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Procedure Contains EDMS Forms: YES NO

Procedure Revision Type: New NON-Editorial Editorial TC Cancellation

Effective Date	Responsible Procedure Owner:	Mike McKenney Manager, Emergency Preparedness	Department	Emergency Preparedness
04/09/15				

Procedures Canceled or Superseded By This Revision

None

Process Applicability Exclusion:

Change Statement

This revision contains the following changes:

Throughout:

- Procedure numbers updated to match the Vermont Yankee transition from fleet to SAFSTOR procedures
- Deleted references to EN-OP-115

References

- Revised policies from company policies to Vermont Yankee policies
- Added NVY 15-015

Attachment 9.2, On-Shift ERO Responsibilities

- Added note regarding the 50.54(x) exemption issued by the NRC


Attachment 9.3, TSC ERO Responsibilities

- Emergency Plant Manager Section
 - Deleted reference to the Severe Accident Management Guidelines
 - Added note regarding the 50.54(x) exemption issued by the NRC
- Operations Coordinator
 - Deleted reference to the Severe Accident Management Guidelines
 - Replaced “severe core damage” with “damage to the fuel in the spent fuel pool”
 - Added note regarding the 50.54(x) exemption issued by the NRC
- Maintenance Coordinator
 - Deleted bullet 2 that contained no information
- Engineering Coordinator
 - Replaced “severe core damage” with “damage to the fuel in the spent fuel pool”


Attachment 9.4, OSC ERO Responsibilities

- OSC Manager
 - Removed reference to the OSC Log Keeper

Contains Proprietary Information: YES NO

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1.0 PURPOSE


- [1] Every person's job at Vermont Yankee (VY) has three components: everyday work, outage support and emergency response. This procedure outlines expectations and responsibilities for Emergency Response Organization (ERO) members, Site Management and the Emergency Preparedness staff to support the successful implementation of emergency response.
- [2] It is the goal of emergency planning to maintain a full emergency response organization with qualified ERO teams.
- [3] The procedure outlines responsibilities for personnel assigned to an ERO position and for other company personnel who may be called upon to support an emergency response effort, but are not directly assigned to an ERO position.

2.0 REFERENCES

- [1] 10CFR50.47(b)1, (b)2
- [2] Emergency Plan
- [3] Vermont Yankee Policy No V-EN-PL-108, Emergency Management Policy
- [4] Vermont Yankee Policy No V-EN-PL-147, Personnel Expectations Related to Emergency Response at Entergy Nuclear Sites
- [5] EN-EP-310, Emergency Response Organization Notification System
- [6] NVEY 15-015, Vermont Yankee Nuclear Power Station – Exemption from the Requirements of 10CFR Part 73, Sections 55(p)(1)(i) and (p)(1)(ii) Related to the Suspension of Security Measures in an Emergency or During Severe Weather (TAC NO. MF2992)

3.0 DEFINITIONS

- [1] Activation – Actions taken to staff and setup an emergency response facility to make it operational. Actions include but are not limited to notification of emergency personnel, equipment setup and equipment operability testing.
- [2] Augmentation – Actions taken to support on-shift personnel or the Emergency Response Organization
- [3] Call-in ERO members – Personnel who are members of the ERO but are not on a rotational team for an assigned duty position. These ERO members may not carry pagers/cellular telephone or be on the ERO notification list but are called to respond to an emergency. Call-in ERO members normally fill call-in positions for their job function.


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- [4] Emergency Response Organization (ERO) – Personnel who are qualified to respond to emergency events and perform duties as outlined in site emergency plans.
- [5] Minimum Staffing – The on-shift and augmented staff shown in the emergency plan table of minimum staffing (Table B-1 equivalent) required to provide facility accident response capability in key functional areas.
- [6] Operational - Status of an emergency facility declared by the appropriate facility manager upon determining that the facility is adequately staffed and equipment is setup and available to assume/perform the emergency functions assigned to that facility.
- [7] Response Time Goals - The emergency response facilities shall be activated at an Alert, Site Area Emergency, or General Emergency declaration. Once activated, the facility shall become operational as soon as possible after declaration of any of these emergency classifications. Otherwise, it is the goal to be operational within the response time goals established by the site emergency plan or procedure. Response time goals are included in Attachment 9.1 of this procedure.

4.0 RESPONSIBILITIES

4.1 All employees who may respond to an emergency are responsible to:

- [1] Maintain ERO qualifications current.
- [2] Adhere to all of the applicable regulations and procedures.
- [3] Maintain a constant awareness of the event status and aggressively pursue actions to mitigate and resolve emergency conditions.
- [4] Apply radiological safety and ALARA concepts to minimize personnel exposure.
- [5] Use human performance error prevention tools.
- [6] Maintain an adequate knowledge and understanding of the assigned ERO position, emergency response facility and applicable procedures and the ability to carry out the assigned duties.
- [7] Inform his or her supervisor and Manager, Emergency Planning (EP Manager) if:
 - Qualifications lapse or failure of any training required for ERO position or employee job function that may be called upon to respond to an emergency,

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- On short or long term disability,
- Any restricted duty status imposed due to medical conditions,
- Loss of access to the protected area,
- Any invoked radworker restrictions,
- Employment is terminated (if required by site termination processes).

4.2 Vice President, Site is responsible to:


- [1] Act as the site Senior Management sponsor for Emergency Planning, where applicable.

4.3 Management and Supervisors are responsible to:

- [1] Select individuals to fill ERO positions assigned to their area of expertise within the Emergency Plan.
- [2] Ensure that each ERO member under their supervision remains qualified to respond to an emergency.
- [3] Enforce accountability for emergency planning policy and procedure violations and individual performance weaknesses.
- [4] Periodically discuss emergency planning issues at staff meetings, focus meetings and/or plan of the day meetings to ensure appropriate priorities are given to those issues.
- [5] Notify the EP Manager of known, or planned, departmental staffing changes that could affect the ERO.
- [6] Support ERO members' required training, qualification, and all drill activity participation requirements.
- [7] Include ERO participation as part of the annual performance planning and review (PP&R) process for employees.

4.4 Operations Shift Manager (SM) is responsible to:

- [1] Implement the emergency plan and procedures to make the initial emergency declaration and act as Emergency Director until relieved.
- [2] Activate the ERO at the emergency classification level described in the emergency plan.

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4.5 Manager, Emergency Planning (EP Manager) is responsible to:


- [1] Ensure that the ERO is maintained in accordance with the emergency plan.
- [2] Complete a listing of ERO personnel that meets all requirements for staffing the ERO and the phone number or contact information at least quarterly.
- [3] Maintain oversight of the ERO administration to ensure that sufficient numbers of personnel are qualified and available to staff the ERO on a 24 hour/day basis.
- [4] Upon notification by an ERO member of any condition listed in 4.1.7, determine if the ERO member qualification needs to be suspended and **IF** so **THEN** suspend the individual's qualifications.

4.6 Emergency planning staff is responsible to:

- [1] Enforce standardization among ERO positions and the uniform implementation of best practices.
- [2] Provide scenarios that challenge the ERO and effectively test major portions of the emergency plan.
- [3] Provide the opportunity for all ERO members to participate in a drill as a player, controller, evaluator, or coach/mentor each calendar year.

