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PG&E Letter DCL-18-094  
PG&E Letter DIL-18-015

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

10 CFR 50.54, 10 CFR 72.32

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Docket No. 72-26, Materials License No. SNM-2511  
Diablo Canyon Independent Spent Fuel Storage Installation  
Emergency Plan Implementing Procedure Update

Dear Commissioners and Staff:

In accordance with 10 CFR 50.54(q)(5) and the requirements of 10 CFR 72.32, Pacific Gas and Electric Company (PG&E) is providing a summary of the analysis of changes to Emergency Plan (E-Plan) Implementing Procedures EP RB-3, Revision 9, "Stable Iodine Thyroid Blocking" and EP G-5, Revision 16 "Evacuation of Non-Essential Site Personnel."

The associated enclosures are listed below:

- Enclosure 1 - Diablo Canyon Power Plant Emergency Plan Implementing Procedures, Revision Numbers for Emergency Plan Implementing Procedures.
- Enclosure 2 - Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP RB-3, Revision 9, "Stable Iodine Thyroid Blocking."
- Enclosure 3 – Summary of the Analysis of Changes to Emergency Plan Implementing Procedure EP G-5, Revision 16 "Evacuation of Non-Essential Site Personnel."

PG&E evaluated the changes for a reduction in effectiveness, as defined in 10 CFR 50.54(q), and concluded that the changes do not reduce the effectiveness of the E-Plan. The E-Plan continues to meet the requirements in Appendix E of



10 CFR 50 and the planning standards of 10 CFR 50.47(b). Therefore, prior NRC approval of the associated changes was not required.

This update does not contain any privacy and proprietary information in accordance with NRC Generic Letter 81-27, "Privacy and Proprietary Material in Emergency Plans."

PG&E makes no new or revised regulatory commitments (as defined by NEI 99-04) in this letter.

If there are questions regarding this update, please contact me at (805) 545-3446.

Sincerely,

Michael A. Ginn  
*Emergency Planning Manager*

armb/4743/51000438 & 51003523

Enclosures

cc/enc: William C. Allen, NMSS Project Manager  
Kriss M. Kennedy, NRC Region IV Administrator  
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Enclosure 1  
PG&E Letter DCL-18-094  
PG&E Letter DIL-18-015

**DIABLO CANYON POWER PLANT EMERGENCY PLAN  
IMPLEMENTING PROCEDURES**

Revision Numbers for Emergency Plan Implementing Procedures

**DIABLO CANYON POWER PLANT EMERGENCY PLAN  
IMPLEMENTING PROCEDURES**

<u>Proc. No.</u>	<u>Rev.</u>	<u>Title</u>
OM10.ID1	18	Maintaining Emergency Preparedness
OM10.DC1	10	Emergency Preparedness Drills and Exercises
EP G-1	45	Emergency Classification and Emergency Plan Activation
EP G-2	51	Interim Emergency Response Organization
EP G-3	60	Emergency Notification of Off-Site Agencies
EP G-4	30	Assembly and Accountability
<b>EP G-5</b>	<b>16*</b>	<b>Evacuation of Non-Essential Site Personnel</b>
EP OR-3	10	Emergency Recovery
EP RB-1	8	Personnel Dosimetry
EP RB-2	8	Emergency Exposure Guides
<b>EP RB-3</b>	<b>9*</b>	<b>Stable Iodine Thyroid Blocking</b>
EP RB-4	5	Access to and Establishment of Controlled Areas Under Emergency Conditions
EP RB-5	9	Alternate Personnel Decontamination Facilities
EP RB-8	29	Instructions for Field Monitoring Teams
EP RB-10	21	Protective Action Recommendations
EP RB-12	12	Plant Vent Iodine and Particulate Sampling During Accident Conditions
EP RB-14	10	Core Damage Assessment Procedure
EP RB-14A	3	Initial Detection of Fuel Cladding Damage
EP RB-15	15	Post Accident Sampling System
EP RB-16	16	Operating Instructions for the EARS Computer Program
EP RB-17	1	Operating Instructions for QuickDose
EP R-2	36	Release of Airborne Radioactive Materials Initial Assessment
EP R-3	9	Release of Radioactive Liquids
EP R-7	18	Off-Site Transportation Accidents
EP EF-1	55	Activation and Operation of the Technical Support Center
EP EF-2	40	Activation and Operation of the Operational Support Center
EP EF-3	47	Activation and Operation of the Emergency Operations Facility
EP EF-4	21	Activation of the Off-Site Emergency Laboratory
EP EF-9	12	Backup Emergency Response Facilities
EP EF-10	17	Activation and Operation of the Joint Information Center
EP EF-11	2	Alternate Emergency Response Facilities / Incident Command Post (ICP)

\*Revised Document

**Summary of the Analysis of Changes to  
Emergency Plan Implementing Procedure EP RB-3, Revision 9  
“Stable Iodine Thyroid Blocking”**

Change	Original Content (Revision 8)	Revised Content (Revision 9)	Description of Change
1	1.2 This procedure was rewritten; therefore, revision bars are not included.	N/A	<p>Removed content.</p> <p>Revision 9 of EP RB-3 is not a rewrite.</p> <p><b>This change does not affect how the current Emergency Plan (E-Plan) meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
2	2.2 The county Health Officer controls authorization for consumption of KI for all non-PG&E employees.	2.2 The County Health Officer (CHO) controls authorization of KI for all non-PG&E personnel.	<p>Modified content.</p> <p>Step rewritten to emphasize that the County Health Officer controls authorization of all aspects of KI issuance, authorization, and ingestion for non-PG&amp;E personnel, not just consumption.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>



<p>3</p>	<p>2.3 Evaluating when to issue KI:</p> <p>2.3.1 Consider issuing KI to PG&amp;E emergency personnel when responding to an event in which any one of the following exists:</p> <ul style="list-style-type: none"> <li>• The potential for a radioactive release to the environment due to the event.</li> <li>• There is a radioactive release to the environment due to the event.</li> <li>• Fuel damage.</li> </ul>	<p>2.3 KI may be issued (handed out) to PG&amp;E personnel at any point during a declared emergency based upon the judgement of the Radiological Manager in the Emergency Operations Facility (EOF) or the Radiological Advisor in the Technical Support Center (TSC).</p>	<p>Modified content.</p> <p>Removed the list of conditions to consider prior to issuing KI and leaves KI issuance to the discretion of the Radiological Manager (RM) and Radiological Advisor (RA).</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
<p>4</p>	<p>2.4 Evaluating when to authorize the ingestion of KI</p> <p>2.4.1 KI is most effective when ingested immediately prior to exposure to radioiodine. Therefore, authorization of KI ingestion should be considered when any one of the following exists:</p>	<p>2.4 For optimal protection against inhaled radioiodines, KI should be administered before or immediately coincident with exposure to radioiodine, though KI may still have a substantial protective effect even if taken 3 or 4 hours after exposure. Furthermore, if the release of radioiodines into the atmosphere is protracted, then, of course, even delayed administration may reap benefits by reducing, if incompletely, the total radiation dose to the thyroid.</p>	<p>Modified content.</p> <p>This item was modified in accordance with the December 2001 FDA guidance on potassium iodide as a thyroid blocking agent in radiation emergencies.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>

<p>5</p>	<p>2.4.1 KI is most effective when ingested immediately prior to exposure to radioiodine. Therefore, authorization of KI ingestion should be considered when any one of the following exists:</p> <ul style="list-style-type: none"> <li>• Core conditions exist where there is gap source term with degrading plant conditions.</li> </ul>	<p>2.5 Authorization of KI ingestion should be considered when any one of the following exists:</p> <ul style="list-style-type: none"> <li>• Core conditions exist where there is gap or core source term (significant iodine consequence) with degrading plant conditions.</li> </ul>	<p>Modified content.</p> <p>This change clarifies that KI authorization should be considered for any significant fuel damage, gap and core, with degrading plant conditions.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
<p>6</p>	<p>N/A</p>	<p>2.6 The protective effect of KI lasts approximately 24 hours. For optimal prophylaxis, KI should therefore be dosed daily, until a risk of significant exposure to radioiodines by either inhalation or ingestion no longer exists.</p>	<p>Added content.</p> <p>This discussion item was added to inform the reader of the importance of taking KI daily until the radioiodine risk no longer exists.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>

7	2.4.2 KI paperwork and authorization of KI ingestion should be prepared prior to a radiological release with significant amounts of iodine, to ensure prompt ingestion of KI.	2.7 Administrative tasks associated with the use of KI (e.g. issuance, briefings, paperwork) should be completed prior to a radiological release with the potential for significant amounts of radioiodine, to ensure prompt ingestion of KI.	<p>Modified content.</p> <p>This discussion item was modified to focus on the administrative tasks necessary for KI ingestion and removes the authorization reference.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
8	N/A	2.10.4 Potassium Iodide: A salt of stable, non-radioactive iodine in medicine form. The administration of potassium iodide saturates the thyroid with non-radioactive iodine, so it does not absorb radioactive iodine released into the environment from a radiological incident.	<p>Added content.</p> <p>The definition of potassium iodine was added to provide context and additional information to the reader.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>



<p>9</p>	<p>3.4 Radiological Advisor (RA) is responsible for:</p> <p>3.4.1 Evaluating when KI should be issued to onsite PG&amp;E personnel, based on radiological conditions.</p>	<p>3.4 Radiological Advisor (RA) is responsible for:</p> <p>3.4.1 Evaluating when KI should be issued to onsite PG&amp;E personnel.</p>	<p>Modified content.</p> <p>Removed conditions to consider prior to issuing KI and leaves KI issuance to the RA's discretion.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
<p>10</p>	<p>3.5 Radiological Manager (RM) is responsible for:</p> <p>3.5.1 Evaluating when KI should be issued to offsite PG&amp;E personnel, based on radiological conditions.</p>	<p>3.5 Radiological Manager (RM) is responsible for:</p> <p>3.5.1 Evaluating when KI should be issued to offsite PG&amp;E personnel.</p>	<p>Modified content.</p> <p>Removed conditions to consider prior to issuing KI and leaves KI issuance to the RM's discretion.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>



11	3.5.5 Ensuring the County Health Officer and applicable County Unified Dose Assessment personnel are informed of when and why KI is issued and is authorized to ingest.	3.5.5 Ensuring the County Health Officer and applicable County Unified Dose Assessment personnel are informed of: <ul style="list-style-type: none"> <li>• When and why KI is issued to PG&amp;E personnel.</li> <li>• What conditions will be used to determine when PG&amp;E will seek authorization for PG&amp;E personnel to ingest KI from the SM/SEC/ED.</li> <li>• When and why KI is authorized for PG&amp;E personnel to ingest.</li> </ul>	Modified content.  Reworded this responsibility to further clarify when and how to inform the County of PG&E decisions concerning KI issuance, authorization, and ingestion.  <b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b>
12	6.1.1 IF conditions warrant issuance of KI, THEN perform the following:	6.1.1 Perform the following:	Modified content.  Removed conditions to consider prior to issuing KI and leaves KI issuance to the RM's and RA's discretion.  <b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b>

