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Victoria WLE, LP
Emergency Operations Plan (EOP)
(Per 16 TAC Sect. 25.53)

EXECUTIVE SUMMARY

For the PUC of Texas

Submitted to:

PUC of Texas, PUC Document No.: 53385
ERCOT via ERCOT MIS Service Request
Texas City Fire Department
Galveston County LEPC
Bacliff VFD

Date: 18 April 2022

1.0 EXECUTIVE SUMMARY

1.1 Description of Contents and Policies

The following Emergency Operations Plan (EOP), together with the Executive Summary and Annexes, was developed in accordance with 16 TAC Sect. 25.53 (the Rule) adopted by the PUC of Texas (the Commission) on February 25, 2022. Victoria WLE, LP is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement this EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly.

1.2 Record of Submittal of EOP

PUC of Texas

Project No: 51841

Filed Under Control Number: 53385

-Redacted Version

-Unredacted Version available upon request

ERCOT

Filed via ERCOT MIS

-Unredacted Version

Victoria Fire Marshal's Office

9508 NE Zac Lentz Parkway

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Victoria County LEPC

Victoria Emergency Management

1703 E Airline Rd

Victoria, TX 77901

jbedford@victoriatxoem.org

1.3 Annual Updates to EOP

(Including section in Executive Summary for the purposes of tracking future changes/non-changes to the EOP; intentionally N/A given Victoria WLE, LP is submitting Version 1)

Material changes made to EOP since last Version: N/A

Updated Version Replacing EOP Submitted On (date): N/A

Description of Change: N/A

Reference Sections and Page Numbers: N/A

Record of Distribution of New EOP: N/A

Affidavit: N/A

No material changes made to EOP since last Version.

Pleading Documenting Changes: N/A

Attestation: N/A

1.4 Contents and Policies

(page numbers indicate starting page number)

- Provides written procedures on cyber security incidents
- Water Shortage Annex [§25.53(e)(2)(B)] PAGE 13
  - Addresses supply shortages of water used in generation of electricity
- Physical Security Incident Annex [§25.53(e)(2)(G)] PAGE 30
  - Addresses written procedures on dealing with physical security incidents
- Restoration of Service Annex [§25.53(e)(2)(C)] PAGE 14
  - Identifies plans intended to restore Victoria WLE, LP to service after it has failed to start or tripped offline due to a hazard or threat
- Pandemic/Endemic Annex [§25.53(e)(2)(D)] PAGE 15
  - Provides procedures in the event of a declared Pandemic/Endemic
- Communication Plan [§25.53(d)(2)] PAGE 6
  - Communication with the media, PUC, OPUC, fuel suppliers, local and state governmental entities, officials, and emergency operations centers (as appropriate), and applicable reliability coordinator
  - Training in latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training
  - Distribution of the EOP to local jurisdictions, as needed
- Business Continuity Plan [§25.53(c)(4)(C)(v)] PAGE 33
  - Demonstrates Victoria WLE, LP maintains a business continuity plan that addresses returning to normal operations after disruptions caused by an incident
- Drills [§25.53(f)] PAGE 6
  - Process and documentation for conducting annual drills to test this EOP. At least one annual drill must include a test of the hurricane annex

1.2 Record of Distribution [§25.53(c)(4)(A)]

Tile	Name	Date of access to and/or training on this EOP
Lead CRO I	Abshire, Colby	4/18/2022
Lead Maintenance Tech	Adams, Paul	4/18/2022
IC&E Tech	Benavides, Alex	4/18/2022
Lead CRO I	Burgos, Carlos	4/18/2022
Maintenance Tech	Campbell, Bryan	4/18/2022
Compliance Manager	Trujillo, Fabian	4/18/2022
Emergency Management Coordinator	Trujillo, Fabian	4/18/2022
Lead CRO I	Davis, Matt	4/18/2022
Lead CRO I	Fisher, M. Wayne	4/18/2022
O&M Manager	Ramirez, Jose (Joey)	4/18/2022
Auxiliary Operator	Gonzales, Charlie	4/18/2022
Maintenance Tech	Hernandez, David	4/18/2022
Plant Manager	Hixson, Jason	4/18/2022
Auxiliary Operator	Priour, Robert	4/18/2022
Auxiliary Operator	Raybon, Pam	4/18/2022

Plant Admin	Kara Skoruppa	4/18/2022
Lead CRO II	Watts, Shea	4/18/2022
Auxiliary Operator	Flores, Rafael	4/18/2022

1.3 Emergency Contacts [§25.53(c)(4)(B)]

Emergency Contact Name	Title	Phone	Email
Jason Hixson	Plant Manager	361-484-0310	jhixson@victorawlepower.com
Joey Ramirez	O&M Manager	361-484-4251	jramirez@victoriawlepower.com
Fabian Trujillo	Compliance Manager/ Emergency Management Coordinator	361-489-2123	ftrujillo@victoriawlepower.com
Paul Adams	Maintenance Lead	361-484-6044	padams@victoriawlepower.com
Shea Watts	Lead CRO	361-655-0385	swatts@victoriawlepower.com
JL Nelson	Operations Director	252-532-7327	JL.Nelson@naes.com
Rachal Havens	Asset Manager	409-960-4881	Rachal.havens@rocklandcapital.com
Matthew Becker	Vice President, Rockland	(713)-203-1793	matt.becker@rocklandcapital.com

AFFIDAVIT

[as required by §25.53(c)(4)(C)]

STATE OF Texas)

COUNTY OF Montgomery)

PERSONALLY came and appeared before me, the undersigned Notary, the within named Will Zapalac, President, who is a resident of Montgomery County, State of Texas, and makes this his/her statement and Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his/her knowledge:

1) Relevant operations personnel are familiar with and have received training on the applicable contents and execution of the Emergency Operations Plan, and such personnel have been instructed to follow the applicable portions of the Emergency Operations Plan except to the extent deviations are appropriate as the result of specific circumstances during an emergency that would warranty such deviations;

2) The Emergency Operations Plan has been reviewed and approved by the appropriate executives of the entity;

3) Due to the expeditious applicability and implementation requirements of 16 TAC Sect. 25.53, the initial drill has been scheduled to take place on May 18, 2022;

4) The Emergency Operations Plan has been distributed to local jurisdictions as needed;

5) The entity maintains a business continuity plan that addresses returning to normal operations following disruptions caused by an incident;

6) The entity's emergency management personnel who are designed to interact with local, state, and federal emergency management officials during an emergency event have received the latest IS-100, IS-200, IS-700, and IS-800 National Incident Management System training.