4.7 Manager, Human Resource is responsible to:

- [1] Notify EP Manager of any of the following as soon as identified:
 - Pending retirements
 - Reassignments/transfers
 - On short or long term disability
 - New hires
 - Terminations/resignations

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5.0 DETAILS

5.1 PRECAUTIONS AND LIMITATIONS

- [1] Revision to this procedure requires a 10CFR50.54 (q) review under V-EN-EP-305, Emergency Planning 10CFR50.54 (q) Review Program.

5.2 EMERGENCY RESPONSE ORGANIZATION GENERAL DIRECTIONS

[1] All employees:

- Every company employee is eligible and responsible to support an emergency response position.


[2] All ERO Members:

- Maintain contact and call-in information up-to-date in their EverBridge Profile. Report changes in home, work, cell phone or pager numbers and changes in drive time that impact timely response.

NOTE


Call-in ERO members who perform job function activities and are not assigned a position shall perform only those tasks for which they are qualified

- Attain qualification as soon as possible, but no later than 6 months, after a new assignment to an ERO position unless waived by the EP Manager under training procedures.
 - a. An employee will not be assigned to fill an ERO position that requires task qualification in a job function (e.g., engineer job function that has areas of specialization) until qualified to perform the job function task.
 - b. Such employees shall be assigned to an ERO position for which they can be quickly qualified as soon as possible but no later than 6 months. The employee may be considered for re-assignment when job qualification is complete.
- Attend scheduled training or briefings, including pre-drill activities such as briefings and post drill activities such as critiques.
- Be fit-for-duty (FFD) when responding to an emergency response facility per the Fitness for Duty program.

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5.2.2 cont

- A person who transfers from one job to another shall continue to fill their assigned ERO position unless they are notified they are no longer an ERO member or they are reassigned and qualified in another position.
- Respond promptly to actual emergencies, site drills, quarterly off-hours/unannounced test and off-hours/unannounced drills when on-call. ERO members not on-call are expected to respond unless they are unavailable.
- Always have your company issued ID badge with you when responding to your assigned emergency response facility during an emergency (road blocks may be set up to restrict public access to the area and ID may be required to pass).
- ERO members at non-affected nuclear sites may be called upon for assistance to the affected site to maximize management, control and mitigation of the emergency.
- Be prepared to be sequestered at the affected site when conditions, such as severe weather or strike contingency, are expected that may prohibit the ERO capability to safely arrive at the site if notified to respond to an emergency.
 - a. Individuals in craft or administrative job functions that may be called upon to support an emergency response effort (RP Technicians, Chemistry Technicians, Electrical Maintenance Technicians, Mechanical Maintenance Technicians, I&C Technicians, Admin Services, etc.):
- Complete the fundamental EP training, if required, and maintain qualifications to perform job functions.
- Personnel will be called out and assigned emergency roles and specific duties based on their qualifications.

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5.2 cont

[3] Additional instructions for ERO members filling an assigned position:

- Maintain ERO qualification for the assigned position including EP training, drill participation and additional position required training such as licenses, respirator qualifications, radiation worker training (RWT), plant access training (PAT).
- Be on-call and available to respond to the appropriate emergency response facility, within the required response time, during an assigned duty period.
- Actively support the ERO as a participant, controller, evaluator or coach in drills or exercises (including pre-drill/exercise and post-drill/exercise activities) when scheduled to fill the role.
- If an ERO member is not available to support an assigned / scheduled drill or exercise, it is the ERO member's responsibility to find a qualified replacement and inform him or her of the assigned function in the drill and/or exercise and notify Emergency Preparedness of the change.
- It is the ERO member's responsibility to find a qualified replacement when an ERO member cannot cover an assigned duty period.
 - The member filling in must clearly understand the responsibilities and for what time period they are assuming the duty.
- When applicable, management personnel qualified in some call-out positions may be on call to fill the position in an emergency until relieved by call-out staff.
- Be prepared to have your ERO participation evaluated as part of the annual Performance Planning and Review (PP&R) process.

[4] ERO pagers or other notification methods

- When on-call, keep the pager or other device turned on, on your person or within hearing range. Be able to recognize the page or call during noisy activities (i.e., mowing the lawn, taking a shower) or when asleep.
- Ensure the pager is in good material condition and the battery is fresh or your phone is in a working condition.


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5.2 cont

- [5] ERO member on-call duty period
- Remain within a travel distance capable of meeting the required response time for the position and facility.
 - Remain fit to meet the company fitness-for-duty program during the entire on-call duty period.
 - Remain capable to respond to their emergency response facility promptly when notified.
- [6] ERO members when NOT on-call:
- All ERO members are subject to call-in should an emergency occur. Respond to the ERO Notification system when contacted.
 - If available and not filling a position during an emergency, be prepared to provide relief support to the ERO responding team.
 - If you are in the area and otherwise would be able to respond, it is recommended that you leave your pager and/or phone turned on.

5.3 ON-CALL ROSTER AND SCHEDULES

- [1] The ERO roster and schedule of on-call personnel is maintained up-to-date and available to ERO members.
- [2] It is the responsibility of the ERO member when assigned an on-call duty to be aware of the on-call schedule, their on-duty status and be aware of the call-out process and pager codes.
- [3] It is the responsibility of the ERO member to ensure the published duty roster correctly identifies his or her duty period and position.

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5.4 ERO POSITION SPECIFIC RESPONSIBILITIES


- [1] See **Attachment 9.2** for the on-shift ERO position initial responder responsibilities.
- [2] See **Attachment 9.3** for the Technical Support Center (TSC) ERO position responsibilities.
- [3] See **Attachment 9.4** for the Operations Support Center (OSC) ERO position responsibilities.
- [4] See **Attachment 9.5** for the Emergency Operations Facility (EOF) ERO position responsibilities.
- [5] See **Attachment 9.6** for the Joint Information Center (JIC) ERO position responsibilities.

5.5 IMPLEMENTATION OF RESPONSIBILITIES

- [1] Implementing procedures or check lists of ERO responsibilities are developed and maintained.

5.6 RESPONSE TO AN EMERGENCY EVENT

- [1] In the event of an emergency declaration, respond per the instructions made in a plant announcement or message delivered by the ERO Notification system.
- [2] If filling an ERO position, take actions as required by the duty assignment and procedures.
- [3] Upon hearing an emergency alarm or verbal announcement of an Alert or higher classification or when emergency facilities are activated, personnel performing a job task shall place the equipment in a safe condition, exit the area following normal radiological, safety and security rules, and report to their assigned facility unless directed otherwise by the announcement.
 - The facility lead will provide instructions to ERO members that are not needed to fill positions for initial activation. (e.g., return to suspended work activity, report to a staging area, report to supervisor or work station, or leave the site and report back when directed or called to report back)
 - Ensure the facility lead and Control Room Shift Manager or Control Room Supervisor is informed of stopped work, status of the equipment and location of the worker.

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5.6 cont

- [4] If escorting a visitor or contractor at an Alert or higher, upon hearing an emergency alarm or verbal announcement, escort the visitor out of the protected area.
- [5] Listen to all plant pages/announcements for directions on additional actions to take.