13	6.2.1 Obtain authorization for the ingestion of KI.	N/A	<p>Removed content.</p> <p>This step was removed due to being repetitive.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
14	6.2.1.a. RA shall obtain SEC authorization for KI ingestion prior to telling onsite PG&E personnel to ingest KI.	6.2.1 RA shall obtain SEC authorization for KI ingestion immediately prior to telling onsite PG&E personnel to ingest KI.	<p>Modified content.</p> <p>Reworded this step to ensure the RA obtains authorization for KI ingestion immediately prior to giving the direction to take KI.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>

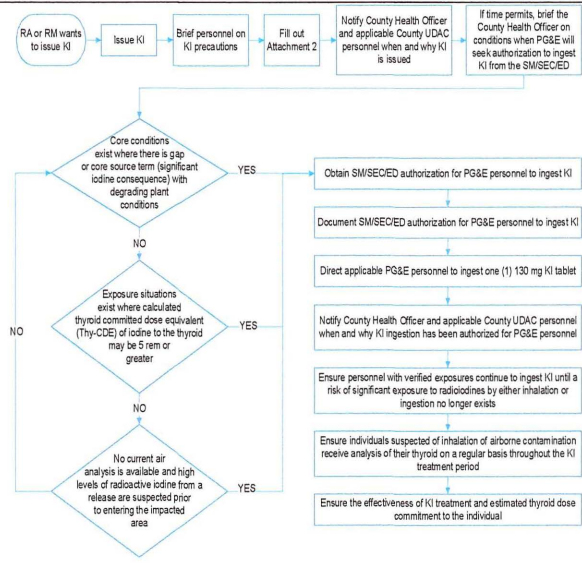
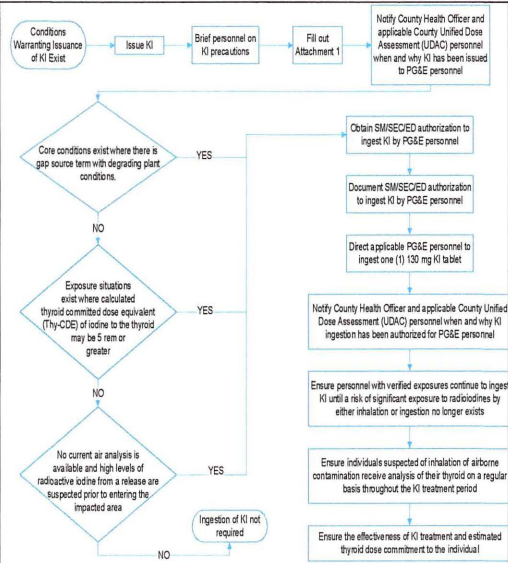
15	6.2.1.b. RM shall obtain ED authorization for KI ingestion prior to telling	6.2.2 RM shall obtain ED authorization for KI ingestion immediately prior to telling offsite PG&E personnel (including all FMTs, onsite and offsite) to ingest KI.	<p>Modified content.</p> <p>Reworded this step to ensure the RM obtains authorization for KI ingestion immediately prior to giving the direction to take KI.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
16	6.2.2 Document the authorization to ingest KI in an ERO position log.	6.2.3 Authorization to ingest KI should be documented in applicable ERO position logs.	<p>Modified content.</p> <p>This step was revised for clarity.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>

17	N/A	<p>6.3 Ingestion of KI</p> <p>6.3.2 IF severe side effects or allergic reactions occur,          THEN affected individuals should immediately stop taking KI and consult a physician for further instructions.</p>	<p>Added content.</p> <p>Added this step to provide instruction in the event that an individual has severe side effects, or an allergic reaction, after taking KI.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
18	6.5.1 Ensure one (1) tablet is ingested daily for up to 10 days after verified exposure.	6.3.3 Ensure one (1) tablet is ingested daily for up to 10 days after verified exposure.	<p>Modified content.</p> <p>Moved step from 6.5 "Follow-Up Actions" to 6.3 "Ingestion of KI"</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>



<p>19</p>	<p>6.4 County Emergency Workers</p> <p>6.4.1 The RM should ensure the ED knows when the County Health Officer has issued, and authorized to ingest, KI to County emergency workers.</p>	<p>6.4 County Emergency Workers</p> <p>6.4.1 The RM should ensure the ED knows when the County Health Officer has authorized County emergency workers to ingest KI.</p>	<p>Modified content.</p> <p>Revised this step to remove the need to inform the Emergency Director (ED) when the County issues KI.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>
<p>20</p>	<p>6.4.2 The RM should ensure the County Health Officer and applicable County Unified Dose Assessment personnel are informed of:</p> <p>a. When and why KI is issued to PG&amp;E personnel.</p> <p>b. When and why KI is authorized for PG&amp;E personnel to ingest.</p> <p>c. What radiological conditions</p>	<p>6.4.2 The RM should ensure the County Health Officer and applicable County Unified Dose Assessment personnel are informed of:</p> <p>a. When and why KI is issued to PG&amp;E personnel.</p> <p>b. What conditions will be used to determine when PG&amp;E will seek authorization for PG&amp;E personnel to ingest KI from the SM/SEC/ED.</p> <p>c. When and why KI is authorized for PG&amp;E personnel to ingest.</p>	<p>Modified content.</p> <p>Revised this step to clarify that the County Health Officer needs to be kept aware of the PG&amp;E decision making process regarding KI issuance, authorization, and ingestion.</p> <p><b>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</b></p>

21



Modified content.

Revised the KI Process Flowchart to reflect the changes in this revision and to correct the logic error of not rechecking conditions after arriving at "Ingestion of KI not required."

**This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.**

**Summary of the Analysis of Changes to  
Emergency Plan Implementing Procedure EP G-5, Revision 16  
“Evacuation of Non-Essential Site Personnel.”**



