60285)	Manager, Emergency Preparedness	Biennially, or more frequently if required	A. Ensure an audit is conducted that meets the QQAPD requirements and includes the Emergency Plan and Implementing Procedures, training, readiness testing, equipment, and interfaces with state and local governments. {R-5.3, R-5.4}
			B. Ensure the Audit Report is submitted to the applicable Vice President for evaluation of findings and resolutions.

¹ And other Energy Northwest managers, such as Health Physics, Operations, Chemistry, Security, Records and Information Management, Telecommunications, and Maintenance.

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	<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
13	EP Program Audit (AR 60285)	Manager, Emergency Preparedness	As Necessary	<p>C. Ensure that findings requiring Energy Northwest corrective action are tracked to completion.</p> <p>D. Ensure the results of the review and recommendations are forwarded to appropriate Corporate and Plant Managers, and that portions pertinent to interface with the state and counties are made available to those jurisdictions.</p>
			Annually	<p>E. Ensure that the EP program audit includes an evaluation of the emergency evacuation notification of individuals in the Owner Controlled Area (i.e., IDC, et al) and their response.</p>
14.	Drill/Exercise Program	Manager, Emergency Preparedness	Annually	<p>A. Prepare and conduct a drill/exercise program schedule in accordance with Emergency Plan, Section 8, and 10CFR50, Appendix E, Section IV F requirements.</p> <p>B. Coordinate drill/exercise controllers and evaluators to control and evaluate the ability of emergency responders to perform their Emergency Plan responsibilities.</p> <p>C. Ensure that drill/exercise evaluation and critique findings are formally documented, and management controls are established to ensure that needed corrective actions are implemented.</p>

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<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
15. Emergency Planning Staff qualifications	Manager, Emergency Preparedness	As Necessary	A. Ensure Emergency Planning staff members maintain their professional qualifications by periodic attendance at industry seminars, training courses, and through observation of, or participation in, emergency exercises conducted at other facilities.
16. Population Study and Evacuation Time Estimate (Model AR 249408-07)	Manager, Emergency Preparedness	Annually	A. Review Emergency Plan Section 5, and update as necessary.
17. Media Briefing (Model AR 249408-03)	Manager, Emergency Preparedness	Annually	A. Ensure annual media briefing is conducted in accordance with Emergency Plan, Section 9.
18. Public Information (Model AR 249408-02)	Manager, Emergency Preparedness	Annually or As Needed	A. Ensure preparation and distribution of public information instructions on essential actions to be taken during emergencies in accordance with Emergency Plan Section 9.
19. Energy Northwest Alert & Notification System Tests (Model ARs 216342 & 236173, AR-REG 61202)	Manager, Emergency Preparedness	Annually or As Required	A. Schedule and conduct operational tests of the Energy Northwest Emergency Alert and Notification System described in Emergency Plan, Section 6. B. Document and transmit reports of test results as required by FEMA Guidance Memorandum for offsite activities.
20. Severe Accident Guidelines (PPM 1.2.7)	Reactor/Fuels Engineering Manager	Annually	A. Review and update Technical Support Guidelines as necessary.

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<u>TOPIC</u>	<u>RESPONSIBILITY</u>	<u>FREQUENCY</u>	<u>SCOPE</u>
21. IDC Implementation of Columbia Generating Station Eplan (Model AR 273501)	Manager, Emergency Preparedness	Annually	A. Conduct an annual assessment of the IDC implementation of the Columbia Generating Station Emergency Plan.
		Annually	B. Ensure participation of IDC personnel during Columbia Generating Station emergency response drills.
	Manager, IDC	Monthly	C. Contact entities resident in the IDC area whose personnel have neither blue nor green badges, and for whom emergency response training is appropriate, to confirm that no new or untrained personnel are employed or present.
	Supervisor, Security Operations	As necessary	D. Ensure SPIPs used to govern security actions for IDC protective actions are reviewed by Emergency Preparedness.

END