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6. EMERGENCY RESPONSE PLAN

6.1 Staffing and Event Classifications

The Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI) has permanent, full-time staff that performs the following:

- Two (2) Security Officers, who monitor the security surveillance video cameras and perform periodic, scheduled rounds of the ISFSI and its environs 24 hours a day.
- One (1) ISFSI Manager who is a trained Emergency Coordinator (EC) available during normal working hours.
- One (1) Facility Safety Officer (FSO) who is a trained EC available during normal working hours.

NOTE: *A trained EC is on-call 24 hours a day. Additional contractor personnel have been trained and are available to act as ECs.*

The classification system results in responses and procedures that are both timely and appropriate for each emergency condition. When determining the classification of a particular situation, the highest classification (ALERT) would be consulted first, working down to the lowest classification, Notification Of Unusual Event.

6.1.1 Emergency Classifications [Responsive to 10 CFR 72.32(a)(2), (3), and (4)]

The following are the descriptions of the two emergency classifications used. Each classification description includes appropriate levels of emergency response actions.

The NRC and DOE Operations Centers shall be notified immediately after notification of the appropriate offsite response organizations and not later than 1 hour after declaration of an emergency. The NRC is the lead federal agency for emergency response to an NRC licensed facility.

6.1.1.1 ALERT: An event is in progress or has occurred that involves an actual or potential substantial degradation of the level of safety of the ISFSI. Any radioactive releases are expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels.

6.1.1.1.1 Typical indications and initiating events for an ALERT include the following:

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- A. Reported or confirmed unauthorized acts that have the apparent intent or potential for affecting containment of irradiated fuel within the MVDS structure, cooling, shielding, explosion, or fire within the MVDS that lasts longer than 15 minutes.
- B. Observed or reported, as determined by off-normal event assessment, damage to the MVDS structure that could result in a loss of containment or loss of shielding or damage to the MVDS inlet/outlet cooling ducts that could result in blockage of cooling air flow or loss of shielding.
- C. Observed or reported drop of a loaded fuel storage container with a breach of the container.
- D. Unexpected high radiation levels or high airborne radioactivity that indicates severe degradation in control of radioactive materials.
- E. Reported and/or confirmed loss of spent fuel.
- F. Accidental criticality.
- G. Reported or experienced severe natural phenomenon such as seismic activity, flood near design level of 6 feet, or tornado striking the ISFSI.

6.1.1.1.2 The purpose of the ALERT category is to ensure that emergency personnel are readily available to provide offsite authorities with current status information. Emergency personnel will take corrective actions, as necessary, to mitigate the consequences of an event. If necessary, ISFSI personnel will be accounted for and evacuated to a designated assembly area located in the Administration Building/Command Post (CP).

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- 6.1.1.1.3 Declaration of an ALERT will trigger prompt initial and follow-up notification to offsite authorities. If applicable, radioactive release information will be provided to offsite authorities. The ALERT status is maintained until the event is declared to be downgraded or terminated.
- 6.1.1.2 Notification Of Unusual Event (NOUE): An event is in progress or has occurred that indicates a potential for degradation of the level of safety of the ISFSI. No release of radioactive material requiring offsite response or monitoring is expected unless further degradation of the ISFSI occurs.
- 6.1.1.2.1 Typical indications and initiating events for a NOUE include the following:
- A. An observed or reported fire in the MVDS that has the potential to spread.
 - B. Observed or reported unusual hazards experienced or projected such as an aircraft crash on site, a near site explosion, or entry of uncontrolled toxic or flammable gases into the facility environs.
 - C. Any equipment or system configuration initiating, or as indicated by an off-normal event assessment, an accident involving storage or handling of spent fuel that could result in a loss of containment or shielding.
 - D. Any event, as indicated by an off-normal event assessment, which may have the potential to impact effectiveness of facility shielding or cooling.
 - E. Visually observed or reported natural phenomenon that are experienced or projected that represent risk beyond normal levels including floods and tornadoes on site.

