Gainesville Renewable Energy Center		SAFETY MAN	NUAL
Number:	Subject:	_	
SMP-2	Emergency Response Plan		
Approved for use by:	Current Issue: Rev. 0	Issue Date: 17 Jan 12	Last Review Date: 24 April 2013
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#### REFERENCES

None

## **SUB-SECTIONS**

None

## DOCUMENT REVISION HISTORY

Rev	Rev Date	Description of Changes / Comments		
D1	27 Aug 12	For Plant Review		
R0	08 Oct 12	Issued to Plant as Revision 0		

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

## 1. PURPOSE

The purpose of this Safety Manual Procedure is to establish guidelines for responding to plant emergencies. The instructions in this SMP apply to all plant personnel, contractors, and any others who may be on the plant site during a fire, chemical release or spill, medical emergency, severe weather, or bomb threat.

#### 2. **RESPONSIBILITIES**

- A. The Plant Manager has overall responsibility for the development, revision, and implementation of this plan and for assigning the associated responsibilities of Emergency Coordinator and Evacuation Coordinator to selected employees so that emergencies shall be effectively managed at all times of day or week.
- B. The Emergency Coordinator is responsible for conducting fire and evacuation drills. The Emergency Coordinator is responsible for ensuring the Fire Department is notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan. The Emergency Coordinator shall designate an Evacuation Coordinator if the emergency requires personnel to evacuate.
- C. The Control Room Operator will act as the Emergency Coordinator until relieved by management and shall account for all personnel on-site.
- D. The Evacuation Coordinator shall maintain communication with the Emergency Coordinator and keep a head count of all evacuated personnel in order to report the status to the Emergency Coordinator. The Evacuation Coordinator may be any qualified plant employee.
- E. All personnel will be trained on their work areas regarding fire routes, exits, the location and use of emergency equipment, and understanding and following this plan. All personnel who have contractors or visitors at the facility shall ensure that they are familiar with this plan.

#### 3. EMERGENCY RESPONSE OVERVIEW

This procedure provides immediate action steps to be used in a variety of emergencies. It is impossible to provide the exact steps to be followed in all emergencies and emergencies can involve several types of problems at once (a fire with corresponding injuries and a release of hazardous materials for example). Also, the sequence of actions in this procedure may not be the best sequence given the specific situation of an emergency. Steps in this procedure should be performed in an order that fits each situation, relying on sound judgment from plant operators.

## A. General Referencing

Use the Emergency Response Call Record Form (Appendix E) to document all notifications made during an emergency, including all instructions given by

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parties contacted. The Emergency Response Contact List (Appendix F) should be posted in the Control Room. Reporting guidelines for accidents and injuries, and for "near-miss" safety/environmental accidents, are covered later in this Safety Manual (SMP-14, Accident and Injury Reporting).

# 4. HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE (HAZWOPER)

#### A. SPILL RESPONSE PROCEDURE

The following steps will be done <u>immediately</u> upon observation of a hazardous material spill. This procedure is intended to be a concise list of the basic emergency response steps and must be used in conjunction with Hazardous Material Spill Training and Follow-up section below.

- 1. ENSURE that all personnel are evacuated from the spill area. Attend to any injured personnel.
- 2. EVACUATE the entire plant if it becomes necessary. Primary evacuation routes are shown in Appendix A. The Plant Manager or his designee may designate different evacuation routes at the time of the accident based on the information known at the time. Personnel may also be directed to go to a particular area of the plant to evacuate the area of the emergency if evacuation of the site is undesirable.
- 3. Additionally, if the emergency involves a toxic airborne release, the Plant Manager or his designee will EVALUATE the release and wind conditions and DETERMINE whether or not to evacuate plant personnel or "shelter-in-place". The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.

If the gas cloud is moving in the direction of the control room, SHUT DOWN all air conditioning and ventilation systems. All personnel in the building should enter the control room area and all doors leading to this area should be closed.

- 4. TAKE the necessary steps to MITIGATE the spill or release (e.g., SHUT OFF pumps, CLOSE valves, DISCONTINUE loading/unloading operations, etc.) if it safe to do so. If at all possible, STOP the spill at its source.
- 5. Immediately NOTIFY (Control Room Operator (or equivalent)) all personnel on-site of the spill/release.

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#### NOTE

The Plant Manager, NAES Headquarters Managers, and the Owner's Representative shall be notified as soon as possible. This requirement should never interfere with proper physical responses to the emergency.

- 6. The Plant Manager (or a designee) will INSTRUCT plant personnel for further spill response measures. At any time the Plant Manager determines that the spill or any measure needed to prevent, contain, control, or clean up the spill is beyond the ability or training of the facility manpower and/or equipment, he shall immediately CONTACT outside hazardous materials emergency responders and remediation contractors to help control/clean up the spill.
- 7. If the spill or release is of a nature that may place the public at risk, INITIATE public warnings through the local emergency agencies listed on the Emergency Response Contact List in Appendix F.
- 8. The Plant Manager or his designee will MAINTAIN plant security and communications. In no case shall members of the press be admitted without the approval of Owner Representative. The Owner Representative or his designee will handle all public relations, press releases, and outside inquiries.
- 9. Make every reasonable effort to keep the spill on the plant property. In the event that the material has been released from the containment system, all necessary steps shall be taken to prevent it from entering storm sewers, public waters, or from escaping the facility property as long as it is safe to do so.
- 10. REFER to MSDS sheets for proper use of personnel protective equipment.
- BUILD berms, PLACE absorbent materials, PLUG storm drain inlets, culverts, and ditches to stop the flow of the spill. If necessary, PLUG culverts of streams and drainage ditches leaving the plant to stop the flow of the spill.

#### NOTE

Plant personnel are only qualified to respond to a spill at the First Responder-Operations level. Response to the spill can involve operating equipment remotely or placing absorbents in the flow path, if done without placing employees in an unsafe condition.

12. DOCUMENT all events in detail as soon as possible.

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13. FOLLOW UP with all emergency response organizations, NAES headquarters, and the Owner Representative to ensure all reporting requirements have been met. REPORT all injuries in accordance with SMP-14, Accident, and Injury Reporting.

#### B. HAZARDOUS MATERIAL SPILL TRAINING AND FOLLOW-UP

This section provides details and information to be used in preparation for and response to emergencies involving hazardous materials incidents in compliance with OSHA Hazardous Waste Operations and Emergency Response Standard. This section is also to be used in conjunction with the facility Spill Prevention, Control, and Countermeasure Plan (SPCC) if the spill involves a fuel oil spill at the plant. The SPCC is required by EPA oil spill regulations 40 CFR 110 (which defines the discharge of oil) and 40 CFR 112.3 (which requires an SPCC). The SPCC is a spill prevention plan (that is, actions to be taken before the spill occurs), while this procedure is a spill response plan (that is, an action to be taken after the spill occurs).

Guidance pertaining to employee safety and training related to major hazardous materials releases and subsequent cleanup operations is contained in 29 CFR 1910.120, Hazardous Waste Operations and Emergency Response, referred to as HAZWOPER.

# Overview of Hazardous Materials

The chemicals listed in Appendix J possess characteristics which could, if released in an uncontrolled manner and in sufficient quantity (above a specified threshold quantity), necessitate an emergency response under regulations specified by 29 CFR 1910.120.

#### Hazardous Materials Release Guidelines

Incidental releases can be controlled, contained, and cleaned up by employees in the immediate area. No outside or special assistance is required. Nuisance spills and minor releases which do not require immediate attention (due to lack of danger to employees) would be considered within the normal activities and training of the employee.

Incidental releases, for the purposes of operator training and response activities pertaining to the unintended release of hazardous materials on-site, may be approached, controlled, stopped, absorbed, neutralized, and cleaned up as long as plant personnel do not endanger themselves, others, or the environment in the process.

Personnel will carry out system operations at a safe distance to minimize the severity of the release. Remote control of valves and pumps will be employed as available to minimize the necessity of approaching the point of origin of an incidental release. Personnel will employ PPE, as needed and for which they are

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trained, to minimize potential for contact with the released materials. Clean up and hazardous material disposal techniques will be followed to ensure safe and efficient return to normal operations.

Recording and reporting of the release should be made promptly as described in the Notification section below. The Plant Manager, or a designee, shall review the situation and notification requirements to determine what outside organizations are required to be notified. As a minimum, the Owner Representative and NAES Headquarters Managers shall be notified. Refer to the table for Reportable/Threshold Quantities for any Extremely Hazardous Substances that are stored on-site. Proper decontamination of equipment and PPE shall be implemented after the cleanup is completed.

A hazardous materials emergency response is any response effort by employees from outside the immediate release area or by other designated responders (i.e., mutual aid groups, local fire departments, etc.) to an occurrence which results, or is likely to result, in an uncontrolled release, which may cause high levels of exposure to toxic substances, or which poses danger to employees requiring immediate attention. No employee shall attempt to perform actions for which they have not been prepared, through training and experience, or for which they are not properly equipped. On-site and off-site training will be conducted both initially and on a continuing basis, as necessary, to ensure that personnel have the knowledge and experience to make a reasonable determination of the dangers when faced with a release situation.

If an uncontrolled release occurs resulting in an emergency, the designated offsite emergency response organizations shall be contacted. Refer to the Emergency Response Contact (Phone) List in Appendix F.

#### Resource Allocation

The Plant Manager has the authority to commit resources and funds for any spill remediation activity. He may delegate duties to other employees to expedite spill containment, clean-up, and disposal. In the event of a major spill or release, the Plant Manager will be in charge of the handling and cleanup of the toxic material. This resource would either be from the licensed spill cleanup company or a government agency (i.e., Ammonia supplier or other chemical supplier, Fire Department, or commercial response organization). The Plant Manager, or a designee, would remain in charge of the overall plant operation and coordination of spill response activities.

## **Emergency Response Training**

Training shall be based on the duties and functions to be performed by each employee. Documentation of such training, including program agendas (with a copy of any outlines, overheads or handouts) and training rosters shall be maintained.