DATED this the 18th day of April, 2022.

Will Zapalac, President

SWORN to subscribe before me, this 18th day of April, 2022.

ASTRIX PORTILLO
Notary Public, State of Texas
Comm. Expires 05-20-2024
Notary ID 129086282

NOTARY PUBLIC

My Commission Expires: 5/20/2024

Victoria WLE, LP

Emergency Operations Plan (EOP)

(Per 16 TAC Sect. 25.53)

Submitted to:

PUC of Texas, PUC Document No.: 53385
ERCOT via ERCOT MIS Service Request
Victoria Fire Marshal
Victoria County LEPC, Victoria Emergency Management

Date: 18 April 2022

1.0 TABLE OF CONTENTS

2.0 EMERGENCY OPERATIONS PLAN (EOP)

2.1 Common Operational Functions Relevant Across Emergency Types [§25.53(d)]

Plans within this document describe the process used to report and respond to unusual events outlined in 16 TAC Sect. 25.53. Plant management will immediately review pertinent event information, perform investigations as needed and determine if further action is needed. Plant management should perform this activity as expeditiously as possible.

Should plant management determine that action is needed for events outlined in 16 TAC Sect. 25.53, the following relevant emergency operation procedures shall be made active at once. If disaster or interruption to normal business occurs, Business Continuity Plans and/or recovery instructions outlined in corresponding plans and procedures will be invoked.

2.2 Approval and Implementation

The following Emergency Operations Plan (EOP), together with the Executive Summary and Annexes, was developed in accordance with 16 TAC Sect. 25.53 (the Rule) adopted by the PUC of Texas (the Commission) on February 25, 2022. Victoria WLE, LP is subject to 16 TAC Sect. 25.53 and is, therefore, required to implement this EOP, including all components established by the Rule and to maintain the EOP, Executive Summary, and Annexes accordingly.

2.3 Individuals Responsible for EOP Maintenance and Changes [§25.53(d)(1)]

1. Plant Manager (or designee)

   Responsible for the execution of this plan.

   Responsible for annual drills and ensuring all outside organizations are notified, if necessary, and coordinating a response to the incident as well as directing the evacuation according to this plan.

   The Plant Manager shall maintain, review, and update this Plan. Plant Manager is authrorized to make changes as necessary.

2.4 Plan Assessments

Assessments will be conducted following annual drills and actual related emergencies to assess the overall effectiveness of the Plan.

2.5 Annual Updates and Submittals

Beginning 2023, if changes were made during the previous calendar year to this Emergency Operations Plan that materially affect emergency response efforts, the Facility will update this Emergency Operations Plan accordingly, no later than March 15th, each calendar year. In addition, the Facility will submit an executive summary to the commission that:

I. describes the changes to the contents or policies contained in this EOP;
II. includes an updated reference to specific sections and page numbers of this EOP (Contents and Policies) that correspond with the requirements;

III. includes a record of distribution as required; and
IV. contains an affidavit as required.

In the event that no changes were made during the previous calendar year to this Emergency Operations Plan that would materially affect emergency response efforts, the Facility will, in the alternative, file the following with the commission:

I. a pleading that documents any changes to the list of emergency contacts as required;
II. an attestation from the entity's highest-ranking representative, official, or officer with binding authority over the entity stating that that entity did not make a change to its Emergency Operations Plan that materially affects how the entity would respond to an emergency; and
III. an affidavit as required.

2.6 Revision Control [§25.53(d)(1)]

This Plan shall be reviewed not less than annually to confirm all Annexes and Procedures are accurate and current.

Notification to commission staff regarding changes shall be made within 30 days of changes.

A revision control summary that lists the dates of each change made to the EOP since the initial filing date (April 2022) will be included.

2.7 Revision Block with Approval Dates [§25.53(d)(1)]

Rev.	Date Approved	Revision Summary	By
0	04/18/2022	Initial Submittal	Jason Hixson

This Emergency Operations Plan (EOP), with approval date of April 18, 2022, supercedes all previous Emergency Operations Plans.

2.8 Reporting Requirements [§25.53(g)]

Upon request by the PUC commission staff during activation of the State Operations Center by Texas Division of Emergency Management (TDEM), updates will be provided on the status of operations, outages, and restoration efforts as required. Status updates will continue until incident-related outages are restored, unless otherwise notified by PUC commission staff.

The Facility will provide documentation of the event and/or lessons learned as required, if requested from PUC commission staff, by the date specified by the commission staff.

In addition, ERCOT may require information from QSEs representing Resources regarding the Resources' fuel capabilities. Requests for this type of information shall be for a time period of no more than seven days from the date of the request. The specific information that may be

requested shall be defined in the Operating Guide. QSEs representing Resources shall provide the requested information in a timely manner, as defined by ERCOT at the time of the request.

2.9 Drills[§25.53(f)]

Victoria WLE, LP will conduct or participate in a minimum of one (1) drill each calendar year to test and assess the effectiveness of this Emergency Operations Plan. Following each drill, the Emergency Operations Plan will be revised as needed. If, however, Victoria WLE, LP has activated this Emergency Operations Plan in response to an actual related emergency, performance of or participation in an annual drill is not required for that calendar year.

2.9.1 Hurricane Drills

The facility operates in a hurricane evacuation zone as defined by the Texas Division of Emergency Management (TDEM) and will conduct an annual drill of the Hurricane Preparedness and Response Annex during each calendar year.

2.9.2 Drill Notices

At least 30 days prior to the date of at least one drill each calendar year, the facility will notify PUC commission staff (using the method and form prescribed by the commission) and TDEM District Coordinators (by email or other written form) of the date, time, and location of the drill.

2.10 Communication Plan [§25.53(d)(2)]

At least one employee will have received training in the following National Incident Management Training (NIMS) Courses:

- ICS-100: Introduction to the Incident Command System
- ICS-200: ICS for Single Resources and Initial Action Incidents
- IS-700: National Incident Management System, An Introduction
- IS-800: National Response Framework, An Introduction

The Emergency Management personnel trained in the above courses can provide communications with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, and emergency operation centers, as appropriate for the entity and the applicable reliability coordinator.