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- F. Reported, but unsubstantiated or potential threats, such as bomb threats or extortion, or any act that has the apparent intent of disrupting operations.
- G. Reported and/or confirmed loss of a major portion of a physical security system that cannot be compensated.

6.1.1.2.2 The purpose of a NOUE is to ensure that the first step in any necessary response has been carried out; bring the operating staff to a state of readiness; and provide systematic handling of unusual event information and decision making.

6.1.1.2.3 In these situations, time is available to take precautionary and constructive steps to prevent a more serious event and/or to mitigate any consequences that may occur. This event status places the ISFSI in a readiness position for a possible cessation of routine activities and/or an augmentation of resources. State officials are notified of a NOUE.

6.1.2 Possible Accidents and Initiating Events

The accidents that could occur at the ISFSI have been analyzed in Section 8 of the Safety Analysis Report for their severity of consequences and probability of occurrence. These accidents reflect the design characteristics of the ISFSI, which are:

- Tornado and tornado generated missiles
- Earthquakes
- Dropping of a fuel storage container
- Fire and explosions
- Drop of a transfer cask
- Impact on charge face structure
- Long term loss of AC electrical power
- Full or partial blockage of inlet to vault module

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- Tornado generated missile impact on the transfer cask in the transfer cask reception bay or cask load/unload port
- Tornado generated missile impact on the container handling machine
- Lifting of equipment out-of-sequence
- Close isolation valve onto partially inserted fuel storage container
- Deposit fuel storage container/fuel element on the charge face
- Traverse container handling machine with load partially inserted
- Maximum credible accident leak of one fuel storage container in a vault module due to fuel storage container seal failure or corrosion.

6.2 Emergency Organization**[Responsive to 10 CFR 72.32(a)(7), (8), (9), and (16)]****6.2.1 Normal Facility Organization**

6.2.1.1 The normal facility organization is depicted in Appendix B.

6.2.1.2 Based on the credible accidents at the ISFSI, offsite dose consequences will be negligible and DOE does not anticipate emergency classifications above an ALERT. With no offsite consequences, DOE does not expect activation of the Colorado State Radiological Emergency Response Plan to support an emergency.

6.2.2 Emergency Response Organization**6.2.2.1 Command Post (CP)**

6.2.2.1.1 The ERO for an ALERT emergency classification is depicted in Appendix C. In the event of an emergency, the CP personnel have the responsibility to initiate immediate actions to limit the consequences of the emergency and to return the ISFSI to a safe and stable condition. The Facility Manager or designated alternate assumes the responsibilities of the EC. During an NOUE emergency classification, the normal facility organization will manage the emergency situation.

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6.2.2.1.2 The EC is responsible for:

- A. Timely classification and declaration of the emergency event.
- B. Initial and follow up notification of appropriate governmental agencies. The notification time requirements start upon event declaration regardless of whether or not management contact is desired or accomplished. Notification is conducted in accordance with EPI-103, “Event Notifications for Fort St. Vrain.”
- C. Initiating protective actions for facility personnel.
- D. Initiating any required corrective actions to mitigate the consequences of the event.
- E. Diagnosing the accident condition and estimating radiological exposures based on ISFSI design basis accident consequences.
- F. Conferring with management personnel for advice or concurrence with initial accident classification. Contacting management should not delay making an event classification and declaration, nor should it delay the required offsite notifications.
- G. Acting as the onsite Public Information Officer until a DOE-Headquarters representative arrives. The DOE Golden, Colorado, Field Office will provide a PIO when requested per EPI-110, “Emergency Public Information for Fort St. Vrain.”

Preapproved generic press releases will be issued as soon as possible to inform the public of events at the FSV Facility. Follow-up releases will be made at least hourly, and whenever additional significant information is available.