5.7 RESPONSE TO THE ERO NOTIFICATION SYSTEM TEST OR DRILL

- [1] The ERO will respond to the ERO Notification System messages per procedures or instructions.

5.8 MINIMUM STAFFING LEVELS FOR EACH ERF


- [1] See **Attachment 9.7** for the Minimum staffing levels to declare emergency response facilities Operational for each ERF.

6.0 INTERFACES

- [1] V-EN-NS-102, Fitness for Duty Program

7.0 RECORDS

The quarterly listing of the qualified ERO personnel should be retained for the required period to support Performance Indicators, inspections and 50.54(t) audits. Records are retained under V-EN-AD-103.


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8.0 SITE SPECIFIC COMMITMENTS

8.1 None

9.0 ATTACHMENTS

- 9.1 ERO Position Titles and Information
- 9.2 On-Shift ERO Responsibilities
- 9.3 TSC ERO Responsibilities
- 9.4 OSC ERO Responsibilities
- 9.5 EOF ERO Responsibilities
- 9.6 JIC ERO Responsibilities
- 9.7 Minimum Staffing Levels for each ERF

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TSC

Emergency Plant Manager
 Security Coordinator
 ENS Communicator
 Maintenance Coordinator
 Radiological Coordinator
 Operations Coordinator
 Engineering Coordinator

EOF

Emergency Director
 Offsite Communicator
 Technical Advisor
 Radiological Assessment Coordinator
 Offsite Team Coordinator
 Dose Assessor
 Offsite Monitoring Team Green
 Offsite Monitoring Team Blue
 Site Boundary Team
 Administration & Logistics Coordinator
 Lead Offsite Liaison
 Offsite Liaison(s)
 Personnel & Equipment Monitor

OSC

OSC Manager
 OSC Craft Support Staff


JIC

Company Spokesperson
 Technical Advisor
 JIC Manager
 Media Liaison
 Inquiry Responder
 Media Monitoring

CR /On-Shift¹

Shift Manager/Emergency Director
 CR Supervisor
 Auxiliary Operators/CR Operators/Non-Certified
 Operators
 RP technician(s)
 Maintenance
 Security

¹ Site on-shift member(s) are per the site emergency plan and may not reflect the staff listed here. On-shift staff may be assigned additional EP position functions of CR communicator, CR dose assessor, fire brigade, corrective actions, first responder/first aid or search/rescue.

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ATTACHMENT 9.1

ERO POSITION TITLES AND INFORMATION


Sheet 2 of 6

The Emergency Plan is the governing document for the Emergency Response Organization and should be referred to when implementing or assessing regulatory compliance.

The ERO staffing tables are administrative and reflect a fully staffed ERO. Site changes to the ERO may be implemented with follow-up revision to the procedure table.

ERO positions with # are designated as Regulatory Required personnel. These positions are required to meet the augmentation requirements of the emergency plan. ALL other ERO Positions are not required for augmentation and are designated as "support" personnel.

Facility & On-shift Staff	Emergency Response Position	Personnel Required On Shift	Response Time Goals minutes	Comment: On Shift Emergency Responders
Control Room	Shift Manager / Emergency Director	1/shift	on shift	
	Control Room Supervisor	1/shift	on shift	
	Auxiliary Operators/Control Room Operator/Non-Certified Operators	3/shift	on shift	
	Control Room Communicator	1/shift	on shift	Filled by on shift Control Room Supervisor
	On shift Dose Assessor	1/shift	on shift	Dose assessor function filled by the on shift Control Room Supervisor
On-shift staff	RP Tech	1/shift	on shift	
	Security	Per Security Contingency Plan	on shift	


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ATTACHMENT 9.1

ERO POSITION TITLES AND INFORMATION

Sheet 3 of 6

Facility	Emergency Response Position	Personnel Required	Response Time Goals minutes	Comment: All report to the TSC at an Alert or higher unless noted below
TSC	Emergency Plant Manager	1/team	60	
	Maintenance Coordinator	1/team	60	
	ENS Communicator #	1/team	60	
	Operations Coordinator	1/team	60	
	Radiological Coordinator	1/team	60	
	Engineering Coordinator	1/team	60	
ICP/TSC	Security Coordinator	1/team	60	

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ATTACHMENT 9.1

ERO POSITION TITLES AND INFORMATION

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Facility	Emergency Response Position	Personnel Required	Response Time Goal Minutes	Comment: All report to the TSC at an Alert or higher unless noted below
OSC	OSC Manager	1/team	60	

Offsite monitoring teams dispatched from the OSC
 On-shift RP (1) fill OSC staffing positions


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ATTACHMENT 9.1

ERO POSITION TITLES AND INFORMATION

Sheet 5 of 6

Facility	Emergency Response Position	Personnel Required	Response Time Goals minutes	Comment: All report to the EOF at an Alert or higher unless noted below
EOF	Emergency Director #	1/team	60	
	Offsite Communicator #	1/team	60	
	Technical Advisor	1/team	60	
	Radiological Assessment Coordinator	1/team	60	
	Admin & Logistics Coordinator	1/team	60	
	Lead Offsite Liaison	1/team	60	
	Offsite Liaisons	3/team	120	
	Personnel & Equipment Monitor	1/team	60	
	Dose Assessor #	1/team	60	
	Offsite Team Coordinator	1/team	60	
	Offsite Monitoring Team Green	2/team	30	Dispatched to EOF from OSC (team- 1 monitor & 1 driver)
	Offsite Monitoring Team Blue	2/team	60	Dispatched to EOF from OSC (team- 1 monitor & 1 driver)
	Site Boundary Team	2/team	30/60	Dispatched to Site Boundary from the OSC


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ATTACHMENT 9.1

ERO POSITION TITLES AND INFORMATION

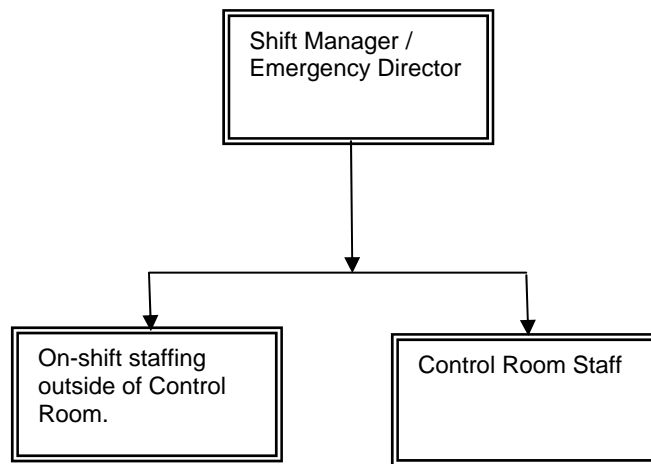
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Facility	Emergency Response Position	Personnel Required	Response Time Goals minutes	Comment: All report to the JIC at an Alert or higher unless noted below
JIC	Company Spokesperson	1/team	60	
	JIC Manager	1/team	120	
	Technical Advisor	1/team	120	
	Media Liaison	1/team	120	
	Media Monitor/Status Phone	1/team	120	
	Inquiry Response	1/team	120	

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ERO


On-Shift Staffing*



* The site Emergency Plan describes the on-shift staffing.