In accordance with NAES AMP108 (Attachment A):

The Operations Director must be notified as outlined in NAES AMP108 Appendix A (Attachment B). Notification attempts should be continued until there is confirmation that the message was received. Notification can be made by phone or email, provided confirmation of receipt is obtained. Leaving a phone message without receiving confirmation of receipt does not constitute notification.

For emergency situations, the Operations Director will take responsibility for providing the subsequent internal NAES notifications as appropriate.

For non-emergency situations, the Plant Manager and Operations Director will agree on how subsequent internal notifications will be made.

Specific notification, reporting and documentation requirements for emergencies are detailed in NAES SMP-2, Emergency Response Procedure (Attachment C).

2.11 Emergency Supplies Maintenance Plan [§25.53(d)(3)]

Emergency Supplies are identified in the Hurricane and Flooding, Cold Weather Plan, and Extreme Hot Weather Procedure.

Annually, the Plant Manager of Victoria WLE, LP will ensure that adequate supplies to respond to an emergency are located onsite. Non-perishable food and bottled water are provided for site workers and supplied to the site in sufficient quantity to ensure two weeks' worth of supplies in event of emergency.

2.12 Emergency Response Staffing Plan[§25.53(d)(4)]

Staffing levels will be adjusted according to the severity of the event. The Plant Manager of Victoria WLE, LP will staff the facility with personnel according to the procedures outlined in the facility weatherization plans.

2.13 Plan for Identifying Weather-Related Hazards[§25.53(d)(5)]

Victoria WLE operations staff will conduct daily meetings (or calls) with their QSE in which, among other things, the weather forecast is reviewed along with any implications to generator availability. Additionally, Victoria WLE maintains contacts registered with the TDEM to receive notices and invitations to Energy Industry Coordination Calls and receives Operating Condition Notices, Advisories, Watches and Emergency Notices from ERCOT which include information on weather conditions that may affect system reliability.

If a weather-related hazard is identified by ERCOT, TDEM or some other local news source, and is expected to impact the Victoria region, Victoria WLE staff will activate the applicable weather-related procedures under the following guidelines:

- Cold Weather: Victoria WLE will activate its Cold Weather Emergency Response Operational Plan if ERCOT issues an OCN for severe winter weather and/or freezing conditions that directly affect the Victoria region.
- Hot Weather: Victoria WLE will activate its Hot Weather Emergency Response Operational Plant if ERCOT issues an OCN for above normal temperatures that directly affect the Victoria region.
- Hurricanes: Victoria WLE will activate its Hurricane Preparedness and Response Plan per the site's Hurricane Preparedness Plan.
- Drought: In the event of an emergency shortage of water or drought, Victoria WLE has groundwater and purchased water available for use. Currently, groundwater is the plant's primary source of water and is drought resistant. It is also possible to purchase additional water from the City of Victoria, if needed.

In accordance with LEPC recommendations, procedures will be based on the storm's category +1. Therefore, a tropical storm would be planned as a Category 1 hurricane, a Category 1 hurricane as a Category 2 hurricane and so on.

The National Weather Service categorizes hurricanes by intensity on a scale of 1 to 5, which includes:

Hurricane Intensity	Wind Speed	Tide Surge
Category I	74-95 mph	4-5 ft.
Category II	96-110 mph	6-8 ft.
Category III	111-130 mph	9-12 ft.
Category IV	131-155 mph	13-18 ft.
Category V	15+6+ mph	19+ ft.

3.0 ANNEXES

3.1 Weather Emergency Annex[§25.53(e)(2)(A)]

Changes in the weather associated with fast-moving severe storm fronts as well as summer and winter events, may provide little or no warning. Tornados develop from powerful thunderstorms. They are incredibly violent local storms that extend to the ground with winds that can reach 300 mph. In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast. The safety of on-site personnel and the integrity of plant equipment will be the first concern. The O&M Manager shall be notified and will try to be on-site to determine appropriate action. If the O&M Manager cannot be contacted, the CRO shall determine the appropriate action.

During severe thunderstorms, caution will be used during outside activities. If thunderstorms are in the immediate area of the plant, outside activities will be curtailed as much as possible. Personnel shall avoid being at the highest elevation on any structure. All mobile equipment (i.e., forklift) will be brought inside the warehouse. Ensure all gas cylinder racks are secured or brought inside if possible. The safety of plant personnel shall be the prime concern and reasonable judgment shall be used.

In the event a tornado is sighted or reported the actions of Emergency Response Plan (SMP-2) should be followed.

The Weatherization Plans are included in Attachments D through F.

The definitions of severe weather events such as tornadoes, hurricanes, tropical depressions, storms, and flooding and criteria for identifying these events are provided in Hurricane and Flooding –Weatherization Plan (Attachment D). Extreme cold and hot weather events are identified through Weather Advisories or receipt of other credible information.

Critical failure points during cold weather include transmitters and drum measurement legs. The freezing of this equipment will negatively impact the ability of the plant to operate. To help prevent freezing of these critical failure points and critical piping, they have been insulated and heat traced with materials designed to protect the equipment to a minimum of 10 °F. Additional measures to prevent freezing of the equipment are presented in the Cold Weather section of the Weatherization Plan (Attachment E).

In the event of an emergency shortage of water or drought, the Victoria WLE has groundwater and purchased water available for use. Currently, groundwater is the plant's primary source of water and is drought resistant. It is also possible to purchase additional water from the City of Victoria, if needed.

3.1.2 Cold Weather - Emergency Response Operational Plan

As required under PUCT Electric Substantive Rules & ERCOT Nodal Protocols Section 3.21, NAES Corporation and Victoria WLE, LP have prepared a weatherization plan to address measures taken to prepare for extreme winter weather events.

Critical failure points during cold weather include transmitters and drum measurement legs. The freezing of this equipment will negatively impact the ability of the plant to operate. To help prevent freezing of these critical failure points and critical piping, they have been insulated and heat traced with materials designed to protect the equipment to a minimum of 10 °F. Additional measures to prevent freezing of the equipment are presented in the Cold Weather section of the Weatherization Plan (Attachment E).

3.1.3 Verification of Fuel Switching Equipment

During normal operations, natural gas is supplied to plant via pipeline from Kinder Morgan. Victoria WLE, LP burns pipeline quality natural gas exclusively and has no provisions for on-site storage of alternate fuels as well as no alternate supplier of fuel gas.