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- H. Direction and coordination of emergency operations. Providing direction to, and coordination for, the ERO.
- I. Facility status updates and radiological information/estimates to appropriate offsite agencies.
- J. Ensuring adequate administrative, technical, and logistic support is available.
- K. Ensuring continuity of emergency organization resources.
- L. Collecting and analyzing technical information.
- M. Personnel accountability.
- N. Assessing radiological release consequences.
- O. Coordinating assistance from the Fort St. Vrain Advisor (FSVA) including assembling personnel for Emergency Response Teams and reserve staffing.

6.2.2.2 INTEC ECC

6.2.2.2.1 The DOE ICP contractor maintains the capability to provide support in the event of an emergency at the ISFSI facility. INTEC ECC logistical support includes ICP contractor personnel, facilities, and equipment, which may be needed in an emergency situation. FSV requests for resources will be approved by the senior ICP contractor personnel in the EOC.

- A. Communications: Communications with the FSV CP and the Fort St. Vrain Advisor in the EOC will be routed by telephone.

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- B. Engineering and Technical Analysis:
The INTEC ECC will provide engineering, licensing, and maintenance support; develop procedures; provide system analysis support; determine alternative system/equipment capabilities or configurations and repair/install/modify equipment; and collect technical data as necessary.
- C. Radiation Protection: The INTEC ECC will provide personnel who direct and perform radiation and contamination surveys and provide contamination control as required.

6.2.2.3 EOC

6.2.2.3.1 The DOE INL contractor maintains the capability to provide INL EOC support in the event of an emergency at the ISFSI facility. EOC support includes senior ICP contractor personnel with the authority to activate personnel, facilities, and equipment as well as financial resources, which may be needed in an emergency situation.

- A. A FSV Advisor (FSVA) will be dispatched to the EOC to provide support in the event of an emergency at the ISFSI facility. The FSVA will coordinate engineering, licensing, and maintenance support; develop procedures; provide system analysis support; determine alternative system/equipment capabilities or configurations and repair/install/modify equipment; and collect technical data as necessary.

Responsibility for making follow up classification and notifications may be formally transferred from the EC to the Fort St. Vrain Advisor.

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- B. A Senior Management Advisor (SMA) will be dispatched to the INL EOC to provide support in the event of an emergency at the ISFSI facility. The SMA will provide support and approve press releases.

6.2.2.4 ECC/CP Activation

The EC and Facility Safety Officer operate from the CP. The CP will be staffed and operational within 60 minutes after classification of an ALERT level incident. If a security ALERT initiates an ALERT emergency declaration, the CP will be staffed and operational 60 minutes following release of personnel to freely move about the site. Key staffing of the INTEC ECC will be activated within 90 minutes after notification of an ALERT. Key staffing of the EOC will be activated within 90 minutes after notification of an ALERT.

6.3 Offsite Emergency Support [Responsive to 10 CFR 72.32(a)(15)]

Offsite emergency support is required under various circumstances. Appendix D lists the support services and organizations that would be of primary assistance during an emergency situation. Letters of Agreement between these organizations and DOE are maintained and will be reviewed annually and updated every 5 years, or as necessary. It is not necessary to have an Emergency Response Letter of Agreement for every organization that may lend assistance.

6.3.1 Local Services Support

In emergency situations, assistance from outside organizations may be required. Available assistance includes traffic control, local ambulance service to provide medical treatment and transport of injured and/or contaminated personnel as well as hospital facilities for personnel who require such assistance. In addition, the Platteville Gilcrest Fire Protection District (PGFPD) provides for onsite fire protection assistance.

6.3.2 Contract Support

Specialized assistance from contractors may also be requested in an emergency situation. Contract support may include construction, dosimetry and laboratory analysis, and decontamination and radioactive waste disposal assistance.

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6.3.3 Federal Assistance

In addition to coordination with State/local governmental entities, technical assistance from other Federal agencies including the NRC in the area of communications, radiological monitoring, laboratory analysis, transportation, and meteorology may be requested through the EOC.

