



August 31, 2012
AET 12-0044

ATTN: Document Control Desk
Ms. Christiana Lui, Director
Division of Security Policy
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**American Centrifuge Lead Cascade Facility
Docket Number 70-7003; License Number SNM-7003
Submittal of Changed Pages of the Emergency Plan for the American Centrifuge Lead
Cascade Facility**

Dear Ms. Lui:

Purpose

In accordance with 10 *Code of Federal Regulations* (CFR) 70.32(i), USEC Inc. (USEC) hereby submits to the U.S. Nuclear Regulatory Commission (NRC) changed pages of the Emergency Plan for the American Centrifuge Lead Cascade Facility (LCF) as Enclosure 1 of this letter.

Background

As a result of the decertification of the Portsmouth Gaseous Diffusion Plant and transition of the facilities from the United States Enrichment Corporation to Fluor-B&W Portsmouth, LLC, USEC submitted revised pages of the Emergency Plan for the LCF to the NRC pursuant to 10 CFR 70.32(i) (Reference 1). On May 22, 2012 (Reference 2), NRC identified issues with the changes to the Emergency Plan and requested that modifications addressing these issues be provided to the NRC during the next revision of the Emergency Plan.

Discussion

Enclosure 1 of this letter contains changes which address the NRC's issues as noted within Reference 2. The changes were reviewed in accordance with 10 CFR 70.32 and determined not to decrease the effectiveness of the applicable plan. Revision bars in the right hand margin depict changes from the previous revision submitted to the NRC.

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Action

No specific action is requested concerning this submittal.

Contact

If you have any questions regarding this matter, please contact me at (301) 564-3470 or Vernon J. Shanks at (740) 897-2343.

Sincerely,



Peter J. Miner
Director, Nuclear Safety and Safeguards

Enclosure: As Stated

cc: J. Calle, NRC Region II
J. Downs, NRC HQ
L. Pitts, NRC Region II
O. Siurano, NRC HQ
B. Smith, NRC HQ

References:

1. USEC letter AET 12-0022 to B. Westreich (NRC) from P.J. Miner regarding Submittal of Changed Pages of the Emergency Plan for the American Centrifuge Lead Cascade Facility, dated March 7, 2012
2. NRC letter to P.J. Miner (USEC) from B.W. Smith regarding USEC Inc., Submittal of Changed Pages of the Emergency Plan for the American Centrifuge Lead Cascade Facility, dated May 22, 2012

Rail and roadways are used for cylinder movements to the plant. The rail spur enters the site from the north and branches to several areas inside the fence. All the process buildings and most of the support facilities have direct rail service. In addition, cylinders are transported around the plant site using a variety of devices, including cylinder carriers, stackers, rail cars, forklifts, trucks, and wagons.

Rivers or major streams do not traverse the plant area. However, Big Beaver Creek and Little Beaver Creek cross the northern edge of the PORTS reservation. Runoff water flows from the area through three streams: Little Beaver Creek, Big Run Creek, and a drainage ditch to the Scioto River.

The PORTS site consists of 3,708 acres with an 800-acre central developed area surrounded by the Perimeter Road. The reservation land outside the Perimeter Road is used for a variety of purposes, including a water treatment plant, lagoons for the process waste water treatment plant, sanitary and inert landfills, and open and forested buffer areas.

Most of the site improvements are located within the 500-acre fenced core area. The core area is largely devoid of trees, with grass and paved roadways dominating the open space. Within this area are the three gaseous diffusion process buildings, each approximately 882 ft by 1781 ft and 80 ft tall.

1.2.1 Primary E-Plan Support Facilities

The primary Emergency Operations Center (EOC) is located in the X-1020 Building. The EOC is a facility that provides communications, information processing capabilities, and support services with which the Crisis Manager can direct mitigation of an emergency. Upon activation, the EOC is staffed by a preassigned cadre who assists the Crisis Manager.

The alternate EOC is located in the X-300 Plant Control Facility (PCF), which houses the Plant Shift Superintendents (PSSs), power operations personnel, and cascade control. The PCF provides communications, information processing capabilities, and support services with which the Crisis Manager can direct mitigation of an emergency.

The X-1007 Fire Station is located just south of the EOC. The X-1007 houses the emergency response personnel and response vehicles and a first aid room. It also contains the fire alarm system room.

The plant medical facility is operational during the day shift, Monday through Friday excluding holidays. The medical facility has supplies, equipment, and personnel to treat most injuries. Medical personnel assess patient condition, provide emergency care, and determine appropriate supplemental treatment. Medical personnel are capable of treating contaminated individuals.

