EDWIN I. HATCH NUCLEAR PLANT
UNITS 1 AND 2

NUCLEAR SECURITY TRAINING AND QUALIFICATION PLAN

March 1993

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EDWIN I. HATCH NUCLEAR PLANT
UNITS 1 AND 2

NUCLEAR SECURITY TRAINING AND QUALIFICATION PLAN

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STATEMENT OF INTENT

The qualification standards and training materials presented herein are intended to provide the Edwin I. Hatch Nuclear Plant with a security force of the highest degree of fitness for duty.

It is the intent of the Georgia Power Company (GPC) to adhere to the spirit of nuclear regulatory requirements while retaining sufficient flexibility for daily operational functions.

To this end, the qualification standards described and the functional tasks and duties to be performed will result in:

1. A well-trained, self-confident, professional security force, capable of discharging all of its functions.

2. Effective integration of the security force into overall plant operations.

The Edwin I. Hatch Nuclear Plant Security Training and Qualification Plan (TQP) shall meet the standards of 10 CFR 73.55, ANSI-ANS 3.3 1982, and Regulatory Guide 5.66 (June 1991) for access authorization as outlined in the Hatch TQP.

1.0 IMPLEMENTATION OF PLAN

The training and qualification of uniformed security personnel will be conducted in accordance with the Plant Hatch TQP following April 15, 1987.

2.0 SUITABILITY OF PERSONNEL

Prior to employment or assignment to the Plant Hatch security force, an individual shall meet the following suitability criteria:

A. Pre-Employment Criteria

Before being assigned to the Plant Hatch uniformed security force, an individual will possess a high school diploma or pass an equivalent performance examination designed to measure basic job-related mathematical, language, and reasoning skills. The individual must also have the ability and knowledge required to perform security job duties.

B. Felony Convictions

Prospective uniformed security personnel will have no history of felony convictions that involve the use of a weapon or reflect on the individual's reliability. Where there is evidence of a felony conviction, complete documentation will be obtained, and an individual assessment of the case will be made by appropriate management officials. Investigations of security personnel will be conducted in accordance with the guidance provided in Regulatory Guide 5.66 (June 1991).

C. Age Requirement

All individuals assigned to the Plant Hatch uniformed security organization in an armed capacity will be at least 21 years of age.

3.0 PHYSICAL AND MENTAL QUALIFICATIONS

3.1 General Physical Qualifications

Individuals assigned to the Plant Hatch uniformed security force shall have no physical weakness or abnormalities that would adversely affect the performance of assigned duties.

3.2 Physical Examination

A prospective member of the uniformed security force will be given a pre-employment physical examination administered by a GPC-retained, licensed physician. After conducting the physical examination, the physician will attest that no condition exists that would render the individual incapable of performing his or her required security duties.

3.2.1 Physical Fitness Qualification

All armed, uniformed members of the security force will demonstrate their physical fitness by performing a physical fitness test. A copy of this test is included in Annex 1-1. The test will be administered following the medical examination, which includes a determination and written certification by a licensed physician that there are no medical restrictions, as disclosed by the medical examination, to participation by the individual in physical fitness tests.

3.2.2 Disqualifying Illness

Individuals who have a medical history or medical diagnosis of epilepsy, diabetes, or other incapacitating disease or physical injury will be evaluated by the Safety and Health Department to determine fitness for duty.

3.2.3 Drug or Alcohol Addictions

Individuals who have a history or medical diagnosis of drug or alcohol addiction shall provide certified documentation of having completed a rehabilitation program; such information will be presented to appropriate management for evaluation.

3.3 Vision (Armed, Uniformed Personnel)

For each individual, distant visual acuity in each eye shall be correctable to 20/30 (Snellen or equivalent) in the better eye and 20/40 in the other eye with eyeglasses or contact lenses. If uncorrected distance vision is not at least 20/40 in the

better eye, the individual shall carry an extra pair of corrective lenses. Near visual acuity, corrected or uncorrected, shall be at least 20/40 in the better eye. Field of vision must be at least 70 horizontal meridian in each eye. The ability to distinguish red, green, and yellow colors is required. Loss of vision in one eye is disqualifying. Glaucoma shall be disqualifying, unless controlled by acceptable medical or surgical means, provided such medication as may be used for controlling glaucoma does not cause undesirable side effects which adversely affect the individual's ability to perform assigned security job duties and provided the visual acuity and field of vision requirements stated above are met. On-the-job evaluation shall be used for individuals who exhibit a mild color vision defect.