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
1.	<p>Multiple locations throughout procedure:</p> <p>DCPP Personnel</p> <ul style="list-style-type: none"> <li>a. All operations personnel.</li> <li>b. All Industrial Fire Officers (IFOs).</li> <li>c. All DCPP maintenance personnel (Mechanical, Electrical and I&amp;C).</li> <li>d. All DCPP Chemistry and Radiation Protection personnel (RP).</li> <li>e. All members of the Emergency Response Organization (ERO).</li> <li>f. All security personnel.</li> <li>g. Persons designated essential by the Shift Manager or Site Emergency Coordinator.</li> </ul>	<p>Multiple locations throughout procedure:</p> <p>DCPP Personnel</p> <ul style="list-style-type: none"> <li>a. All Operations personnel.</li> <li>b. All Chemistry and Radiation Protection personnel</li> <li>c. All members of the Emergency Response Organization (ERO).</li> <li>d. All security personnel.</li> <li>e. All Fire Fighters.</li> <li>f. All Medical personnel.</li> <li>g. All maintenance personnel (Mechanical, Electrical and I&amp;C).</li> <li>h. Personnel identified as essential or performing critical tasks under the direction of the Shift Manager of Site Emergency Coordinator (SEC).</li> </ul>	<p>Modified content.</p> <p>This change aligns the definition of essential personnel to match what is in EP G-4.</p> <p>This change does not affect how the current Emergency Plan (E-Plan) meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
2.	<p>2.2.3</p> <p>Evacuation Coordinator: A member of the security force as requested by the Shift Manager or Site Emergency Coordinator.</p> <ul style="list-style-type: none"> <li>a. This person is assigned by the Diablo Canyon Watch Commander (DCWC) or designee.</li> <li>b. This may be a management person if security is unable to support the request.</li> <li>c. This may be the TSC Security Advisor if available.</li> </ul>	<p>2.2.3</p> <p>Evacuation Coordinator: A member of the security force as requested by the Shift Manager or Site Emergency Coordinator.</p> <ul style="list-style-type: none"> <li>a. This may be the TSC Security Advisor, a management person, or anyone else if available.</li> <li>b. If TSC Security Advisor is not available this person is assigned by the Diablo Canyon Watch Commander (DCWC) or designee.</li> </ul>	<p>Modified content.</p> <p>This change reorders list to clarify that Technical Support Center (TSC) Security Advisor is first option and if they are not available then DCWC assigns an individual to be the Evacuation Coordinator.</p> <p>This change aligns with the E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
3.	<p>2.2.7</p> <p>Off-Site Assembly Area: Areas personnel relocate to after the decision has been made to evacuate non-essential site personnel.</p>	<p>2.2.7</p> <p>Offsite Assembly Area: Areas personnel relocate to, if needed, after the decision has been made to evacuate or release non-essential personnel.</p>	<p>Modified content.</p> <p>This change adds the statement “if needed” and “or release” to clarify that it is not always necessary to use offsite assembly areas and that assembly areas may be used during an early work release.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
4.	<p>2.2.7</p> <p>a. Areas to the south may include: The PG&amp;E Energy Education Center (EEC), Ontario Road (frontage road north of the EEC), Port San Luis Parking Lot, or the Avila Beach Post Office Parking Lot.</p>	<p>2.2.7</p> <p>a. Areas to the south may include: The PG&amp;E Energy Education Center (EEC), Ontario Road (frontage road north of the EEC), San Luis Service Center, Port San Luis Parking Lot, or the Avila Beach Post Office Parking Lot.</p>	<p>Modified content.</p> <p>This change adds San Luis Service Center to the list of areas to the south that can be used for offsite assembly. This location is listed as available for use as a back-up offsite assembly area in the E-Plan Section.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
5.	NA – added new content	<p>2.2.9</p> <p>Site Evacuation: The removal of non-essential personnel from the site to avoid or reduce high-level, short-term exposure, usually from the plume or from deposited activity. May be a preemptive action taken in response the facility conditions rather than an actual release.</p>	<p>Added new content.</p> <p>Added definition of site evacuation.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
6.	<p>Multiple locations throughout procedure</p> <p>Areas Outside the Protected Area: Training Building (Building 109), Maintenance Shop Building (Building 119), and Warehouse B.</p>	<p>Multiple locations throughout procedure</p> <p>Areas Outside the Protected Area: Training Building (Bldg 109), Maintenance Shop Building (Bldg 119), and Warehouse B (Bldg 113).</p>	<p>Modified content.</p> <p>This change adds specific building number to Warehouse B and makes editorial changes to other onsite assembly area locations for consistency.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
7.	<p>3.2 Site Emergency Coordinator (SEC)</p> <p>3.2.1 Determines the need for, and makes the decision to, evacuate or perform an early work release, chooses the offsite assembly areas if applicable), chooses the evacuation route, assigns the Evacuation Coordinator, if not already done so by the SM.</p>	<p>3.2 Site Emergency Coordinator (SEC)</p> <p>3.2.1 Determines the need for, and makes the decision to, evacuate or perform an early work release.</p> <p>3.2.2 Determines if pre-evacuation site accountability is necessary, if not already done.</p> <p>3.2.3 Chooses the evacuation route.</p> <p>3.2.4 Chooses the offsite assembly areas, if applicable.</p> <p>3.2.5 Appoints the Evacuation Coordinator, if not already done so by the SM.</p>	<p>Modified content.</p> <p>This change reformats multiple embedded responsibilities from one statement into multiple statements for ease of understanding.</p> <p>Added in the responsibility to “Determines if pre-evacuation site accountability is necessary, if not already done” to align SEC responsibilities with Shift Manager (SM) responsibilities.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
8.	<p>3.3 Evacuation Coordinator</p> <p>3.3.1</p> <p>d. Communicates the evacuation / early work release plan with offsite agencies (California Highway Patrol, Sheriff's Department etc.) prior to moving people offsite.</p>	<p>3.3 Evacuation Coordinator</p> <p>3.3.1</p> <p>d. Coordinates early work release plan with the San Luis Obispo County Emergency Operations Center (EOC) or Sheriff's Department Watch Commander if EOC is not activated.</p> <p>e. Communicates site evacuation plan with the San Luis Obispo County EOC or Sheriff's Department Watch Commander if EOC is not activated prior to moving people offsite.</p>	<p>Modified content.</p> <p>This change separates early work release and site evacuation into two actionable items. It also corrects the name of the offsite agency to be coordinated and communicated with.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
9.	<p>4. PREREQUISITES</p> <p>4.1. The Shift Manager or Site Emergency Coordinator has identified a need to relocate site personnel.</p>	<p>4. PREREQUISITES</p> <p>4.1 The Shift Manager or Site Emergency Coordinator has identified a need to relocate non-essential site personnel.</p>	<p>Modified content.</p> <p>This change clarifies that it is non-essential site personnel for which this procedure refers.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
10.	<p>7. RECORDS</p> <p>7.1 Forms and attachments completed during a real event are quality related records and shall be retained per AD10.ID1.</p> <p>7.2 When used during a drill, forms and attachments are good business records and shall be retained by emergency planning for 3 years per AD10.ID2.</p>	<p>7. RECORDS</p> <p>7.1 Documents generated by this procedure during drills are non-quality good business records and are maintained per OM10.ID1, "Maintaining Emergency Preparedness."</p> <p>7.2 Documents generated by this procedure during actual events are non-quality records and are maintained for the life of the plant, per AD10.ID2, "Storage and Control of Non-quality Assurance Records."</p>	<p>Modified Content</p> <p>This change updates the records retention requirements.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
11.	<p>Off-Site Assembly Areas Attachment 1</p> <p>SLOECCO San Luis Obispo Electric Control Center Operations</p>	<p>Off-Site Assembly Areas Attachment 1</p> <p>SLO Service Center</p>	<p>Modified content.</p> <p>This change updates the title of SLOECCO San Luis Obispo Electric Control Center Operations with San Luis Service Center. These are the same locations but San Luis Service Center is consistent with name used in the E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
12.	<p>Attachment 2</p> <p>1. Evacuation</p> <p>N/A – added new content.</p>	<p>Attachment 2</p> <p>1. Site Evacuation</p> <p>NOTE: The SM/SEC may assign qualified persons to perform tasks in this checklist. The SM/SEC shall retain the decision to evacuate site personnel.</p>	<p>Modified content.</p> <p>This change adds site in front of evacuation to be consistent with the intent of this attachment.</p> <p>The addition of the note clarifies that other qualified individuals may perform tasks in the checklist but reiterates that only the SM/SEC shall make the decision to evacuate site personnel.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
13.	<p>Attachment 2</p> <p>1.b.7) The dose expected during evacuation shall be weighted against the dose expected if the person is not evacuated.</p>	<p>Attachment 2</p> <p>1.b.7) The dose expected during evacuation shall be weighed against the dose expected if the person is not evacuated.</p>	<p>Modified content.</p> <p>This change is editorial in nature and corrects a grammatical error.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
14.	<p>Attachment 2</p> <p>1.c. Determine the evacuation route using the following criteria:</p> <p>1) IF ... THEN use the southern route.</p> <p>2) IF none of the above conditions exist OR the southern route is known to be impassable, THEN use the northern route.</p> <p>3) IF the northern route is to be used,</p>	<p>Attachment 2</p> <p>1.c. Determine the evacuation route.</p> <p>1) IF ... THEN choose the southern route.</p> <p>2) IF none of the above conditions exist OR the southern route is known to be impassable, THEN choose the northern route.</p> <p>3) IF the northern route is chosen,</p>	<p>Modified content.</p> <p>This change is being made to clarify that evacuation routes are chosen by the SM/SEC, not used. This change is being made throughout the procedure.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
15.	<p>Attachment 2</p> <p>1.c.2)c)</p> <p>IF security is cannot be reached for the gate combos,</p>	<p>Attachment 2</p> <p>1.c.3)b)</p> <p>IF security cannot be reached for the gate combos,</p>	<p>Modified content.</p> <p>This change deleted “is” which was not necessary in the sentence. This change is editorial only.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
16.	<p>Attachment 2</p> <p>2) d) Determine the offsite assembly areas (if applicable):</p> <p>1) IF the southern route is being used, THEN use the following areas.....</p> <p>3) IF the northern route is being used TEHN use the following area:</p>	<p>Attachment 2</p> <p>1.d. Determine if offsite assembly areas are needed.</p> <p>1) IF a radiological release occurred, or is in progress that may contaminate personnel or personnel vehicles, THEN offsite assembly areas should be activated.</p> <p>2) If the southern route was chosen, THEN use the following areas.....</p> <p>3) IF the northern route was chosen, THEN use the following area:</p>	<p>New content.</p> <p>Added specific information on how to determine if offsite assembly areas are needed.</p> <p>Additional change is being made to clarify that evacuation routes are chosen by the SM/SEC, not used.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
17.	<p>Attachment 2 – multiple locations Table of southern offsite assembly areas.</p> <p>Table located at end of this attachment.</p>	<p>Attachment 2 – multiple locations Table of southern offsite assembly areas.</p> <p>Table located at end of this attachment.</p>	<p>Modified content.</p> <p>This change adds San Luis Service Center to the list of areas to the south that can be used for offsite assembly. This location is listed as available for use as a back-up offsite assembly area in the E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
18.	<p>Attachment 2</p> <p>1.i.</p> <p>NOTE: The SLO County Emergency Organization needs to be notified prior to evacuation or early work release due to potential; traffic control problems, impediments to evacuation, and/or adverse public reaction to the mass traffic from the site.</p>	<p>Attachment 2</p> <p>1.e.</p> <p>NOTE: The SLO County EOC should be notified prior to starting a site evacuation to assess for potential traffic control problems or other impediments to evacuation.</p>	<p>Modified content.</p> <p>This change moved the location of this note earlier in the attachment and rewrote it to be specific to site evacuation. In addition, clarification has been provided that SLO County EOC must be notified prior to commencement of site evacuation. This is consistent with the E-Plan.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
19.	<p>Attachment 2</p> <p>1.e. Determine the need for offsite assistance:</p> <p>1) Direct the DCPW Watch Commander, or designee, to interface with local law enforcement to determine the need for offsite assistance. Consider the need for:</p> <p>a) Traffic control assistance along the evacuation route.</p> <p>b) Traffic control assistance at the offsite assembly areas.</p> <p>c) Evacuation route clearing (i.e., bulldozers to move impediments).</p> <p>d) Medical resources at the offsite assembly areas.</p> <p>e) Fire resources at the offsite assembly areas (fire engines may be used for vehicle decontamination etc.).</p>	<p>Attachment 2</p> <p>1.e. Determine the need for offsite assistance.</p> <p>1) Contact the EOF Security Liaison and have them coordinate with the County EOC to determine the need for:</p> <p>a) Traffic control assistance along the evacuation route.</p> <p>b) Traffic control assistance at the offsite assembly areas.</p> <p>c) Evacuation route clearing (i.e., bulldozers to move impediments).</p> <p>d) Medical resources at the offsite assembly areas.</p> <p>e) Fire resources at the offsite assembly areas (fire engines may be used for vehicle decontamination etc.).</p> <p>2) IF the EOF is not activated OR the EOF Security Liaison is not available, THEN contact the SLO County EOC or Sheriff's Watch Commander if County EOC is not activated.</p>	<p>Modified content.</p> <p>This change moves the step up in the checklist and reassigns the responsibility for determining offsite assistance from the DCWC to the Emergency Operations Facility (EOF) Security Liaison.</p> <p>This change also directs contact with the Security Liaison at the EOF, if available rather than directly with local law enforcement based on request from SLO County. In addition, these changes include information on the appropriate offsite agency to interface with in the event the EOF Security Liaison is not available.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
20.	<p>Attachment 2</p> <p>1.f. Determine the need for radiological monitoring at the assembly areas:</p> <p>1) IF there was, or currently is, a release of radioactive materials above normal operating limits that may result in the spread of contamination, THEN personnel and vehicle monitoring/decontamination should be performed at the offsite assembly areas.</p> <p>2) Refer to the tables in step 1.d of this attachment to determine the suggested number of radiological monitoring resources for each offsite assembly area.</p>	<p>Attachment 2</p> <p>1.f. Determine the need for personnel monitoring and decon at offsite assembly areas.</p> <p>1) IF there was, or currently is, a release of radioactive materials above normal operating limits that may result in the spread of contamination, THEN personnel and vehicle monitoring and decon should be performed at designated offsite assembly areas.</p> <p>2) Refer to the tables in step 1.d of this attachment to determine the suggested number of radiological monitoring resources for each offsite assembly area.</p>	<p>Modified content.</p> <p>Minor word changes were made to the step to improve use. Intent of the step remains unchanged.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
21.	<p>Attachment 2</p> <p>1.i. Ensure the Emergency Director (ED) at the emergency operations facility (EOF) is notified of:</p> <p>1) The decision to move personnel offsite.</p> <p>2) The evacuation route to be used.</p> <p>3) The designated offsite assembly areas.</p> <p>a) IF the EOF is not activated OR the ED is not available, THEN direct the DCPD Watch Commander to notify the Sheriff's Department that personnel are going to be evacuated, the route to be used, and approximate number of people being moved offsite.</p> <p>(1) Additionally, provide details about any offsite assistance that may be necessary as determined in step 1.e.</p>	<p>Attachment 2</p> <p>1.g. Ensure the Emergency Director (ED) at the EOF (if activated) is notified of the:</p> <p>1) Decision to perform site evacuation</p> <p>2) Evacuation route chosen</p> <p>3) Designated offsite assembly areas (if applicable)</p> <p>1.h. IF the EOF is not activated, THEN notify the SLO County EOC (or Sheriff's Watch Commander if County EOC is not activated) that:</p> <p>1) Personnel are going to be evacuated from DCPD</p> <p>2) The evacuation route chosen</p> <p>3) Approximate number of people being evacuated</p> <p>4) Details about offsite assistance needed (if applicable)</p> <p>5) Designated offsite assembly areas (if applicable)</p>	<p>Modified content.</p> <p>This change moved the location of the coordination with the EOF earlier in the attachment and specifies decision is to perform site evacuation.</p> <p>In addition these changes include information on the appropriate offsite agency to notify in the event the EOF is not available.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
22.	<p>Multiple locations throughout procedure:</p> <p>Determine if any additional personnel need to stay due to their specialized skill set.</p> <p>Consider skills such as:</p> <p>(1) Engineering  (2) Procurement  (3) Telecommunications</p>	<p>Multiple locations throughout procedure:</p> <p>Determine if any additional personnel need to stay due to their specialized skill set.</p> <p>Consider skills such as:</p> <ul style="list-style-type: none"> <li>• Engineering</li> <li>• Procurement</li> <li>• Telecommunications</li> </ul>	<p>Modified Content</p> <p>Editorial change to replace numbers with bullets.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
23.	<p>Attachment 2</p> <p>1.h. Complete the following table to document decisions and information for the Evacuation Coordinator.</p> <p>Site Evacuation <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA  Early Work Release <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA  Evacuation Route: <input type="checkbox"/> Southern <input type="checkbox"/> Northern  Northern  Assembly Areas  <input type="checkbox"/> N/A (early work release/no radiological release)  <input type="checkbox"/> PG&amp;E Energy Education Center (60-70 cars)  <input type="checkbox"/> Frontage Rd north of Energy Education Center (hundreds)  <input type="checkbox"/> Port San Luis Parking Lot (250 cars)  <input type="checkbox"/> Avila Beach Post Office Parking Lot (250 cars)</p> <p>Outside assistance requested: <input type="checkbox"/> Yes <input type="checkbox"/></p>	<p>Attachment 2</p> <p>1.j. Complete the following table to document decisions and information for the Evacuation Coordinator.</p> <p style="text-align: center;">SITE EVACUATION</p> <p>Evacuation Route: <input type="checkbox"/> Southern <input type="checkbox"/> Northern  Offsite Assembly Areas:  <input type="checkbox"/> N/A (no radiological release)  <input type="checkbox"/> PG&amp;E Energy Education Center (60-70 cars)  <input type="checkbox"/> Frontage Rd north of Energy Education Center (hundreds)  <input type="checkbox"/> San Luis Service Center (125 cars)  <input type="checkbox"/> Port San Luis Parking Lot (250 cars)  <input type="checkbox"/> Avila Beach Post Office Parking Lot (250 cars)  <input type="checkbox"/> Montana de Oro State Park Ranger Station (200 cars)</p> <p>Offsite assistance requested: <input type="checkbox"/> Yes <input type="checkbox"/></p>	<p>Modified content.</p> <p>The table in this section is used to document site evacuation. Changes to form were made to clarify this use. Check boxes for EOF and SLO County notification of site evacuation were added to make sure that notification is not missed.</p> <p>San Luis Service Center and Montana de Oro State Park Ranger Station were included in the list of assembly areas.</p> <p>Outside has been corrected to read Offsite and check boxes are being provided to list personnel that may be requested to stay onsite for ease of documentation.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
24.	<p>Attachment 2</p> <p>1.j. Obtain and brief an Evacuation Coordinator:</p> <p>N/A – added new content.</p> <p>1) Contact the DCPD Watch Commander, or designee, and request that:</p> <p>a) He/she assign a member of the security force as the Evacuation Coordinator.</p> <p>b) Have the assigned individual call the Shift Manager / Site Emergency Coordinator.</p> <p>c) IF security is unavailable OR cannot support allocation of a security officer, THEN contact and assign any available supervisor or manager to perform Evacuation Coordinator duties.</p> <p>d) If available, the TSC Security Advisor may be assigned the duties of the Evacuation Coordinator.</p>	<p>Attachment 2</p> <p>1.k. Obtain and brief an Evacuation Coordinator:</p> <p>1) If available, the TSC Security Advisor should be assigned the duties of the Evacuation Coordinator.</p> <p>2) IF TSC is not activated or Security Advisor is not available THEN contact the DCPD Watch Commander, or designee, and request that:</p> <p>a) He/she assign a member of the security force as the Evacuation Coordinator.</p> <p>b) Have the assigned individual call the Shift Manager / Site Emergency Coordinator.</p> <p>3) IF security is unavailable OR cannot support allocation of a security officer, THEN contact and assign any available supervisor or manager to perform Evacuation Coordinator duties.</p>	<p>Modified content.</p> <p>This change reorders list to clarify that TSC Security Advisor is first option and if they are not available then DCWC assigns an individual to be the Evacuation Coordinator.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
25.	<p>Attachment 2</p> <p>1.k.1)</p> <p>Make a Public Address using the script in Attachment 6, "Public Address Script."</p>	<p>Attachment 2</p> <p>1.l.1)</p> <p>Direct someone (Control Room operator or TSC Director) to make a Public Address using the script in Attachment 6, "Public Address Script."</p>	<p>Modified content.</p> <p>This change adds information for SM or SEC to direct someone to make a public address (PA).</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
26.	<p>Attachment 2</p> <p>1.k.4)b)</p> <p>Add PA message to bridge line extension 2800.</p> <p>1.l.2)</p> <p>Provide periodic updates to the EOF, if activated, about the status of the site evacuation.</p>	<p>Attachment 2</p> <p>1.l.4)b)</p> <p>Add PA message to plant status line x2800.</p> <p>1.m.2)</p> <p>Provide periodic updates to the EOF (if activated) about the status of the site evacuation.</p>	<p>Modified content.</p> <p>This change corrects name of the plant status line and inserts parentheses around "if activated." This change is found in multiple locations throughout procedure and is not being added to change table to reduce redundancy.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
27.	<p>Attachment 2</p> <p>2.c. Plant conditions that warrant an early work release may include, but are not limited to:</p> <p>2) Fuel damage that is causing significant increases in RCS activity and/or general dose rated within the plant.</p> <p>3) A tsunami warning that may lead to a stranded plant scenario.</p> <p>a) The County of San Luis Obispo Emergency Operations Center may, as a preventative measure, close down Avila Bay Drive during a tsunami warning. It may be a prudent action to initiate an early work release prior to the road closures.</p>	<p>Attachment 2</p> <p>2.c. Plant conditions that may warrant an early work release:</p> <p>2) Fuel damage resulting in significant increases in RCS activity and/or general area dose rates within the plant.</p> <p>NOTE: The County of San Luis Obispo Emergency Operations Center may, as a preventative measure, close down Avila Bay Drive during a tsunami warning. It may be a prudent action to initiate an early work release prior to the road closures.</p> <p>3) A tsunami warning or other natural event that may lead to a stranded plant scenario.</p>	<p>Modified content.</p> <p>This change moves information from a sub-step into a note. In addition, “other natural event” has been added to clarify that tsunami warning is not the only natural event that may warrant an early work release.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
28.	<p>Attachment 2</p> <p>2.d.</p> <p>2) Offsite conditions such as weather or damage due to a natural event which may endanger evacuated personnel (e.g., seismic event and associated damage, tsunami warning and associated inundation paths, etc.).</p>	<p>Attachment 2</p> <p>2.d.</p> <p>2) Offsite conditions such as weather or damage due to a natural event which may endanger personnel (e.g., seismic event and associated damage, tsunami warning and associated inundation paths, etc.).</p> <p>4) Are offsite resources available to assist with movement of personnel if necessary?</p>	<p>Modified content.</p> <p>This change deletes term evacuated. In addition, this change adds a consideration to initiating an early work release based on availability of offsite resources.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
29.	<p>Attachment 2</p> <p>2.e. Determine the egress route, using the following criteria:</p> <p>1) IF the southern route is passable AND ANY of the following conditions exist:            a) There is NO release in progress that has the potential to contaminate personnel or personnel vehicles.            b) There is a release that has the potential to contaminate personnel or personnel vehicles, but the wind is coming from between 100° and 220°.            c) It is raining.            d) The northern route is known to be impassable.            THEN use the southern route.</p> <p>2) IF none of the above condition exist OR the southern route is known to be impassable,            THEN use the northern route.</p> <p>3) IF the northern route is to be used...</p>	<p>Attachment 2</p> <p>2.e. Determine the egress route.</p> <p>1) IF the southern route is passable AND ANY of the following conditions exist:</p> <ul style="list-style-type: none"> <li>• There is NO release in progress that has the potential to contaminate personnel or personnel vehicles</li> <li>• There is a release that has the potential to contaminate personnel or personnel vehicles, but the wind is coming from between 100° and 220°</li> <li>• It is raining</li> <li>• The northern route is known to be impassable</li> </ul> <p>THEN choose the southern route.</p> <p>2) IF none of the above condition exist OR the southern route is known to be impassable,            THEN choose the northern route.</p> <p>3) IF the northern route is chosen...</p>	<p>Modified content.</p> <p>This change reformats the step into bullet form and clarifies that egress routes are chosen by the SM/SEC, not used.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
30.	<p>Attachment 2</p> <p>2.f. Determine if offsite assembly areas are needed:</p>	<p>Attachment 2</p> <p>2.f. Determine if offsite assembly areas are needed (typically offsite assembly areas are not necessary during an early work release).</p>	<p>Modified content.</p> <p>This change added a parenthetical statement to provide clarity around need for offsite assembly areas during an early work release.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
31.	<p>Attachment 2</p> <p>2.f.</p> <p>2) IF the southern route is being used ...</p>	<p>Attachment 2</p> <p>2.f.</p> <p>2) IF the southern route was chosen ...</p>	<p>Modified content.</p> <p>This change is being made to clarify that egress routes are chosen by the SM/SEC, not used.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
32.	N/A – added new content.	<p>Attachment 2</p> <p>2.g.</p> <p>NOTE: The SLO County EOC needs to be coordinated with prior to starting an early work release to assess for potential traffic control problems or other impediments.</p>	<p>Added content.</p> <p>Note has been added to highlight importance of coordinating with SLO County EOC prior to starting an early work release.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
33.	<p>Attachment 2</p> <p>2.g. Determine the need for offsite assistance:</p> <p>1) Direct the DCPW Watch Commander, or designee, to interface with local law enforcement to determine the need for offsite assistance. Consider the need for:</p> <p>a) Traffic control assistance along the evacuation route.</p> <p>b) Traffic control assistance at the offsite assembly areas.</p> <p>c) Evacuation route clearing (i.e., bulldozers to move impediments).</p> <p>d) Medical resources at the offsite assembly areas.</p> <p>e) Fire resources at the offsite assembly areas (fire engines may be used for vehicle decontamination etc.).</p>	<p>Attachment 2</p> <p>2.g. Determine the need for offsite assistance.</p> <p>1) Contact the EOF Security Liaison and have them coordinate with the County EOC to determine the need for:</p> <p>a) Traffic control assistance along the egress route.</p> <p>b) Traffic control assistance at the offsite assembly areas.</p> <p>c) Egress route clearing (i.e., bulldozers to move impediments).</p> <p>d) Medical resources at the offsite assembly areas.</p> <p>e) Fire resources at the offsite assembly areas (fire engines may be used for vehicle decontamination etc.).</p> <p>2) IF the EOF is not activated OR the EOF Security Liaison is not available, THEN contact the SLO County EOC or Sheriff's Watch Commander if County EOC is not activated.</p>	<p>Modified content.</p> <p>This change reassigns the responsibility for determining offsite assistance from the DCWC to the EOF Security Liaison.</p> <p>This change also directs contact with the Security Liaison at the EOF, if available rather than directly with local law enforcement based on request from SLO County. In addition, these changes include information on the appropriate offsite agency to interface with in the event the EOF Security Liaison is not available.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
34.	<p>Attachment 2</p> <p>2.h. Determine the need for radiological monitoring at the assembly areas:</p> <p>1) IF there was, or currently is, a release of radioactive materials above normal operating limits that may result in the spread of contamination, THEN personnel and vehicle monitoring/decontamination should be performed at the offsite assembly areas.</p> <p>2) Refer to the tables in step 2.f of this attachment to determine the suggested number of radiological monitoring resources for each offsite assembly area.</p>	<p>Attachment 2</p> <p>2.h. Determine the need for radiological monitoring at the assembly areas.</p> <p>1) IF there was, or currently is, a release of radioactive materials above normal operating limits that may result in the spread of contamination, THEN personnel and vehicle monitoring and decontamination should be performed at designated offsite assembly areas.</p> <p>2) Refer to the tables in step 2.f of this attachment to determine the suggested number of radiological monitoring resources for each offsite assembly area.</p>	<p>Modified content.</p> <p>This is an editorial change only to remove the slash between “monitoring/decontamination.”</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
35.	<p>Attachment 2</p> <p>2.k.</p> <p>Ensure the Emergency Director (ED) at the emergency operations facility (EOF) is notified of:</p> <ol style="list-style-type: none"> <li>1) The decision to move personnel offsite.</li> <li>2) The evacuation route to be used.</li> <li>3) The designated offsite assembly areas.</li> </ol> <p>a) IF the EOF is not activated OR the ED is not available, THEN direct the DCPD Watch Commander to notify the Sheriff's Department that personnel are going to be evacuated, the route to be used, and approximate number of people being moved offsite.</p> <p>(1) Additionally, provide details about any offsite assistance that may be necessary as determined in step 2.f</p>	<p>Attachment 2</p> <p>2.i.</p> <p>Ensure the Emergency Director (ED) at the EOF (if activated) is notified of the:</p> <ol style="list-style-type: none"> <li>1) Decision to perform early work release</li> <li>2) Egress route chosen</li> <li>3) Designated offsite assembly areas (if applicable)</li> </ol> <p>2.j. IF the EOF is not activated THEN notify the SLO County EOC (or Sheriff's Watch Commander if County EOC is not activated) that:</p> <ol style="list-style-type: none"> <li>1) Personnel are going to be leaving DCPD</li> <li>2) The egress route chosen</li> <li>3) Approximate number of people being released offsite</li> <li>4) Details about offsite assistance needed (if applicable)</li> <li>5) Designated offsite assembly areas (if applicable)</li> </ol>	<p>Modified content.</p> <p>This change moved the location of the coordination with the EOF earlier in the attachment and specifies decision is to perform early work release versus "move personnel offsite."</p> <p>In addition, these changes include information on the appropriate offsite agency to notify in the event the EOF is not available.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
36.	<p>Attachment 2</p> <p>2.j. Complete the following table to document decisions and information for the Evacuation Coordinator.</p> <p>Egress Route: <input type="checkbox"/> Southern <input type="checkbox"/> Northern</p> <p>Assembly Areas</p> <p><input type="checkbox"/> N/A (early work release/no radiological release)</p> <p><input type="checkbox"/> PG&amp;E Energy Education Center (60-70 cars)</p> <p><input type="checkbox"/> Frontage Rd north of Energy Education Center (hundreds)</p> <p><input type="checkbox"/> Port San Luis Parking Lot (250 cars)</p> <p><input type="checkbox"/> Avila Beach Post Office Parking Lot (250 cars)</p> <p>Outside assistance requested: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Personnel Monitoring and Decon required: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Attachment 2</p> <p>2.i. Complete the following table to document decisions and information for the Evacuation Coordinator.</p> <p style="text-align: center;">EARLY WORK RELEASE</p> <p>Egress Route: <input type="checkbox"/> Southern <input type="checkbox"/> Northern</p> <p>Offsite Assembly Areas:</p> <p><input type="checkbox"/> N/A (no radiological release)</p> <p><input type="checkbox"/> PG&amp;E Energy Education Center (60-70 cars)</p> <p><input type="checkbox"/> Frontage Rd north of Energy Education Center (hundreds)</p> <p><input type="checkbox"/> San Luis Service Center (125 cars)</p> <p><input type="checkbox"/> Port San Luis Parking Lot (250 cars)</p> <p><input type="checkbox"/> Avila Beach Post Office Parking Lot (250 cars)</p> <p><input type="checkbox"/> Montana de Oro State Park Ranger Station (200 cars)</p> <p>Offsite assistance requested: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Personnel Monitoring and Decon required: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>EOF notified of early work release: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>County notified of early work release: <input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Modified content.</p> <p>The table in this section is to be used to document early work release.</p> <p>San Luis Service Center and Montana de Oro State Park Ranger Station have been included in the list of assembly areas.</p> <p>Outside has been corrected to read Offsite.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>





Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
38.	<p>Attachment 2</p> <p>2.n. Follow-up actions:</p> <p>1) Maintain communications with the Evacuation Coordinator, if established, for periodic status updates on progress of the early work release.</p> <p>3) Provide periodic updates to the EOF, if activated, about the status of the early work release.</p>	<p>Attachment 2</p> <p>2.o. Follow-up actions:</p> <p>1) Maintain communications with the Evacuation Coordinator (if applicable) for periodic status updates on progress of the early work release.</p> <p>3) Provide periodic updates to the EOF (if activated) about the status of the early work release.</p>	<p>Modified content.</p> <p>Replaced “if established” with “if applicable” and added parenthesis around “if applicable.”</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
39.	<p>Attachment 3</p> <p>1.a. Receive evacuation instructions for the Shift Manager/Site Emergency Coordinator, including:</p> <p>Site Evacuation <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA  Early Work Release <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA  Evacuation Route: <input type="checkbox"/> Southern <input type="checkbox"/> Northern</p> <p>Assembly Areas:  <input type="checkbox"/> N/A (early work release/no radiological release)  <input type="checkbox"/> PG&amp;E Energy Education Center (60-70 cars)  <input type="checkbox"/> Frontage Rd north of Energy Education Center (hundreds)  <input type="checkbox"/> Port San Luis Parking Lot (250 cars)  <input type="checkbox"/> Avila Beach Post Office Parking Lot</p>	<p>Attachment 3</p> <p>1.a. Receive evacuation/early work release instructions for the Shift Manager/Site Emergency Coordinator, including:</p> <p>Site Evacuation <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA  <input type="checkbox"/> NA  Early Work Release <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA  Evacuation / Egress Route: <input type="checkbox"/> Southern <input type="checkbox"/> Northern  Offsite Assembly Areas:  <input type="checkbox"/> N/A (early work release/no radiological release)  <input type="checkbox"/> PG&amp;E Energy Education Center (60-70 cars)  <input type="checkbox"/> Frontage Rd north of Energy Education Center (hundreds)  <input type="checkbox"/> San Luis Service Center (125 cars)  <input type="checkbox"/> Port San Luis Parking Lot (250 cars)  <input type="checkbox"/> Avila Beach Post Office Parking Lot</p>	<p>Modified content.</p> <p>The table in this section is used to document both evacuation and early work release.</p> <p>San Luis Service Center and Montana de Oro State Park Ranger Station have been included in the list of assembly areas.</p> <p>Outside has been corrected to read Offsite.</p> <p>Check boxes are being provided to list personnel that may be requested to stay onsite for ease of documentation.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>(250 cars)</p> <p>Outside assistance requested: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Personnel Monitoring and/or Decon required: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Personnel to remain on site:  <input type="checkbox"/> ERO  <input type="checkbox"/> Other (list below)            Date/Time:            Shift Manager / Site Emergency Coordinator Initials:</p>	<p>(250 cars)</p> <p><input type="checkbox"/> Montana de Oro State Park Ranger Station (200 cars)</p> <p>Offsite assistance requested: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Personnel Monitoring and Decon required: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>EOF notified of evacuation/early work release: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>County notified of evacuation/early work release: <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>DCCP Personnel to remain on site:  <input type="checkbox"/> ERO  <input type="checkbox"/> All Operations personnel  <input type="checkbox"/> All Chemistry and Radiation Protection personnel  <input type="checkbox"/> All security personnel  <input type="checkbox"/> All Fire Fighters  <input type="checkbox"/> All Medical personnel  <input type="checkbox"/> All maintenance personnel (Mechanical, Electrical and I&amp;C)  <input type="checkbox"/> Other (list below)            Date/Time: Shift Manager / Site Emergency Coordinator Initials:</p>	<p>specific commitments. No additional evaluation required.</p>
40.	<p>Attachment 3</p> <p>1.b. Check with the Shift Manager / Site Emergency Coordinator that communications with offsite agencies (California Highway Patrol, Sheriff's Department etc.) have been made prior to evacuating personnel from the site.</p>	<p>Attachment 3</p> <p>1.b. Check with the Shift Manager / Site Emergency Coordinator to ensure communications with the SLO County EOC or Sheriff's Watch Commander (if EOC is not activated) have been made prior to evacuating or releasing personnel from the site.</p>	<p>Modified content.</p> <p>These changes correct the offsite agency to communicate with and include information on early work release in addition to site evacuation. It also clarifies that radiological resources are personnel and not equipment. Additionally, multiple grammatical and</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>1.c. Start the evacuation after receiving Shift Manager / Site Emergency Coordinator permission.</p> <p>1.d. IF radiological monitoring and/or decon is required, THEN:</p> <p>1) Contact the TSC Radiological Advisor to coordinate the allocation of qualified radiological monitoring resources. a) At least one qualified monitor per offsite assembly area is required.</p> <p>2) IF the TSC is not activated OR the Radiological Advisor is unavailable, THEN contact the EOF Radiological Manager to coordinate the allocation of qualified radiological monitoring resources.</p> <p>3) IF both the TSC and EOF are unavailable, THEN perform a manual call-out of RP management personnel until someone is reached who can coordinate the allocation of qualified radiological monitoring resources.</p> <p>4) Provide the location(s) of the offsite</p>	<p>1.c. If not already in progress, start the site evacuation or early work release after receiving Shift Manager / Site Emergency Coordinator permission.</p> <p>1.d. IF radiological monitoring and decon is required, THEN:</p> <p>1) Contact the TSC Radiological Advisor to coordinate the allocation of qualified radiological monitoring personnel. a) At least one person qualified in radiological monitoring is required per offsite assembly area.</p> <p>2) IF the TSC is not activated OR the Radiological Advisor is unavailable, THEN contact the EOF Radiological Manager to coordinate the allocation of qualified radiological monitoring personnel.</p> <p>3) IF both the TSC and EOF are unavailable, THEN perform a manual call-out of RP management personnel until someone is reached who can coordinate the allocation of qualified radiological monitoring personnel.</p> <p>4) Provide the location(s) of the offsite</p>	<p>editorial errors are corrected.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>assembly areas (if applicable) that are going to be used to the radiological monitoring personnel.</p> <p>5) Qualified monitoring personnel should accompany, or meet, each evacuation group to their assembly area.</p>	<p>assembly areas (if applicable) that are going to be used.</p> <p>5) Qualified monitoring personnel should accompany, or meet, each evacuation group at their assembly area.</p>	
41.	<p>Attachment 3</p> <p>1.f. Appoint Evacuation Team Leaders:</p> <p>1) At each of the onsite assembly areas, as determined from step 1.e, select management personnel to act as Evacuation Team Leaders.</p> <p>1.f.2)</p> <p>NOTE: Evacuation kits and a supply of radios are in the north east corner of Warehouse B. The onsite FMT kits are located in the same area. Each kit type is labeled accordingly.</p>	<p>Attachment 3</p> <p>1.f. Appoint Evacuation Team Leaders.</p> <p>1) Select management personnel to act as Evacuation Team Leaders for each onsite assembly area.</p> <p>1.f.2)</p> <p>NOTE: Evacuation kits and a supply of radios are in Warehouse B (Bldg. 113) in the FLEX storage area. The onsite FMT kits are located in the same area. Each kit type is labeled accordingly.</p>	<p>Modified content.</p> <p>These changes reorder sentences for clarity and includes additional detail on location of evacuation kits.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
42.	<p>Attachment 3</p> <p>1.f.</p> <p>2)b) A qualified radiological monitor (person)</p> <p>3) Either the Evacuation Team Leader or a qualified radiological monitor needs a dosimeter to determine evacuation doses.</p> <p>a) There are 100 PEDs and 100 TLDs located in Warehouse B in the same area where the evacuation kits are located.            (1) Additional self reading dosimeters may be obtained from RP or the Radiological Advisor in the TSC if available.</p>	<p>Attachment 3</p> <p>1.f.</p> <p>2)b) Qualified radiological monitoring personnel</p> <p>3) Either the Evacuation Team Leader or qualified radiological monitoring personnel needs a dosimeter to determine evacuation doses.</p> <p>a) There are 100 PEDs and 100 TLDs located in Warehouse B (Bldg. 113) in the same area where the evacuation kits are located.            (1) Additional self-reading dosimeters may be obtained from RP or the Radiological Advisor in the TSC if available.</p>	<p>Modified content</p> <p>This change clarifies that radiological resources are personnel and not equipment, adds specific building number for Warehouse B, and corrects a grammatical error.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>
43.	<p>Attachment 3</p> <p>1.g. Instruction for personnel evacuation:</p> <p>1) Direct all personnel to:</p> <p>a) Retain their security badges for identification.</p> <p>b) Proceed in caravan fashion along the designated route to the offsite assembly area if required.</p> <p>c) Personnel without transportation should carpool with others that are going to the same offsite assembly area.            (1) Arrangements to get home should be</p>	<p>Attachment 3</p> <p>1.g. Direct all personnel to:</p> <p>1) Retain their security badges for identification.</p> <p>2) Proceed in caravan fashion along the designated route to the offsite assembly area (if applicable).</p> <p>3) Personnel without transportation should carpool with others that are going to the same offsite assembly area.</p>	<p>Modified content</p> <p>Deleted step that titled section and reformatted all proceeding steps. In addition, replaced term required with applicable for consistency.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>made at the offsite assembly area.</p> <p>d) If required, evacuated personnel should remain at the offsite assembly area until monitored and cleared for release.</p> <p>2) Notify the TSC Communications Advisor (x3390) of who the Evacuation Team Leader is for each offsite assembly area.</p> <p>3) Notify Avila Gate of the evacuation.</p> <p>4) Coordinate with the TSC Security Advisor (x3260) to have Security direct traffic onsite.</p> <p>5) Coordinate with the DCPD Watch Commander, or designee, all requested offsite traffic control.</p>	<p>4) Arrangements to get home should be made at the offsite assembly area.</p> <p>5) Personnel should remain at the offsite assembly area until monitored and cleared for release (if applicable).</p> <p>1.h. Notify the TSC Communications Advisor (x3390) of who the Evacuation Team Leader is for each offsite assembly area.</p> <p>1.i. Notify Avila Gate of the evacuation.</p> <p>1.j. Coordinate with the TSC Security Advisor (x3260) to have Security direct traffic onsite.</p> <p>1.k. Coordinate with the DCPD Watch Commander, or designee, all requested offsite traffic control.</p>	