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Facility response personnel are given instruction in emergency procedures related to a release of a hazardous substance or any hazardous chemical. Topics of instruction include emergency equipment (proper use, inspection and maintenance procedures), emergency systems (such as alarms/communications, key cut off systems for automatic feed systems), response procedures for fires, explosions, and spills (including spills to groundwater), and the organizational responsibilities of response personnel under the National Incident Management System.

#### First Responder Awareness Level

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They will take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

- 1. An understanding of what a hazardous substances are, and the risks associated with them in an incident
- 2. An understanding of the potential outcomes associated with an emergency created when hazardous substances are present
- 3. The ability to recognize the presence of hazardous substances in an emergency
- 4. An understanding of the role of the first responder awareness individual in the employer emergency response plan, including site security and control, and the DOT Emergency Response Guidebook
- 5. The ability to realize the need for additional resources, and to make the appropriate notifications to the communications center

#### First Responder Operations Level

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the spill from a safe distance, keep it from spreading, and prevent exposures. First responders at the operational level shall have received at least eight hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level:

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- 1. Knowledge of the basic hazard and risk assessment techniques
- 2. Knowledge of how to select and use proper PPE provided to the first responder operational level
- 3. An understanding of basic hazardous materials terms
- 4. Knowledge of how to perform basic control, containment and/or confinement within the capabilities of the resources and PPE available within their unit
- 5. Knowledge of how to implement basic decontamination procedures
- 6. An understanding of the relevant standard operating and termination procedures

#### Spill Response

Upon observation of a release of a hazardous material, chemical, or oil, employees shall immediately notify the Plant Manager with information concerning the spill, such as:

- 1. Employee name
- 2. Location of spill
- Type and quantity of material spilled
- Actions and result of actions taken to mitigate the spill
- 5. Circumstances that caused the spill

The Plant Manager, or his designee, will notify the necessary organizations and governmental agencies listed on the Emergency Contact (Phone) List in Appendix F. If necessary, the Plant Manager, or a designee, may contact outside Hazardous Materials Emergency Response organizations, and/or hazardous waste clean-up contractors to assist in the remediation of the spill.

The Plant Manager, or a designee, will also notify NAES management and the Owner Representative of all spills regardless of quantity and type as soon as practical.

The Plant Manager or his designee will provide the following information in the agency notification:

- 1. The facility name, exact location, and phone number
- 2. The source and cause of the spill

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- 3. The type (chemical name), volume of material released, and whether the material is classified as extremely hazardous
- 4. The volume estimated that reached navigable waters
- 5. The time, date, and duration of the spill
- 6. The medium of release (air, soil, water) and anticipated release movement
- 7. The action taken and anticipated
- 8. State whether evacuation is needed
- 9. The weather conditions, if applicable
- 10. Known health risks and required medical attention
- 11. Names of other parties contacted
- 12. Names of other parties to be contacted

Keep notifications factual and do not speculate. Keep a record of all notifications made including all instructions given by parties contacted using the Emergency Response Call Record Form shown on Appendix E

All inquiries from the media and the public should be referred to the Plant Manager, or his designee. Under no circumstances shall any plant personnel provide information to media or the general public concerning the spill. The Plant Manager will refer all inquiries to the Owner Representative.

#### NOTE

The following information is required in the above notification. An asterisk (\*) denotes information included in the SPCC plan.

- 1. A complete copy of the SPCC plan
- 2. Name, phone number, and address of the facility (\*)
- 3. Owner and operator name and address (\*)
- 4. Date and year of initial facility operation (\*)
- 5. Maximum storage capacity and average daily use (\*)
- 6. Description of the facility (\*)

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- Quantity and type of material spilled
- 8. Cause(s) of the spill(s)
- Corrective actions
- 10. Additional preventative measures
- 11. Other pertinent information

The plant staff shall investigate each incident that resulted in, or could reasonably have resulted in, a release of hazardous materials. An incident investigation shall be initiated as promptly as possible, but not later than 24 hours following the incident.

## Managerial Responsibilities

Managerial responsibilities following a Hazmat release include determining the origin of the incident, investigating the effectiveness of this procedure, and evaluating the potential need for modifications to this procedure and plant personal response. NAES will be responsible for the implementation and communication of any changes to this procedure following an accidental release of aqueous ammonia. A summary shall be prepared at the conclusion of the investigation that includes at a minimum:

- 1. Date of incident and investigation
- 2. A description of the incident
- 3. The factors that contributed to the incident
- 4. Any recommendations resulting from the investigation

The managers of the facility will promptly address and resolve the investigation findings and recommendations. Resolutions and corrective actions shall be documented. The findings shall be reviewed with all affected personnel whose job tasks are affected by the findings. Investigation summaries shall be retained for five years in the plant environmental files.

#### Spill Clean-up and Disposal Procedure

Cleanup will be conducted to coordinate collection for isolation and disposal of contaminated products and materials, as appropriate. The categories listed below will be isolated and secured independently. These steps are necessary to reduce costs associated with clean up and disposal of contaminated materials.

1. Recovered pure product for possible refining and reuse

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- 2. Contaminated PPE for separate disposal
- 3. Oiled debris for separate disposal, i.e., wood products
- 4. Contaminated soils for possible incineration or separate disposal
- 5. Absorbent materials for incineration

All residuals (recovered chemicals, contaminated clean up materials, and contaminated soil) resulting from spill remediation will be placed in containers that have been inspected for use as such.

Disposal of spilled material will meet all Federal and State regulations guiding the disposal of waste. Hazardous waste manifests will accompany containers of spill residues if the residue is determined by definitions of hazardous regulations to be hazardous. All required labeling and recordkeeping requirements will be followed.

Consult the applicable Material Safety Data Sheet for the substance to determine the appropriate cleanup procedures. Ensure all plant and contractor personnel assisting with the clean-up are aware of clean-up instructions and hazards listed on the MSDS.

Refer to the facility Environmental instructions for further guidelines on the disposal of hazardous materials. Additionally, contact NAES headquarters and or the NAES Environmental Support Services (ESS) Division for assistance, if needed.

#### 5. FIRE RESPONSE PROCEDURE

- A. In the event of any fire, immediately report the fire to the Control Room Operator (CRO) via plant radio, cell phone, or other means. The report to the CRO shall include the following:
  - 1. Your name
  - 2. Nature of event "Fire"
  - Location of the fire
  - 4. Severity of the fire
  - 5. Your planned action (e.g., evacuate or use fire extinguisher)
- B. Incipient stage fire means a fire which is in the initial or beginning stage and which can be controlled or extinguished by one person with one portable fire extinguisher. If the fire is in the incipient stage and you have been properly trained, respond using the appropriate fire response equipment.

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#### NOTE

If the fire progresses into a life-threatening event, immediately evacuate the area and notify the Control Room.

- C. In the event that the fire is beyond the incipient stage and requires outside emergency response the CRO will contact 911 and sound the plant evacuation alarm.
- D. To facilitate a quick response, the plant will designate a liaison to meet the Fire Response Service at the main entrance gate.
- E. The areas on-site that have been designated as "muster areas" are listed and locations identified in Appendix A
- F. Upon hearing the fire evacuation alarm, all personnel shall evacuate to their primary evacuation area.
- G. If necessary, a secondary evacuation area will be determined based upon site conditions and wind direction (as determined by the wind sock).
- H. The Visitor Log Book from the Administration Building should be utilized to aid in accounting for all personnel.
- I. Fire Evacuation Drills shall be conducted annually. At a minimum, the plant evacuation alarm shall be tested monthly. A written record of all drills shall be maintained. Any deficiencies observed shall be corrected.

#### 6. CHEMICAL RELEASE/SPILL PROCEDURE

- A. In the event of a chemical spill or release, immediately report it to the CRO via plant radio, cell phone, or other means. The report to the CRO shall include the following:
  - 1. Your name
  - 2. Nature of event "chemical spill/release"
  - 3. Location of the spill/release
  - 4. Chemical identity and severity of the spill/release (estimate quantity)
  - 5. Your planned action (ex. evacuate or close remote valve)
- B. Depending on the chemical and quantity involved, refer to section 4.B for steps necessary to respond to the spill.

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#### 7. MEDICAL EMERGENCIES

- A. All injuries must be reported to your supervisor, no matter how small. First Aid/CPR trained personnel will be called to respond to minor first aid injuries.
- B. If someone is seriously hurt, notify the CRO of the location of the injured person, nature of the injury, and any other important information related to the incident scene (ex. down power line next to injured person, chemical drum spill, etc.).
- C. The CRO will contact 911 to alert emergency crews. An individual will be designated to meet emergency crews at the main entrance gate.
- D. The CRO will make an announcement for all available First Aid/CPR trained personnel to report to the incident site. The First Aid/CPR trained personnel will administer first aid and any other measures within their training until the emergency crews arrive at the scene.
- E. If the situation warrants the rescue of an unconscious or immobile person from a confined space or an elevated surface, or in a personal fall arrest system the CRO will be instructed to dial 911 and shall explain to emergency personnel the type, location, and hazards of the area.

## 8. EARTHQUAKES, TORNADOS, AND SEVERE STORM EMERGENCIES

#### A. EARTHQUAKES

- 1. TAKE cover under a desk or strong table or in a doorway, or sit or stand against an inside wall.
- 2. STAY away from windows, glass, bookcases, and outside doors.
- DO NOT ATTEMPT to leave the building during a severe earthquake because of the hazards of downed power lines, falling debris from the building, etc.
- 4. MOVE away from buildings and utility wires.
- 5. WATCH for falling glass, electrical wires, poles or other debris.
- 6. CHECK for injuries and provide first aid as necessary.
- 7. CHECK for broken fuel lines and electrical faults. Isolate ruptures and faults as necessary.
- 8. CHECK for ruptures in systems containing hazardous chemicals. Isolate and contain spills.

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- 9. PLACE the plant in a safe condition by shutting down equipment as necessary.
- 10. AVOID using the telephone except for emergency notification.

#### B. TORNADOS AND SEVERE STORMS

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast. The Plant Manager shall be notified and will try to be on-site to determine appropriate action. If the Plant Manager cannot be contacted, the CRO shall determine the appropriate action.