ERO Minimum PI Key Positions

Shift Manager
Communicator

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ATTACHMENT 9.2

ON-SHIFT ERO RESPONSIBILITIES


Sheet 2 of 4

ERO Position Responsibilities

Shift Manager/ Emergency Director (ED)	<p>Provide overall command and control of the emergency response. Responsibilities include:</p> <div style="border: 1px solid black; padding: 5px; margin: 5px 0;"> <p style="text-align: center;">NOTE</p> <p>The Emergency Director (ED) may delegate responsibilities except for those designated below. The SM can transfer ED duties to another ED qualified person.</p> </div> <ol style="list-style-type: none"> 1. Classify and declare the emergency (cannot delegate) 2. Assume role of ED and overall command and control of the emergency response until relieved 3. Approve the offsite notification and message content (cannot delegate) 4. Direct correct and timely offsite notification 5. Direct and ensure timely augmentation of the ERO consistent with site procedures 6. Direct timely ENS notification and ensure NRC is kept informed of the emergency situation 7. Ensure others (Site Duty Manager, Corporate, etc) are kept informed of the emergency situation 8. Perform accident assessment and oversight of the corrective actions to mitigate the event 9. Direct and ensure dose assessment is performed if a release is occurring 10. Review and interpret offsite dose projections for accuracy and impact to the health and safety of personnel and the public 11. Make offsite protective action recommendations (PAR) (cannot delegate) 12. Direct protective actions for on-site personnel 13. Approve and ensure correct and timely PAR notification to offsite agencies (cannot delegate) 14. Authorize emergency radiation exposure and issuance of KI. 15. Implement severe accident management procedures (where applicable) 16. Invoke 50.54x¹ 17. Direct evacuation of area, building, protected area or owner controlled area 18. Request security to perform accountability 19. Direct first responders/first aid to respond to reported medical events 20. Direct qualified personnel to perform search and rescue operations 21. Request assistance from offsite fire and/or medical support agencies 22. Integrate off-site responders with on-site response efforts when required 23. Direct personnel to coordinate transportation of injured personnel to supporting hospital 24. Ensure reports of other non-emergency reportable events are made during emergency plan activation (hazardous material spills, contaminated injured personnel, and so forth). 25. Turnover command and control of responsibilities for notification, classification, PARs, and actions outside of the protected area to the relieving Emergency Director. 26. Turnover command and control of onsite accident mitigation and corrective actions, onsite protective actions, and ENS notifications to the Emergency Plant Manager. 27. Advise the relief ED on plant conditions for classification and PAR determinations. 28. Authorize press releases (cannot delegate) 29. Terminate the emergency (cannot delegate)
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¹The decision to depart from the license or a technical specification in an emergency shall be approved, as a minimum, by a licensed senior operator. If more senior licensee personnel are available, the decision to depart from the license in an emergency would pass to them as higher authorities in the chain of command. The rule does not specify that the senior licensee personnel be licensed senior operators or that they obtain the concurrence of a licensed senior operator to make such a decision. [RIS 2008-26]

Note: The US Nuclear Regulatory Commission (NRC) issued an exemption to remove the requirement that a licensed senior operator approve the emergency suspension of security measures and for Vermont Yankee Nuclear Power Station (VY) during certain emergency conditions or during severe weather. As a result of this exemption, all suspensions must be approved by a Certified Fuel Handler. [NVY 15-015]


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ATTACHMENT 9.2

ON-SHIFT ERO RESPONSIBILITIES

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<u>ERO Position</u>	<u>Responsibilities</u>
Certified Fuel Handlers	<ol style="list-style-type: none"> 1. Assume the responsibilities and authority of the ED if the SM becomes incapacitated or is absent. 2. Direct plant operations and assessment of operational aspects 3. Perform accident assessment and initiate actions to mitigate the event.
On-shift Auxiliary/CR/Non-Certified Operators	<ol style="list-style-type: none"> 1. Perform other assigned functions per emergency procedures or emergency plan (e.g., fire brigade, OSC Operations Support) 2. Report to the OSC when activated if required to perform other functions outside the CR
On-shift Radiation Protection Technician(s)	<p>Perform functions as directed by the ED to provide initial in-plant and near plant area radiological support actions. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Monitor and/or survey area for changing radiological conditions and radiological release 2. Collect and analyze samples 3. Perform radiological surveys for repair and corrective action teams, search and rescue, medical and fire-fighting activities when required. 4. Support evacuation and assembly (where applicable) 5. Provide dosimetry, as needed, and radiation exposure control support to on-shift personnel. 6. Provide dosimetry and radiation exposure control support to offsite agencies responding to provide assistance onsite such as medical, fire, and law enforcement (where applicable) 7. Perform other assigned functions per emergency procedures or emergency plan 8. Report to the OSC (or other assigned ERF) when activated
On-shift Maintenance	<p>Perform functions as directed by the Emergency Director</p> <ol style="list-style-type: none"> 1. Perform repair and corrective actions 2. Report to the OSC when activated