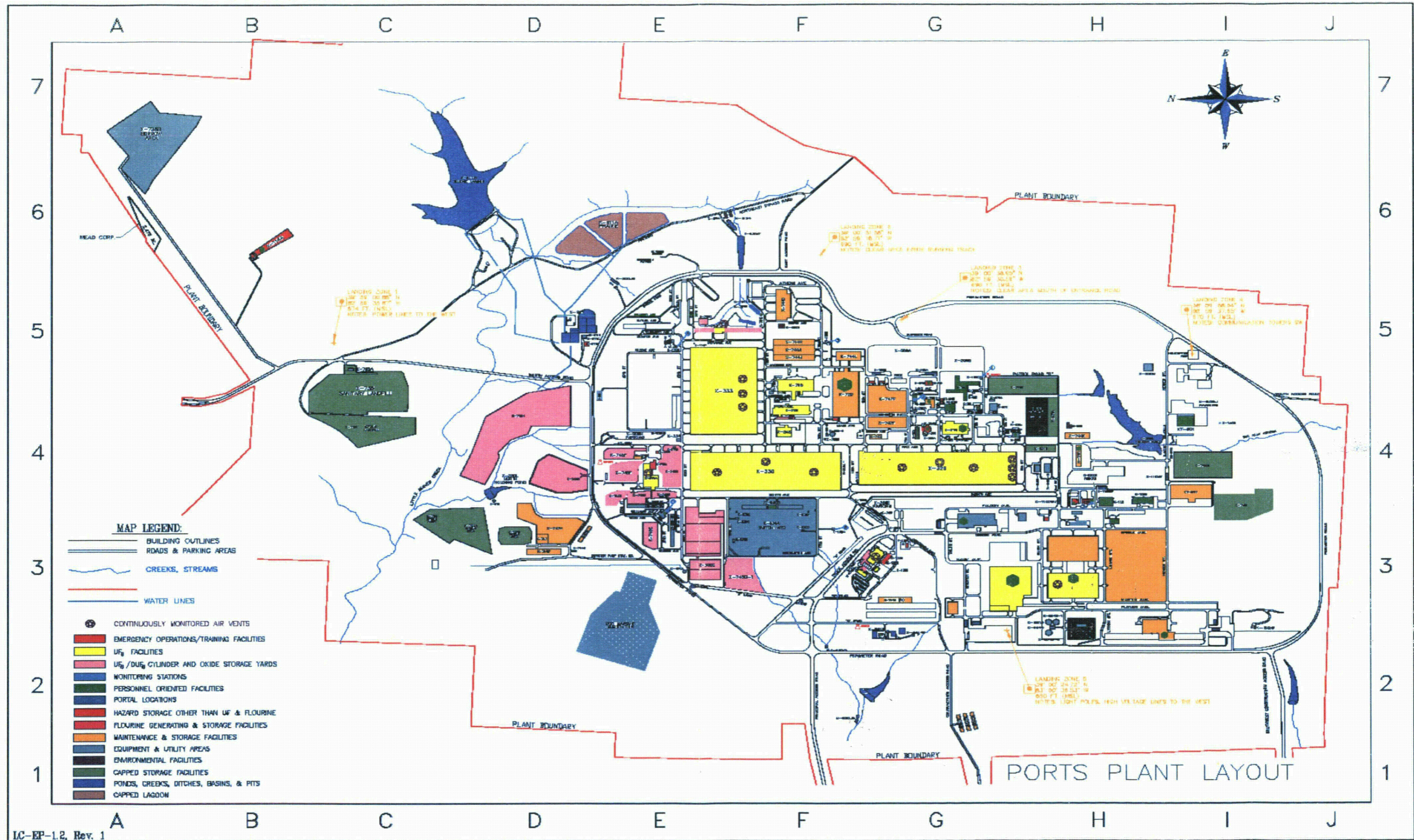
1.2.2 Former Uranium Enrichment Facilities (FUEF)

The FUEF consists of various buildings and processes which are described below.

The three process buildings account for 8 million ft² of the total 10 million ft² of floor space at PORTS, excluding the Gas Centrifuge Enrichment Plant (GCEP) facilities. The plant also includes a series of electrical switchyards, storage areas, cooling towers, a steam plant, water treatment plant, sewage disposal plant, pollution abatement facility, service and maintenance buildings, and facilities for administration, medical, fire, and security. Figure 1-2 shows the plant layout at PORTS.