During severe thunderstorms, caution should be used during outside activities. If thunderstorms are in the immediate area of the plant, outside activities should be curtailed. The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

The best protection in a tornado is usually an underground area. The best above ground areas in a building are:

- 1. Small interior rooms on the lowest floor without windows
- 2. Hallways on lowest floor away from outside doors and windows
- 3. Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.
- 4. Employees should be instructed to seek shelter areas as near as possible to inside walls, away from window areas. The CRO will make an announcement, and ensure that all personnel have been warned of the outside conditions and to seek shelter inside in a safe location.
- 5. Get as close to the floor as possible and against sturdy machinery that will prevent portions of the roof, etc. from striking directly should they fall.
- 6. Do not evacuate the building until dangerous wind levels have subsided. An automobile is not a safe place to be in these circumstances.
- 7. If outside, seek safety in a low-lying depression such as a ditch or ravine.
- 8. An announcement shall be made indicating when the tornado or severe storm has passed.
- 9. An investigative team shall be designated to inspect all outside plant areas looking for damages, down power lines, and other potentially dangerous conditions.

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#### 9. BOMB THREATS AND ACTS OF SABOTAGE

The events of September 11, 2001, coupled with the northeast power outage of August 14, 2003 and similar electrical disturbances have heightened the awareness of people worldwide to the threat of Sabotage to critical facilities in general and to the electrical infrastructure in particular. To protect the North American electrical infrastructure, NAES requires that all its power plant managers and operators shall understand and comply with the following NERC requirements.

# Recognition (NERC Standard CIP-001 R1)

Each NAES-managed power generating facility shall have procedures for the recognition of and for making their operating personnel aware of Sabotage events on its facilities and multi-site Sabotage affecting larger portions of the Interconnection.

## Response (NERC Standard CIP-001 R3)

Each NAES-managed power generating facility shall provide its operating personnel with Sabotage response guidelines, including personnel to contact for reporting disturbances due to Sabotage events.

#### Communication (NERC Standard CIP-001 R2)

Each NAES-managed power generating facility shall have procedures for the communication of information concerning Sabotage events to appropriate parties in the Interconnection.

#### Reporting (NERC Standard CIP-001 R4)

Each NAES-managed power generating facility shall establish communications contacts, as applicable, with local Federal Bureau of Investigation (FBI) officials and develop reporting procedures as appropriate to their circumstances.

#### A. RECOGNITION

Understanding when an act of Sabotage is taking place or is about to take place is the first step towards preventing the subsequent injury and damage that the event can ultimately result in. A variety of tools are available to each NAES-managed facility meant to be used in conjunction with the Emergency Response Plan for any actual or potential Acts of Sabotage. These tools are available as Appendices to this procedure and are described below:

 Appendix B – Bomb Threat Checklist contains a checklist to be used when a bomb threat is received over the phone. This will help the receiver of the call obtain as much information as possible to help find the source.

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- 2. Appendix C Suspected Bomb/Sabotage Device Safety Precautions contains a list of precautions to be taken around unidentified packages, bombs, and suspected Sabotage devices.
- Appendix G Electric Emergency Incident and Disturbance Report contains a copy of DOE Form OE-417, Electrical Emergency Incident and Disturbance Report.
- 4. Appendix H Electric Emergency Incident and Disturbance Report Instructions contains the DOE Instructions on how to fill in and submit DOE Form OE-417.
- 5. Appendix I Actions for Suspected Sabotage Events contains a list and description of potential Sabotage events as well as immediate actions to be taken in case of those types of events.

The Plant Manager and <u>all</u> plant personnel and visitors shall maintain and enforce a strict site security policy to try and avoid any potential Sabotage events.

#### B. RESPONSE

Although many threats turn out to be hoaxes, it is very important to not dismiss the possibility of injury and damage and treat every situation seriously. When a bomb threat or discovery of a suspected Sabotage event is discovered, remember to not panic, remain calm, and follow the steps below:

- 1. For any abnormal events that could potentially be acts of Sabotage, refer to Appendix I Actions for Suspected Sabotage Events.
- When a call is received regarding a bomb threat or other act of Sabotage, refer to Appendix B – Bomb Threat Checklist while keeping the following items in mind:
  - a. Engage the caller in as much conversation as possible and complete the checklist as the call progresses. If you are at a phone with caller ID, note the phone number of the caller.
  - b. Keep the caller on the line as long as possible. Ask the caller to repeat the message even if you fully understood the message the first time. This will stall or cause a delay and allow the operator more time to react properly and involve the necessary personnel.
  - c. If the caller does not give a location of the device, Sabotage method, or a time for the event, attempt to attain this information.

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- d. Inform the caller that the building is occupied and that such an event (explosion or equipment destruction) would result in serious injury or death to innocent people.
- e. Be aware of the caller's voice and any background noises that may assist in identifying the location of the call. Record your findings on the checklist.
- f. Attempt to have the caller speak to a designated member of management.
- g. Do not hang up until the conversation ends and the caller hangs up.
- 3. Maintain security and communications. The Plant Manager (or designee) shall maintain plant security by restricting access so that only essential plant personnel and emergency personnel are admitted. The telephones should be manned if there are enough people on-site. Two-way radio communication should be kept free to be used as needed. In no case shall members of the press be admitted without the approval of the Owner Representative. The Owner Representative or his designee will handle all public relations, press releases, and outside inquiries.
- 4. Quickly search the plant area for suspicious, unusual, or foreign items (suspected bombs/Sabotage devices), and report any findings, but do not touch, move, jar, disturb, or cover any suspicious items found. Observe the precautions listed in Appendix C. When police arrive, assist as necessary with a more detailed search of the plant.
- 5. If a suspicious item or bomb is located during the search, do the following:
  - a. Isolate and DO NOT TOUCH OR DISTURB the item.
  - b. Make notes of the location, appearance, colors, wires, etc.
  - c. Contact the civil authorities and management in person.
  - d. Do not use two-way radios or intercoms.

#### NOTE

At any time during these actions, the Plant Manager or on shift CRO can order the shutdown of equipment and evacuation if, in his judgment, there are strong indications of an immediate serious threat to the plant and/or its personnel.

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- 6. If the plant is evacuated at any point, do not return until after the police have declared the site safe.
- 7. Upon completion of the threat, the management team shall assemble to critique the handling of the situation. Any recommendations for improvement must be incorporated into the policy and re-training conducted with the necessary personnel.

# C. COMMUNICATION

- 1. Report the event to the police as soon as possible. Provide the police with the following information:
  - a. Your name
  - b. Your location and phone number
  - c. A detailed account of the event
  - d. If the event is a threat received (via phone or other method), report the following:
    - (1) Name of the initial recipient
    - (2) Name of any employee threatened by the caller
    - (3) Normal work location of any threatened employee
    - (4) Time the bomb is supposed to explode/Sabotage event is to occur
    - (5) Exact location of the bomb or Sabotage device
    - (6) Outside appearance or description of the bomb or device
- 2. Report information related to the suspected Sabotage event to your Transmission Operator, Balancing Authority, and any other entities involved with your interconnection to the Bulk Electric System. Contact information can be found in Appendix F Emergency Response Contact List.
- 3. Ensure that plant operating personnel are aware of the sabotage event.
- 4. When the police arrive at the site, the Plant Manager (or designee) shall brief the police as to:
  - a. Location of any emergency control valves or switches,

## SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

- b. Plant overall security status, and
- c. Any other information regarding the nature of the threat or event.

#### NOTE

Have all written records or notes of the threat available.

- 5. Appropriate assistance should be requested from the police including site protection and personnel protection during an evacuation.
- 6. As soon as the threat has been at least tentatively identified and controlled, notify the Plant Manager, the Owners Representative, and the NAES Headquarters Project Manager. Applicable telephone numbers are listed below for quick access. Additional contact information is provided in Appendix F and should be utilized as necessary based on the circumstances of the event.

**TABLE 1. Emergency Organizational Telephone Numbers for Threat Control** 

Name	Title	Home Telephone Number	Fax Number
Russell Abel	Plant Manager	352-575-3502	386-462-1565
Mark Gollini	NAES Project Manager	425-677-4375	425-961-4646
Len Fagan	Owners Representative	774-644-2240	

#### D. REPORTING

It is essential that any incident involving a real or suspected threat of Sabotage be reported as soon as reasonably possible.

Distribution of this information should be initiated by the immediate submission of an Electrical Emergency Incident and Disturbance Report (Form OE-417 Appendix G) to the US Department of Energy according to the instructions given in Appendix H. The Form OE-417 consists of an Alert Notice (Schedule 1) and a Narrative Description (Schedule 2) which must be submitted within the time frames described below (and as specified in the top portion of the Alert Notice).

Plant Personnel shall also establish communications, as appropriate based on the situation, with contacts of local Federal Bureau of Investigation (FBI) officials and inform them that you are submitting a DOE Form OE-417 as described above, including the contents of the submitted Report. The local contact for communication with FBI officials is listed below.

## SAFETY MANUAL PROCEDURE 2 (SMP-2)

Name:	Phone:

Emergency Response Plan

Use the information below (taken from OE-417) to ensure reporting takes place as directed by the Department of Energy.

**WITHIN ONE HOUR OF INCIDENT:** Schedule 1 and lines 13-17 of Schedule 2 must be filed if one or more of the following criteria are met

- 1. Physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations
- 2. Cyber event that causes interruptions of electrical system operations
- 3. Complete operational failure or shut-down of the transmission and/or distribution electrical system
- 4. Electrical System Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system
- 5. Uncontrolled loss of 300 Megawatts (MW) or more of firm system loads for more than 15 minutes from a single incident
- 6. Load shedding of 100 MW or more implemented under emergency operational policy
- 7. System-wide voltage reductions of 3 percent or more
- 8. Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the electric power system

**Note**: If the incident or disturbance is having a critical impact on operational events, respondents must balance their operational requirements with this mandatory reporting requirement. In such instances, telephone notification to the DOE Emergency Operations Center (202-586-8100) is acceptable, pending a written submission of the completed form.