Where corrective eyeglasses are required, they shall be of the safety glass type. The use of corrective eyeglasses or contact lenses shall not interfere with an individual's ability to effectively perform assigned security job duties during normal or emergency operations.

3.4 Hearing (Armed, Uniformed Personnel)

Each individual shall have no hearing loss in the better ear greater than 30 dB average at 500 Hz, 1000 Hz, and 2000 Hz, with no level greater than 40 dB at any one frequency (by ISO 389, "Standard Reference Zero for the Calibration of the Purtone Audiometer," [1975] or ANSI S3.6-1969 [R 1973], "Specifications for Audiometers").

A hearing aid is acceptable provided suitable testing procedures demonstrate auditory acuity equivalent to the above-stated requirement. The use of a hearing aid shall not decrease the effective performance of the individual's assigned security job duties during normal or emergency operation.

3.5 Incapacitation

An individual who has been incapacitated by a serious illness or injury will be examined by a GPC-retained, licensed physician prior to being reassigned to security duty. The physician will attest that the individual is medically capable of performing specifically assigned security duties. An individual recuperating from an illness or injury may be assigned specific, dedicated security duties, as long as the incapacitating factor does not hinder the performance required for the accomplishment of the assigned duty. The individual may be periodically re-examined to determine the individual's fitness for continued assignment to security duties.

In all circumstances, armed uniformed security personnel must be in conformance with the prescribed physical condition before assuming those duties as an armed security officer.

3.6 Mental Qualification

Individuals assigned as members of the uniformed security force will be observed by a GPC-retained, licensed physician to identify emotional instability. The physician's findings will be attested to as part of the pre-employment and annual physical examinations.

Each individual shall demonstrate mental alertness and the capability to exercise good judgment, implement instructions, assimilate assigned security task, and possess the acuity of senses and ability of expression sufficient to permit accurate communication by written, spoken, or audible, visible, or other signals required by assigned job duties.

Each individual shall have no emotional instability that would interfere with the effective performance of assigned security job duties. This determination shall be made by a licensed psychologist, psychiatrist, physician, or other person professionally trained to identify emotional instability.

Each individual shall be continually observed to allow for appropriate corrective measures in the event of emotional instability while performing assigned security job duties. Identification of emotional instability by responsible supervision shall be subject to verification by a GPC-retained licensed physician.

3.7 Annual Physical Requalification

All armed and uniformed security force personnel will be required to pass an annual physical examination in accordance with section 3.2 of the TQP. Physical fitness testing will be required at least once each 12 months in accordance with section 3.2 of this plan. "Annually" and/or "once each 12 months" shall mean "not later than the last day of the twelfth month following the month during which the previous qualification took place."

3.8 Documentation

Documentation concerning an individual's suitability, medical status, and physical fitness test will be maintained at the site by the nuclear security manager or his designated alternate for

not less than 2 calendar years. Access authorization documentation required in accordance with Regulatory Guide 5.66 (June 1991) will be retained for a period of 5 years after access authorization has been terminated. This information will be available for inspection purposes in accordance with applicable requirements.

4.0 TRAINING REQUIREMENTS

4.1 Initial Training and Qualification

All personnel assigned security duties, as listed by duty position in Annex 1-2, will be trained and qualified in accordance with the Hatch TQP. Individuals may be assigned, trained, and qualified to perform all security duties or only specific security duties. In either case, with the exception of on-the-job-training, no individual will be assigned to a security duty, prior to his successful completion of the training program correlated to that duty and prior to his having successfully demonstrated that he can perform that duty. Where an individual fails to meet the performance objectives of the TQP, they will be retrained and qualified in the tasks in which they are deficient prior to being assigned duties requiring the performance of those tasks. Documentation for initial qualification will be in accordance with section 4.4 of the TQP. During the on-the-job-training phase, an individual may perform duties for which he/she has not been qualified providing this is done under the observation of an instructor or designated on-the-job-training trainer/evaluator who is qualified to perform the duties.