3.1.4 Cold Weather Emergency Response Checklists

Victoria Power Station has Checklists for Cold Weather, Freeze Protection kit location and equipment, and Cold Weather Supplies. All Checklists are included in Attachment E, which include supplies needed per lessons learned from past weather emergencies.

3.1.5 Hot Weather – Emergency Response Operational Plan

Victoria WLE, LP has the potential to be subject to temperatures at or above 100 deg. F. However, the units and associated equipment are designed to operate at temperatures above 100 deg. F. As with any situation, personnel safety and preservation of equipment are priority when responding to extreme weather conditions.

The Summer Readiness Procedure is to detail the steps necessary to place the plant into a Hot Weather readiness condition for operation, along with verifying that all extreme hot weather preparations and building cooling is operating correctly for the summer months. As per the Emergency Operations Plan, the Extreme Hot Weather Procedure (Attachment F) is to be completed by April 15th each year and on a monthly basis June through October.

The following major equipment must be prepared for summer operations:

- Demineralized Water System
- Cooling Systems
- Compressed Air System
- Waste System Piping
- Lube Oil Systems – Turbine, Generator and Hydraulic

3.1.6 Hot Weather Emergency Response Checklists

1. Annually, prior to April 15, routine maintenance is conducted to ensure reliable operation of the units.

- ❑ Lessons Learned from past Weather Emergencies have been included in this Checklist.
- ❑ Inspect the CTG evaporative cooling system. Lubricate all motors, inspect the evaporative media, check the sprays and distribution header, and the water control valves. Make repairs as necessary;
- ❑ Conduct preventive maintenance and inspections on all site air conditioning systems. Vital units such as those on the CEMS enclosure, the CTG electrical compartments, HRSG MCC, and the control room are priority units;
- ❑ Review operational data (temperatures) of equipment serviced by auxiliary heat exchangers. Where operational data indicates, conduct inspections and if necessary, cleaning of heat exchangers;
- ❑ Inspect the Unit 3-4 cooling tower fans, gear reducers, motors and pumps. Perform maintenance based on condition;

- ❑ Repair any deficiencies found in the annual cooling tower structural inspections;
- ❑ Discuss hot weather safety precautions and heat related stress in monthly safety meeting; and

2. Upon receipt of a Weather Advisory or other credible information indicating that an extreme hot weather event is anticipated:

- ❑ Check operational condition of critical air conditioning systems (CEMS, CTG electrical compartments, HRSG MCC and the control room);
- ❑ Ensure adequate supplies of bottled drinking water, Gatorade, or similar drinks are available and conduct a toolbox safety discussion on identifying and avoiding heat related stress and illness; and
- ❑ Schedule an additional auxiliary (outside) operator. Extra inspections of plant circulating water systems, cooling tower fans and critical equipment will be conducted.
- ❑ To the extent possible, take necessary measures to provide for proper ventilation of the turbine building and for cooling of balance of plant equipment contained in the building. This may include opening additional windows, doors and the setting up of fans to move air through the building and around specific plant equipment for which cooling may be an issue.

3.2 Water Shortage Annex[§25.53(e)(2)(B)]

In the event of an emergency shortage of water or drought, the Victoria Power Station has groundwater and purchased water available for use. Currently, groundwater is the plant's primary source of water and is drought resistant. It is also possible to purchase additional water from the City of Victoria, if needed.

3.3 Restoration of Service Annex [§25.53(e)(2)(C)]

[redacted]

3.4 Pandemic and Endemic Annex[§25.53(e)(2)(D)]

The purpose of NAES SMP-20 (Attachment G) is to provide a coordinated and comprehensive response to a pandemic event in order to help ensure continuation of operations.

And Endemic is defined as "regularly found among particular people or in a certain area." The response plans used for an endemic would be similar to a pandemic response.

The procedure describes potential pandemic threats, identifies and prioritizes the critical operations and business functions of this facility, and provides appropriate response guidelines.

The information in this Plan is based on generally accepted assumptions about the development, outbreak, and expected progress of an influenza pandemic. Site-specific information required for implementing this Plan (contact lists, recovery details, etc.) are provided via site specific Appendices. Control and survival of a pandemic will depend on the ability of thoughtful individuals to conduct a well-planned and well-organized response. The ultimate objective of this Plan is to prepare those individuals for success.

3.4.1 Facility Staffing Plan

Once it has been determined that a pandemic outbreak is in full force, a determination will be made as to whether Victoria WLE, LP will be operated either at full staffing, or reduced staffing based on the location of the outbreak.

Key Personnel and Critical Skills are identified in NAES SMP-20 Tables 4 and 5.

3.4.2 Pandemic and Endemic Annex

Vendor List

The following list of vendors is in priority order as to those that would have the greatest and most immediate impact on the facility:

- Kinder Morgan (Fuel Manager)
- Tenaska Power Services Co. (QSE)

Potential Contract Support (if required)

Potential additional contractor support that may be required would primarily fall in the Technician area but could affect other areas depending on the timing of the pandemic.

- Temporary on-site Technician personnel to assist major equipment breakdowns
- High-Voltage contractor for invasive repairs
- Crane contractor for lifting process with major component repairs

3.4.3 Communications Plan

Victoria WLE, LP has a list of the employee's telephone and cell phone numbers in case of an emergency. On-site communication tools are adequate for this type of event.

If a pandemic outbreak is imminent, an effort will be made by Plant Manager or designee to collaborate with local health officials on availability of immunization shots for critical plant personnel. In addition to local bulletin boards and websites, NAES Corporate Pandemic

Response Team will monitor World Health Organization (WHO) and Centers for Disease Control (CDC) websites daily for updates to potential health threats and informational broadcasts.

A communication chain will be developed so that working staff members are aware of who within the facility staff is healthy and available and who has been infected by the outbreak.

3.4.4 Security

3.4.5 Training, Drills, and Vaccinations

Training will be conducted for all staff members prior to a viral outbreak and again at the first signs of a developing pandemic. The focus of the training would be on the early symptoms of the virus, the nature of the virus (i.e., how it is spread), how long it lives on surfaces outside the body, and how to minimize the chances of being infected. The need for exceptional personal hygiene, especially hand washing, would be emphasized. Guidance would be provided, and expectations would be set on how to minimize the risk of spreading the disease. Training on vaccinations and their potential side-effects should be conducted by the medical staff administering the vaccine. After training has been completed, all staff personnel should be screened for willingness to receive the vaccine. An effort will be made by Management to obtain vaccines for critical employees.