**WITHIN SIX HOURS OF INCIDENT:** Schedule 1 and lines 13-17 of Schedule 2 must be filed if one or more of the following criteria are met and none of the eight criteria above apply

- 9. Physical attack that could potentially impact electric power system adequacy or reliability; or vandalism which targets components of any security systems
- Cyber event that could potentially impact electric power system adequacy or reliability

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

- 11. Loss of electric service to more than 50,000 customers for 1 hour or more
- 12. Fuel supply emergencies that could impact electric power system adequacy or reliability

**Update Report** — Schedule 1 and lines 13-17 in Schedule 2 should be resubmitted if significant information (or changes) regarding a reported incident or disturbance becomes available after the initial Emergency Alert or Normal Alert Report was submitted. Add the new information and/or changes to the original submission and resubmit the form, checking Update as the Alert Status on line 1 of the form.

**WITHIN 72 HOURS OF INCIDENT** A *FINAL REPORT* must be filed. An updated Form OE-417 Schedule 1 and all of Schedule 2 are both due within 72 hours of the incident to provide complete disruption information.

Complete and revise Schedule 1 as necessary and check "Final" as Alert Status on line 1.

On Schedule 2 provide a narrative description of the event and actions taken to resolve the incident. There are several specific subject blocks of space shown on the Schedule that are provided to gather the specific information. Include, as appropriate, the cause of the incident or disturbance, change in frequency, the equipment damaged, critical infrastructures interrupted, and affect on other electrical systems. Equivalent documents containing this information can be supplied to meet this requirement; this includes the North American Electric Reliability Corporation EOP-004 Disturbance Report.

#### 10. TRAINING

- A. All plant employees shall receive training on emergency response procedures on an annual basis.
- All newly hired employees shall receive this training during orientation.
- C. Contract employees must receive this training as integrated into the contractor orientation and training.

#### NOTE

In addition to the training, the appropriate number of radios shall be determined and issued to the Contractor Supervisor/Foreman.

- D. All plant employees training must include at a minimum the following:
  - 1. Familiarization with this plan
  - 2. Any Hazmat Training that may be applicable

# GAINESVILLE RENEWABLE ENERGY CENTER - GAINESVILLE, FL SAFETY MANUAL PROCEDURE 2 (SMP-2)

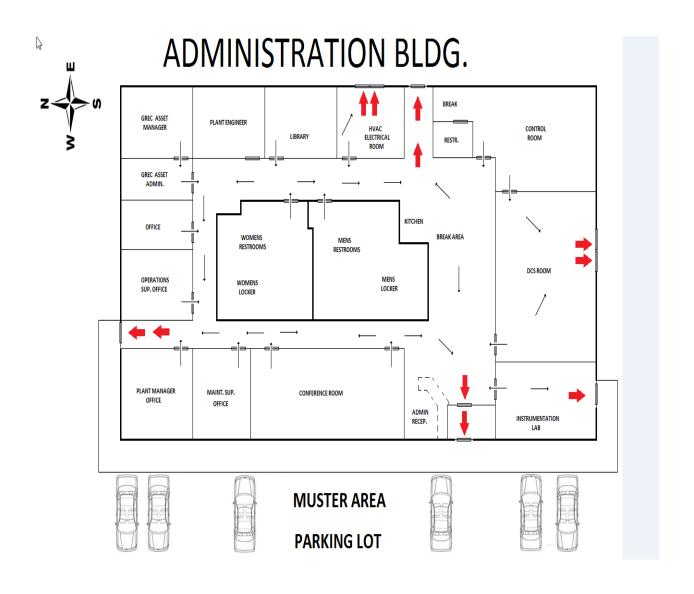
- 3. The use of any firefighting equipment available
- 4. Any special items or needs that may rise
- E. All contract employees training must include the following:
  - 1. A general overview of this plan
  - 2. Any special items or needs that may arise during the course of their stay on-site
- F. A written record must be maintained of all plant employees and contract employees who have received the training.

# GAINESVILLE RENEWABLE ENERGY CENTER - GAINESVILLE, FL SAFETY MANUAL PROCEDURE 2 (SMP-2)

**Emergency Response Plan** 

#### **APPENDIX A**

# **Facility Evacuation Route Diagram**



# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

Time of Hang-up\_\_\_\_\_

#### **APPENDIX B**

# **BOMB THREAT CHECKLIST**

Instructions: Have someone else call police (911) and keep caller on the line. Listen; do not interrupt the caller except to ask:

1. When will it go off?

2. Where is it planted?

3. What floor is it on?

4. What kind of bomb is it?5. What does it look like?

6. Why are you doing this?

7. Who are you?\_\_\_\_\_

8. Where are you?\_\_\_\_\_ Time of Call\_\_\_\_\_

Description of Caller:				
Voice Characteristics	Speech	Language		
Loud Soft High Pitch Deep Pleasant Raspy Intoxicated Other	☐ Fast ☐ Slow ☐ Distorted ☐ Stutter ☐ Nasal ☐ Slurred ☐ Precise ☐ Other	Excellent Good Fair Poor Four Other Use of Certain Words or Phases:		
Accent	Manner	Background Noises		
Local Not Local Foreign Regional Race Other  Explain:	Calm Angry Rational Irrational Coherent Incoherent Deliberate Emotional Righteous Laughing Is voice familiar? Sounds like	☐ Office ☐ Street   ☐ Machines ☐ Traffic   ☐ Factory ☐ Airplanes   ☐ Machines ☐ Trains   ☐ Bedlam ☐ Voices   ☐ Animals ☐ Music   ☐ Quiet ☐ Party   ☐ Mixed ☐ Atmosphere		

# Action to take immediately after call:

- 1. Notify plant management.
- 2. Notify Owner's Representative.
- 3. Notify NAES Headquarters' Management.
- 4. Forward a copy of this to parties above ASAP.
- 5. Write exact statement or caller below:

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

#### APPENDIX C

# Suspected Bomb/Sabotage Device Safety Precautions

The safety precautions below are designed to acquaint you with dangers inherent in the search, discovery, and handling of "suspected bombs" or "suspected Sabotage devices".

While some of the following safety precautions may seem elementary, do not dismiss them as unimportant nor take them for granted, because adequate knowledge of these precautionary provisions may save your life or the lives of other plant operators and visitors.

- 1. Do not touch a suspected object.
- 2. Do not shake, shock, or jar a suspected Bomb/Device.

## **WARNING**

The presence of nearby equipment/storage tanks that could present secondary hazards in the event of explosion or other Sabotage event.

- 3. Do not use radio equipment near the Bomb/Device to transmit messages.
- 4. Do not move light switches.
- 5. Do not smoke.
- 6. Do not accept the contents of any container as bona fide, simply because it was delivered by routine means.
- 7. Do not accept container markings and/or appearance as sole evidence of their contents' identification and legitimacy.
- 8. Do not cover a suspected bomb/device.
- 9. Do not carry a suspected bomb/device.
- 10. Do not assume that a suspected bomb/device is of a specific (high explosive or incendiary) type.
- 11. Do not open any suspicious container or object.
- 12. Do not cut a string, cord, or wire on a suspicious container or object.
- 13. Do not cut or remove the wrapper on a suspicious object or container.
- 14. Do not unscrew the cover, move the latch or hook on the cover, or raise or remove the cover of a suspicious container.
- 15. Do not change the position of a suspicious container or object.
- 16. Do not place a suspicious container or object into water.

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# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

#### **APPENDIX D**

# **Emergency Response Event Log**

Emergency Description:				
Date and Time of Emergency:				

Note: Log all events associated with the emergency chronologically. Keep logs factual and concise.

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

# **APPENDIX E**

# **Emergency Response Call Record Form**

Emergency Description:						
Date and	Date and Time of Emergency:					
Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact			
Descriptio	n of Correspondence:					
		_				
Time	O-manay/A consy Natified	Company/Aganay Contact	NATC LIO Contact			
Time	Time Company/Agency Notified Company/Agency Contact NAES HQ Co					
Descriptio	n of Correspondence:					
		_				
Time	Company/Agency Notified	Company/Agency Contact	NAES HQ Contact			
1 11.1.0	Odinpanyii igonoj i iomios	Ouripariyir igonoy Contact	TO LEGITIC COMMON			
Descriptio	n of Correspondence:					

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# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

#### **APPENDIX F**

# **Emergency Response Contact List**

Contacts should be made in the following order whenever possible. However, if contact cannot be made after two attempts, move on to the next level.

Event	Contact Title	Phone 1	Phone 2	Comment
Sabotage/Bomb Threat/Event	Local Emergency Services	911		
	Plant Manager	352-575-3502		
	GRU Dispatcher	(352) 393-6421		
	FBI	352-372-9600	904-248-7000	

# GAINESVILLE RENEWABLE ENERGY CENTER - GAINESVILLE, FL SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

## **APPENDIX G**

# **DOE Form OE-417**

# ELECTRIC EMERGENCY INCIDENT AND DISTURBANCE REPORT

(Instructions are provided in Appendix H.)