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ATTACHMENT 9.2

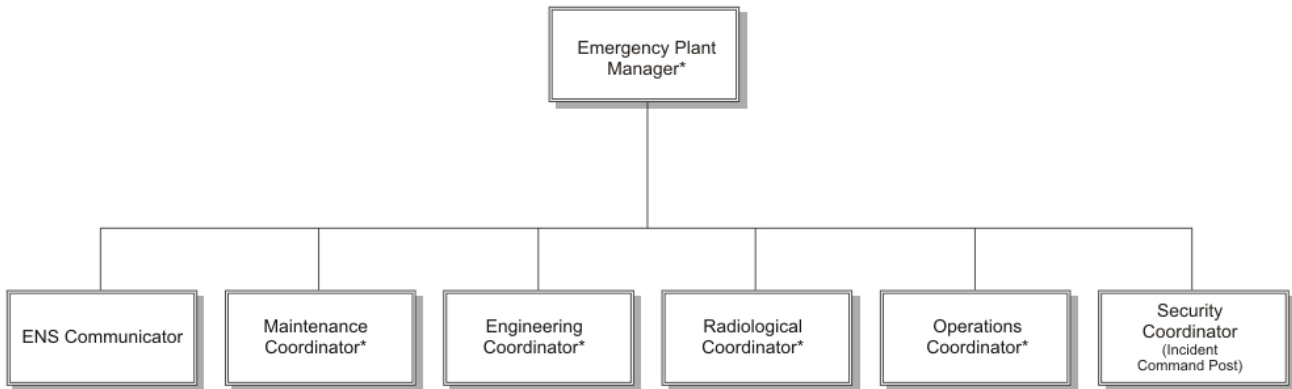
ON-SHIFT ERO RESPONSIBILITIES

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ERO Position	Responsibilities
Security (tasks that support the EPlan)	<p>Perform functions per the Security Contingency Plan and as requested by the Emergency Director.</p> <ol style="list-style-type: none"> 1. Perform accountability of personnel in the protected area 2. Support evacuations and assembly where applicable 3. Request assistance from local law enforcement to support emergency plan response 4. Support site access for medical, fire fighting, or law enforcement offsite responders 5. Serve as liaison/coordinator for the incident command system 6. Provide input to the Shift Manager/ED for security EALs
On-Shift CR Communicator	<p>The Control Room Communicator reports to the ED. (The site will designate which on shift position(s) performs this function) Responsibilities include:</p> <ol style="list-style-type: none"> 1. Make timely and correct notification to State and Local agencies using the primary and backup notification system when directed by the ED until relieved. 2. Prepare the NRC notification worksheet 3. Make timely NRC notifications when directed by the ED until relieved. 4. Complete notification forms and procedure/checklists where applicable. 5. Activate the ERO notification system when directed. 6. Make follow-up notifications 7. Turn over the State and local notification responsibilities to the relief Offsite Communicator when directed by the ED. 8. Turnover the ENS Communicator responsibilities to relief ENS Communicator when directed by the ED.
On-shift Dose Assessor <i>(filled by shift personnel assigned other duties)</i>	<p>Conduct on-shift dose assessment as directed. (The site will designate which on shift position performs this function)</p> <ol style="list-style-type: none"> 1. Monitor or obtain meteorological and radiological data 2. Monitor parameters to detect changes that affect dose assessment 3. Perform dose projection calculations using primary and backup methods 4. Evaluate dose projection output 5. Determine dose consequences 6. Communicate results to the ED to determine appropriate classification or PAR
Fire Brigade <i>(filled by shift personnel assigned other duties)</i>	<p>Perform fire fighting functions per the fire protection plan and procedures when directed by the SM/ED or OSC Manager where applicable. The Fire Protection Plan designates who fills the fire brigade. When offsite assistance is requested:</p> <ol style="list-style-type: none"> 1. Integrate fire fighting efforts with the fire fighting assistance provided by offsite fire fighting departments 2. (FBL) Brief the offsite fire fighting chief/leader when they arrive on scene 3. (FBL) Turnover fire fighting command and control to the offsite agency incident commander. 4. (FBL) Provide technical support to the incident commander
Rescue/First Aid <i>(filled by shift personnel assigned other duties)</i>	<p>Perform functions per the search and rescue or medical response procedures</p> <ol style="list-style-type: none"> 1. Locate missing personnel following an evacuation. 2. Provide initial first aid/medical treatment on reported injuries.

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TECHNICAL SUPPORT CENTER ERO



* required for activation

ERO Minimum PI Key Positions

Emergency Plant Manager
TSC technical support
Ops Coordinator

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ATTACHMENT 9.3


TSC ERO RESPONSIBILITIES

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<u>ERO Position</u>	<u>Responsibilities</u>
Emergency Plant Manager (EPM)	<p>The EPM reports to the EOF ED. The EPM has the responsibility for the command and control of all accident mitigation actions at the site and performs these duties from the Technical Support Center (TSC). Responsibilities include:</p> <ol style="list-style-type: none"> 1. Direct the activation, operation and deactivation of the TSC 2. Assure staffing/timely activation of the TSC. 3. Maintain facility log on WebEOC or other acceptable method. 4. Assume command and control of the TSC and OSC and the onsite mitigation efforts 5. Provide information and recommendations to the ED regarding the classification of an emergency 6. Prepare and facilitate facility briefings 7. Verify event classifications 8. Ensure timely ENS notifications 9. Perform accident assessment to prioritize mitigation actions. 10. Coordinate the activities of the CR, TSC and OSC 11. Set priorities for the TSC personnel/OSC Teams. 12. Direct personnel evacuation, assembly and accountability of non-essential personnel 13. Provide information and recommendations to the ED regarding plant activities 14. Advise the ED on plant conditions for classification and PAR determination. 15. Direct the organization, coordination, and prioritization of repair corrective action teams 16. Direct onsite protective actions 17. Authorize emergency radiation exposure and issuance of KI to recommended personnel in the CR, TSC or OSC or to Security personnel. 18. Make operational decisions involving the safety of the plant and its personnel and make recommendations to the Control Room Personnel 19. Initiate immediate corrective actions to limit or contain the emergency invoking the provisions of 10 CFR 50.54(x)¹ if appropriate¹ 20. Direct relocation to an alternate location. 21. Oversee the activities for relocation to an alternate location. 22. Integrate offsite responders with on-site response efforts when required 23. Perform emergency termination duties 24. Deactivate the TSC when the emergency is terminated.


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ATTACHMENT 9.3
TSC ERO RESPONSIBILITIES
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<u>ERO Position</u>	<u>Responsibilities</u>
Security Coordinator	<p>The Security Coordinator reports to the EPM. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Overall coordination of the offsite assistance for the security related response. 2. Designated National Incident Management System (NIMS) Liaison between the Incident Command Post (ICP) and Site Organization. 3. Coordinate accountability 4. Keep security force advised of emergency status 5. Coordinate with Radiological Coordinator regarding protective actions for the security force. 6. Keep the ED/EPM informed of any security contingency event which may be occurring and response in progress 7. Coordinate the dispatch of security officers to evacuation assembly areas and keep the ED/EPM informed of evacuation accountability.
ENS Communicator	<p>The ENS Communicator reports to the EPM. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Prepare the NRC notification worksheet. 2. Establish and maintain communications with the NRC via the ENS phone. 3. Prepare follow-up notifications 4. Monitor plant computer parameters and provide plant status to the NRC. 5. Use backup NRC notification method if ENS line fails.

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ATTACHMENT 9.3


TSC ERO RESPONSIBILITIES

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<u>ERO Position</u>	<u>Responsibilities</u>
Operations Coordinator	<p>The Operations Coordinator reports to the EPM. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Coordinate TSC efforts in determining the nature and extent of emergencies pertaining to equipment and plant facilities in support of Control Room actions. 2. Perform accident assessment activities. 3. Provide assistance to initiate immediate corrective actions to limit or contain the emergency invoking the provisions of 10 CFR 50.54(x)¹ if appropriate. 4. Recommend equipment operations checks and miscellaneous actions to the Control Room in support of restoration and accident mitigation. 5. Approve emergency special procedures, and implement as required under the provisions of 10 CFR 50.54(x)¹ if qualified. 6. Recommend changes in plant priorities. 7. Assist the Maintenance Coordinator in determining the priority assigned to OSC activities. 8. Coordinate additional staffing for the Control Room if requested by the SM. 9. Provide input on event classification. 10. Assist the EPM in evaluating changes in event classification. 11. Direct the tracking of plant configuration changes. 12. Inform the TSC of the overall plant condition and significant changes to system and equipment status. 13. Ensure the Control Room, TSC, and EOF is informed of significant changes in event status (e.g. changes in classification, command and control, initiation of station assembly, accountability, evacuation, etc.). 14. Coordinate CR request for operations activities outside of the Control Room 15. Provide technical assistance to the Shift Manager. 16. Recommend strategies and actions to prevent damage to the fuel in the spent fuel pool and containment failure and reduce radiological release.
Maintenance Coordinator	<p>The Maintenance Coordinator reports to the EPM. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Communicate the request for repair and corrective teams to the OSC Manager. Use WebEOC or other acceptable methods.