Personnel denying receipt of the vaccination will sign a waiver documenting their training, understanding vaccine's purpose, and the potential consequences of refusal of the vaccination.

3.4.6 Critical Personnel Protective Equipment and "Clean Area"

In anticipation that Personal Protective Equipment (PPE) will become more limited and harder to obtain, the facility will stock extra amounts of appropriate PPE and make available to all personnel.

Proper sanitization of normally occupied areas and commonly used items will be followed based upon recommendations per NAES Corporate Pandemic Response Team, World Health Organization (WHO) and Centers for Disease Control (CDC).

The Control Room will be designated as a "clean area" where only essential personnel will be allowed to enter once an outbreak has been confirmed.

3.4.7 Interaction with Local Health Department

Portions of this plan may be altered impromptu in accordance with suggestions and/or mandates by either County or State Health Departments.

Contact Information:

Victoria County Public Health Dept.
2805 North Navarro St. Victoria, TX 77901
(361) 578-6281

3.4.8 Post Pandemic Actions

Normal facility operation may be resumed once the pandemic has ended and has been verified by governmental agencies through the Local Health Department or the local Hospital/Clinic.

3.4.9 Conclusion

In the event a pandemic does take place, it will be NAES and Victoria WLE, LP primary goal to assist its employees through all challenges put forth by a pandemic.

3.5 Hurricane Preparedness and Response Annex [§25.53(e)(2)(E)]

Victoria WLE, LP has a Hurricane and Flooding procedure (Attachment D). This procedure establishes plant policy for actions during periods of severe weather during commercial operations.

The preservation of lives and the safety of personnel shall take precedence over all other considerations when determining the actions to be taken in case of threatened storm or flood damage.

In all situations, the plant operations will be conducted according to instructions from the QSE and ERCOT.

If it is deemed necessary to shutdown plant operations and to evacuate the facility, every precaution possible must be taken to ensure that equipment is shut down in the proper manner and secured in such a way that windstorm and flood wave action will have minimum impact.

As a power generator, the facility plays a key role in restoration following a natural disaster. Plant Management is responsible for restoring services as quickly as practical and as safely as possible following evacuation and shutdown. Additionally, every effort must be made to maintain power generation in the event of a natural disaster, taking into consideration the safety of all personnel.

The Plant Manager or designee will provide continuous updates and involvements to the Owner's Representative regarding activities related to the event.

3.5.1 Responsibility

1. The Plant Manager or designee will establish and maintain a Hurricane Preparedness Plan. This plan will ensure that the plant is ready to cope with a hurricane in case of a Level 1 Warning. The plan shall include the nomination of a Hurricane Crew with an action Checklist, a Securing Crew with an action Checklist, and a Hurricane Supplies Checklist. The Plant Manager or designee will also be responsible for the following actions:
    a. Designate an estimated date/time for return to the plant.
    b. Coordinate with local authorities and emergency response personnel to advise them of plant storm preparations and the number of personnel remaining at the plant during the storm. Establish both primary and alternate means of communication with local authorities and emergency response personnel.
    c. As necessary and in compliance with state and local laws and regulations, make necessary arrangements for return of essential plant personnel immediately after storm subsidence. This may require providing a list of essential personnel to local authorities so that they will be allowed back into the storm area after the storm is over.

The O&M Manager (or control room operator in the Operation's Managers absence) will be responsible for the following:

    d. The monitoring of weather conditions for potential problems.
    e. The monitoring of local radio channels and when possible CNN (Cable News Network via internet). In the event that the foregoing is not

available, the O&M Manager shall establish contact with the National Weather Service and arrange for the receipt of periodic weather reports.

f. Keep the Plant Manager advised of any potential threats to the plant. In any event, conditions that may result in a Level 1 storm condition or above must be reported. If a storm reaches Level 2, the storm will be tracked on an hourly basis on a suitable map.

g. Prior to any storm, O & M manager should contact contractors and suppliers in the area to make prior arrangements for any equipment or personnel that may be required to restore plant operation. This may include arrangement for cranes, emergency generators, portable, lighting and other measures that may be necessary based on an evaluation of the anticipated storm's intensity. Arrangements may also need to be made for support personnel that may be necessary to support plant restoration including mechanical and electrical contractors as well as the plant water plant contractor.

h. Prior to any storm, O & M manager should contact key plant suppliers to arrange for expedited post-storm delivery of necessary bottled gases, chemicals (such as aqueous ammonia) and other consumables necessary for plant operation. Where possible, such supplies should be topped off prior to any storm.

i. Review the possibility of unusual events and operational conditions that may occur during and after the storm with personnel remaining at the plant during the storm. This may include sudden loss of large blocks of load, voltage surges and other events. Stress the need to communicate with the QSE, transmission operators and other agencies prior to any restoration operations.

2. The Hurricane Crew will consist of the minimum number of people required to safely operate the plant in case of an emergency. The crew shall consist of at least one senior manager. The crew will be responsible for operating the plant during Level 2 through 4 and initial restoration conditions unless the Plant Manager determines that the plant is to be evacuated. Guidance for the Hurricane Crew is provided on the Hurricane Crew Checklist.

3. The Securing Crew will consist of the Hurricane Crew plus personnel required to secure the plant in the event of an impending hurricane. The crew will be responsible for preparing the plant for a potential hurricane but will evacuate the plant in case of a Level 3 condition. Guidance for the Securing Crew is provided on the Securing Crew Checklist.

4. Crews will be determined on a voluntary, first come, first serve basis. Members will serve on the crew for the entire hurricane season, May through November. Those employees who volunteer will be exempt from being chosen the following year. In the event not enough employees volunteer, employees will be chosen by lottery. All plant personnel must be available to assist in manual labor to prepare the plant. The required personal safety equipment will be worn by all employees during the hurricane and flooding procedure.

3.5.2 Hurricane Levels and Response

LEVEL 1 (HURRICANE WATCH)

1. The Plant Manager will activate the Hurricane Crew and the Securing Crew. These crews will then begin to make preparations to stay on site if the need arises.

2. The Hurricane Crew is to initiate the actions defined in the Hurricane Procedure Checklist.

3. The O&M Manager will monitor the local news for an announcement of a Hurricane Watch.

4. Once a Hurricane Watch is issued, notify the plant staff of Level 1 and call a meeting with all plant supervisors to review the hurricane procedures.