The process buildings are referred to as the cascade buildings. These cascade buildings, designated X-326, X-330, and X-333, are steel-framed transite-covered two-story buildings that house the enrichment

PORTSMOUTH GASEOUS DIFFUSION PLANT EMERGENCY PLAN MAP



LC-EP-1.2, Rev. 1

Figure 1-2 PORTS Plant Layout

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PLAN SUMMARY

The United States Enrichment Corporation Incorporated (USEC Inc.) has established and shall maintain and be prepared to follow the Portsmouth Gaseous Diffusion Plant (PORTS) Emergency Plan (the Plan) to ensure that plant personnel are adequately prepared for accidents or other emergencies involving the potential release of radioactive materials and that prompt, orderly, and effective response actions are taken to mitigate the consequences of such accidents and emergencies and protect the health and safety of the public and workers at the plant.

This Plan is implemented by the Emergency Plan Implementing Procedures (EPIPs). The EPIPs address generic requirements for responses to incidents involving hazardous chemicals, radioactive materials, natural phenomena, and other adverse conditions. This Plan and the accompanying EPIPs meet the requirements of 10 Code of Federal Regulations (CFR) 70.22(i)(3). A single emergency classification system is in place at PORTS. The DOE Portsmouth, Paducah Project Office has an exemption, to implement the NRC emergency classification system indefinitely, as long as NRC-regulated activities are in operation on-site.

The format of the Plan is generally based upon NRC Regulatory Guide 3.67, Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities (January, 1992). Additionally, PORTS Emergency Action Levels have been developed using examples provided in this Regulatory Guide. The details of the EPIPs implementing each section of the Plan are not included in the Plan itself, but the Plan includes a general description of the procedures that are followed in connection with each activity to demonstrate that appropriate actions can and will be taken to mitigate accident consequences and to protect the health and safety of the public and plant personnel in the event of an emergency.

The Plan provides an overall description of the comprehensive site-wide emergency preparedness program, which is based, in large measure, on the emergency preparedness policies, procedures, and practices that have been successfully used at PORTS for over 40 years. This program has been established to manage and respond in a consistent and integrated fashion to accidents or other emergency situations that may occur at the site. The structure of this program is intended to ensure that the consequences of emergencies are promptly mitigated and that the health and safety of the public, personnel on the surrounding DOE reservation, and plant personnel are protected, regardless of the cause or nature of the emergency. Therefore, the Plan addresses both radiological and non-radiological emergencies as well as potential emergencies arising out of activities at the site that are regulated by the NRC and that are regulated by DOE.

The scenarios addressed in the Plan include accidents involving radioactive materials, non-radioactive materials, chemicals, fires, natural disasters such as earthquakes and tornadoes, and security-related emergencies. The scenarios include a large uranium hexafluoride (UF₆) release.

The Plan includes a general description of the plant and the surrounding area. It identifies the types of accidents and the emergencies for which protective actions may be needed and describes the manner in which accidents are detected and classified. The Plan also contains a description of the policies and procedures that are followed for the notification of and communication with plant personnel, local governments, and regulatory agencies in the event of an emergency and for the coordination of the emergency response activities of both onsite and offsite response organizations. The Plan provides a description of the responsibilities of the key individuals and organizations involved in emergency response activities and the manner in which the consequences of an emergency are mitigated and assessed.

The Plan also includes separate sections and subsections addressing the establishment and maintenance of emergency response equipment, facilities, and capabilities; the training and exercises that are conducted to maintain and enhance emergency preparedness; the manner in which plant equipment and systems are restored to a safe condition after an accident; and all other topics required under 10 CFR 70.22(i)(3). The Plan also confirms that USEC Inc. and site DOE contractors have met the responsibilities under the Emergency Planning and Community Right-to-Know Act of 1986. The Plan is maintained and updated by USEC Inc. In accordance with 10 CFR 70.32, USEC Inc. may change the Plan without receiving prior NRC approval, providing the change does not decrease the effectiveness of the Plan and the NRC and affected offsite response organizations are provided with copies of any changes to the Plan. In addition, any changes to the Plan are reviewed for approval by PORTS DOE contractors who utilize the Plan with DOE approval as required.

In summary, the Plan is the master document summarizing the site-wide emergency preparedness program and the policies, procedures, and actions that will be implemented in any emergency at the site to mitigate the consequences of the emergency and protect the health and safety of the public and plant workers.

2. TYPES OF ACCIDENTS AND OTHER EMERGENCIES

2.1 FUEF DOE-REGULATED OPERATIONS

Hazards and consequence analyses reflected in FUEF Basis for Interim Operation (BIO) and supporting analysis, PHAs, and Emergency Planning Hazard Assessments and in the DOE Documented Safety Analyses and hazard assessments for the DUF₆ Conversion Plant and for the Category 2 Non-leased Facilities form the basis for emergency preparedness planning.