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
44.	<p>Attachment 3</p> <p>1.g.6) Dispatch a vehicle to clear the south access road of personnel who may be working along the road or working on the farms.</p> <p>a) IF conditions warrant (a radiological release occurred or is in progress), THEN a qualified monitor should be assigned to this vehicle to monitor these personnel and their vehicles.</p> <p>b) This vehicle should proceed to the offsite assembly area for traffic control.</p> <p>1.g.7) Dispatch a vehicle to notify personnel and visitors along the north access road. Their assembly area is the Montana de Oro State Park Ranger Station.</p> <p>a) IF conditions warrant (a radiological release occurred or is in progress), THEN a qualified monitor should be assigned to this vehicle to monitor these personnel and their vehicles.</p>	<p>Attachment 3</p> <p>1.l. Dispatch a vehicle to clear the south access road of personnel who may be working along the road or working on the farms.</p> <p>1) IF conditions warrant (a radiological release occurred or is in progress), THEN qualified radiological monitoring personnel (1) should be assigned to this vehicle to monitor these personnel and their vehicles.</p> <p>a) This vehicle should proceed to the offsite assembly area for traffic control.</p> <p>1.m. Dispatch a vehicle to notify personnel and visitors along the north access road. Their assembly area is the Montana de Oro State Park Ranger Station.</p> <p>1) IF conditions warrant (a radiological release occurred or is in progress), THEN qualified radiological monitoring personnel (1) should be assigned to this vehicle to monitor these personnel and their vehicles.</p>	<p>Modified content</p> <p>This change clarifies that radiological resources are personnel and not equipment and renumbers steps based on previous change.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required</p>
45.	<p>Attachment 3</p> <p>1. h. Actions to be taken at the offsite assembly area(s)</p>	<p>Attachment 3</p> <p>1.n. Actions to be taken at the offsite assembly area(s).</p>	<p>Modified content.</p> <p>This checklist is used to document both evacuation and early work release. In</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>1) Ensure personnel are accounted for and monitored.</p> <p>2) Direct the radiological monitors to begin surveying personnel and vehicles for contamination using Attachment 5.</p> <p>3) Provide periodic updates to the Shift Manager / Site Emergency Coordinator about:</p> <p>a) Evacuation status</p> <p>b) Offsite assembly area resource needs</p> <p>(1) Additional DCPP personnel needed</p> <p>(2) Additional non-DCPP resources needed (Fire, local law enforcement, traffic control, etc.)</p> <p>c) Radiological monitoring progress (if applicable)</p> <p>4) IF public parking lots are used as assembly areas and lots cannot be completely cleared prior to evacuees arriving, THEN the owners and/or vehicle license numbers of cars still in the lot should be recorded and the vehicles surveyed before being allowed to leave.</p> <p>a) Local law enforcement officials shall be relied upon for detaining vehicles. PG&amp;E</p>	<p>1) Ensure personnel are accounted for and monitored.</p> <p>2) Direct the radiological monitors to begin surveying personnel and vehicles for contamination using Attachment 5.</p> <p>3) Provide periodic updates to the Shift Manager / Site Emergency Coordinator about:</p> <p>a) Evacuation / early work release status</p> <p>b) Offsite assembly area resource needs</p> <ul style="list-style-type: none"> <li>• Additional DCPP personnel needed</li> <li>• Additional non-DCPP resources needed (Fire, local law enforcement, traffic control, etc.)</li> </ul> <p>c) Radiological monitoring progress (if applicable)</p> <p>4) IF public parking lots are used as offsite assembly areas and lots cannot be completely cleared prior to personnel arriving, THEN the owners or vehicle license numbers of cars still in the lot should be recorded and the vehicles surveyed before being allowed to leave.</p> <p>a) Information on vehicles surveyed should be provided to the San Luis Obispo County EOC.</p>	<p>addition, the information on PG&amp;E authority to detain personnel has been deleted. Formatting changes have also been made.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required</p>