5. Check fuel and lube oil inventory levels. If necessary, top off diesel fuel tanks.

6. Perform an inventory of the Hurricane Supplies Checklist and replenish as needed.

LEVEL 2 (HURRICANE WARNING)

1. Once a Hurricane Warning has been issued, notify the plant staff that a Level 2 condition exists and call a meeting with all plant supervisors to check the status of the hurricane procedure and checklists.

2. The Securing Crew is to initiate the actions defined in the Securing Crew Checklist.

3. The Plant Manager will verify that the Securing Crew Checklist actions are complete.

4. The plant will stop all maintenance projects not essential to placing the plant in a safe condition.

5. The Hurricane Crew members must relieve each other as necessary so that they have enough time to sleep and prepare their home for the impending hurricane.

D. LEVEL 3

1. The Plant Manager will determine manning requirements and at an appropriate time evacuate all non-essential personnel from the plant. The decision to evacuate is to be made far enough in advance of the storm so as to allow evacuating personnel adequate time to reach safety prior to the storm's approach. The Hurricane Crew will stay on site to maintain the site safety.

2. The Plant Manager will verify that all precautions have been taken to maintain the safety of the plant and all remaining on-site personnel.

3. Notify the Owner's Representatives, the Corporate Compliance Contact, and the Corporate O&M contact.

4. Notify the QSE of the plant status and determine actions necessary to maintain communications and coordinate activities. Alternate means of communication should be identified in case primary means are not available.

E. LEVEL 4

The Plant Manager will track the storm and, based on the reported intensity and course, will determine whether or not to continue plant operations.

1. If a complete evacuation of the plant is deemed necessary, the Plant Manager shall:

a. Notify the QSE, the Owner's Representatives, the Corporate Compliance Contact, and the Corporate O&M Contact of the impending plant shutdown.

b. Shutdown and evacuate the plant. Shutdown of the plant will be performed so as to maximize the prompt plant recovery once storm conditions have cleared.

2. During the storm, all personnel must stay inside, away from doors and windows, close all interior doors, and lie on the floor under a table or other sturdy object during intense periods.

3. Do not be misled by the "eye" or the lull that occurs as the storm center moves overhead. The other side of the hurricane "eye" has winds that will rapidly increase and will come from the opposite direction.

4. Notify Owner Representative and QSE and obtain permission before restarting the plant. Care is to be exercised in reconnecting to the grid because system faults may cause operational problems.

3.5.3 Flooding Precautions

Severe flooding may result from heavy rainfall or from storm driven water. Flooding poses the following potential hazards:

1. Drowning. In severe cases, personnel may be washed away in strong currents and may drown or be severely injured.

2. Pollution. Rising water may cause drains and sumps to overflow causing pollution to the environment.

3. Equipment Damage. Machinery and other equipment may be damaged due to rising or flowing water.

4. Electrocution Hazard. Rising water may cause electrical short circuits and may become an electric shock hazard.

5. Subsidence. Saturated ground may subside. Underground tanks, especially if empty, may be forced to rise. Piping may become distorted or rupture.

6. Landslides. Saturated ground may shift or result in land or mud slides. Earthen berms may be threatened with collapse.

7. Snakes and other potentially dangerous animals may seek dry ground.

3.5.4 Flooding Actions

In the event of rising water or continued heavy rains, the Plant Manager should ensure that:

1. Elevate critical spares and equipment sufficiently to ensure that they will not be flooded.

2. Secure all necessary buildings so as to prevent floodwater from entering the structure.

3. Vehicles should be moved to higher ground if possible or evacuated.

3.5.4 After the Storm

1. Following the passing of the storm, every effort to return the plant to normal operations is to be made.

2. A complete inspection of the facility is to be made with any noted damage reported and photographed for insurance purposes and for repairs. A complete report of the storm and damage must be written and maintained on file.

3. All plant personnel are to contact the site management team using previously established primary or alternate methods such that manpower availability can be determined.

4. All plant personnel will cautiously approach the plant and communicate with onsite staff to check for downed high voltage lines and other personnel/plant hazards before entering the plant.

5. Provide first aid and transport any injured personnel to the nearest clinic/hospital.

6. Proceed cautiously and identify any safety hazards or plant problems. Barricade off unsafe areas.

7. Establish a new plant watch rotation and relieve the hurricane watch team as soon as practical to allow the hurricane watch team the opportunity to check on their homes and family.

8. Identify damaged/missing equipment and make reports to the Plant Manager. Designate reporting codes for ability to return to service: A) not able to repair or is missing, B) Major repair (>8 hours), C) Minor repair (<6 hours) and D) appears to be in working order or no damage noted. Maintain a status board of areas checked and equipment damaged.