This Plan is based upon an evaluation of the risks associated with various accident scenarios identified in the site-specific hazards analyses for PORTS and other potential emergency situations at PORTS. Those analyses concluded that the most extreme credible scenario would be an accident involving a large UF₆ release. The analyses included consideration of the risks associated with the potential release of other hazardous radioactive and non-radioactive materials stored or used onsite. These other hazardous materials are identified in the Material Safety Data Sheets (MSDS), the chemical inventory, information from the Safeguards and Security Plan, the Spill Contingency, Control, and Countermeasures Plan, and Hazardous Waste Contingency Plans.

Due to the small quantity of licensed material (≤ 250 kg UF₆), the consequences of any Lead Cascade accident postulated in the Integrated Safety Analysis would be minor when compared to the postulated accidents at the FUEF. Therefore, postulated accidents addressed in the PORTS Emergency Plan bound identified Lead Cascade accidents.

Each type of credible accident or event that could result in an emergency associated with these hazards has been identified and analyzed to assess the potential consequences to plant workers, the public, the environment, and onsite and offsite property.

This plan is applicable to radiological and non-radiological accidents or other emergencies that could occur at the site, including the following:

1. Hazardous materials (HAZMAT) releases involving toxic or radioactive materials;
2. Equipment failures and industrial accidents;
3. Natural phenomena, such as tornadoes and earthquakes, and fires; and
4. Security-related events, such as bomb threats and civil disturbances.

2.1.1. Description of Postulated Accidents and Other Emergencies

Various hazardous materials are used or stored at the site. Accidents involving the release of these materials could require an emergency response. Fires, a nuclear criticality event, or severe natural phenomena could also require an emergency declaration and/or response.

3. CLASSIFICATION AND NOTIFICATION OF ACCIDENTS AND OTHER EMERGENCIES

Significant emergencies are classified as either Alerts or Site Area Emergencies (SAEs). This classification system facilitates the notification process and the implementation of immediate response actions applicable to a specific emergency. This system also provides for upgrading or downgrading the response accordingly in the event of a change in the severity of the condition.

Emergency Action Levels (EALs) are used to determine whether any given accident or event rises to the level of an emergency and, if so, whether it should be classified as an Alert or SAE. These levels are used to give a relatively quick indication to the plant staff of the severity of an accident or event. The EALs provide the earliest possible indication of actual or potential emergency conditions. EALs associated with off site radiological or nonradioactive hazardous materials releases are based upon the U. S. Environmental Protection Agency's Protective Action Guides (PAGs), as summarized in EPA 400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents, and the Emergency Response Planning Guides (ERPGs) established by the American Industrial Hygiene Association for extremely hazardous chemicals, Acute Exposure Guideline Levels (AEGLs) established by the USEPA, and the toxic endpoints established by the USEPA in 40 CFR Part 68, Appendix A. Additionally, examples from NRC Regulatory Guide 3.67, Appendix A, have been used to develop EALs. The plant emergency response organization determines the potential for reaching or exceeding the PAGs or ERPGs/toxic endpoints in the event of a radiological or non-radioactive hazardous materials release to the environment.

EALs associated with on-site radiological releases are based on the U.S. EPA PAGs. EALs associated with on-site non-radioactive releases are based on the initial isolation and protective action distances as defined in the current edition of the U.S. Department of Transportation (DOT) North American Emergency Response Guidebook, and on the AEGLs/ERPGs/toxic endpoints. The plant emergency response organization determines when an on-site radiological or non-radioactive hazardous materials release to the environment reaches or exceeds the PAGs or the DOT initial isolation and protective action distances.

EALs may be symptom-based or event-based. However, the nature of plant operations and instrumentation generally precludes symptom-based EALs. Developed EALs are provided in an EPIP.

3.1 CLASSIFICATION SYSTEM

The classification system is based on the requirements of 10 CFR 70.22(i)(3). A single emergency classification system is in place at PORTS. The Portsmouth DOE Site Office has an exemption, to implement the NRC emergency classification system indefinitely, as long as NRC-regulated activities are in operation on-site.

3.1.1 Alert

An Alert is defined as an incident that has led or could lead to a release to the environment of radioactive or other hazardous material. Such a release is not expected to require a response by an offsite response organization to protect the general public offsite.