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	has no authority to detain personnel and/or their property.		
46.	<p>Attachment 3</p> <p>1.i.</p> <p>NOTE: Each assembly is treated separately to determine when personnel are to be released.</p> <p>1.i. Release of personnel from offsite assembly areas:</p> <p>1) WHEN all of the following conditions are met,            a) A sufficient number of persons and vehicles in the area have been surveyed to determine contamination is not a factor.            b) Self reading dosimeter results have been recorded.            c) Permission to release personnel has been received from the Shift Manager / Site Emergency Coordinator.            THEN allow personnel to leave the offsite assembly area.</p>	<p>Attachment 3</p> <p>1.o.</p> <p>NOTE: Each offsite assembly area is treated separately to determine when personnel are to be released.</p> <p>1.o. Release of personnel from offsite assembly areas.</p> <p>1) WHEN all of the following conditions are met,            a) A sufficient number of persons and vehicles in the area have been surveyed to determine contamination is not a factor.            b) Self-reading dosimeter results have been recorded.            c) Permission to release personnel has been received from the Shift Manager / Site Emergency Coordinator.            THEN allow personnel to leave the offsite assembly area.</p>	<p>Modified content</p> <p>This change clarifies that assembly areas are offsite and corrects a grammatical error.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
47.	<p>Attachment 3</p> <p>1.j. Close out actions:</p> <p>1) Have Evacuation Team Leaders and radiological monitors:</p> <p>a) Return equipment to Warehouse B, or other designated area if site is inaccessible.</p> <p>b) Provide assembly area documentation (survey forms, dosimetry records, etc.) to you.</p> <p>2) Inform the Shift Manager / Site Emergency Coordinator when all actions are completed.</p> <p>3) Forward all documentation to Emergency Planning.</p>	<p>Attachment 3</p> <p>1.p. Close out actions</p> <p>1) Have Evacuation Team Leaders and radiological monitoring personnel:</p> <p>a) Return equipment to Warehouse B (Bldg. 113), or other designated area.</p> <p>b) Provide offsite assembly area documentation (survey forms, dosimetry records, etc.) to Control Room or TSC.</p> <p>2) Inform the Shift Manager / Site Emergency Coordinator when all actions are completed.</p> <p>3) Forward all documentation to Emergency Planning.</p>	<p>Modified content</p> <p>This change clarifies that radiological resources are personnel and not equipment, adds specific building number for Warehouse B, and clarifies that assembly areas are offsite. Additionally, the specific facility where documentation shall be provided is being designated.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required</p>
48.	<p>Attachment 4</p> <p>1.a.</p> <p>NOTE: Evacuation kits and a supply of radios are in the north east corner of Warehouse B. The onsite FMT kits are located in the same area. Each kit type is labeled accordingly.</p> <p>1.a. Obtain the following:</p>	<p>Attachment 4</p> <p>1.a.</p> <p>NOTE: Evacuation kits and a supply of radios are in Warehouse B (Bldg. 113) in the FLEX storage area. The onsite FMT kits are located in the same area. Each kit type is labeled accordingly.</p> <p>1.a. Obtain the following:</p>	<p>Modified content.</p> <p>This change clarifies that radiological resources are personnel and not equipment, adds specific building number for Warehouse B, and includes additional detail on location of evacuation kits. The detail added on access to the FLEX storage area is provided in FLEX Support Guide 5.</p> <p>This change does not affect how the</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>1) A qualified radiological monitor (as determined by the Evacuation Coordinator)</p> <p>N/A – added new content.</p> <p>2) Dosimetry (north east corner of Warehouse B)            a) Either the Evacuation Team Leader or a qualified radiological monitor needs a dosimeter to determine evacuation doses.</p> <p>(1) There are 100 PEDs and 100 TLDs located in Warehouse B in the same area where the evacuation kits are located.            (2) Additional self reading dosimeters may be obtained from RP or the Radiological Advisor in the TSC if available.</p> <p>3) Plant Frequency Portable Radio (north east corner of Warehouse B)</p> <p>4) Evacuation kit (north east corner of Warehouse B)</p>	<p>1) Qualified radiological monitoring personnel (as determined by the Evacuation Coordinator)</p> <p>2) Access to the FLEX storage area in Warehouse B (Bldg. 113):            a) Open the west personnel door using the electronic lock (pass code for the electronic lock is 2701)            b) Enter from the fire station side of the building            c) Break a window in the west rollup door</p> <p>3) Dosimetry from Warehouse B (Bldg. 113)            a) Either the Evacuation Team Leader or qualified radiological monitoring personnel needs a dosimeter to determine evacuation doses.</p> <p>(1) There are 100 PEDs and 100 TLDs located in Warehouse B (Bldg. 113) in the same area where the evacuation kits are located.            (2) Additional self-reading dosimeters may be obtained from RP or the Radiological Advisor in the TSC if available.</p> <p>4) Plant Frequency Portable Radio from Warehouse B (Bldg. 113)</p> <p>5) Evacuation kit from Warehouse B</p>	<p>current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>5) Evacuation route (as determined by the Evacuation Coordinator)</p> <p>6) Assigned offsite assembly area (as determined by the Evacuation Coordinator)</p> <p>4) On-site traffic pattern (as determined by the Evacuation Coordinator)</p> <p>5) Sequence of evacuation which will generally be:            a) Warehouse B area            b) Parking lots            c) Training Building/Maintenance Shop Building            d) All other areas (as determined by the Evacuation Coordinator)</p>	<p>(Bldg. 113)</p> <p>6) Evacuation route (as determined by the Evacuation Coordinator)</p> <p>7) Assigned offsite assembly area (as communicated by the Evacuation Coordinator)</p> <p>8) Onsite traffic pattern (as determined by the Evacuation Coordinator)</p> <p>9) Sequence of evacuation will generally be:            a) Warehouse B (Bldg. 113) area            b) Parking lots            c) Training Building (Bldg. 109)            d) Maintenance Shop Building (Bldg. 119)            e) All other areas (as determined by the Evacuation Coordinator)</p>	
49.	<p>Attachment 4</p> <p>1.b. Actions at the offsite assembly area:</p> <p>1) At the offsite assembly area ensure personnel are accounted for and monitored.</p> <p>a) Record the security badge numbers of all evacuees, noting any evacuees suspected of having received doses in excess of 100 mrem TEDE and those requiring decontamination.</p>	<p>Attachment 4</p> <p>1.b. Actions at the offsite assembly area</p> <p>1) At the offsite assembly area ensure personnel are accounted for and monitored.</p> <p>2) Record the security badge numbers of all personnel, noting those suspected of having received doses in excess of 100 mrem TEDE and those requiring decontamination.</p>	<p>Modified content.</p> <p>This change clarifies that radiological resources are personnel and not equipment; that it is personnel, not evacuees; corrects grammar and format; and provides direction on where documentation shall be provided.</p> <p>In addition, the information on PG&amp;E authority to detain personnel has been deleted.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>(1) IF the evacuee does not have a security badge,            THEN obtain their names and addresses.</p> <p>2) Direct the radiological monitors (if required) to begin surveying personnel and vehicles for contamination using Attachment 5.</p> <p>3) Provide periodic updates to the Evacuation Coordinator about:</p> <p>a) Evacuation status</p> <p>b) Off-site assembly area resource needs</p> <p>(1) Additional DCPD personnel needed</p> <p>(2) Additional non-DCPD resources needed (Fire, local law enforcement, traffic control, etc.)</p> <p>c) Radiological monitoring progress (if applicable)</p> <p>4) IF public parking lots are used as assembly areas and lots cannot be completely cleared prior to evacuees arriving,            THEN the owners and/or vehicle license numbers of cars still in the lot should be recorded and the vehicles surveyed before being allowed to leave.</p> <p>a) Local law enforcement officials shall be relied upon for detaining vehicles. PG&amp;E</p>	<p>a) IF personnel does not have a security badge,            THEN obtain their name and address.</p> <p>3) Direct qualified radiological monitoring personnel (if required) to begin surveying personnel and vehicles for contamination using Attachment 5.</p> <p>4) Provide periodic updates to the Evacuation Coordinator about:</p> <p>a) Evacuation status</p> <p>b) Off-site assembly area resource needs</p> <ul style="list-style-type: none"> <li>• Additional DCPD personnel needed</li> <li>• Additional non-DCPD resources needed (Fire, local law enforcement, traffic control, etc.)</li> </ul> <p>c) Radiological monitoring progress (if applicable)</p> <p>5) IF public parking lots are used as offsite assembly areas and lots cannot be completely cleared prior to personnel arriving,            THEN the owners or vehicle license numbers of cars still in the lot should be recorded and the vehicles surveyed before being allowed to leave.</p> <p>a) Information on vehicles surveyed should be provided to the Evacuation Coordinator.</p>	<p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	has no authority to detain personnel and/or their property.		
50.	<p>Attachment 4</p> <p>1.c. Allow personnel to leave the offsite assembly area ONLY after:</p> <p>1) They and their vehicle have been surveyed or a sufficient number of persons in that area have been surveyed to determine contamination is not a factor.</p> <p>2) Self reading dosimeter results have been recorded.</p> <p>3) Permission to release the personnel has been received from the Shift Manager / Site Emergency Coordinator via the Evacuation Coordinator.</p> <p>4) Inform the Evacuation Coordinator:</p> <p>a) When all personnel have left the assembly area.</p> <p>b) If there are any radiological issues that need to be addressed.</p> <p>(1) This may include the survey and release of the offsite assembly area itself after all personnel have left.</p>	<p>Attachment 4</p> <p>1.c. Allow personnel to leave the offsite assembly area after all of the following:</p> <p>1) They and their vehicle have been surveyed or a sufficient number of persons in that area have been surveyed to determine contamination is not a factor.</p> <p>2) Self-reading dosimeter results have been recorded.</p> <p>3) Permission to release the personnel has been received from the Shift Manager / Site Emergency Coordinator via the Evacuation Coordinator.</p> <p>1.d. Inform the Evacuation Coordinator when:</p> <p>1) All personnel have left the offsite assembly area.</p> <p>2) There are any radiological issues that need to be addressed.</p> <p>3) Survey and release of the offsite assembly area itself is complete.</p>	<p>Modified content.</p> <p>This change reformats one task into two, simplifies steps, and rewrites for clarity.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
51.	<p>Attachment 4</p> <p>1.d. Close out actions:</p> <p>1) Return equipment to Warehouse B, or other designated area if site is inaccessible.</p> <p>2) Provide assembly area documentation (survey forms, dosimetry records, etc.) to the Evacuation Coordinator.</p> <p>3) Inform the Evacuation Coordinator when all actions are completed.</p>	<p>Attachment 4</p> <p>1.e. Close out actions:</p> <p>1) Return equipment to Warehouse B (Bldg. 113), or other designated area.</p> <p>2) Provide offsite assembly area documentation (survey forms, dosimetry records, etc.) to the Evacuation Coordinator.</p> <p>3) Inform the Evacuation Coordinator when all actions are completed.</p>	<p>Modified content.</p> <p>This change adds specific building number for Warehouse B and clarifies that assembly areas are offsite.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required</p>
52.	<p>Attachment 5</p> <p>1.a.</p> <p>NOTE: Evacuation kits and a supply of radios are in the north east corner of Warehouse B. The onsite FMT kits are located in the same area. Each kit type is labeled accordingly.</p> <p>1.a. Obtain the following:</p> <p>N/A – added new content.</p>	<p>Attachment 5</p> <p>1.a.</p> <p>NOTE: Evacuation kits and a supply of radios are in Warehouse B (Bldg. 113) in the FLEX storage area. The onsite FMT kits are located in the same area. Each kit type is labeled accordingly.</p> <p>1.a. Obtain the following:</p> <p>1) Access to the FLEX storage area in Warehouse B (Bldg. 113):</p> <p>a) Open the west personnel door using the electronic lock (pass code for the electronic lock is 2701)</p> <p>b) Enter from the fire station side of the</p>	<p>Modified content.</p> <p>This change adds specific building numbers and includes additional detail on location of evacuation kits. The detail added on access to the FLEX storage area is provided in FLEX Support Guide 5. This change also includes an editorial change and clarifies that offsite assembly areas are communicated to by the Evacuation Coordinator to the Radiological Monitor.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>1) Dosimetry (north east corner of Warehouse B)            a) Either the Evacuation Team Leader or a qualified radiological monitor needs a dosimeter to determine evacuation doses.</p> <p>(1) There are 100 PEDs and 100 TLDs located in Warehouse B in the same area where the evacuation kits are located.            (2) Additional self reading dosimeters may be obtained from RP or the Radiological Advisor in the TSC if available.</p> <p>2) Plant Frequency Portable Radio (north east corner of Warehouse B)</p> <p>3) Evacuation kit (north east corner of Warehouse B)</p> <p>4) Evacuation route (as determined by the Evacuation Coordinator)</p> <p>5) Assigned offsite assembly area (as determined by the Evacuation Coordinator)</p> <p>6) Onsite traffic pattern (as determined by the Evacuation Coordinator)</p> <p>7) Sequence of evacuation which will</p>	<p>building            c) Break a window in the west rollup door</p> <p>2) Dosimetry from Warehouse B (Bldg. 113)            a) Either the Evacuation Team Leader or qualified radiological monitoring personnel needs a dosimeter to determine evacuation doses.            (1) There are 100 PEDs and 100 TLDs located in Warehouse B (Bldg. 113) in the same area where the evacuation kits are located.            (2) Additional self-reading dosimeters may be obtained from RP or the Radiological Advisor in the TSC if available.</p> <p>3) Plant Frequency Portable Radio from Warehouse B (Bldg. 113)</p> <p>4) Evacuation kit from Warehouse B (Bldg. 113)</p> <p>5) Evacuation route (as determined by the Evacuation Coordinator)</p> <p>6) Assigned offsite assembly area (as communicated by the Evacuation Coordinator)</p> <p>7) Onsite traffic pattern (as determined by the Evacuation Coordinator)</p>	



