



## EMERGENCY MANAGEMENT INTEGRATION PLAN

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Effective Date: \_\_\_\_\_

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## REVISION SUMMARY

<b>Rev. No.</b>	<b>Description of Change</b>	<b>Pages</b>	<b>Date</b>
0	Initial Release – Infrastructure Services Contract DE-EM0003733 initial submittal.	All	12/01/15
1	Revised to remove inactivated SST emergency management procedures, update SST emergency response actions. References updated.	iv, 2, 4-10	03/10/17
2	Revised in response to IM-2017-120 and to address deficiencies noted in issue #2 of PADU-17-IA-101073 DOE ISMS Verification Assessment, April 2017 and in accordance with DOE Order 151.1D, <i>Comprehensive Emergency Management System</i> .	1-7, 9, 10	8/11/17

## ACRONYM LIST

AHJ	Authority Having Jurisdiction
CFR	Code of Federal Regulations
COOP	Continuity of Operations Plan
DOE	U.S. Department of Energy
EAP	emergency action plan
EOC	Emergency Operations Center
ERAP	Emergency Readiness Assurance Plan
ES&H	Environment, Safety, and Health
FPE	Fire Protection Engineer
GET	General Employee Training
JIC	Joint Information Center
LED	Local Emergency Director
NFPA	National Fire Protection Association
O	Order
O/FM	Organizational/Functional Manager
PGDP	Paducah Gaseous Diffusion Plant
PPPO	Portsmouth/Paducah Project Office
SEP	Site Emergency Plan
SST	Swift & Staley Team

## 1.0 INTRODUCTION

The Emergency Management Integration Plan establishes the relationship and emergency response actions that Swift & Staley Inc. (hereinafter referred to as Swift & Staley Team [SST]) will perform in cooperation with the plant on-site emergency response coordinator and other Paducah Gaseous Diffusion Plant (PGDP) U.S. Department of Energy (DOE) contractors in implementing the Emergency Readiness Assurance Plan (ERAP). The actions described in this SEP are provided to clarify appropriate and timely emergency support and link SST emergency response responsibilities with the Paducah Site emergency management program.

This plan applies to SST, its subcontractors, and visitors. SST subcontractors shall promptly notify the SST Environment, Safety, and Health (ES&H) Manager and the appropriate site notification contact of any emergency conditions, personal injuries, or other unusual events that result in or could have resulted in personnel injury, environmental releases, or property damage. Subcontractors shall provide a complete report of all incidents outlining the causes, corrective actions, and measures taken to prevent recurrence to the SST ES&H Manager. In order to ensure immediate notification for reporting of emergencies, the subcontractor shall provide radio, telephone, or other reliable means of contact for their personnel working on-site.

## 2.0 ORGANIZATIONAL RESPONSIBILITIES

The responsibilities depicted and provided by this plan cover only those facilities, locations, and actions under the contract for PGDP Infrastructure Support Services.

Multiple organizations are involved in responding to emergencies at PGDP. This emergency response will be coordinated by the Deactivation and Remediation Contractor in accordance with CP2-EP-1000, *Paducah Site Emergency Management Plan*, and supported by the additional organizations (DOE, SST, the Conversion Contractor, etc.), as needed. Coordinated and cooperative interaction and response of each organization are essential for effective emergency response and mitigations. SST is committed to be a cooperative, responsive, and competent team player in emergency responses at PGDP and to comply with DOE Order (O) 151.1D, *Comprehensive Emergency Management System*.

In accordance with the Paducah Infrastructure Support Service Contract with DOE, DE-EM0003733, section C.2.2.6, Emergency Management, SST provides input to the Deactivation and Remediation Contractor for the annual update to the Paducah Site Emergency Plan, the Continuity of Operations Plan, and the Emergency Readiness Assurance Plan. SST develops and submits for DOE approval an All Hazards Survey for infrastructure facilities/activities in accordance with O 151.1D. SST will provide input to the Deactivation and Remediation Contractor for the Site Threat Hazard Identification and Risk Assessment.

## **2.1 SWIFT & STALEY TEAM EMERGENCY COORDINATOR**

The SST Emergency Coordinator is the ES&H Manager, 270-441-5018 (office) and 270-556-6889 (cell). The alternate is the Environmental Compliance Specialist, 270-441-6294 (office) and 270-210-7354 (cell).