6.4 Emergency Measures [Responsive to 10 CFR 72.32(a)(11)]

Emergency measures for the ISFSI will be initiated upon, and according to, event classification. This section identifies segments of the ERO, details methods and procedures for assessment actions and required notifications, specifies actions to correct or minimize the emergency situation, describes protective actions to prevent or minimize radiological exposure, sets forth measures to assist persons injured or contaminated, and defines the EPZ.

6.4.1 Activation of Emergency Response Organization

NOTE: *Activation of the ERO is not required in a NOUE.*

The two classes of emergency defined in Section 6.1 require a varying degree and scope of emergency event responses. The emergency organization activated in each emergency classification is described in Section 6.2. CP personnel will immediately initiate action to limit the consequences of an event and to return the facility to a safe and stable condition. The emergency organization for a NOUE consists of normal staff personnel. For ALERT level accidents, the CP will be staffed with an EC and activated.

6.4.1.1 State and county agencies, as well as the NRC Operations Center, the DOE Headquarters Operations Center, and the INL WCC, will be notified of an emergency event (Appendix E). EPI-103, "Event Notification for Fort St. Vrain," identifies the agencies to be notified and their telephone numbers.

6.4.2 Assessment Actions [Responsive to 10 CFR 72.32(a)(6)]

The assessment of facility conditions, radiation levels, and offsite consequences is coordinated by the EC. Assessment will continue throughout the emergency period and may result in reclassifying the incident and consequent alteration in emergency response actions. Methodology used to predict EPZ dose rates is contained in ERP Implementing Procedures. Dose rates from incidents involving an actual release of radioactive materials to the environment are verified by personnel that survey the EPZ boundary and other areas as may be appropriate. A map of the EPZ is included as Appendix F.

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6.4.3 Mitigation [Responsive to 10 CFR 72.32(a)(5)]

In the event of an emergency, the EC has the responsibility to initiate immediate and ongoing actions to limit the consequences of (mitigate) the emergency and to return the ISFSI to a safe and stable condition and protect workers onsite. Mitigating actions will be emergency dependent and will make use of the ERO, facilities and equipment, and offsite assistance as deemed necessary.

6.4.4 Corrective Action

Corrective actions may involve response by the following organizations:

- 6.4.4.1 Fire Fighting: If fire fighting assistance is required, a call will be made to the Weld County Regional Communications Center who will dispatch appropriate local fire departments; normally the PGFPD.
- 6.4.4.2 Physical Security: Bomb threats, civil disturbances, or other security threats will prompt a call to the Weld County Regional Communications Center who will dispatch appropriate law enforcement personnel. Imminent physical threat will prompt security personnel to declare a Security ALERT and announce for all personnel to take cover.

6.4.5 Protective Actions

- 6.4.5.1 Actions to protect ISFSI personnel and visitors are the responsibility of the EC.
- 6.4.5.2 Protective actions for personnel on ISFSI property will be taken whenever a radiological emergency has occurred that could result in a significant unplanned exposure to ISFSI workers.
- 6.4.5.3 In addition, protective actions will be taken for those personnel in other emergency situations such as fires, floods, and tornadoes where personnel safety is threatened. Notification will be by actuation of alarm systems, telephone calls, or announcements as applicable.

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6.4.5.3.1 Accountability: The on-scene Incident Commander (IC) is responsible for ensuring that initial accountability of personnel is completed within 1-hour of making an appropriate announcement. Initial accountability will be conducted by appropriate facility personnel and reported to the IC in accordance with the applicable implementing procedure. The initial report will include the number or names of missing personnel. The IC is responsible for continuing accountability of personnel.

The designated assembly area for site personnel is normally the Administration Building/CP. An alternate assembly area(s) may be established as necessary.

6.4.5.3.2 Access Control: Support personnel responding to the facility during an emergency report to the appropriate access control personnel. A staging area for support personnel will be established if needed.

6.4.5.3.3 Search and Rescue Operations: When personnel are unaccounted for in the initial or subsequent accountability process, the IC may assign a team to locate personnel.

6.4.5.3.4 Use of Onsite Protective Equipment and Supplies: Protective equipment and supplies are available to minimize radiological exposures and contamination problems.