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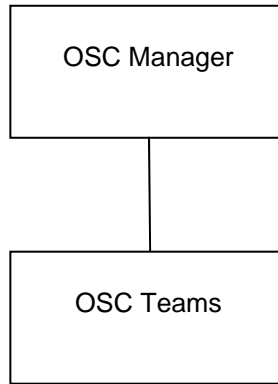
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TSC ERO RESPONSIBILITIES
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ERO Position	Responsibilities
Engineering Coordinator	<p>The Engineering Coordinator reports to the EPM. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Provide technical guidance to support repair activities. 2. Recommend strategies and actions to prevent damage to the fuel in the spent fuel pool and reduce radiological releases. 3. Coordinate Engineering work requests with the Engineering support team. 4. Direct tracking and trending of parameters. 5. Direct the development of emergency repair procedures to support emergency teams. 6. Track plant configuration changes.
Radiological Coordinator	<p>The Radiological Coordinator reports to the EPM. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Assess radiological conditions to develop radiological plans. 2. Keep the TSC Manager informed of the radiological conditions. 3. Obtain and evaluate data on plant conditions such as meteorological and radiological monitoring readings, and other pertinent data. 4. Ensure that appropriate bioassay procedures have been implemented for onsite personnel when a radioactivity incident has occurred. 5. Coordinate RP activities, including on-site radiological assessment, personnel exposure control, and radiation protection programs. 6. Ensure use of protective clothing, respiratory protection, and access control within the plant is deemed appropriate to control personnel exposures. 7. Recommend authorization of personnel emergency exposure limits. 8. Advise the EPM when use of KI should be considered and coordinate the issuance if approved. 9. Deploy onsite radiation monitoring teams to survey radiation levels and sample for contamination. 10. Ensure habitability of the TSC and/or OSC and habitability of Control Room (where applicable) 11. Recommend evacuation based on environmental conditions 12. Conduct/provide assistance for the rad briefings to support the dispatch of the repair/corrective action teams and chemistry/ RP sampling. 13. Communicate rad/chemistry sample results to the TSC and/or CR. 14. Advise the EPM and EOF Radiological Assessment Coordinator of changes in radiological release status. 15. Ensure chemistry sampling priorities. 16. Assist in planning rescue operations and provide monitoring services as required, including the transfer of injured and/or contaminated personnel. 17. Coordinate with the Security Coordinator to determine the routes to be used for evacuation of non-essential personnel and BRE's. 18. Evaluate and request additional radiation protection personnel and/or equipment. 19. Advise the OSC Manager of changes in plant conditions or equipment that may change radiological conditions onsite.


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OPERATIONS SUPPORT CENTER ERO



ERO Minimum PI Key Positions

OSC Manager


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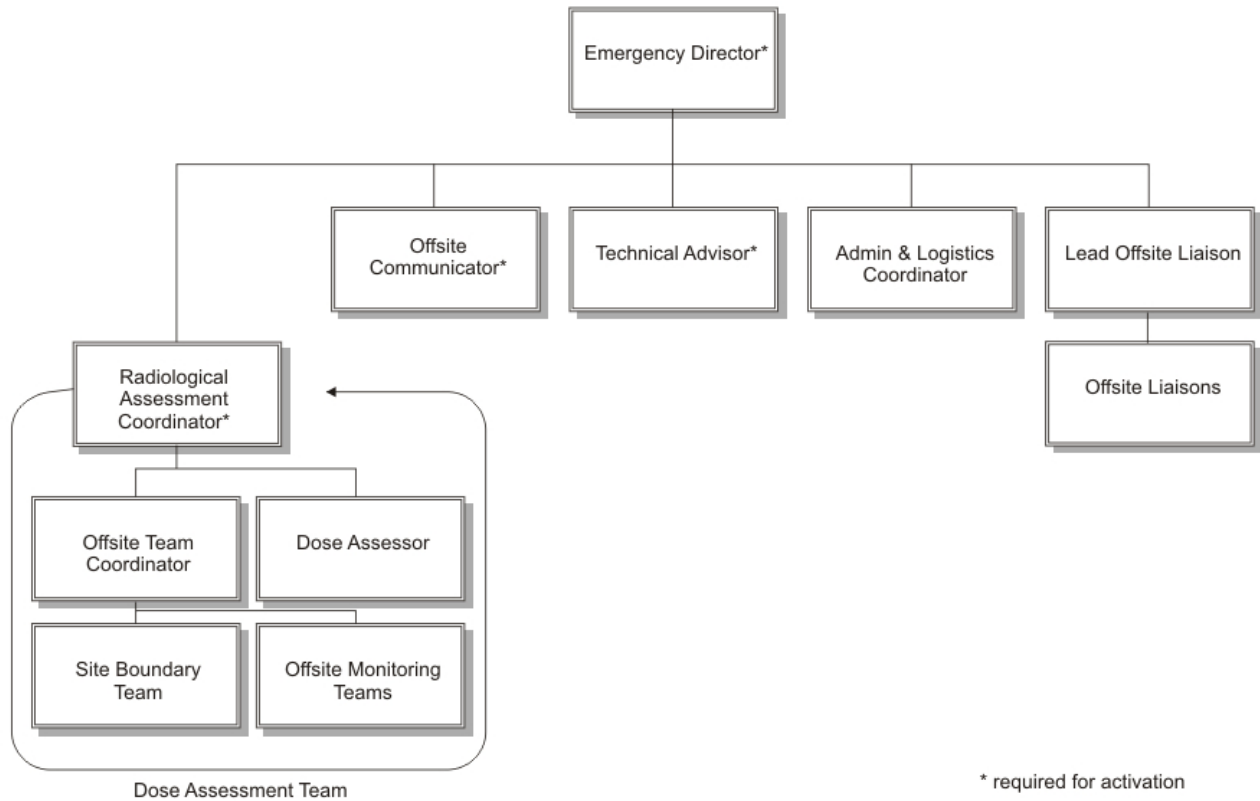
OSC ERO RESPONSIBILITIES

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<u>ERO Position</u>	<u>Responsibilities</u>
OSC Manager	<p>The OSC Manager has the overall responsibility for the activation and operation of the Operational Support Center. The OSC Manager reports to the EPM located in the TSC and has the following responsibilities:</p> <ol style="list-style-type: none"> 1. Direct the activation, operation and deactivation activities of the OSC. 2. Maintain facility log on WebEOC or other acceptable method. 3. Coordinate and/or prioritize assessment and corrective actions with the TSC. 4. Provide periodic briefings to the OSC personnel to include plant status, EALs, and plant priorities. 5. Support the formation, briefing and debriefing of repair/corrective action teams and onsite monitoring teams. 6. Maintain communications with the Control Room and the Technical Support Center to inform of OSC teams and activities via WebEOC or Status Board entries. 7. Maintain communications with the Maintenance Coordinator in the TSC. 8. Assign team members to the repair and corrective action teams. 9. Conduct or participate in the pre-job briefing for the assigned tasks. 10. Ensure timely dispatch of the repair/corrective action teams, search and rescue teams, onsite monitoring teams and mobilize other required support personnel. 11. Ensure repair and corrective action teams are tracked. 12. Ensure communication with the teams is maintained. 13. Participate in debriefing of returning emergency teams. 14. Ensure work task priorities are being maintained. 15. Ensure the SM is informed of OSC teams and activities. 16. Maintain OSC accountability. 17. Coordinate movement of OSC personnel to a habitable location or alternate OSC if conditions degrade. 18. Identify and request resources, equipment and supplies to support the OSC.
OSC Teams	<p>Perform qualified job functions and/or emergency plan functions as directed by the OSC Manager.</p> <ol style="list-style-type: none"> 1. Perform initial actions per procedures upon arrival in the OSC. 2. Attend pre-job briefing prior to performing emergency maintenance. 3. Ensure status boards and/or WebEOC reflect the correct status. 4. Perform in-plant activities as directed by the OSC M. 5. Debrief team activity upon return to the OSC. 6. RP performs habitability of ERFs where applicable