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>generally be:</p> <ul style="list-style-type: none"> <li>a) Warehouse B area</li> <li>b) Parking lots</li> <li>c) Training Building/Maintenance Shop Building</li> <li>d) All other areas (as determined by the Evacuation Coordinator).</li> </ul>	<p>8) Sequence of evacuation will generally be:</p> <ul style="list-style-type: none"> <li>a) Warehouse B (Bldg. 113) area</li> <li>b) Parking lots</li> <li>c) Training Building (Bldg. 109)</li> <li>d) Maintenance Shop Building (Bldg. 119)</li> <li>e) All other areas (as determined by the Evacuation Coordinator).</li> </ul>	
53.	<p>Attachment 5</p> <p>1.b. Actions at the offsite assembly area:</p> <ul style="list-style-type: none"> <li>1) Record the names and/or vehicle license numbers of any vehicles in the parking lot before evacuee's arrival.</li> <li>2) IF public parking lots are used as assembly areas and lots cannot be completely cleared prior to evacuees arriving, THEN the owners and/or vehicle license numbers of cars still in the lot should be recorded and the vehicles surveyed before being allowed to leave.</li> <li>e) Local law enforcement officials shall be relied upon for detaining vehicles. PG&amp;E has no authority to detain personnel and/or their property.</li> <li>3) Record the security badge numbers of all evacuees, noting any evacuees suspected of</li> </ul>	<p>Attachment 5</p> <p>1.b. Actions at the offsite assembly area</p> <ul style="list-style-type: none"> <li>1) Record the names and vehicle license numbers of any vehicles in the parking lot before personnel arrival.</li> <li>2) IF public parking lots are used as assembly areas and lots cannot be completely cleared prior to evacuees arriving, THEN the owners or vehicle license numbers of cars still in the lot should be recorded and the vehicles surveyed before being allowed to leave.</li> <li>a) Information on vehicles surveyed should be provided to the Evacuation Team Leader.</li> <li>3) Record the security badge numbers of all personnel, noting those suspected of having received doses in excess of 100 mrem TEDE and those requiring</li> </ul>	<p>Modified Content</p> <p>Editorial change to replace numbers with bullets, reorders sentences for readability, and corrects grammar and formatting. This change also clarifies that it is personnel, not evacuees who are being monitored; and provides direction on where documentation shall be provided.</p> <p>In addition, the information on PG&amp;E authority to detain personnel has been deleted.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>having received doses in excess of 100 mrem TEDE and those requiring decontamination.</p> <p>f) IF the evacuee does not have a security badge, THEN obtain their names and addresses.</p> <p>4) Initiate a personnel and vehicular contamination survey program.</p> <p>a) Record results on the following forms:            (1) Attachment 7, "Post Evacuation Vehicle Monitoring Data"            (2) Attachment 8, "Evacuee Monitoring Data"</p> <p>(3) Report survey summary to Evacuation Coordinator and/or Evacuation Team Leader.</p> <p>5) A representative sample of individuals and vehicles shall be surveyed to determine if contamination is a factor.</p> <p>6) IF personnel are found to be contaminated, THEN ensure contaminated personnel are taken to a decontamination center and decontaminated.</p> <p>a) Decontamination should be performed per RCP NISP-RP.06, "Personnel Contamination Monitoring."            b) Off-site decon facility selection:            (1) The Energy Education Center</p>	<p>decontamination.</p> <p>a) IF the evacuee does not have a security badge, THEN obtain their names and addresses.</p> <p>4) Initiate a personnel and vehicle contamination survey program.</p> <p>a) Record results on the following forms:            (1) Attachment 7, "Post Evacuation Vehicle Monitoring Data"            (2) Attachment 8, "Evacuee Monitoring Data"</p> <p>b) Report survey summary to Evacuation Team Leader and/or Evacuation Coordinator.</p> <p>c) A representative sample of individuals and vehicles should be surveyed to determine if contamination is a factor.</p> <p>5) IF personnel are found to be contaminated, THEN ensure contaminated personnel are taken to a decontamination center and decontaminated.</p> <p>a) Decontamination should be performed per RCP NISP-RP.06, "Personnel Contamination Monitoring."            b) Offsite decon facility selection:</p>	