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

U.S. Department of Energy Electricity Delivery and Energy R Form OE-417  NOTICE: This report is mandatory us law. For the sanctions and the provision Title 18 USC 1001 makes it a criminal	dentiality of information submitte	EPORT in criminal fines, ed on this form, se	ee General Information portion	2.03 hours ons as provided by of the instructions.		
RESPONSE DUE: Within 1 hour of the hours of the incident, submit Schedule 1 report (all of Schedules 1 and 2) within 7	ats as to any matter we e incident, submit Scho and lines 13-17 in Sch	vithin its jurisdiction.  edule 1 and lines 13-17 in Schedule 2 as a Normal Report if on	ıle 2 as an Emerge	ency Alert report if criteria 1-8	are met. Within 6	
	N	<b>METHODS OF FILING RESPO</b> a completed copy of this form fo				
E-mail: Submit your form via of FAX: FAX your Form OE-4	mail as an attachmen to the following fact mail or fax the form,	g the link at <a href="http://www.oe.netl.d">http://www.oe.netl.d</a> t to <a href="does.gov">doehqeoc@hq.doe.gov</a> simile number: (202) 586-8485. <b>please c</b> all and report the inform	(Use if e-mail is ration to the follow	not available.) ving telephone number: (202) 5	86-8100.	
		LE 1 ALERT NO riteria for Filing (Check all that		1 of 3)		
		ee Instructions For More Inform				
1. [	•	at causes major interruptions or i	•		erations	
3. [ If any box 1-8 on the right is checked, this form must be filed	4. [ ] Electrical System Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise					
within 1 hour of the incident; check Emergency Alert (for the Alert Status) on <b>Line 1</b> below.	2) 5. [ ] Uncontrolled loss of 300 Megawatts or more of firm system loads for more than 15 minutes from a single incident					
3) 4) 5)		shedding of 100 Megawatts or mo	•	under emergency operational po	olicy	
7) 8)	8) 8. [ ] Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the electric					
which targets components  checked AND none of the boxes 1-8 are checked, this form must be filed within 6 hours of the incident; check Normal Alert (for the Alert  Status) on Line 1 below  which targets components 10) 11) 12) 13) 11. [ ] Loss 14)		nd attack that could potentially import any security systems  r event that could potentially imp	_		y; or vandalism	
		of electric service to more than 50 upply emergencies that could imp			7	
If significant changes have occurred after	If significant changes have occurred after filing the initial report, re-file the form with the changes and check Update (for the Alert Status) on <b>Line 1</b> below.					
<u> </u>	thin 72 hours of the in-	cident with the latest information	and with Final (f	or the Alert Status) checked on	Line 1 below	
LINE NO. ORGANIZATION FILING			N 111 . F			
1. Alert Status (check one)		Emergency Alert [ ] 1 Hour	Normal Alert [ 6 Hours	] Update [ ] As required	Final [ ] 72 Hours	
2. Organization Name						
3. Address of Principal Business	Office					

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

U.S. Department of Energy Electricity Delivery and Energy Reliability Form OE-417		LECTRIC EMERGENCY INCIDENT AND DISTURBANCE REPORT AND DISTURBANCE REPORT Burden Per Response: 2.03 hours
	SCHEDULE	E 1 ALERT NOTICE (page 2 of 3)
	INCIDENT AND DISTURBANCE DATA	
4.	Geographic Area(s) Affected	11. Unknown [ ]
5.	Date/Time Incident Began (mm-dd-yy/hh:mm) using 24-hour clock	
6.	Date/Time Incident Ended (mm-dd-yy/ hh:mm) using 24-hour clock	
7.	Did the incident/disturbance originate in your system/area? (check one)	Yes [ ]
8.	Estimate of Amount of Demand Involved (Peak Megawatts)	Unknown [ ]
9.	Estimate of Number of Customers Affected	Unknown [ ]

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

10. Type of Emergency Check all that apply			11. Cause of Incident Check if known or suspected	12. Actions Taken Check all that apply
Physical Attack	[	]	Complete Electrical System Failure [ ]	Shed Firm Load [ ]
Cyber Event	[	]	Electrical System Separation – Islanding [ ]	Reduced Voltage [ ]
Major Transmission System Interruption	[	]	Inadequate Electric Resources to Serve Load [ ]	Made Public Appeals [ ]
Major Generation Inadequacy	[	]	Actual or Potential Attack/Event Physical Attack [ ] Cyber Event [ ] Vandalism [ ]	Implemented a Warning, Alert, or Contingency Plan  [ ]
Major Distribution System Interruption	[	]	Transmission Equipment [ ]	Shed Interruptible Load [ ]
Other	[	]	Loss of Part or All of a High Voltage Substation or Switchyard (230 kV + for AC, 200 kV+ for DC).	Repaired/Restored [ ]
Additional Information/Comments:			Weather or Natural Disaster [ ]	Mitigation(s) Implemented [ ]
			Operator Action(s) [ ] Fuel Supply Deficiency (e.g., gas, oil, water) [ ]	• Other [ ]
			Unknown Cause [ ] Other [ ] Additional Information/Comments:	Additional Information/Comments:

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

					Emergency Response Flan
U.S. Department of Energy Electricity Delivery and Energy Reliability Form OE-417				RGENCY INCIDENT BANCE REPORT	Form Approved OMB No. 1901-0288 Approval Expires 01/31/15 Burden Per Response: 2.03 hours
12. SCHEDULE 2 NARRATIVE DESCRIPTION (page 3 of 3)					
THIS INFORMATION IS CONSIDERED PROTECTED					
NAME OF OFFICIAL THAT NEEDS TO BE CONTACTED FOR FOLLOW-UP AND ANY ADDITIONAL INFORMATION					
13. 14.	Name Title				
15.	Telephone Number		( )-( )-(	)	
16. 17.	FAX Number E-mail Address		( )-( )-(	)	
Provide a description of the incident and actions taken to resolve it. Include as appropriate, the cause of the incident/disturbance, change in frequency, mitigation actions taken, equipment damaged, critical infrastructures interrupted, effects on other systems, and preliminary results from any investigations. Be sure to identify: the estimate restoration date, the name of any lost high voltage substations or switchyards, whether there was any electrical system separation (and if there were, what the islanding boundaries were), and the name of the generators and voltage lines that were lost (shown by capacity type and voltage size grouping). If necessary, copy and attach additional sheets. Equivalent documents, containing this information can be supplied to meet the requirement; this includes the NERC EOP-004 Disturbance Report. Along with the filing of Schedule 2, a final (updated) Schedule 1 needs to be filed. Check the Final box on line 1 for Alert Status on Schedule 1 and submit this and the completed Schedule 2 no later than 72 hours after detection that a criterion was met.  18. Narrative:					
19. Estimated Restoration Date for all Affe Who Can Receive Power			cted Customers		 mo dd yy
20. N	Name of Generator(				77
(Fo	ge Line(s) system re (terminal points) r these losses, please ground nerator type and voltage	up by			
21. Ic	lentify Name of Los	st High			
	tage Substation(s) a Switchyards	_			
(230	kV + for AC 200 kV+ f	for DC)			
descrip	dentify Electrical S Separation: Islandin Boundaries (DOE needs a basic otion/understanding of the rating resources to load p	ng he linked			

# GAINESVILLE RENEWABLE ENERGY CENTER - GAINESVILLE, FL SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

#### **APPENDIX H**

# **DOE Form OE-417 Instructions**

# ELECTRIC EMERGENCY INCIDENT AND DISTURBANCE REPORT, INSTRUCTIONS FOR

**DOE Form OE-417** 

(Blank Form is provided in Appendix G)

# OE-417 ELECTRIC EMERGENCY INCIDENT AND DISTURBANCE REPORT

#### **QUESTIONS**

If you have any questions about Form OE-417 after reading the instructions, please contact Brian Copeland at (202) 586-1178, FAX Number (202) 586-2623 or E-mail: <a href="mailto:brian.copeland@hq.doe.gov">brian.copeland@hq.doe.gov</a>.

For additional information write to the following address:
Assistant Secretary, Office of Electricity Delivery and Energy Reliability
(OE-1)1000 Independence Ave, SW Washington, DC 20585

Emergency Contact: DOE Operations Center Telephone Number: (202) 586-8100 FAX Number: (202) 586-8485 Email: <a href="mailto:doehqeoc@hq.doe.gov">doehqeoc@hq.doe.gov</a>.

#### **PURPOSE**

The Department of Energy (DOE), under its relevant authorities, has established mandatory reporting requirements for electric emergency incidents and disturbances in the United States. DOE collects this information from the electric power industry on Form OE-417 to meet its overall national security and Department of Homeland Security's National Response Framework responsibilities. DOE will use the data from this form to obtain current information regarding emergency situations on U.S. electric energy supply systems. DOE's Energy Information Administration (EIA) will use the data for reporting on electric power emergency incidents and disturbances in monthly EIA reports. The data also may be used to develop legislative recommendations, reports to the Congress and as a basis for DOE investigations following severe, prolonged, or repeated electric power reliability problems.

#### **HOW TO SUBMIT**

<u>Online</u>: An online form is now available at <a href="http://www.oe.netl.doe.gov/oe417.aspx">http://www.oe.netl.doe.gov/oe417.aspx</a>. The online form is now the preferred delivery method.

Instructions on how to report via e-mail, facsimile, or telephone are printed on Schedule 1 of Form OE-417.

<u>E-mail</u>: If you experience problems using the online form, you may submit your form via e-mail as an attachment to <u>doehgeoc@hq.doe.gov</u>.

<u>Fax:</u> If you experience problems submitting via the online submission form or email, you may fax the form to the following facsimile number. (202)586-8485.

<u>Telephone:</u> If you experience problems submitting via online, email, or fax, please call and report the information to the following telephone number: (202) 586-8100. This telephone number is staffed 24/7.

# COPIES OF SURVEY FORMS AND INSTRUCTIONS

Copies in portable document format (PDF) and word format (DOC) are available on OE's website. You may access the materials by following the steps:

- Go to OE's Electric Emergency Incident And Disturbance Report website at http://www.oe.netl.doe.gov/oe417.aspx.
- Click on the hypertext link for the Form or for the Instructions.

#### **GENERAL INSTRUCTIONS**

Form OE-417 is mandatory pursuant to Section 13(b) of the Federal Energy Administration Act of 1974 (Public Law 93-275). The form is considered an emergency form filed only when at least one of the criteria for filing the form, on page one of the form, is met.

The Form OE-417 alerts the Department of Energy to electrical emergency incidents and disruptions. The ability of DOE to quickly respond to energy emergencies that may impact the Nation's infrastructure and to help alleviate or prevent further disruptions depends on industry's prompt response. As such, the initial timely filing of this form is of paramount importance. Many electric utilities have received approval to operate the Balancing Authority and/or Reliability Coordinator functions from the North American Electric Reliability Corporation (NERC). In addition, electric utilities also have computer centers and physical security departments. (Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs) are established by the Federal Energy Regulatory Commission and are considered electric utilities.)