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EMERGENCY OPERATIONS FACILITY ERO




ERO Minimum PI Key Positions

- Emergency Director
- Radiological Assessment Coordinator
- Offsite Communicator

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<u>ERO Position</u>	<u>Responsibilities</u>
Emergency Director	<p>Provide overall command and control of the emergency response. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Receive turnover from the ED and assume command/control of EOF and activities outside the area controlled by the TSC 2. Direct the activation, operation and deactivation of the EOF. 3. Maintain a chronological log of emergency status and EOF activities on WebEOC or other acceptable method 4. Prepare and facilitate facility briefings 5. Upgrade the emergency classification level. (cannot delegate) 6. Make protective action recommendations (PAR) to offsite agencies (cannot delegate) 7. Direct and approve offsite notification to State and local agencies (cannot delegate) 8. Communicate within and between the emergency response facilities 9. Ensure event information is communicated to other organizations (NRC, Entergy Corp, etc.) to keep them informed of the emergency situation. 10. Direct the activities of the EOF organization in support of the TSC and offsite response agencies. (County, Parish and State) 11. Direct protective actions for offsite monitoring teams, EOF ERO and offsite resources. 12. Request assistance from offsite agencies, excluding requests for offsite medical/fire, security assistance. (Coordinate request for Federal assistance through the State) 13. Obtain additional resources through the Admin/Logistics Coordinator when necessary 14. Integrate off-site responders with site response efforts when required. 15. Authorize issuance of KI and radiation exposure in excess of 10CFR 20 limits for ERO members outside of the protected area. 16. Authorize press releases (cannot delegate) 17. Direct facility relocation to the alternate EOF (where applicable) 18. Determine reportability actions for non-emergency reportable events during an emergency (hazardous material spills, contaminated injured personnel, and so forth). 19. Conduct turnover of command and control to relief ED. 20. Terminate the event in accordance with procedures (cannot delegate) 21. Establish and direct recovery actions


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ATTACHMENT 9.5


EOF ERO RESPONSIBILITIES

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EOF Technical Advisor	<p>Reports to the Emergency Director. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Maintain contact with the TSC and Control Room to obtain current plant and emergency status 2. Monitor plant computer system parameters. 3. Recommend actions on classification of emergencies 4. Support PAR decision making/determination. 5. Transmit and receive information from onsite ERF's. 6. Ensure JIC is provided with current plant status 7. Ensure classification upgrades are communicated to Company Spokesperson to ensure media briefings are accurate 8. Review press releases and provide to the ED for approval
Offsite Communicator	<p>Reports to the Emergency Director. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Ensure the Emergency Director approves all notifications forms to State/Local agencies. 2. Make notification to the State and local agencies as required by regulations using primary and backup notification system. 3. Verify State and local agencies received and understand the notification 4. Make follow-up notifications 5. Maintain records of all notifications and communications

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<u>ERO Position</u>	<u>Responsibilities</u>
Admin & Logistics Coordinator	<p>The Admin/Logistics Coordinator is responsible for providing support to the Emergency Director and the TSC Emergency Response Organization. Responsibilities include</p> <ol style="list-style-type: none"> 1. Manage 24 hour staffing of the emergency response facilities. 2. Manage logistics for supporting the onsite and offsite emergency response such as additional support personnel or equipment, meals, lodging, etc. 3. Coordinate access security measures in the EOF if applicable 4. Notify Entergy Corporate Office and Corporate Emergency Center.
Offsite Liaison(s)	<p>The Offsite Liaison reports to the Lead Offsite Liaison. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Obtain plant information and ensure the offsite agencies located in the EOC are briefed on the plant conditions. 2. Clarify plant conditions, respond to questions, etc. for the offsite agencies.

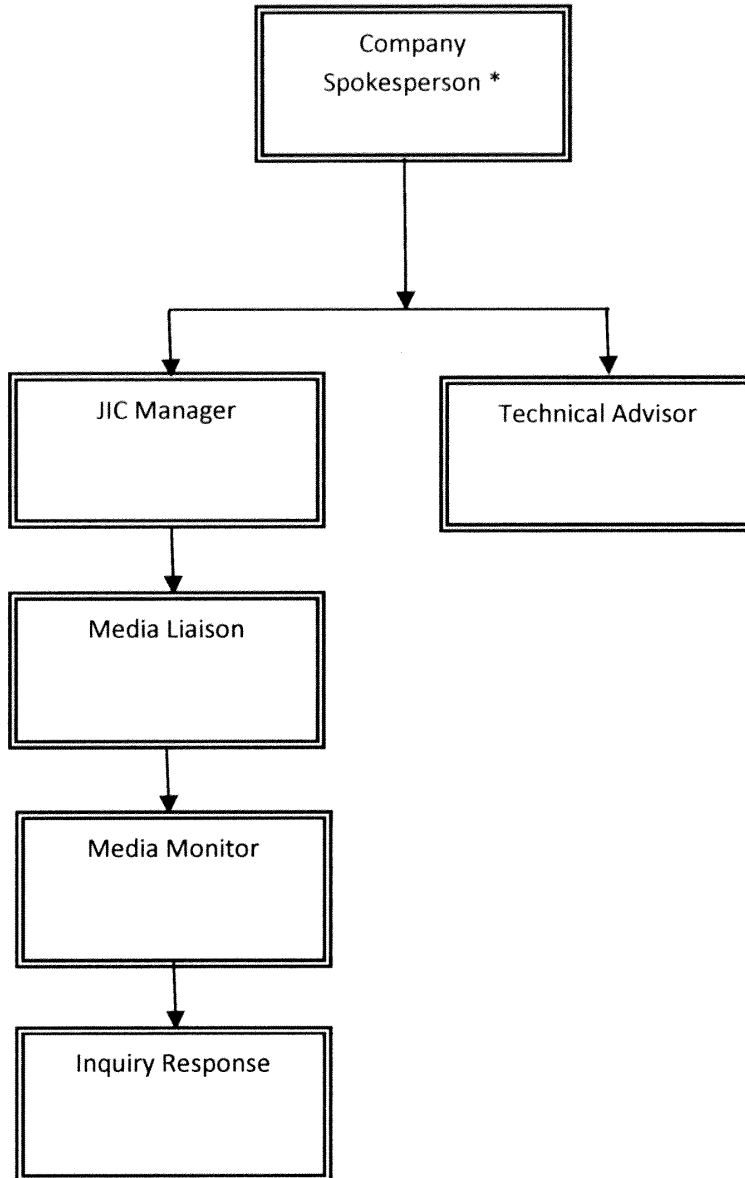
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<u>ERO Position</u>	<u>Responsibilities</u>
Radiological Assessment Coordinator (RAC)	<p>The Radiological Assessment Coordinator is responsible for conducting assessment activities for offsite radiological conditions. During operation of the EOF, the Radiological Assessment Coordinator reports to the ED. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Direct the activities of the dose assessor and radiological offsite monitoring teams. 2. Evaluate dose assessment results and recommendations. 3. Determine dose consequences 4. Communicate dose projection results to the ED to determine classification or PAR. 5. Keep the ED appraised of offsite radiological conditions. 6. Maintain awareness of dose projections generated by NRC, state and utility models and recognize differences. 7. Provide overall liaison and coordination of efforts in the area of field team data with State Radiological Personnel. 8. Brief offsite authorities responding to the EOF on radiological information. 9. Contact the NRC on Health Physics Network (HPN) Line.(Can be designated to another staff member) 10. Direct possible predictive and worst-case dose projections. 11. Monitor or direct monitoring of ERF habitability. 12. Ensure facility emergency ventilation in service (where applicable) 13. Recommend EOF relocation based on environmental conditions and provide radiological guidance for the EOF evacuation, where applicable. 14. Monitor information from displays or reports to detect changes that affect dose assessment. 15. Establish radiological controls for supplemental and relief personnel responding to the station. 16. Recommend emergency exposure limits and KI for EOF ERO or offsite monitoring teams 17. Coordinate the administration of KI.
Dose Assessor	<p>The Dose Assessor reports to the Radiological Assessment Coordinator. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Support the radiological activities of the EOF 2. Obtain data from offsite monitoring team reports, meteorological and radiological data, and plant data 3. Perform dose projection calculations using plant data and offsite monitoring team data. 4. Perform possible predictive (what-if) and worst case dose projections when directed 5. Provide offsite dose projection information to the RAC 6. Monitor available parameter indications to detect changes that affect dose assessment. 7. Perform dose projections using primary and backup methods