4. RESPONSIBILITIES

USEC Inc. is responsible for the control of the Plan. FBP provides emergency management and response services. USEC Inc., FBP and other DOE contractors and subcontractors will each meet the requirements of the Plan

4.1 NORMAL FACILITY ORGANIZATION

FBP is responsible for the safe operation of the FUEF and is responsible for the day-to-day management and operation of the FUEF, including the program of emergency management and response services. An FBP organizational chart showing the functional levels and reporting responsibilities is provided in the BIO Chapter 17. The administrative and technical support personnel staffing the plant organization are normally onsite daily, Monday through Thursday or Friday, holidays excluded. Plant operational personnel are on duty 24 hours per day. Descriptions of the key managers at the plant and their responsibilities are provided below.

Other senior managers are responsible for the Lead Cascade and the DUF₆ Conversion Facility. Senior managers from these site entities may be designated and qualified as Crisis Managers. The Crisis Manager is authorized to declare an emergency, initiate the appropriate response, and assign a Recovery Manager when emergency conditions no longer exist. (The duties and responsibilities of the Recovery Manager are addressed in Section 9.)

4.1.1 FBP Organization

4.1.1.1 Program Manager

The Program Manager has direct responsibility for operation of the FUEF in a safe, reliable, and efficient manner.

The Program Manager also oversees FUEF industrial safety, nuclear safety, and nuclear criticality safety functions which provide support to the Emergency Plan and emergency plan management function. These areas are managed by directors who report to the Program Manager.

4.1.1.2 Project Support and Oversight Directors

Project Support and Oversight Directors are responsible for technical functions in direct support of plant activities. These positions oversee engineering; environmental; waste management; records management document control; procedures and training; radiation protection and health physics and industrial hygiene technician functions, fire services; emergency management; emergency medical services, work control and maintenance of the work control database. These services are managed by functional area managers who report through this Director.

4.1.1.3 Project Execution Directors

Project Execution Directors are responsible for the day-to-day operations of shift operations; power, utilities, chemical services; and related infrastructure support systems. These responsibilities are managed by managers who report through these Directors.

Project Execution Directors are also responsible for day-to-day activities of project maintenance; X-326/X-330/X-333 operations; X-340 Complex activities; X-705, X720, X-700 operations; and project management and oversight of special projects. These responsibilities are managed by managers who report through these Directors.

4.1.1.4 Training Manager

The Training Manager is responsible for the FUEF training and procedures programs.

4.1.1.5 Shift Operations-Manager

The Shift Operations Manager oversees the activities of the Plant Shift Superintendents and has the responsibility and authority to make decisions to assure safe operation of the FUEF.

4.1.1.6 Quality Assurance Manager

The Quality Assurance Manager is responsible for implementing and directing independent assessments, quality systems, quality control, and administration of the problem reporting, commitment management and corrective action system.

4.1.1.7 Emergency Management Manager

The Emergency Management Manager is responsible for ensuring that the emergency management program is designed to comply with Federal, State, and local regulations.

4.1.1.8 On-Duty Plant Shift Superintendent

The on-duty PSS responsibilities include operational, technical and/or environmental, safety, and health support functions to site operations. The on-duty PSS reports directly to the Shift Operations Manager, who in turn, reports to the Site Infrastructure & Utilities Services Manager.

The on-duty PSS is responsible for making proper notifications of abnormal plant conditions, determining the severity of the event declaring an emergency, and initiating appropriate response. The on-duty PSS acts as the on-scene Incident Commander and subsequently as the Crisis Manager until relieved by a member of management designated in the Emergency Line of Executive Succession. While acting as the Crisis Manager, this position has the authority to declare an emergency.

4.1.1.9 Assistant Plant Shift Superintendent (APSS)

The APSS responsibilities include operational, technical and/or environmental, safety and health support functions to the plant shift operating staff. The on-duty APSS reports directly to the on-duty PSS. The on-duty APSS may function as the IC when necessary and, if acting as the Crisis Manager, has the authority to declare an emergency.

4.1.1.10 Nuclear Criticality Safety Manager

The Nuclear Criticality Safety Manager is responsible for implementing the nuclear criticality safety program. This position reports to the Nuclear Safety Manager.

4.1.1.11 Protective Force Manager

The Protective Force Manager is responsible for plant police services and security.

4.1.2 USEC Inc. Organization

4.1.2.1 General Manager, American Centrifuge Plant Operations

As described in Chapter 2.0 of the license application, the General Manager, American Centrifuge Plant Operations is responsible for the day-to-day management of Licensee activities in the Lead Cascade. The General Manager, American Centrifuge Plant Operations also oversees activities of line management organizations that support Lead Cascade operations, as applicable. The General Manager, American Centrifuge Plant Operations may delegate responsibility for this day-to-day interface to the Organizational Managers.