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>Decontamination Facility</p> <p>(a) This facility is located in a separate building behind the main information center building, which is located on the west frontage road to Highway 101 (Ontario Rd.), just south of the San Luis Bay Drive turnoff to Avila Beach.</p> <p>(b) This is the only designated offsite decontamination facility for non-injured personnel.</p> <p>(c) One shower and one washbasin are located in both decontamination rooms in this facility.</p> <p>(d) This facility is normally stocked with decontamination supplies.</p> <p>(e) Supplies from the plant, the emergency kits or other available sources may augment the stored supplies stored at this facility.</p> <p>(2) French Hospital Emergency Room</p> <p>(a) This facility is located at French Hospital at 1911 Johnson Avenue in San Luis Obispo city.</p> <p>(b) This is the only decontamination facility designated for injured personnel requiring immediate offsite medical attention. It should only be selected for personnel with serious medical conditions requiring prompt care.</p>	<p>(1) The Energy Education Center Decontamination Facility</p> <ul style="list-style-type: none"> <li>• This facility is located in a separate building behind the main building, which is located on the west frontage road to Highway 101 (Ontario Rd.), just south of the San Luis Bay Drive turnoff to Avila Beach.</li> <li>• This is the only designated offsite decontamination facility for non-injured personnel.</li> <li>• One shower and one washbasin are located in both decontamination rooms in this facility.</li> <li>• This facility is normally stocked with decontamination supplies.</li> <li>• Supplies from the plant, the emergency kits or other available sources may augment the supplies stored at this facility.</li> </ul> <p>(2) French Hospital Emergency Room</p> <ul style="list-style-type: none"> <li>• This facility is located at French Hospital at 1911 Johnson Avenue in San Luis Obispo city.</li> <li>• This is the primary decontamination facility designated for injured personnel requiring immediate offsite medical attention. It should only be selected for personnel with serious medical conditions requiring prompt care.</li> </ul>	

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
	<p>7) IF vehicles are found to be contaminated,            THEN coordinate with the Evacuation Team Leader and Evacuation Coordinator to determine the best course of action.            a) PG&amp;E has no authority to detain personnel and/or their property.</p> <p>8) Provide periodic updates to the Evacuation Team Leader about:            a) Offsite assembly area resource needs            (1) Additional DCPD personnel needed            (2) Additional non-DCPD resources needed (Fire, local law enforcement, traffic control, etc.)            b) Radiological monitoring progress (if applicable)</p> <p>9) Periodically, record all self reading dosimeter results.</p>	<p>6) IF vehicles are found to be contaminated,            THEN coordinate with the Evacuation Team Leader and Evacuation Coordinator to determine the best course of action.</p> <p>7) Provide periodic updates to the Evacuation Team Leader about:            a) Offsite assembly area resource needs           <ul style="list-style-type: none"> <li>• Additional DCPD personnel needed</li> <li>• Additional non-DCPD resources needed (Fire, local law enforcement, traffic control, etc.)</li> </ul>           b) Radiological monitoring progress (if applicable)</p> <p>8) Periodically, record all self-reading dosimeter results.</p>	



Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
54.	<p>Attachment 5</p> <p>1.c. Allow personnel to leave the offsite assembly area ONLY after:</p> <p>1) They and their vehicle have been surveyed or a sufficient number of persons in that area have been surveyed to determine contamination is not a factor.</p> <p>2) Self reading dosimeter results have been recorded.</p> <p>3) Permission to release the personnel has been received from the Shift Manager / Site Emergency Coordinator via the Evacuation Coordinator.</p> <p>4) Inform the Evacuation Coordinator and/or Evacuation Team Leader:</p> <p>a) When all personnel have left the assembly area.</p> <p>b) If there are any radiological issues that need to be addressed.</p> <p>(1) This may include the survey and release of the offsite assembly area itself after all personnel have left.</p>	<p>Attachment 5</p> <p>1.c. Allow personnel to leave the offsite assembly area after all of the following:</p> <p>1) They and their vehicle have been surveyed or a sufficient number of persons in that area have been surveyed to determine contamination is not a factor.</p> <p>2) Self-reading dosimeter results have been recorded.</p> <p>3) Permission to release personnel has been received from the Shift Manager / Site Emergency Coordinator via the Evacuation Coordinator.</p> <p>1.d. Inform the Evacuation Team Leader and/or Evacuation Coordinator when:</p> <p>1) All personnel have left the assembly area.</p> <p>2) There are any radiological issues that need to be addressed.</p> <p>3) Survey and release of the offsite assembly area itself is complete.</p>	<p>Modified content.</p> <p>This change reformats one task into two, simplifies steps, and renumbers for clarity.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>

Change	Original Content (Revision 15)	Revised Content (Revision 16)	Description of Change
55.	<p>Attachment 5</p> <p>1.d. Close out actions:</p> <p>1) Return equipment to Warehouse B, or other designated area if site is inaccessible.</p> <p>2) Provide assembly area documentation (survey forms, dosimetry records, etc.) to the Evacuation Coordinator.</p> <p>3) Inform the Evacuation Coordinator when all actions are completed.</p>	<p>Attachment 5</p> <p>1.e. Close out actions:</p> <p>1) Return equipment to Warehouse B (Bldg. 113), or other designated area.</p> <p>2) Provide assembly area documentation (survey forms, dosimetry records, etc.) to the Evacuation Coordinator.</p> <p>3) Inform the Evacuation Coordinator when all actions are completed.</p>	<p>Modified content.</p> <p>This change adds specific building number for Warehouse B.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required</p>
56.	<p>Attachment 7</p> <p>Post Evacuation Vehicle Monitoring Data</p> <p>Direct Survey results Frist</p>	<p>Attachment 7</p> <p>Post Evacuation Vehicle Monitoring Data</p> <p>Direct Survey Results Frisk</p>	<p>Modified content.</p> <p>This change is to correct a typographical area.</p> <p>This change does not affect how the current E-Plan meets any planning standard functions, elements, or site-specific commitments. No additional evaluation required.</p>