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<u>ERO Position</u>	<u>Responsibilities</u>
Offsite Team Coordinator	<p>The Offsite Team Coordinator reports to the Radiological Assessment Coordinator. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Maintain communications with offsite monitoring teams (OMT). 2. Employ and direct OMT based on radiological /met information. 3. Supervise/develop a plume tracking strategy. 4. Log communications with OMT to include dose /air sample survey results, dosimeter reading, etc. 5. Ensure radiological information is communicated to the RAC for possible modifications to the dose calculations 6. Support coordination of efforts in the area of offsite monitoring team data with State radiological personnel 7. Ensure team is aware of changing plant / meteorological conditions 8. Ensure team is notified on KI requirements
Offsite Monitoring Teams (Green, Blue & Site Boundary Team)	<p>The Offsite monitoring team reports to the Offsite Team Coordinator (OTC). Responsibilities include:</p> <ol style="list-style-type: none"> 1. Perform activities directed by the OTC to support plume tracking and measurements 2. Monitor self reading dosimeters and report results back to the OTC 3. Implement KI protective measures when notified by the OTC


JOINT INFORMATION CENTER ERO




*required for activation

ERO Minimum PI Key Positions

None

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<u>ERO Position</u>	<u>Responsibilities</u>
Company Spokesperson	<p>The Company Spokesperson is responsible for overall public information. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Obtain briefing from the ED to ensure timely development of news releases. 2. Ensure that news media briefings are held regularly during the course of the emergency. 3. Serve as spokesperson at media briefings. 4. Keep the Entergy Vice President of Communications, or designee, informed throughout the emergency. 5. Resolve any known rumors or misinformation to the Media.
JIC Manager	<p>The JIC Manager reports to the Company Spokesperson. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Direct the activation, operation and deactivation of the JIC. 2. Maintain facility log on WebEOC or other acceptable method. 3. Obtain ED approval for the developed news releases and revise accordingly. 4. Ensure press release information is communicated to the offsite agencies. 5. Ensure press releases are coordinated with the offsite agencies. 6. Ensure distribution of all press releases to the offsite agencies, JIC/EOF facilities and to the Media Liaison. 7. Ensure appropriate timing, content and distribution of news releases. 8. Ensure activation of rumor control/public inquiry activities for response to questions from the general public. 9. Supervise public response activities. 10. Supervise media monitoring and response activities. 11. Establish or ensure media briefing schedule. 12. Notify the Corporate Emergency Center (CEC). 13. Fax copies of press releases to the CEC/Corporate Communications
JIC Technical Advisor	<p>The Technical Advisor (TA) reports to the Company Spokesperson. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Answer technical questions from the news media regarding the emergency situation. 2. Advise the Inquiry Responder on questions about radiation or nuclear technology to respond to phone questions from the public or media. 3. Assists the Company Spokesperson for technical accuracy of press releases.
JIC Media Liaison	<p>The Media Liaison reports to the JIC Manager. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Verify the readiness of the JIC briefing area. 2. Establish security to restrict access to the JIC to authorized Utility/Government JIC responders. 3. Activate facility security and briefing center. 4. Maintain access control to the JIC. 5. Ensures media is informed of protocol and schedules established for media briefings. 6. Receive and distribute press release information to the media in the JIC briefing area. 7. Restrict access to the JIC media/briefing area to persons with media credentials.

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ATTACHMENT 9.6

JIC ERO RESPONSIBILITIES

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<u>ERO Position</u>	<u>Responsibilities</u>
Media Monitoring Note: This position may be jointly staffed with offsite personnel and is a collaborative effort	Media Monitor reports to the JIC Manager: <ol style="list-style-type: none"> 1. Monitor TV and radio broadcasts for inaccuracies 2. Report all inaccuracies to the JIC Manager to ensure they are addressed in the media briefings.
Public Inquiry Response¹ Note: This position may be jointly staffed with offsite personnel and is a collaborative effort	Reports to the JIC Manager and respond to telephone inquiries from the general public and news media. <ol style="list-style-type: none"> 1. Log questions that require a callback 2. Log rumors and provide to the Inquiry Response Coordinator 3. Monitor and respond to the public/media inquiry calls and track trends. 4. Refer questions on radiation or nuclear technology from Rumor Control Center to the Technical Advisor

¹May be performed by non-nuclear utility personnel such as a call center or at a company remote facility.

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EMERGENCY RESPONSE ORGANIZATION				

ATTACHMENT 9.7

MINIMUM STAFFING LEVELS FOR EACH ERF

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The following table illustrates the typical minimum staffing to declare emergency response facilities Operational. Staffing requirements are listed in the site's emergency implementing procedures. The ERO should take appropriate actions necessary to mitigate the event regardless of facility manning or status.

Facility	Emergency Response Position	Comment:
TSC	Emergency Plant Manager (EPM)	
	Operations Coordinator	
	Radiological Coordinator	
	Engineering Coordinator	
	Maintenance Coordinator	
EOF	Emergency Director	
	Technical Advisor	
	Radiological Assessment Coordinator or Dose Assessor	
	Offsite Communicator	
OSC	OSC Manager	
JIC	Company Spokesperson	