4.1.2.2 Organizational Managers

As described in Chapter 2.0 of the license application, the Organizational Managers are responsible for managing the activities in their area of responsibility in direct support of the Lead Cascade. These managers oversee technical services; operations; maintenance; environmental; waste management; records management; procedures and training; radiation protection and health physics, fire services, emergency management, quality assurance, and security.

4.1.2.3 Fire Safety/Emergency Management Manager

The Fire Safety/Emergency Management Manager is responsible for maintenance and control of the plan. The Fire Safety/Emergency Management Manager has established an agreement with the DOE for emergency management program support, fire services testing and inspections, emergency response and event notification.

4.1.2.4 Operations Shift Supervisors

As the senior manager on shift (one per shift), the Operations Shift Supervisor represents the General Manager, American Centrifuge Plant Operations and has the authority and responsibility to make decisions, as necessary, to ensure safe operations. The Operations Shift Supervisors are responsible for accumulation and dissemination of information regarding plant activities to the Incident Commander during emergencies. The Operations Shift Supervisors are also responsible for directing the operation of systems within the facilities necessary to support the Lead Cascade enrichment operation.

4.2 ONSITE EMERGENCY RESPONSE ORGANIZATION

The Emergency Response Organization (ERO) is responsible for taking immediate mitigative and corrective actions to minimize the consequences of an incident to workers, public health and safety, and the environment. The ERO is staffed with trained personnel who respond to events and are required to participate in formal training, drills, and exercises. The ERO is comprised of personnel from USEC Inc. and DOE Contractors/Subcontractors from various site entities. The incident type and severity dictate the level of ERO activation.

The ERO has the following specific functions and responsibilities, depending on the incident and level of response needed to mitigate the problem: event categorization, determination of emergency class, notification, protective action recommendations, management and decision making, control of onsite emergency activities, consequence assessment, medical support, emergency public information, activation and coordination of onsite response resources, security, communications, administrative support, and coordination and liaison with offsite support and response organizations.

The ERO is divided into functional groups as follows:

1. Field ERO,
2. EOC cadre, and
3. Joint Public Information Center (JPIC).

Members of these groups are assigned to on-scene response locations and emergency response centers such as the EOC. Emergency assignments correspond as closely as possible to daily duties. Primary and alternate personnel are assigned to the ERO positions. Assignments are updated periodically. Management ERO positions in each group provide oversight and final authority in the group's decision-making process.

4.2.1 Direction and Coordination

The initial ERO consists of the appropriate shift personnel with the PSS or designee as IC. Upon classification of the emergency as an Alert or SAE, the PSS becomes the CM and maintains overall control of the plant during the emergency until relieved. Once the EOC is operational, the Crisis Manager relieves the PSS as CM and the overall control of the emergency shifts from the PSS to the CM.

The PSS conducts transition and turnover of command and control authority and responsibility of the CM function in a formal manner by use of specially developed procedural checklists and, if possible, face-to-face briefings. A primary and alternates are identified for the CM.

The order of succession for the CM position is identified in an EPIP and includes the following:

1. PSS
2. Crisis Manager (Crisis Managers are designated by the Program Manager and trained and qualified as CM.)

Because of the importance of some emergency responsibilities, these responsibilities may be performed only by the ERO position assigned to address them. The following responsibilities are transferred when the overall responsibility for emergency response is transferred.

1. Emergency Classification — Initially this is a PSS responsibility as CM. Once the EOC is operational, this responsibility is transferred from the PSS to the CM in the EOC.
2. Protective Action Recommendations — Initially this is a PSS responsibility as CM. Once the EOC is operational, approval of offsite protective action recommendations is transferred to the CM in the EOC.
3. Facility Activation — The PSS or designee is responsible for directing activation of the EOC. The EOC is automatically activated for Alerts and SAEs and may be selectively activated for other emergencies related to non-E-Plan described activities.

4.2.2 Onsite Staff Emergency Assignments

4.2.2.1 Plant Field Emergency Response Organization

Capability for initial site-level response prior to EOC activation is provided by the following:

1. PSS personnel,
2. Protective force personnel,
3. Fire services personnel,
4. Emergency squad personnel, and
5. Local emergency director.

Fire services personnel are trained and have experience in fire fighting, HAZMAT response, health physics, environmental response, and emergency medical treatment. Plant emergency squad personnel are trained in basic fire fighting response. Figure 4-2 illustrates a typical plant initial on-scene ERO. In addition, shift personnel can provide support for various technical areas, such as operations and maintenance activities.