6.4.5.3.5 Contamination Control Measures: Measures will be taken to prevent, or minimize inhalation or ingestion of radioactive materials deposited within the EPZ. As necessary, affected areas will be identified and isolated.

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6.4.6 Aid to Affected Personnel

- 6.4.6.1 Emergency Personnel Exposure Criteria: Exposure records are maintained as required for ISFSI personnel. If available, this information will be used in determining emergency team assignments. Criteria used for limiting doses to emergency workers are shown in Appendix G. Appendix H describes expected health effects associated with acute elevated radiation doses. Emergency workers will carry appropriate dosimetry.
- 6.4.6.1.1 Every effort will be made to minimize emergency worker doses. The EC is responsible for emergency team assignments.
- 6.4.6.1.2 The EC will be notified of accidental exposure in excess of occupational limits. Those individuals will not be assigned to further emergency team operations involving radiation hazards. Decisions to accept doses in excess of occupational limits in life saving situations will be on a volunteer basis. The EC is ultimately responsible for ensuring the distribution of appropriate dosimetry to emergency personnel and the ongoing accountability of each worker's exposure. Personnel suspected of receiving an intake of radioactivity will undergo bioassay.
- 6.4.6.2 Decontamination and First Aid: Provisions have been made with North Colorado Medical Center to assist personnel who are injured or who may have become contaminated. Onsite decontamination areas are equipped with decontamination supplies and other specialized equipment. Personnel found to be contaminated will undergo decontamination in accordance with the appropriate procedures. Where contamination of personnel with significant injuries is involved, personnel will be transported to North Colorado Medical Center for treatment.
- 6.4.6.3 Medical Transportation: Contaminated personnel who require immediate medical attention will be transported to North Colorado Medical Center by helicopter or ambulance service. A personal vehicle may be used, if appropriate. Radiation protection trained personnel will accompany contaminated patients to the hospital, if available.

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Communications between the CP and emergency medical vehicles will normally be channeled through the Weld County Regional Communications Center.

- 6.4.6.4 Medical Treatment: Arrangements for treating contaminated patients have been made with North Colorado Medical Center in Greeley, Colorado. In situations where there is not time to transport a patient to North Colorado Medical Center, any area hospital may be used. In these cases, radiation protection trained personnel will respond to assist in contamination control at the hospital, when available.

6.5 Emergency Facility, Equipment, and Procedures [Responsive to 10 CFR 72.32(a)(1) and (8)]

This section describes the emergency response facility, onsite and offsite communication systems links, first aid and medical facilities, the decontamination facility, and damage control equipment and supplies. A listing of topics of procedures, which effectively implement the ERP, is included as Appendix A.

6.5.1 Command Post (CP)

- 6.5.1.1 CP: Emergency assessment and control is directed from the CP by the EC. The primary CP is located outside of the ISFSI in the Administration Building, a modular building approximately 150 ft from the front of the ISFSI. The primary CP contains facility procedures and radio and telephone equipment. Technical drawings, radiological monitoring equipment, protective clothing, dosimetry, and decontamination equipment are also located in close proximity to the primary CP. An alternate CP location(s) may be established by the EC as necessary. Alternate CP location(s) may not contain or be in close proximity to the above materials.
- 6.5.1.2 Communications Systems: Communications between onsite and offsite facilities and personnel consist of commercial telephones and radios. Two-way security radios may be used to maintain communications between the CP and facility emergency teams. Primary telephone and secondary communication links are shown in Appendix I. DOE, NRC, state, and county communications facilities are staffed on a 24-hour basis. These are the principal entities involved in the offsite notification process.