4.2 Requalification

Requalification in selected tasks or elements of tasks will be given to all uniformed security personnel as indicated in Annex 1-2 (Task and Duty Summary). Requalification in those tasks identified as Requalification Tasks will be accomplished once each 12 months. If during requalification, an individual is found deficient in a given task, he/she will be retrained and qualified in the task. A deficiency in a particular task or element shall not restrict a person from being assigned to other specific security duties which do not require the performance of the task or element in which that person was found to be deficient. Once each 12 months shall mean not later than the last day of the twelfth month following the month during which the previous qualification took place. Documentation for requalification will be in accordance with section 4.4 of the TQP.

4.3 Performance Deficiencies

If an individual is found to be deficient in the performance of a listed task while on duty, the persons immediate supervisor

will immediately correct persons performance by retraining and requalifying the persons or by assigning the persons to duties not requiring the performance of the task in which he/she was found to be deficient, pending retraining and requalification by supervisory or training personnel. Documentation for this requalification will be in accordance with Section 4.4 of the TQP.

4.4 Training Documentation

Attestation of performance will be by initials or signature of certified security training personnel (instructor) or other designated representatives (supervisory personnel) of the nuclear security manager. Tests/task certification forms will show the date of task performance of subject area, and will be attested to by the examinee's initials or signature and the initials or signature of the person assigned to give the class and/or administer the test. For inspection purposes, this documentation will be maintained and retained at the site for not less than 2 calendar years.

4.5 Training Materials

A copy of training materials developed for the implementation of the Hatch TQP will be onsite for inspection purposes.

4.6 Security Equipment

Officers will be trained in the use of site-issued security equipment as listed in the Plant Hatch Physical Security Plan (PSP) required for the performance of their duties.

4.7 Security Duties

Officers will be trained to implement the provisions of the PSP and Contingency Plans.

4.8 Tasks and Duties to be Performed

Normal duty and response force tasks will be performed with site-issued security equipment. This section lists tasks to be performed.

On all written examinations, a minimum score of 70 percent must be attained. On all practical examinations, the student will correctly demonstrate critical elements of the particular task being tested in accordance with the Security Plan and other applicable site procedures. This process will be carried out using a preprinted criteria form. Each criteria form will adequately reflect satisfactory or unsatisfactory performance.

Task 1: Identify and/or describe potential threats to the site and their consequences.

1. Elements

   A. Natural threats.

   B. Man-made threats.

   C. Design basis threat.

2. Performance objectives

   On a written examination, the student will recognize and/or identify and/or describe elements A through C.

Task 2: Identify and/or describe the security concepts utilized to neutralize potential threats.

1. Elements

   A. Regulatory requirements.

   B. PSP.

   C. Security design features.

   D. Security system.

2. Performance objectives

   On a written examination, the student will recognize and/or identify and/or describe elements A through D.

Task 3: Identify and/or describe the operation of the security force.

1. Elements

   A. Site security organization and chain of supervision.

   B. Types of security posts and duties of officers.

   C. Organization and duties of response force.

   D. Liaison with local law enforcement agencies.

2. Performance objectives

   On a written examination, the student will recognize and/or identify and/or describe elements A through D.

Task 4: Personnel identification and access authorization.

1. Elements

   A. Issue badges to site employees.

   B. Issue badges to visitors.

   C. Grant/Deny Access.

2. Performance objectives

   On a written examination and/or in a practical exercise, the student will recognize and/or identify and/or describe and/or demonstrate elements A through C in accordance with the PSP and other applicable site security procedures.

Task 5: Personnel, package, and material search and access control.

1. Elements

   A. Monitor/operate search equipment.

   B. Conduct searches.

   C. Test search equipment.

2. Performance objectives

On a written examination and/or in a practical exercise, the student will recognize and/or identify and/or describe and/or demonstrate elements A through C in accordance with the PSP and other site security procedures.

Task 6: Control vehicles.

1. Elements

A. Grant/deny vehicle access.

B. Escort/disable vehicles.

C. Search vehicles.

2. Performance objectives

On a written examination and/or in a practical exercise, the student will recognize and/or identify and/or describe and/or demonstrate elements A through C in accordance with the PSP and other applicable site security procedures.

Task 7: Conduct a patrol.

1. Elements

A. Conduct protected area patrol.

B. Conduct vital area patrol.

C. Respond to alarm.

2. Performance objectives

On a written examination and/or in a practical exercise, the student will recognize and/or identify and/or describe and/or demonstrate elements A through C in accordance with the PSP and other site security procedures.