#### WHO MUST SUBMIT

- Balancing Authorities (BA), Reliability
  Coordinators (RC), some Generating Entities, and
  Electric Utilities, including those located Puerto Rico,
  the Virgin Islands, Guam or other U.S. possessions
  are responsible for completing all relevant portions of
  the form when any of the criteria are met requiring the
  filing of Form OE-417.
  - All electric utilities must provide information to a BA when necessary for their reporting obligations and file Form OE-417 in cases where a BA will not be involved.
    - Note: this includes U.S. based utilities for whom balancing authority oversight responsibilities are handled by electrical systems located across an international border.
  - Foreign utilities, handling U.S. balancing authority responsibilities, may wish to file this information voluntarily to the DOE. Any U.S.-based utility in this international situation must inform DOE that

these filings will come from a foreign-based electric system.

 Computer centers and physical security departments of electric utilities may file directly with OE on the selected areas identified in the Form OE-417instructions.

Note: This information does not have to flow directly into the officials running the BA and RC and then be forwarded to DOE.

 Joint filing: BAs' and RCs' can file notifications for joint filings. BAs can also file a combined report with electric utilities under their electrical oversight or all information is passed to the BA who then files a single report.

Note: OE requests that it be notified of those entities that plan to file jointly and of those electric utilities that want to file separately. (Notification can be done at the time of the filing.)

# FUNCTIONAL RESPONSIBLITY OF FILING ENTITIES

All entities must file on all line items except for the following exclusions:

- ELECTRIC UTILITIES There are no exclusions allowed, all items need to be addressed.
- BALANCING AUTHORITY (BA) Reporting on the count of customers (and the amount of load, if the BA is based at a regional transmission organization or independent system operator) is required only for the final report. A BA located in vertically integrated utilities, a municipality, federal utility, state-owned or cooperative will report the amount of load and counts of customers.
- RELIABILITY COORDINATORS (RC) Reporting on the count of customers is excluded. If the RC has an agreement with the regional transmission organization to supply the customer counts, the RC can supply this information.
- GENERATING ENTITIES Entities who have 300 MW or more of generation dedicated to one or more end-use customers (e.g. retail or industrial customers) are required to file the form under criterion number 5.
- LOCAL UTILITIES IN ALASKA, HAWAII, PUERTO RICO, THE U.S. VIRGIN ISLANDS, AND THE U.S. TERRITORIES - If the local electrical system is less than 300 MW, then only file if criteria 1, 2, 3 or 4 are met.
- Computer, telecommunication, and physical security offices That support the BA, RC, and electric utility or are located within the entity - these support centers or offices can file information, in lieu of the emergency offices, on criteria 1, 2, 9 or 10 in direct submissions to DOE. These support centers or offices will address no other incident types.

#### WHEN TO SUBMIT

Form OE-417 is considered an emergency form. Schedule 1 and lines 13-17 in Schedule 2 of the form must be submitted to the DOE only when at least one of the twelve criteria on page one of the form is met. Depending on the nature of the situation, the Form OE-417 must be filed either within one hour or six hours of the incident.

#### Criteria for Filing:

Within One Hour of Incident: Schedule 1 and lines 13-17 of Schedule 2 must be filed if one or more of the following criteria are met

- Physical attack that causes major interruptions or impacts to critical infrastructure facilities or to operations
- Cyber event that causes interruptions of electrical system operations
- Complete operational failure or shut-down of the transmission and/or distribution electrical system
- Electrical System Separation (Islanding) where part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system
- Uncontrolled loss of 300 Megawatts (MW) or more of firm system loads for more than 15 minutes from a single incident
- 6. Load shedding of 100 MW or more implemented under emergency operational policy
- 7. System-wide voltage reductions of 3 percent or more
- Public appeal to reduce the use of electricity for purposes of maintaining the continuity of the electric power system

**Note**: If the incident or disturbance is having a critical impact on operational events, respondents must balance their operational requirements with this mandatory reporting requirement. In such instances, telephone notification to the DOE Emergency Operations Center (202-586-8100) is acceptable, pending a written submission of the completed form.

**WITHIN SIX HOURS OF INCIDENT**: Schedule 1 and lines 13-17 of Schedule 2 must be filed if one or more of the following criteria are met and none of the eight criteria above apply

- Physical attack that could potentially impact electric power system adequacy or reliability; or vandalism which targets components of any security systems
- Cyber event that could potentially impact electric power system adequacy or reliability
- Loss of electric service to more than 50,000 customers for 1 hour or more
- 12. Fuel supply emergencies that could impact electric power system adequacy or reliability

**Update Report** — Schedule 1 and lines 13-17 in Schedule 2 should be re-submitted if significant information (or changes) regarding a reported incident or disturbance becomes available after the initial Emergency Alert or Normal Alert Report was submitted. Add the new information and/or changes to the original submission and resubmit the form, checking Update as the Alert Status on line 1 of the form.

WITHIN 72 HOURS OF INCIDENT A FINAL REPORT must be filed. An updated Form OE-417 Schedule 1 and all of Schedule 2 are both due within 72 hours of the incident to provide complete disruption information.

Complete and revise Schedule 1 as necessary and check "Final" as Alert Status on line 1.

On Schedule 2 provide a narrative description of the event and actions taken to resolve the incident. There are several specific subject blocks of space shown on the Schedule that are provided to gather the specific information. Include, as appropriate, the cause of the incident or disturbance, change in frequency, the equipment damaged, critical infrastructures interrupted, and affect on other electrical systems. Equivalent documents containing this information can be supplied to meet this requirement; this includes the North American Electric Reliability Corporation EOP-004 Disturbance Report.

#### **SPECIFIC INSTRUCTIONS**

<u>Definitions</u> of electric power industry terminology and other terms are available on the EIA website and in Appendix B, the Glossary for these instructions. Refer to the above for details on accessing the EIA website. Please refer to these definitions before completing the survey form.

#### Schedule 1

Criteria for filing Examine the Criteria for Filing on page 1 of the form to determine if a form needs to be filled out. Check all criteria (boxes 1–12) that apply to the situation or incident. If any of criteria 1-8 apply to the incident, then a report must be filed within one hour of the incident and respondents should check the Emergency Alert box on Line 1. If any of the boxes 9-12 are checked AND none of the boxes 1-8 have been checked, then the form must be filed within 6 hours of the incident and respondents should check the Normal Alert box on the Alert Status (line 1). An updated Schedule 1 also should be submitted with all of Schedule 2 filled out as the Final Report, 72 hours after the incident.

#### Organization Filing section Lines 1 – 3

• Line 1, Alert Status: check the Emergency Alert box if at least one of criteria 1-8 apply; check Normal Alert box if only one or more of criteria 9-12 apply; check Update box if this filing is a re-submission due to important changes or corrections from the prior submission; check Final box to indicate this is the final report submitted for the incident, which should be filed 72 hours after the incident or disturbance was detected to have met one of the 12 criteria.

• Lines 2 and 3: enter the name and address of the organization filing the report.

**Incident and Disturbance Data** -- Completely fill out all parts of Lines 4-13 that apply

- Line 4 Geographic Area(s) Affected, enter the name of the State(s) and political subdivision(s) (i.e., city, town, county, etc.) affected by the incident. Please identify in general terms the largest area affected by the incident. (This does not represent a requirement to list all the cities and towns in a region or State.) If you are unsure what geographic areas are affected at the time of the initial submission of Schedule 1 of the form, check the unknown box; when the geographic locations are determined fill in this data on line 4 of the form and re-submit the form, checking the Update or Final Alert Status box on line 1, as applicable.
- Line 5 Date/Time Incident Began (mm-dd-yy/hh:mm), enter the month, day, and year, the time, in 24-hour time format, and check the appropriate time zone when that the incident began.
- Line 6 Date/Time Incident Ended (mm-dd-yy/hh:mm), enter the month, day, and year, the time, in 24-hour time format, and check the appropriate time zone when the event no longer met any of the 12 criteria.
- Line 7 Did the incident/disturbance originate in your system/area? If known, check the Yes or No box; otherwise check the unknown box. If the unknown box is checked at the time of initial submission, and later this is determined, check the Yes or No box as applicable when re-submitting the form as either an Update or Final report.
- Line 8 Estimate of Amount of Demand Involved (Peak Megawatts), enter the amount of the peak demand involved over the entire incident. In the Emergency or Normal alert, if amount is unknown and you are unable to make an estimate, then leave this blank. Provide the actual number or an estimate in any Update notice or Final report.
- Line 9 Estimate of Number of Customers Affected, enter the total number of customers affected during the entire incident or disturbance which could be more than the peak number in the case of rolling blackouts. If this number cannot be estimated when the form is initially submitted, check the unknown box; when the number of customers can be estimated, fill in this data on line 9 of the form and re-submit the form, checking the Update or Final Alert Status box on line 1, as applicable.
- Line 10 Type of Emergency check all options that apply:
  - Physical Attack: An attack on any part of your system suspected of being a deliberate attack or sabotage that disrupts system operations or had the intent to harm the national security of the United States. Note: If burglary or vandalism is suspected check Vandalism under Line 12 instead.
  - Cyber Event: A disruption on the electrical system and/or communication system(s) caused by

- unauthorized access to computer software and communications systems or networks including hardware, software, and data.
- Major Transmission System Interruption: An event has occurred that required action(s) to relieve voltage or loading conditions; or transmission separation or islanding has occurred.
- Major Generation Inadequacy: Insufficient generation exists to meet demand, or unexpected problems or inadequacies develop that impact operational and/or system reliability.
- Major Distribution System Interruption: A significant uncontrolled loss of load has occurred, or an unexpected controlled loss of load is required.
- Other: Check if the type of emergency is known, but not one of those listed above or if the type of emergency is unknown.
- Additional Information/Comments: Include any description of the type of emergency which can be publically released.
- Line 11, Cause of Incident, check all of options that apply:
  - Complete Electrical System Failure: check if total system failure occurred.
  - Electrical System Separation Islanding: check if Islanding has occurred.
  - Inadequate Electric Resources to Serve Load: check if resource constraints have been identified or are expected to happen that limit the availability of power sources to serve load or if electric resources are not available.
  - Actual or Potential Attack/Event: check if there
    was an actual attack or reason to suspect that the
    disruption was intentionally caused (or that there
    was an attempt), check all of the following that may
    apply:
    - **Physical Attack**: for disruption of the system caused by physical means such as destruction of property or an attack on any security system.
    - **Cyber Event:** for disruption of the electrical system and/or communication system caused by unauthorized access to computer software and communications systems or networks including hardware, software, and data.
    - **Vandalism** -- the criteria for reporting of vandalism have been separated into two parts. The primary requirement is defined by the severity of impact.
    - Report incidents that include vandalism or threat actions which attempt to or circumvent significant security systems which protect key