9. If the plant is still operating, use the control room alarm system to identify areas to investigate.

10. Restore the plant to service, noting that problems may arise as equipment is restored and started.

11. Check equipment that was shut down and isolated, empty containment areas.

12. Take action to contain any hazardous spills that may have occurred.

13. Clear debris from site.

14. Perform restoration of systems in accordance with Business Continuity Plan.

15. Perform Restoration to Service procedures as applicable.

3.6 Cyber Security Annex [§25.53(e)(2)(F)]

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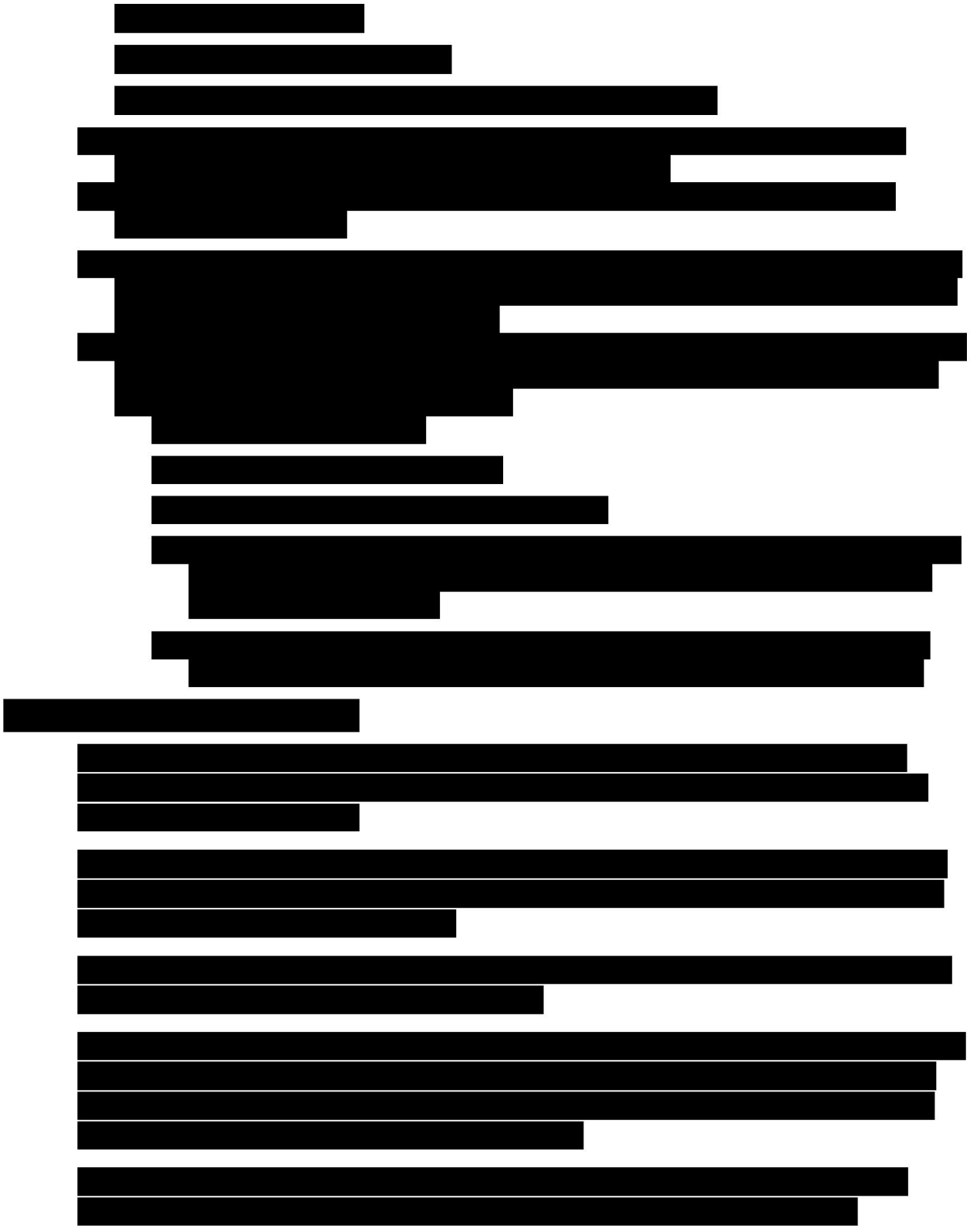

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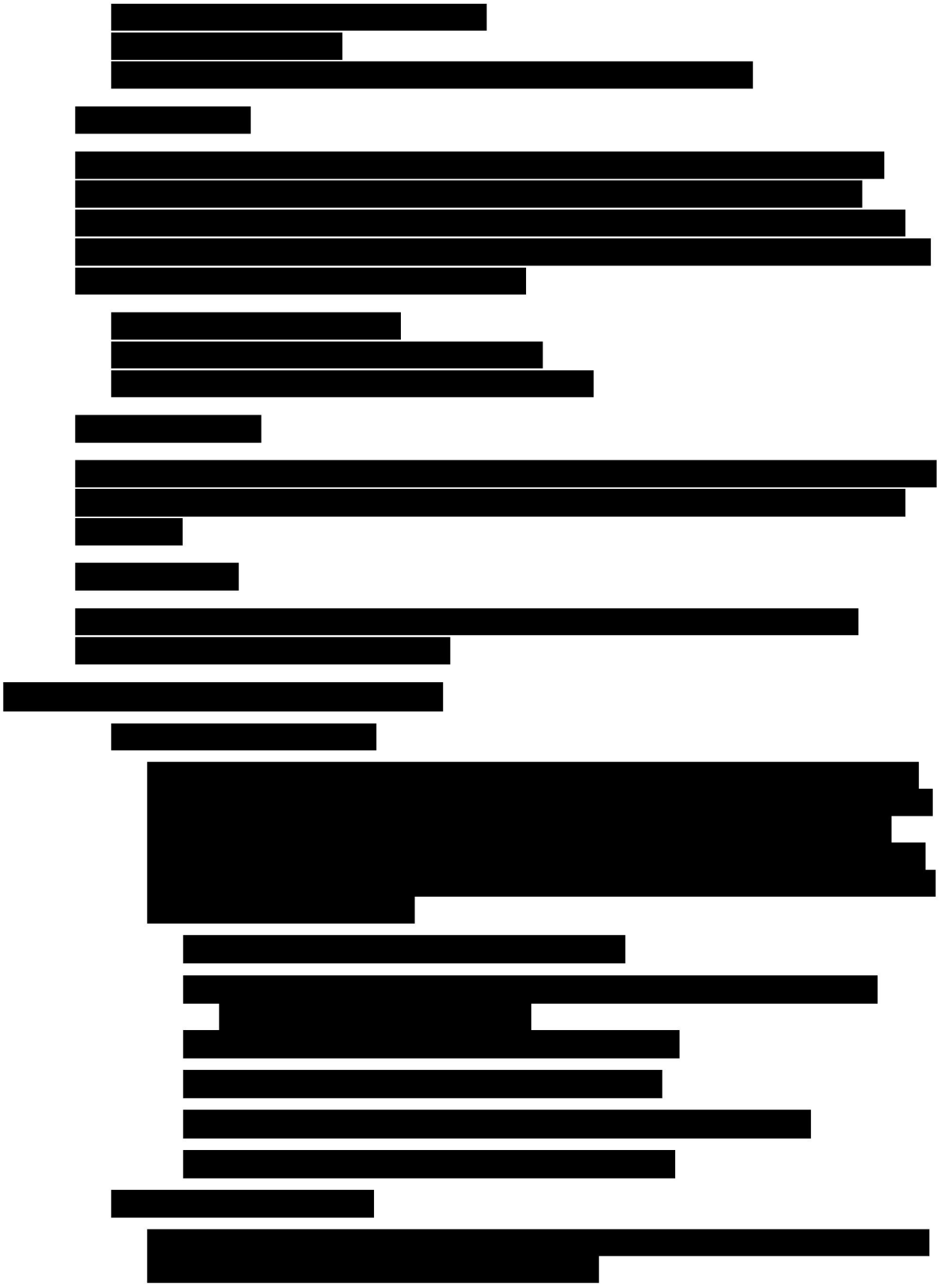