Task 8: Communications.

1. Elements

A. Establish radio communications.

B. Establish non-radio communications.

C. Implement contingency procedures.

2. Performance objectives

On a written examination and/or in a practical exercise, the student will recognize and/or identify and/or describe and/or demonstrate elements A through C in accordance with the PSP and other applicable site security procedures.

Task 9: Security law.

1. Elements

A. Georgia criminal law.

B. Laws of arrest, search, and seizure.

C. Laws relating to the use of force.

2. Performance objectives

On a written examination, the student will recognize and/or identify and/or describe elements A through C.

Task 10: Restrain and search arrested persons.

1. Elements

A. Use handcuffs.

B. Control arrested persons.

C. Use field search techniques.

2. Performance objectives

In a practical exercise, the student will demonstrate elements A through C.

Task 11: Use service firearms.

1. Elements

A. Recognize and/or identify and/or describe the operational/performance characteristics of the site-issued service firearms.

B. Operate and maintain site-issued service firearms.

C. Fire site-issued service firearms for qualification. (See Notes 1, 2, and 3.)

D. Fire site-issued service firearms at night.

E. Fire site-issued service firearms while wearing a protective gas mask.

2. Performance objectives

On a written examination, the student will recognize and/or identify and/or describe element A.

In a practical exercise, the student will acceptably demonstrate elements B through E.

Annual requalification is required for elements B and C.

NOTE 1: In element C, the qualification course of fire for the handgun will be a nationally registered, approved course in compliance with the laws of the State of Georgia, an example of which is shown in Annex 1-3. The Security Department reserves the right to alter the course to incorporate the most modern shooting techniques that may be developed by governmental, law enforcement, and professional shooting agencies. The course will utilize not less than 50 rounds of ammunition and include close shooting distances not greater than 7 yd and long shooting distances not greater than 25 yd, using both exposed and protective shooting positions.

NOTE 2: In element C, the qualification course of fire for the shotgun will be an approved course in compliance with the laws of the State of Georgia, an example of which is shown in Annex 1-4. The Security Departments reserves the right to alter the course for the same reason as in Note 1. The course will incorporate, as a minimum, both stages of the typical shotgun qualification course shown in Annex 1-4 and a minimum passing score of at least 70 percent.

NOTE 3: In element C, the qualification course of fire for the rifle will be an approved course in compliance with the laws of the State of Georgia, an example of which is shown in Annex 1-5. The Security Department reserves the right to alter the course for the same reason as in Note 1. The course will incorporate, as a minimum, 60 rounds of ammunition and include close shooting distances of not less than 50 yd and long shooting distances not greater than 100 yd. Shooting positions will include standing, kneeling, sitting, and prone.

Task 12: Use chemical agents.

1. Elements

   A. Recognize and/or identify/describe site-issued chemical agent devices.

   B. Use site-issued chemical agent devices.

   C. Inspect and maintain a site-issued protective gas mask.

   D. Use a site-issued protective gas mask.

2. Performance objectives

   On a written examination, the student will recognize and/or identify and/or describe element A.

   In a practical exercise, the student will demonstrate elements B through D.

Task 13: Recognize and search for explosives and sabotage devices.

1. Elements

   A. Explosives/incendiaries and initiators.

   B. Improvised explosive devices.

   C. Search for a bomb or sabotage device.

2. Performance objectives

   On a written examination, the student will recognize and/or identify and/or describe elements A and B.

   In a practical exercise, the student will demonstrate element C.

Task 14: Initiate compensatory measures.

1. Elements

   A. Physical barriers.

   B. Assessment aids.

   C. Intrusion detection system.

   D. Security communications.

   E. Power supplies.

   F. Keys/card keys.

   G. Search equipment.

   H. Response force equipment.

   I. Security records.

2. Performance objectives

   On a written examination without the use of site security procedures, the student will recognize and/or identify and/or describe the compensatory measures for elements A through I in accordance with the PSP and other applicable site security procedures. Alarm station operators may use site security procedures during examinations specific to their responsibilities.

Task 15: Respond to contingency events.