The SST Emergency Coordinator is responsible for the maintenance of the emergency program within SST and interfaces between DOE, the Deactivation and Remediation Contractor, and SST. This position ensures communication and interface with local response agencies to off-site facilities (e.g., Kevil office building) operated by SST and their contractors. The SST Emergency Coordinator ensures appropriate training is conducted including formal classroom, web-based, drills, and exercises. Lastly, the SST Emergency Coordinator assigns Local Emergency Directors (LED) for facilities operated by SST and their contractors. Other duties and responsibilities are included in SST Procedure 03.08.01, *Emergency Operations Center Activities*.

## **2.2 SWIFT & STALEY TEAM LOCAL EMERGENCY DIRECTORS**

LEDs (this term includes wardens) are designated by the SST Emergency Coordinator. Duties and responsibilities are described in facility emergency action plans. In general, LEDs provide direction, guidance, and communication during an emergency. They are tasked with ensuring certain immediate actions are completed by the general populace (e.g., closing office doors during severe weather and securing ventilation during shelter-in-place), and will perform local accountability during facility evacuation. LEDs can be contacted by facility occupants and visitors for additional information on actions to be taken in the event of an emergency.

## **2.3 DEACTIVATION AND REMEDIATION CONTRACTOR**

The Deactivation and Remediation Contractor has significant responsibilities for emergency responses and actions at PGDP and will fulfill the overall requirements of DOE O 151.1D, *Comprehensive Emergency Management System*, as follows:

- Program Management and Administration
- All-Hazards Planning Basis
- Emergency Response Organization
- Emergency Operations System
- Training and Drills
- Emergency Medical Support
- Offsite Response Interfaces
- Emergency Categorization
- Protective Actions
- Emergency Facilities and Equipment/Systems

- Notifications and Communications
- Emergency Public Information
- Termination and Recovery
- Readiness Assurance
- Consequence Assessment

Other organizations at PGDP are expected to respond, support, and aid in the implementation of the site's emergency response actions.

#### **2.4 SWIFT & STALEY TEAM**

SST supports and aids in the implementation of emergency response actions.

SST will maintain personnel qualified and trained in effective and timely response to site emergencies and will report to and assume EOC roles, as necessary and directed by the Deactivation and Remediation Contractor. SST EOC responders will maintain their availability through the emergency EOC notification mechanism.

SST will cooperate with the Deactivation and Remediation Contractor, DOE, and other site organizations, as needed, to aid in mitigation of emergencies. SST also will provide support to the EOC based upon the jointly determined level of involvement and can include the following:

- Manning stations in the EOC;
- Providing coordination between site entities;
- Remaining as a standby resource;
- Providing technical and support personnel, equipment, and supplies as needed by the EOC for response to an emergency;
- Providing for recovery resources for events that are SST's responsibility;
- Providing input to Deactivation and Remediation Contractor for the Paducah Site ERAP and SEP; and
- Maintaining an active role in the site-wide Drill and Exercise Committee chaired by the Deactivation and Remediation Contractor.

### **3.0 EMERGENCY NOTIFICATION, REPORTING, AND RESPONSE**

#### **3.1 INCIDENT SCENE RESPONSE BY SWIFT & STALEY TEAM**

Upon the discovery of an emergency situation by SST personnel, whether perceived or real, the employee will initiate the response actions of SST Procedure 03.02.05, *Accident/Incident Reporting*; SST Procedure 04.06.01, *Radiological Accidents and Emergencies*; SST Procedure, 05.03.01, *Occurrence Notification and Reporting*; and/or this SEP as necessary. Published emergency action plans (EAPs) at each facility also will be utilized by individual employees during the initial response to an incident. SST will use the following methods of notifying the Deactivation and Remediation Contractor Plant Shift Superintendent:

- On-site telephone (333);
- Alarm pull box;
- Call 270-441-6211 or 270-441-6333 if using a cell phone;
- Radio - Alpha 1, Channel 16; or
- Send messenger.

#### **3.2 RESPONSE BY SWIFT & STALEY TEAM**

SST will maintain trained and technically qualified persons to respond during emergencies. SST personnel will respond to the EOC and act in a support function, as described in SST Procedure 03.08.01, *Emergency Operations Center Activities*. Positions filled in the EOC by SST personnel are the SST EOC Coordinator, Officially Designated Security Authority, Public Relations, and Recorder/Historian.