4.2.2.2 Emergency Operations Center Cadre

The Emergency Operations Center (EOC) cadre provides the external support to the IC and provides information to Federal, State, and local government agencies. Specifically, the EOC cadre provides additional technical expertise in engineering, radiological/hazardous materials monitoring and assessment, logistics support, such as transportation, food, communications, materials, and supplies, and other needed services.

The EOC is the primary facility for coordinating onsite response and mitigation and offsite interface activities. EOC staff confer, provide personnel and materials, coordinate activities, and communicate with onsite and offsite personnel. A support staff serves on the EOC cadre and provides technical advice to other members of the EOC staff and to the IC at the scene.

The EOC cadre is updated by the Crisis Manager by the use of the EOC Briefing Checklist, which is part of the Emergency Operations Center Concept of Operations Procedure.

4.2.2.3 Joint Public Information Center

The Joint Public Information Center (JPIC) is activated at the declaration of an SAE or for other events that may generate significant interest from the media. This organization provides for timely information dissemination to the media and to the public regarding a plant emergency.

4.3 LOCAL OFFSITE ASSISTANCE TO FACILITY

The severity of some emergencies may warrant the use of offsite individuals, organizations, and agencies. As a result, letters of agreement (as identified in Appendix B) have been entered into with offsite groups to provide assistance in the event of an emergency. These support services encompass areas such as medical assistance, fire control, evacuation, and ambulance services. When the PSS or designee or CM determines that offsite assistance is needed, the appropriate organization is notified and assistance is requested. Properly trained members of the ERO which conduct these notifications and requests for assistance include but are not limited to the PSS or designee, APSS, and EOC Director. Plant protective force personnel provide site access control and escort support for the responding offsite organizations. Thermoluminescence

Dosimeters (TLDs) will be provided to off-site responders as required when entering the CAA. Necessary emergency information is provided to the responding organizations, including potential hazards associated with the incident.

The offsite emergency support organizations are described in the following subsections.

4.3.1 Medical Support

In certain instances, medical emergencies may require the transport of an injured person from the plant to an offsite medical facility. Transportation of injured persons to the medical facility is normally provided by the plant's onsite ambulance. To maintain a state of readiness the onsite ambulance is tested for operability and inspected for response capability on a daily basis.

In the event the onsite ambulance is not available, the Pike County Emergency Medical Service or locally based paid ambulance services provide the transportation of injured persons to an offsite medical facility. This includes contaminated injured onsite workers. Ambulances are equipped with radios to maintain communications with local hospitals. The primary medical facilities for injured personnel with or without contamination are Pike Community Hospital, Southern Ohio Medical Center, and Medical Center Hospital. These hospitals have agreed to accept injured personnel or victims of radiation/hazardous materials-related accidents for emergency medical and surgical treatment and observation. These hospitals are notified by telephone or radio of the need for offsite assistance.

4.3.2 Fire Support

When the PSS or designee or CM determines that offsite fire support is needed, the applicable offsite fire departments are notified by telephone call or radio transmission to the Pike County Sheriff's Office.

The offsite fire departments include Beaver Fire Department, Benton Township Fire Department, Camp Creek Fire Department, Elm Grove Fire Department, Jackson Township Fire Department, Pebble Township Fire Department, Pike Forest Fire Department, Piketon-Seal Township Fire Department, Scioto Township Fire Department, Stockdale Fire Department, and Waverly Fire Department. These fire fighting groups have agreed to furnish the plant with fire-fighting personnel and necessary resources upon request. The fire services are under the direction and control of the plant PSS or designee, who retains responsibility for the overall on-scene emergency response effort. In instances when offsite fire-fighting assistance is needed to fight a fire involving radioactive/hazardous materials, radiological/toxicological information and assistance is provided by knowledgeable members of the plant ERO.

4.3.3 Law Enforcement Assistance

The nature of an emergency may require that the local law enforcement agencies be activated to assist in the emergency response effort. The Pike County Sheriff provides local law enforcement assistance through a written agreement. The emergency support may include the following:

1. Furnishing personnel and equipment as necessary to supplement the protective force,
2. Controlling access to areas affected by the emergency,
3. Directing area evacuation, and
4. Responding to bomb threats.

4.4 COORDINATION WITH PARTICIPATING GOVERNMENT AGENCIES

Coordination between the local, state, and plant emergency plans serves to better ensure the safety and health of the general public. It also enables emergency organizations to participate in the emergency effort with a minimum of confusion and hesitation. During an emergency effort, participating agencies must have a clear picture of their responsibilities which are provided for in their respective emergency plans and procedures. Appendix C provides a list of supporting documents.