- components used to operate the Nation's electric power systems have to be reported at all times.
- ii. A secondary reporting requirement on vandalism will not be activated for much/all of the three-year clearance cycle. This secondary requirement would be imposed on reporting of all other types of attempts or damage inflicted upon security protection within the electric power industry (e.g., cutting of locks and fences), but the obligation to report at this level and the duration of time period for which these reports have to be will be reviewed by DOE. If this becomes a reporting requirement, DOE will notify the respondents that the reporting threshold has to be met and will identify the reporting population for the duration of reporting at that level. The notification will be done by e-mail to the respondents and by an alert to critical energy infrastructure protection centers. The threat or other determination that obligates' DOE to activate this lower reporting level is directly linked to national security concerns.
- Transmission Equipment: check if failure of or damage to transmission equipment occurred, causing disruption to service or reliability.
- Loss of Part or All of a High Voltage Substation or Switchyard: check if substations or switchyards (230+ kV AC or 200+ kV DC) were adversely affected, causing disruption to service or reliability.
- Weather or Natural Disaster: check if severe weather (thunderstorms, ice storms, etc.) or natural disasters (hurricanes, floods, tornadoes, solar activity, etc.) have caused service disruption.
- Operator Action(s): check if service or reliability disruption is attributable to operator action.
- Fuel Supply Deficiency: check if an existing or anticipated fuel supply emergency situation occurred.
- **Unknown Cause:** check if the cause of the disruption is unknown.
- Other: Check if the cause of the disruption is known, but not one of those listed above.
- Additional Information/Comments: Include any description of the cause of the incident which can be publically released.
- Line 12, Actions Taken, check all of options that apply:
  - Shed Firm Load: check if, in order to maintain the bulk power system, system operators called for load shedding of 100 MW or greater of firm-load customers' demand, or if firm load customers were disconnected from the bulk power system during emergency conditions.
  - Reduced Voltage: check if system wide voltage reductions of 3 percent or greater were implemented.
  - Made Public Appeals: check if public appeals to

reduce the use of electricity for purposes of maintaining the continuity of the bulk electric power system were issued. Check only if appeals were issued during emergency conditions. Do not check if appeals were energy conservation related.

- Implemented a Warning, Alert, or Contingency Plan: check if existing short-term contingency plans were implemented to reduce demand, maximize generation to maintain the bulk power system, and/or address other reliability issues.
- Shed Interruptible Load: check if, in order to maintain the bulk electric system, system operators called for load shedding of 100 MW or greater of pre-selected interruptible load customers' demand, or if those interruptible customers were disconnected from the bulk power system during emergency conditions. Do not check if terminations were under contract agreements during normal operations.
- Repaired/Restored: check if system was repaired or restored.
- Mitigation(s) Implemented: check if mitigations for the event were implemented
- Other: check if other actions were taken
- Additional Information/Comments: Include any description of the actions taken that which be publically released.
- For items that are unknown, check the "unknown" box, and update that Line when the information becomes available in as an update filing or final report.

#### Schedule 2

When to File: Lines 13-17 of Schedule 2 must be filed 1 or 6 hours after the incident. All of Schedule 2 must be filed within 72 hours of the incident along with an updated Schedule 1.

- Lines 13-17 Name of Official that needs to be contacted for follow up. Fill in contact information on official to contact for follow up.
- Line 18 Narrative: Provide a description of the incident and actions to resolve it.
- Provide an estimate when restoration of customers who are able to receive power will be complete.
- Provide the information on generators, lines system reference, substations, system separation, etc causing or impacted by the event.
- Provide details of any unit, process, system or critical component failures. Use additional sheets if necessary

#### **SPECIAL INVESTIGATIONS**

Under its authorities, DOE may instigate a special investigation into incidents affecting the electric power industry that involve more than BAs and Reliability

Coordinators. DOE may address any energy concern or may contact any utility or business entity that participates in the electric power industry for technical information concerning a particular incident. These special investigations are infrequent.

# PROVISIONS REGARDING CONFIDENTIALITY OF INFORMATION

The information reported on Schedule 1 will be considered "public information" and may be publicly released in company or individually identifiable form, and will not be protected from disclosure in identifiable form.

All information on Schedule 2 of the form will be protected and will not be disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905. The DOE will protect the information in accordance with its confidentiality and security policies and procedures.

The Federal Energy Administration Act requires the DOE to provide company-specific protected data to other Federal agencies when requested for official use. The information reported on this form may also be made available, upon request, to another component of DOE; to any Committee of Congress, the General Accountability Office, or other Federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any nonstatistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are applied to the statistical data published from OE-417 survey information to ensure that the risk of disclosure of identifiable information is very small.

The data collected on Form OE-417, Electric Emergency Incident and disturbance Report will be used by DOE to meet its overall national security and Federal Emergency Management Agency's National Response Framework responsibilities.

#### **SANCTIONS**

DOE is authorized to collect the information on Form OE-417 under the Federal Energy Administration Act of 1974 (Pub. L. No. 93-275, 15 U.S.C. 761 et seq.) as amended, the Federal Power Act (16 U.S.C 791a et seq.), the DOE Organization Act (Public Law No. 95-91, 42 U.S.C. 7101 et seg.) as amended, and the Public Utility Regulatory Policies Act of 1978, Sect. 209 (Public Law No. 95-317, 92 stat. 3117, 16 U.S.C. 824a-2). The timely submission of Form OE-417 by those required to report is mandatory under Section 13(b) of the Federal Energy Administration Act of 1974 as amended. Failure to respond may result in a penalty of not more than \$2,750 per day for each civil violation or a fine of not more than \$5,000 per day for each criminal violation. The government may bring a civil action to prohibit reporting violations, which may result in a temporary restraining order or a preliminary or permanent injunction without bond. In such civil action, the court may

also issue mandatory injunctions commanding any person to comply with these reporting requirements. Title 18 U.S.C. 1001 makes it a criminal offense for any person knowingly and willingly to make to any Agency or Department of the United States any false, fictitious, or fraudulent statements as to any matter within its jurisdiction.

# FILING FORMS WITH THE FEDERAL GOVERNMENT AND ESTIMATED REPORTING BURDEN

Respondents are not required to file or reply to any Federal collection of information unless it has a valid OMB control number. The public reporting burden for Schedule 1 is estimated to average 10 minutes per response and 2 hours for Schedule 2, including reviewing the form and instructions, gathering information, and submitting the form during an emergency situation. In addition DOE estimates there will be additional burden for refresher training of approximately 2 hour annually for each entity subject to reporting on Form OE-417. The burden per response has been calculated to be 2.03 hours on average. Send comments regarding this burden estimate or any other aspect of this collection of information including suggestions for reducing this burden to: Office of Electricity Delivery and Energy Reliability, OE-30, Infrastructure Security and Energy Restoration Division, 1000 Independence Avenue, S.W., Washington, D.C. 20585; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

## SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

U.S. Department of Energy Electricity Delivery and Energy Reliability Form OE-417	1	ELECTRIC EMERGENCY NCIDENT AND DISTURBANCE REPORT	Form Approved OMB No. 1901-0288 Approval Expires 01/31/15 Burden Per Response: 2.03 hours					
APPENDIX A QUICK REFERENCE GUIDE								
WHEN TO REPORT								
Incident	File	if Meet Criteria						
1. Physical attack	If ca	If causes major interruption or major negative impact on critical infrastructure facilities or to operations.						
2. Cyber event	If ca	If causes interruptions of electrical system operations.						
Complete operational failure of electrical system	colla	If isolated or interconnected electrical systems (transmission or distribution) suffer electrical system collapse.						
Electrical System Separation     (Islanding)		If part or parts of a power grid remain(s) operational in an otherwise blacked out area or within the partial failure of an integrated electrical system.						
5. Uncontrolled loss of firm system load		If 300 MW or more for greater than 15 minutes from a single incident.						
6. Load shedding	If 10	0 MW or more implemented under emergency operati	onal policy.					
7. Voltage reductions	3 ре	rcent or more applied system-wide to maintaining the	continuity of bulk electric system					
8. Public appeal to reduce use of electricity	If in	If in emergency condition only to reduce demand.						
Physical attack which targets any security system or could impacts electric power system reliability	If any component of any physical security system is damaged by an attack or is suspected to have been altered or vandalism which targets components of any security systems.							
10. Cyber event which could impact electric power system reliability	If the	If the attempt occurred or was mitigated before causing an interruption or impact.						
11. Loss of electric service	If greater than 50,000 customers for 1 hour or more.							
12. Fuel supply emergencies	Fuel inventories or hydro project water storage levels at 50 percent or less of normal, with projected continued downward trend; emergency generation requiring abnormal use of a particular fuel.							
WHO MUST REPORT								
Entity – Functional Responsibility		What is Excluded						
Electric Utilities		There are no exclusions allowed. All items need to	be addressed.					
Balancing Authority (BA)		Reporting on the count of customers (and the amount of load, if the BA is based at a Regional Transmission Organization (RTO) or Independent System Operator) is required only for the Final Report. A BA located in vertically integrated utilities, a municipality, federal utility, stateowned or cooperative will report the amount of load and counts of customers.						
Reliability Coordinators (RC)		Reporting on the count of customers is excluded. If the RC has an agreement with the RTO to supply the customer counts, the RC can supply this information						
Generating Entities		Entities who have 300MW or more of generation detected to one or more end-use customers are required to file the form under criterion #5.						
Local Utilities in Alaska, Hawaii, Puerto Rico, the U.S. Virgin Islands, and the U.S. Territories		If the local electrical system is less than 300 MW, then only file if criteria 1, 2, 3 or 4 are met.						
Computer, telecommunication, and physical security offices that support the BA, RC, and electric utility or located within the entity		These support centers or offices can file information, in lieu of the emergency offices, on incident types 1, 2, 9 or 10 in direct submissions to DOE. These support centers or offices will address no other incident types.						
WHEN TO SUBMIT								
Schedule		Time Limit						
Submit Emergency Alert - Schedule 1 and lines 13-17 of Schedule 2		Within 1 hour after the incident if any of criteria 1-8 is met.						
Submit Normal Alert - Schedule 1 and lines 13-17 of Schedule 2		Within 6 hours after the incident if any of criteria 9-12 is met and criteria 1-8 has not been met.						
Submit Update - Schedule 1 and lines 13-17 of Schedule 2		As applicable after initial submission if significant new information is available or if significant changes occurred since submission.						
Submit Final - Schedule 1 and Schedule 2		Within 72 hours after incident.						
HOW TO SUBMIT	<u> </u>							
How		Website/E-mail Address/Phone Number						
Online		http://www.oe.netl.doe.gov/oe417.aspx						
E-mail		doehqeoc@hq.doe.gov						
Telephone (Staffed 24/7)		(202) 586-8100						
Fax		(202) 586-8485 (only when other methods are not av-	ailable)					