When the Joint Information Center (JIC) is activated by the Crisis Manager, SST provides trained primary and alternate personnel. Specific details of the position are provided in Deactivation and Remediation Contractor Procedure CP3-EP-1008, *Emergency Public Information*.

SST also will have additional technical and operational support personnel on standby to be used as needed. In addition, SST will make available heavy equipment, communications equipment, and assorted vehicles to the response and recovery efforts. SST will be responsible for protective actions and accountability of its personnel. Occasionally, SST has work crews in remote locations on the DOE reservation and nearby wildlife management area. Notifications of emergency conditions are of vital importance. Various means to ensure communications have been established.

- Plant radios for each work crew,
- Plant public address system,
- Public warning sirens at the plant boundaries, and
- Personal and work cell phones.

### **3.3 CONTINUITY OF OPERATIONS PLAN**

A Continuity of Operations Plan (COOP) has been developed to cover a full spectrum of situations and/or emergencies that could disrupt operations at PGDP. It provides the basics of continuity planning for DOE and Prime contractors. The plan addresses the recovery of equipment and systems that may be considered mission critical. SST provides input on the COOP to the Deactivation and Remediation Contractor upon request.

### **3.4 EMERGENCY PUBLIC INFORMATION**

SST has personnel assigned to both the EOC and JIC for the purpose of emergency public information. Deactivation and Remediation Contractor Procedure CP3-EP-1008, *Emergency Public Information*, will be followed in the performance of their duties. Public information releases will be communicated to the Portsmouth/Paducah Project Office (PPPO) in Lexington, Kentucky, by the DOE representative in the EOC. The information is approved for release by PPPO and issued as press releases. Press releases subsequent to the initial press release are coordinated with DOE Headquarters. JIC personnel provide direct access for the media, releasing and explaining the information approved by DOE.

## **4.0 FIRE PROTECTION**

SST implements a fire protection program commensurate with work scope and risk of the Infrastructure Support Services Contract with DOE, DE-EM0003733. This section describes the various fire protection processes, training, and procedures applied to the work activities of the contract. Other duties and responsibilities can be found in SST Procedure 03.09.01, *Fire Protection and Evacuation Alarms*.

### **4.1 FACILITIES**

All SST buildings are operated to minimize fire loading. Installed fire protection warning and extinguishing systems are maintained operable.

Engineering is involved at the onset of new facility construction. Applicable engineering standards are specified as part of the design input. Installed systems (passive and active) are tested and accepted. In some cases, as with the C-752-B On-site Fuel Dispensing Station, the final construction is certified by the cognizant regulatory agency.

SST also performs inspections of fire extinguishers in all DOE facilities in accordance with National Fire Protection Association (NFPA) 10, *Standards for Portable Fire Extinguishers*, and SST 06.10.01, *Portable Fire Extinguisher Inspections, Testing, and Refurbishment*. The organization has NFPA 10 qualified technicians, a supervisor, and administrative support to handle these fire extinguisher duties.

## 4.2 STORAGE

SST does not store items, chemicals, or materials long term. Quantities purchased are sufficient to complete the planned task. Excess flammable or combustible materials are stored near the point of use in a NFPA compliant cabinet. Containers are labeled clearly in accordance with 29 Code of Federal Regulations (CFR) 1910.1200, *Hazard Communication*, and NFPA 704, *Standard System for the Identification of the Hazards of Materials for Emergency Response*.

SST has procedures concerning the safe storage of flammable materials. SST Procedure 03.01.01, *General Safety Requirements*, and SST Procedure 03.02.04, *Hazard Communication*, include requirements regarding flammable materials.

## 4.3 SMOKING AND HOT WORK

Cigarette smoking is allowed only in designated areas. These areas are chosen for their absence of nearby flammable and combustible materials (i.e., grass, woods). Ash receptacles are provided at these areas. Smoking in government facilities or vehicles is strictly forbidden. These requirements are implemented through SSI.HR-0009, *Employee Handbook*, and SST Procedure 03.01.01, *General Safety Requirements*.