Emergency management coordinates required emergency planning activities directly with these organizations and agencies. Emergency management personnel offer to meet at least annually with each offsite response organization to review emergency plans and procedures and any changes relevant to the plant's emergency management program. Plant emergency action levels, notifications, and the overall response coordination process are discussed at these meetings. Response roles of the key agencies are summarized in this section.

4.4.1 State of Ohio Government Interfaces

The State of Ohio's Emergency Response Annex for Events at DOE Facilities provides guidance on dealing with all types of disasters or incidents and outlines the state response to incidents at PORTS. The Ohio Emergency Management Agency (EMA) is responsible for coordinating overall state response and overseeing the local implementation of recommended protective actions. The EMA also assists the Governor in formulating policy, establishing priorities, gathering and analyzing information, monitoring the execution of planned actions, and directing modifications as necessary. The Ohio State Highway Patrol provides support to offsite law enforcement agencies as requested. The Ohio Department of Health coordinates hazard assessment and is the principal contact for technical information and recommendation of protective actions. The Ohio EPA oversees removal and disposal of hazardous waste generated as a result of a PORTS emergency.

The State of Ohio has a permanent EOC that has been designed and equipped to be the direction and control center for all major emergencies in the state. The EOC is manned 24 hours a day by operations duty officers and has the capability to provide almost instantaneous communications with key state officials.

4.4.2 Local Government Interfaces

The Pike County commissioners have overall responsibility and authority for conducting county emergency responses and exercises. They serve as the officials-in-charge during an emergency and are supported by the county EOC staff. The county EOC is at the Pike County Airport two miles north of Waverly, Ohio, which is approximately seven miles north of PORTS.

The Pike County EMA director serves as the chief of staff for the county EOC staff. The director is responsible for ensuring that the EOC is fully functional. In addition, the director is responsible for coordinating local government emergency management planning and response activities.

The Pike County commissioners and Pike County EMA director can authorize the opening and staffing of the county EOC. The EOC may be opened and staffed on the threat of an emergency or because of an actual emergency. Minor emergencies may be directed by agency officials from their normal work stations.

Pike County authorities can also authorize the opening and staffing of the JPIC to ensure that the public and media can obtain information during an emergency. Rumor control measures are addressed in specific EPIPs.

Local law enforcement and fire services assistance is coordinated with the director and staff in the county EOC.

Notification and warning points have been established for each local government entity. Local government entities coordinate response efforts from the Pike County EOC.

4.4.3 Federal Government Interfaces

4.4.3.1 United States Nuclear Regulatory Commission (NRC)

The NRC provides regulatory oversight over the USEC Inc. Lead Cascade uranium enrichment activities to ensure compliance with the License requirements, including the emergency planning requirements. The NRC Operations Center is notified of any emergency immediately after notification of the appropriate offsite organizations, within one hour after the declaration of an alert or SAE. The NRC evaluates the protective actions taking place and coordinates with USEC and DOE to ensure that all reasonable and appropriate actions are being taken to protect the public health and safety.

4.4.3.2 United States Department of Energy (DOE)

The DOE provides oversight for those activities onsite involving DOE environmental management and FUEF facilities and operations. Additionally, DOE provides control and oversight of activities involving uranium enriched to greater than 10% ²³⁵U. Events involving DOE operations or property are reported to DOE's Paducah Portsmouth Project Office (PPPO), Oak Ridge OROC duty officer (ORO/DOE), and DOE HQ operations center. The DOE maintains various emergency response assets capable of providing radiological monitoring and support assistance during an emergency.

4.4.3.3 Federal Bureau of Investigation (FBI)

The FBI has jurisdictional authority for safeguards and security emergencies involving violations of Federal criminal law. A representative of the FBI may assume command and control of these types of emergencies. The FBI Hostage Rescue Team or regional SWAT team may also be provided if requested. The FBI will coordinate all responding Federal law enforcement agencies.

4.4.3.4 Other Federal Agencies

The following Federal Agencies that may be involved in plant emergencies:

1. *Federal Aviation Administration (FAA)*. FAA restricts airspace over the plant at the request of the CM or the PSS or designee, as appropriate.
2. *Federal Emergency Management Agency (FEMA)*. FEMA is the primary Federal government agency for the administration of planning, preparedness, operational coordination, and recovery programs.
3. *U.S. Environmental Protection Agency (USEPA)*. USEPA is the major Federal government agency for the regulation and control of pollution and waste management programs. USEPA provides a Federal on-scene coordinator for significant hazardous materials incidents.
4. *U.S. Occupational Safety and Health Administration (OSHA)*. OSHA is the primary Federal government agency for the regulation of nonradiological worker safety.