#### SAFETY MANUAL PROCEDURE 2 (SMP-2)

**Emergency Response Plan** 

#### APPENDIX B

#### **GLOSSARY**

Balancing Authority (BA): The responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.

**Complete Operational Failure:** An emergency event where an electrically isolated or interconnected electrical system suffers total system collapse that results in the shutdown of the transmission and/or distribution electrical system. If communications are affected, then reporting is done as soon as practical after restoration of an operational control center.

**Cyber Event:** A disruption on the electrical system and/or communication system(s) caused by unauthorized access to computer software and communications systems or networks including hardware, software, and data.

**Cyber/computer/telecom:** Cyber/computer systems are those used in a power entity organization for electric power operations, power marketing or corporate IT (information technology) functions.

**Electric Utility:** A corporation, person, agency, authority, or other legal entity or instrumentality aligned with distribution facilities for delivery of electric energy for use primarily by the public. Included are investor-owned electric utilities, municipal and State utilities, Federal electric utilities, and rural electric cooperatives. A few entities that are tariff based and corporately aligned with companies that own distribution facilities are also included

**Electrical System Separation – Islanding:** Part or parts of the utility grid remain(s) operational in an otherwise blacked out area.

Firm Load: Power provided to customers that is continuously available on demand and which is subject to interruption only under extreme circumstances.

**Fuel Supply Emergency:** Existing or anticipated fuel supply situations that could threaten continuity of the bulk electric power supply system, including:

- 1. Fuel inventories or hydro project water storage levels at 50 percent or less of normal, with a projected continued downward trend.
- 2. Emergency generation requiring abnormal use of a particular fuel with the potential to reduce supply or stocks to a level that threatens the reliability or adequacy of electric service.

**Generating Entity:** Any combination of physically connected generators, reactors, boilers, combustion turbines, and other prime movers operated together to produce electric power.

**Independent System Operator (ISO):** An independent entity that coordinates regional transmission in a manner that is non-discriminatory against any transmission owners, operators or users, and ensures a safe and reliable electric system.

**Interruptible Load:** This Demand-Side Management category represents the consumer load that, in accordance with contractual arrangements, can be interrupted at the time of annual peak load by the action of the consumer at the direct request of the system operator. Reporting on the Form OE-417 is limited to those interruptions implemented under emergency operational policy or contingency plans.

**Major Distribution System Interruption:** Loss of load has occurred in a controlled or uncontrolled fashion that exceeds the reporting thresholds.

**Major Generation Inadequacy:** When there is insufficient generation to meet demand, forcing a service interruption or disruption.

**Major Transmission Interruption:** The disruption of the movement or transfer of electric energy over an interconnected group of lines and associated equipment between points of supply and points at which it is transformed for delivery to other electric systems that will deliver it in their distribution systems to end-use consumers. Major interruptions are those disruptions that impact the reliability of the electrical system that cannot be addressed by use of alternate transmission paths or cause the potential of additional system disabling contingencies. These transmission events require action(s) to relieve voltage or loading conditions, or transmission separation or islanding has occurred.

**Regional Transmission Organization (RTO):** Independent entities that control and operate regional electric transmission grids free of any discriminatory practices.

Reliability Coordinators: The entity that is the highest level of authority who is responsible for the reliable operation

#### SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations.

**Telecommunications:** Critical telecommunications are those systems that are essential for the power industry system operation including wireline and wireless, both voice and data.

**Transmission Operator:** The entity responsible for the reliability of its "local" transmission system, and that operates or directs the operations of the transmission facilities.

**Voltage Reduction:** Any intentional reduction of system voltage for reasons of maintaining the continuity of service of the bulk electric system.

#### SAFETY MANUAL PROCEDURE 2 (SMP-2)

**Emergency Response Plan** 

#### **APPENDIX I**

# **Actions for Suspected Sabotage Events**

All personnel should pay close attention to the events described in the table below. For all situations, perform the following actions along with the supplementary actions and then refer back to Section 9:

- 1. Immediately contact the Plant Manager (or designee in his/her absence)
- 2. Ensure that all on duty personnel are alerted to the possibility of a sabotage event.
- 3. Document as many details about the situation as possible. Note times, events, and descriptions as applicable to the situation.
- 4. If appropriate, notify law enforcement and parties of the interconnection in accordance with Section 9C.

Event	Event Definition		Supplementary Actions
Abnormal Behavior of Personnel	Persons with disgruntled, violent, or threatening behavior. Persons		Stay calm and don't aggravate the situation  If they are receptive, try to calm the person down.
	with a history of health or financial problems or any other reason that may cause odd behavior.		Explain that you wish to help.
Unfamiliar/Unescorted Visitors	Anyone who is on-site without	•	Provide escort to a secure area of the facility
	permission and without an escort	•	Gather information as to the purpose of their visit
Unexplained Packages or	Any delivery with questionable	•	DO NOT DISTURB THE OBJECT
Shipments	labeling or from an unknown	•	Refer to Appendix C - Suspected Bomb/Sabotage
	shipping company. Any package of suspicious origins that cannot be identified.		Device Safety Precautions
Abandoned Vehicles	Vehicles on-site or near the facility	•	Inquire as to the owner of the vehicle
	that are not recognized and have no purpose being there	•	Record a description of the vehicle and its license plate number

# SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

Event	Event Definition	Supplementary Actions
Abnormal Observations	Observation of any suspicious persons taking pictures and/or notes around the facility.	<ul> <li>Attempt to identify the person and their intent</li> <li>Take note of identifying details about the person and their method of transportation.</li> </ul>
Equipment Misuse/Abuse	Unauthorized changes to equipment that affect functionality or deliberate efforts to damage or destroy equipment.	<ul> <li>Coordinate with the Plant Manager and the Control Room to place the facility in a safe condition if the affected equipment cannot be isolated from the system.</li> <li>Determine the extent of which the equipment was misused/abused</li> </ul>
Attempted Intrusion (Physical)	A detected effort to gain unauthorized access of a person or a device through the physical perimeter but without obvious success.	<ul> <li>Inform all personnel of the event and conduct a search of the area for anything or anyone that appears to be suspicious.</li> <li>Secure all sensitive plant areas through any available means</li> </ul>
Attempted Intrusion (Cyber)	A detected effort to gain unauthorized ingress or egress through the electronic perimeter or into an electronic perimeter device but without obvious success.	<ul> <li>Record all activity that led you to determine the event was an attempted intrusion</li> <li>Using an alternate means of communications (e.g. cell phone), contact appropriate entities listed on Appendix F – Emergency Response Contact List</li> <li>For Critical Facilities, refer to facility CIP policies and procedures.</li> </ul>
Cyber and/or Communication Disruptions	Failure, degradation of functionality, or unauthorized access or use of facilities used for the exchange of voice or data.	<ul> <li>Record details of any suspicious events that led up to the disruption</li> <li>Using an alternate means of communications (e.g. cell phone), contact appropriate entities listed on Appendix F – Emergency Response Contact List</li> <li>For Critical Facilities, refer to facility CIP policies and procedures.</li> </ul>

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Event	Event Definition	Supplementary Actions
Information Theft and/or Loss of Sensitive Plant Information	Unauthorized removal or loss of sensitive information.	<ul> <li>Record details about the theft including the last time you saw or used the data or documentation in question</li> <li>Contact appropriate entities listed on Appendix F – Emergency Response Contact List</li> <li>For Critical Facilities, refer to facility CIP policies and procedures.</li> </ul>
Unauthorized Modification of Software or Data	Unauthorized addition or modification of software or data associated with the proper operation of cyber assets.	<ul> <li>Record details regarding the modification</li> <li>Ensure any affected systems are in a safe condition and close the affected programs.</li> <li>For Critical Facilities, refer to facility CIP policies and procedures.</li> </ul>

## SAFETY MANUAL PROCEDURE 2 (SMP-2)

Emergency Response Plan

#### **APPENDIX J**

# **On-Site Hazardous Chemicals**

Chemical Name, Description	Threshold Qty, Pure Product	Threshold Qty Solution in Use	Stored Qty On-site
Aqueous Ammonia (19% solution)	100 lbs.	~13 gallons	15000 gallons
Diesel Fuel Oil (No. 2 grade)	1,000 gallons	1,000 gallons	1000 gallons
Sulfuric Acid (93% solution)	1,000 lbs	~65 gallons	5000 gallons
Sodium Hydroxide (50 % solution)	1,000 lbs.	~79 gallons	gallons
Sodium Hydroxide (15 % solution)	1,000 lbs.	~79 gallons	gallons