Spark or flame-producing activities are strictly controlled to minimize the danger of fire. Specific environmental conditions must be met, a qualified fire watch set, precautions identified, and time duration established before permission is granted to initiate spark- or flame-producing activities. SST maintains a fixed weld shop in C-755-A. The permit is granted by the Deactivation and Remediation Contractor Fire Department and posted in the area.

Hot Work Permits are used outside the fixed weld shop for short duration work activities that produce flame or spark. SST Procedure 03.02.06, *Welding, Burning, and Hot Work*, governs these permits and work activities.

## 4.4 PREVENTION

Fire prevention is accomplished through thorough hazards analysis, permitting, general awareness level training, and good housekeeping practices. Job tasks are reviewed for hazards by the SST ES&H staff and workers (reference SST Procedure 03.02.03, *Hazard Assessments*, and SST Procedure 06.01.01, *Paducah Work Control Process*). Spark- or flame-producing activities are controlled through the permitting process discussed in the previous section. Employee awareness is maintained by frequent management walkdowns (reference SST Procedure 05.02.01, *Integrated Oversight Program*) and the SST General Employee Training (GET) module. Special fire-watch training also serves to raise the general awareness level.

The housekeeping requirements of 29 CFR 1910, *Occupational Safety and Health Standards*, maintain combustible loading in work areas to a minimum acceptable level. Work crews are directed to clear their work area after each task. Time is set aside after work activities and periodically, as needed for housekeeping duties. SST Procedure 03.01.01, *General Safety Requirements*, and Management By Walking Around assessments address housekeeping requirements.

#### **4.5 FIRE HAZARD ANALYSIS**

Fuel tanks and drums greater than 55 gallons are inspected routinely for leakage or deterioration. The inspections are maintained as records.

SST facilities, with the exception of the aforementioned fuel dispensing station, were reviewed in SSIEM-0005, *Hazard Survey for Infrastructure Facilities/Activities*. No issues were identified with the structures or how they are being utilized. This document is annually reviewed and revised, as necessary.

#### **4.6 PERSONNEL**

##### **4.6.1 All Employees**

All employees are responsible for:

- Planning and conducting all work in a manner that minimizes hazards from fire and other related events;
- Complying with requirements established in fire protection performance documents;
- Providing feedback on work processes to improve requirements and performance documents;
- Recognizing and responding to local fire evacuation alarms;
- Knowing how to promptly summon help in an emergency; and
- Understanding the need for good housekeeping practices, including keeping exits and emergency equipment free from obstructions.

##### **4.6.2 Environment, Safety, and Health Manager**

The ES&H Manager is responsible for the following:

- Developing a fire protection program that will assist in accomplishing the SST fire protection policy objectives;
- Maintaining and updating related documents such as the SEP, Facility Hazard Analyses, etc.;
- Overseeing the implementation of the fire protection program and providing company level support to project teams;

- Assigning fire protection program responsibilities to the appropriate Organizational/Functional Manager (O/FM); and
- Ensuring adequate resources are provided to implement the program through deployment of personnel to SST projects.

#### **4.6.3 Organizational/Functional Managers/Supervisors**

The O/FM and Supervisors are responsible for:

- Ensuring all employees know their responsibilities to:
  - Recognize and respond to local fire evacuation alarms;
  - Be aware of exit routes;
  - Promptly summon assistance for fire, emergency, medical aid, and security patrol;
  - Read the building/facility emergency plan and know its location;
- Ensuring assigned projects are compliant with applicable fire protection requirements in work smart standards and the Integrated Safety Management System guiding principles and core functions;
- Ensuring the performance of work in accordance with the SST fire protection program by implementing project specific fire protection program descriptions and procedures;
- Reinforcing to all employees the SST commitment to perform work in accordance with fire protection safety requirements; and
- Ensuring employee implementation of good housekeeping and fire prevention practices.

#### **4.6.4 Operations and Maintenance Fire Services**

Operations and Maintenance Fire Services personnel are responsible for performing fire services inspections and maintenance as government furnished services specified in the SST contract.

### **5.0 TRAINING**

SST will maintain trained technical, operational, and public relations personnel to support the EOC and JIC. Emergency response personnel will receive annual refresher training, participate in drills, and conduct exercises. Initial training for emergency response personnel consists of required reading and EOC orientation.

SST also will provide training and guidance for its workers to help in the early recognition and response to incidents. This training will include the following:

- Incident recognition;
- Notification actions; and
- Safe incident scene early response actions.