1. Elements

   A. Events covered in the Site Contingency Plan.

2. Performance objectives

   On a written examination, without the use of site security procedures, the student will recognize and/or identify and/or describe the responses to element A in accordance with the Site Contingency Plan and other applicable site security procedures. Alarm station operators may use site security procedures during examinations specific to their responsibilities.

Task 16: Operate alarm station.

1. Elements

   A. Operate communications equipment.

   B. Operate intrusion detection system.

   C. Operate card access system.

   D. Operate closed-circuit television (CCTV) system.

   E. Conduct/monitor systems equipment tests.

2. Performance objectives

   On a written examination and/or in a practical exercise, with the use of alarm station operator manuals and site security procedures, the student will recognize and/or identify and/or describe and/or demonstrate elements A through E in accordance with the PSP and other site security procedures and applicable equipment instruction manuals.

Task 17: Identify and/or describe the responsibilities of uniformed supervisory personnel.

1. Elements

   A. Inspect, brief, and supervise a shift.

   B. Identify event/reporting requirements.

   C. Control security equipment.

   D. Demonstrate knowledge of the PSP and regulatory requirements.

2. Performance objectives

   On a written examination, the student will recognize and/or identify and/or describe the responsibilities of uniformed supervisory personnel as outlined in elements A through C in accordance with the PSP and other site security procedures.

Task 18: Act as a response force team member.

1. Element

   A. Don/use tactical equipment.

   B. Select/take up defensive positions.

   C. Use tactical movement techniques.

   D. Conduct search and clear operations.

   E. Employ tactical communications.

2. Performance objectives

   In a practical exercise, the student will demonstrate elements A through E in accordance with the PSP and other site security procedures.

Task 19: Lead response to a Contingency Event.

1. Elements

   A. Brief the MSF.

   B. Direct movement to objective area.

   C. Control/direct MSF actions in objective area.

   D. Provide situation reports to CAS/SAS as necessary.

   E. Cordon area as necessary.

   F. Coordinate with local law enforcement agencies as necessary.

2. Performance objectives

   In a practical exercise, the student will demonstrate elements A through F in accordance with the PSP and other site security procedures.

Task 20: Act as a crowd and mob control formation member.

1. Elements

   A. Don/use riot equipment.

   B. Execute mob and crowd control formations.

2. Performance objectives

In a practical exercise, the student will demonstrate elements A and B.

ANNEX 1-1

HATCH NUCLEAR SECURITY TASK CERTIFICATION FORM

Name_____ Test Date_____ Location_____

Employee #_____ Badge #_____ Social Security #_____

GO_____ NO GO_____

PHYSICAL FITNESS TEST

ACTION	STANDARD	TIME OF PERFORMANCE	PASS	FAIL
100-yd run and simulated radio transmission	25 sec			
30-ft ladder (or 45 stair-step) climb; up & down, once	40 sec			
40-lb lift and carry, 50 ft	Without stopping			
175-lb drag, 25 ft	Without stopping			

STANDARD: The examinee is scored GO if he/she performs all four actions according to their listed standard. If the examinee fails any portion, the test is scored NO GO.

SCORER'S COMMENTS _____

_____

_____

_____

_____

_____
EXAMINEE'S SIGNATURE

_____
SCORER'S SIGNATURE

ANNEX 1-2 (Sheet 1 of 2)

TASK AND DUTY SUMMARY

	Task	Watch Person	Armed Off-icer	CAS/ SAS	Unif Supv Pers	Re-Qual
1.	IDENTIFY AND/OR DESCRIBE POTENTIAL THREATS TO THE SITE AND THEIR CONSEQUENCES	X	X	X	X	
2.	IDENTIFY AND/OR DESCRIBE THE SECURITY CONCEPTS UTILIZED TO NEUTRALIZE POTENTIAL THREATS	X	X	X	X	
3.	IDENTIFY AND/OR DESCRIBE THE OPERATION OF THE SECURITY FORCE	X	X	X	X	
4.	PERSONNEL IDENTIFICATION AND ACCESS AUTHORIZATION	*X	X	X	X	X
5.	PERSONNEL, PACKAGE, AND MATERIAL SEARCH AND ACCESS CONTROL	*X	X	X	X	X
6.	CONTROL VEHICLES	*X	X	X	X	X
7.	CONDUCT A PATROL		X		X	X
8.	COMMUNICATIONS	X	X	X	X	X
9.	SECURITY LAW	*X	X	X	X	X
10.	RESTRAIN AND SEARCH ARRESTED PERSONS		X		X	X
11.	USE SERVICE FIREARMS		*X		*X	Elem B,C
12.	USE CHEMICAL AGENTS	*X	*X	*X	*X	Elem B,C
13.	RECOGNIZE AND SEARCH FOR EXPLOSIVES AND SABOTAGE DEVICES	X	X	X	X	X
14.	INITIATE COMPENSATORY MEASURES	*X	*X	*X	*X	**X
15.	RESPOND TO CONTINGENCY EVENTS	*X	*X	*X	*X	**X