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- 6.5.1.3 First Aid Supplies and Medical Facilities: Necessary first aid kits, and basic medical supplies are maintained in case of injuries. Basic first-aid treatment of injured individuals will be administered by trained personnel. Advanced medical care, if required, will be obtained by contacting the Weld County Regional Communications Center for ambulance assistance and, if necessary, transporting the individual(s) to North Colorado Medical Center.
- 6.5.1.4 Offsite Fire Fighting Support: The Weld County Regional Communications Center will be called for a fire, who will contact one or more of the local fire departments to respond.
- 6.5.1.5 Decontamination Supplies: Decontamination supplies are maintained at the ISFSI to facilitate personnel with decontamination as necessary.
- 6.5.1.6 Radiation Detection Equipment: Equipment is available to perform radiation monitoring inside and outside of the ISFSI.
- 6.5.1.7 Seismic Instrumentation: Facility seismic instrumentation can be evaluated via a computer link.
- 6.5.1.8 Severe Weather: The ISFSI is designated as the shelter for severe weather warnings, i.e., tornado, severe thunderstorms, etc., for ISFSI personnel.
- 6.5.1.9 Implementing Procedures: Emergency Response Plan Implementing Procedures provide instructions and checklists for use by personnel when responding to an emergency declaration. Specific emergency preparedness procedures provide the means by which emergency equipment and supplies are maintained, and the drills and actions specified are performed.

6.6 Maintaining Emergency Preparedness**6.6.1 Organizational Preparedness
[Responsive to 10 CFR 72.32(a)(7), (10) and (12)]**

To ensure that the ERO is prepared a program comprising: (a) personnel training, (b) participation in scheduled drills and exercise, and (c) regular emergency plan review and evaluation has been established.

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6.6.1.1 Training: ERO ISFSI training is described in implementing procedure EPI-109, “Emergency Preparedness Training for Fort St. Vrain.” Each ISFSI employee receives general instruction on the ERP from contractor training personnel. A training and annual retraining program is maintained by the contractor to ensure that personnel who actively participate in emergency situations are familiar with the contents and responses set forth in the ERP. Training is conducted in accordance with contractor training procedures.

Training for ICP ERO personnel is described in Section 13 of PLN-2012, ICP Emergency Plan/RCRA Contingency Plan, The section describes the ICP emergency management training program, ERO training, controller/evaluator training, professional development, outline of ERO training activities, ERO initial training requirements, requalification requirements, ERO training program elements, evaluation methodologies, program evaluation, administration of annual ERO requalification and ERO equivalent qualification.

Training for INL ERO personnel is described in Manual 16A, *INL Emergency Plan/RCRA Contingency Plan*.

The DOE contractor offers training for members of the local Fire Protection District, which includes familiarization with the layout; the location and nature of fire hazards; the location, type, and availability of extinguishing equipment; and radiological considerations. Training is also offered to the Weld County Sheriff, Weld County Paramedic Service, and North Colorado Medical Center personnel. Such training for non-ISFSI personnel includes site access procedures, identification of station emergency personnel who will control such support forces, and a general ERP overview, as applicable.

6.6.1.2 Drills and Exercises: Regular participation by personnel in drills and exercises is scheduled to maintain emergency preparedness effectiveness and test the adequacy of emergency procedures and equipment. The FSV ISFSI Manager is responsible to ensure drills and exercises are completed as described below.

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6.6.1.2.1 Drills: Drills for the station staff are conducted periodically to: (a) test response timing and familiarity with implementing procedures and methods; (b) test emergency equipment; and (c) ensure that emergency organization personnel are familiar with their duties. Radiological/Health Physics, Medical, and Fire drills shall be conducted semiannually.

6.6.1.2.2 Exercises: Each exercise critique is conducted by individuals not having direct implementation responsibility for conducting the exercise. Exercise performance is critiqued by exercise controllers/observers who offer corrections to erroneous performance. Objectives and criteria are established for each exercise to assess performance of the participants against the objectives that are applicable to their function. These objectives and criteria allow the evaluation of the appropriateness of the plan, emergency procedures, facilities, equipment, training of personnel, and overall effectiveness of the plan. Personnel are provided written evaluations of the exercise performance based on the results of critiques, including participant's comments, if available. Follow-up action is then delineated to upgrade areas where deficiencies are noted.