Attachment A, *Swift & Staley Team First Responder Guidance During an Emergency Event*, provides initial worker emergency response actions.

In addition to the emergency management training, all SST personnel are annually provided fire extinguisher training in SST Consolidated Annual Training. Fire watch personnel must pass a training course as well as the field practical test of operating an extinguisher to put out a fire. EAPs are written for each normally occupied facility or area and include immediate actions in event of a fire. Training on EAPs is provided by the SST ES&H Manager whenever a revision is made.

Fire response currently is provided by qualified Deactivation and Remediation Contractor fire department personnel. Agreements are in place between the Deactivation and Remediation Contractor and local mutual aid services to provide additional firefighting capability if needed.

## **6.0 DRILLS AND EXERCISES**

SST will participate in emergency response drills and exercises. This participation may include development of the drill, conduct of the drill, response and implementation of drill activities, critiques, and corrective actions.

SST also will conduct periodic tabletop and walkthrough exercises with its staff to help ensure the workers are aware of appropriate response actions.

The Deactivation and Remediation Contractor is responsible for updating the ERAP, which describes the planning and training needed to remain proficient in emergency response. SST provides input to the ERAP annually, including training, drill exercises, and oversight schedules.

## **7.0 REFERENCES**

29 CFR 1910.1200, *Hazard Communication*

DOE Order 151.1D, *Comprehensive Emergency Management System*

NFPA 10, *Standards for Portable Fire Extinguishers*

NFPA 704, *Standard System for the Identification of the Hazards of Materials for Emergency Response*

SSIEM-0005, *Hazard Survey for Infrastructure Facilities/Activities*

SST/C-752-B/FHA/R0, *Fire Hazard Analysis for the Fuel Dispensing Facility Building C-752-B*

SST GET module

SST Procedure 03.01.01, *General Safety Requirements*

SST Procedure 03.02.03, *Hazard Assessments*

SST Procedure 03.02.04, *Hazard Communication*

SST Procedure 03.02.05, *Accident/Incident Reporting*  
SST Procedure 03.02.06, *Welding, Burning, and Hot Work*  
SST Procedure 03.08.01, *Emergency Operations Center Activities*  
SST Procedure 03.09.01, *Fire Protection and Evacuation Alarms*  
SST Procedure 04.06.01, *Radiological Accidents and Emergencies*  
SST Procedure 05.02.01, *Integrated Oversight Program*  
SST Procedure 05.03.01, *Occurrence Notification and Reporting*  
SST Procedure 06.01.01, *Paducah Work Control Process*  
SST Procedure 06.10.01, *Portable Fire Extinguisher Inspections, Testing and Refurbishment*  
Deactivation and Remediation Contractor Procedure CP2-EP-1000, *Paducah Site Emergency Management Plan*  
Deactivation and Remediation Contractor Procedure CP3-EP-1008, *Emergency Public Information*

## **8.0 ATTACHMENTS**

Attachment A, *Swift & Staley Team First Responder Guidance During an Emergency Event*

## **ATTACHMENT A –SWIFT & STALEY TEAM FIRST RESPONDER GUIDANCE DURING AN EMERGENCY EVENT**

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An SST first responder is any individual who arrives at or is present at the beginning of an emergency event. The first responder should perform the following actions, if safe to do so, prior to the arrival of the plant emergency squad.

1. Determine if remaining in the area is an immediate risk to self. If so, evacuate to the designated area outside the building or area as specified in the Facility Emergency Action Plan.
2. Call the Plant Shift Superintendent at 270-441-6211, 270-441-6333, 333 (on-site phone), or use the plant radio, Alpha 1, Channel 16.
3. Stay on the phone and provide the following information as long as you safely can do so:
  - Location of emergency event and affected areas;
  - Phone number of responder location;
  - Personnel injuries observed;
  - Structural/equipment damage;
  - Type of emergency (i.e., spill, person injury, fire, leak, etc.); and
  - Parameter of the event (i.e., how far has spill traveled, entrance to sewers, etc.).
4. When appropriate:
  - Pull fire alarm box;
  - Notify appropriate supervisor in the area; and
  - Warn other persons in the immediate affected area.

Warn non-emergency response personnel about not entering the area. After response staff and organizations arrive, provide them with information and follow their directions.