A:\HATTQANX

ANNEX 1-2 (Sheet 2 of 2)

TASK AND DUTY SUMMARY

	Task	Watch Person	Armed Off-icer	CAS/ SAS	Unif Supv Pers	Re-Qual
16.	OPERATE ALARM STATION			X		X
17.	IDENTIFY AND/OR DESCRIBE THE RESPONSIBILITIES OF UNIFORMED SUPERVISORY PERSONNEL				X	
18.	ACT AS A RESPONSE FORCE TEAM MEMBER			X	X	**X
19.	LFAD RESPONSE TO A CONTINGENCY EVENT				X	**X
20.	ACT AS A CROWD AND MOB CONTROL FORMATION			X	X	**X

*Personnel may be certified in only those elements of a task applicable to their duty position.

**Element(s) of task(s), as selected by supervisory/training personnel (as indicated in each task listing).

ANNEX 1-3

FIREARMS QUALIFICATION/REQUALIFICATION REQUIREMENTS

HANDGUN

Initial Qualification

Minimum Qualifying Score - 70%

Requalification

Minimum Qualifying Score - 70%

HANDGUN COURSE OF FIRE

60 Shots, Double Action

No refires or alibis caused by the shooter's error are allowed during the firing of the course for qualification.

B-27 target is required.

Distance (yd)	Position	Time (sec)
3	12 Rounds Standard	25
	6 rounds, strong hand only	
	6 rounds, weak hand only	
7	18 Rounds	
	12 rounds standing	30
	6 rounds kneeling	12
15	18 Rounds	
	12 rounds standing	35
	6 rounds kneeling	18
25	12 Rounds	60
	6 rounds, using barricade for cover (shooter's choice of side and position)	
	6 rounds, prone (strong side barricade)	

ANNEX 1-4

FIREARMS QUALIFICATION/REQUALIFICATION REQUIREMENTS

SHOTGUN

Initial Qualification

Minimum Qualifying Score - 70% = 51 hits in black area of target

Requalification

Minimum Qualifying Score - 70% = 51 hits in black area of target

SHOTGUN COURSE OF FIRE

Course requires the use of four separate B-27 targets.

Shooter to fire at four separate targets from each firing line.

8 rounds 00 buck (9 pellets per 00 buck round).

Time requirements: complete each string of 4 rounds within 10 sec.

No refires or alibis caused by shooter's error are allowed during the firing of the course for qualification.

Distance (yd)	Position	Time (sec)
25	4 rounds, standing from the shoulder	10
15	4 rounds, standing from the shoulder	10

ANNEX 1-5

FIREARMS QUALIFICATION/REQUALIFICATION REQUIREMENTS

RIFLE

.223 Semiautomatic Rifle

(assigned security personnel only)

Initial Qualification

Minimum Qualifying Score - 80%

Requalification

Minimum Qualifying Score - 80%

RIFLE COURSE OF FIRE

60 rounds.

No refires or alibis caused by shooter's error are allowed during the firing of the course for qualification.

B-27 target is required.

Distance (yd)	Position	Time
100	3 rounds prone	30 sec
	5 rounds prone	90 sec
	15 rounds prone magazine exchange	2 min 10 sec
	1-10 rounds/1-5 rounds	
	5 rounds kneeling	2 min
	7 rounds sitting	5 min
75	5 rounds standing	25 sec
	4 rounds kneeling	20 sec
	6 rounds sitting	30 sec
50	5 rounds standing	25 sec
	5 rounds kneeling	25 sec

Enclosure 3

Edwin I. Hatch Nuclear Plant Units 1, 2
Physical Security Plan
Revised Front Matter (Distribution List & Cover)

PLANT HATCH PHYSICAL SECURITY PLAN

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