A biennial exercise of the ERP will be conducted to test the adequacy of implementing procedures and methods, test emergency equipment and communications networks, and ensure that emergency response personnel are familiar with their duties. Offsite response organizations shall be invited to participate in the biennial exercise. The NRC will be notified in advance of the exercises.

Scenario information must be strictly limited to those preparing, controlling, authorizing, and evaluating the event. It is the responsibility of each individual involved to limit release of scenario and related information. The exercise coordinator should stress confidentiality of the

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scenario time and details at all scenario group meetings.

6.6.1.3 Communication and Notifications: Communication checks with offsite response organizations are conducted semiannually. Emergency Telephone Numbers are updated, as needed. Verification of emergency response facility communication links is accomplished quarterly.

6.6.1.4 Emergency Planning/Preparedness Responsibility: The FSV ISFSI Manager has overall responsibility and authority for developing, maintaining, and updating the ISFSI ERP.

6.6.2 Periodic ERP Review and Letters of Agreement

6.6.2.1 The ERP is reviewed annually and updated as needed. Special attention is devoted to maintaining effective communication channels, and ensuring up-to-date contact and notification lists.

6.6.2.2 Revised or updated emergency plans and procedures are handled in accordance with appropriate procedures.

6.6.2.3 Letters of Agreement are maintained between DOE and support organizations. These agreements are reviewed annually and updated every 5 years, or as necessary.

**6.6.3 Maintenance and Inventory of Emergency Equipment and Supplies
[Responsive to 10 CFR 72.32(a)(5)]**

6.6.3.1 Radiation monitoring equipment is calibrated and maintained in a state of readiness in accordance with contractor procedures.

6.6.4 Independent Review of the Emergency Management Program

6.6.4.1 An independent audit will be conducted on a biennial basis of the Fort St. Vrain Emergency Management Program.

6.7 Recovery

6.7.1 Recovery operations consist of transactions associated with the long-term post emergency efforts that follow a major incident. These transactions will be performed under the direction of the Recovery Manager.

**FORT ST. VRAIN (FSV) EMERGENCY RESPONSE
PLAN (ERP) SECTION 6
RESPONSE PLAN**

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- 6.7.2 After termination of the emergency, (i.e., the ISFSI is in a safe and stable condition) recovery actions are designed to: (a) assess the extent of facility damage, (b) prepare specific plans and programs for facility repairs, and (c) implement specific corrective action plans and programs.
- 6.7.3 The following general guidelines assist in determining whether the ERO should be terminated and the Recovery Organization established:
- 6.7.3.1 Radiation levels are stable or decreasing with time.
 - 6.7.3.2 Releases of radioactive material to the environment have ceased.
 - 6.7.3.3 Fire, flooding, or similar emergency conditions no longer constitute a hazard to facility personnel.
 - 6.7.3.4 The ISFSI is in a stable condition.
 - 6.7.3.5 Measures have been successfully instituted to correct or compensate for malfunctioning equipment.
 - 6.7.3.6 NRC and state/local officials have been notified of intent to terminate the ERO.
 - 6.7.3.7 The EC has authorized transition from the ERO configuration to the Recovery Organization, and notified personnel accordingly.
 - 6.7.3.8 Shipping accidents have been stabilized.
- 6.7.4 The Recovery Organization described in the following sections may be activated following the termination of the emergency. Staffing and equipment resources supporting the individual functional segments of the recovery organization will vary according to the severity of damage and specific situational needs.
- 6.7.5 During recovery, actions will be preplanned to limit exposures. Access to affected area will be controlled and exposure to personnel documented.
- 6.7.6 Management personnel involved in the emergency will be assigned to direct and coordinate recovery operations. An overview of topics that may be addressed during establishment of recovery operations is presented in Appendix J and EPI-80, “Recovery.”

The Recovery Organization will be established to respond to a particular situation in accordance with the ICP Emergency Plan/RCRA Contingency Plan (Reference 4.3).