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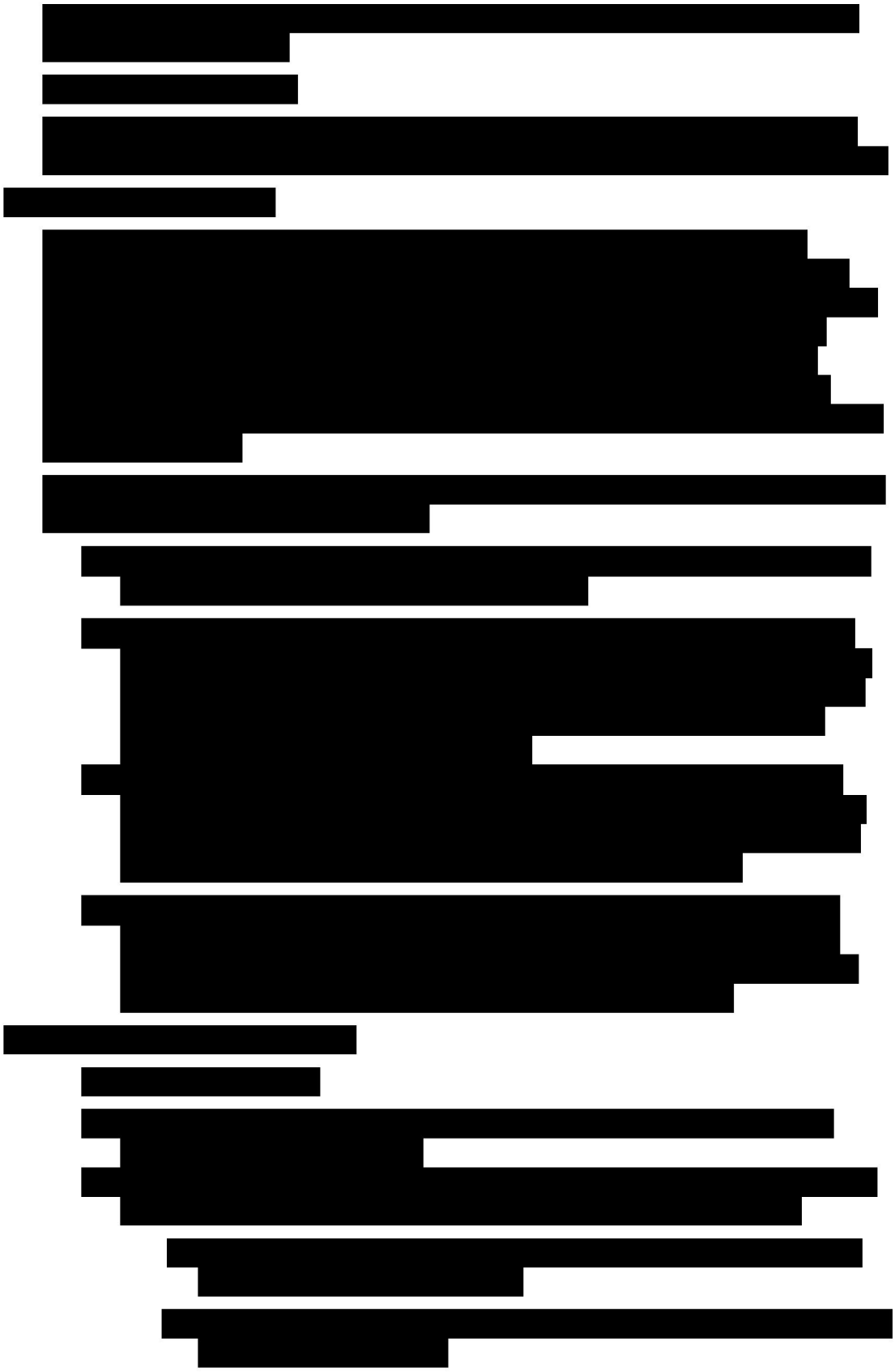

3.7 Physical Security Incident Annex [§25.53(e)(2)(G)]

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3.8 Communications Plan [§25.53(d)(2)]

This Communication Plan describes the procedures used during an emergency for communicating with the media, the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity and the applicable reliability coordinator. The plan address communication skills, training requirements, media communication instructions, and contacts.

This Communication Plan is designed for crisis communications for use in any situation. It has been adapted from existing EOPs and SOPs. The communication plan is used in conjunction with pertaining plans and procedures. This plan is intended to be used with existing plans and procedures in part with and not in place of.

This plan supplies responders and relevant personnel with a communication plan to inform across jurisdictions, disciplines, and levels of government as needed and if required. The procedure assists in reliable and timely communications among responders and relevant personnel and between public agencies.

Victoria WLE responds to events that will impact the bulk electrical system. Victoria WLE works in conjunction with facility's Qualified Scheduling Entity (QSE) to relay facility conditions. If Victoria WLE identifies an event impacting the operation of the facility, Victoria WLE shall contact Qualified Scheduling Entity (QSE) as soon as practicable.

3.8.1 Event Response

When an Event has occurred, and a notification has been sent out from the facility, the Plant Manager will be the primary point of contact for employees, and the Emergency Management Coordinator will serve as the single point of contact for all response events to the commission, Office of Public Utility Council (OPUC), fuel suppliers, local and state government entities, officials, Qualified Scheduling Entity (QSE), and emergency operation centers, as appropriate for the entity.

After initial notification of the event, the Plant Manager will contact and notify the NAES Operations Director, and facility ownership.

The Plant Manager, in coordination with the NAES Operations Director, will determine if a Crisis Management teleconference will be initiated for this event. If a teleconference is initiated, the Operations Director will utilize contact information attached to the event.

MEDIA

The need for a rapid message to media and / or elected officials is determined by the Facility President. The Emergency Management Coordinator will craft messages, with assistance from the Leadership Team and Plant Manager, as necessary. Targeted audiences for messages will be determined and considered. The official media communication messages will be distributed as appropriate by the Facility President or designee.

Media Relations Do's and Don'ts for Employees

DO

- Always put reporters or local media in touch with media relations first.
- Make yourself familiar with the official media relations policy.
- Contact us if you're not sure about something
- Ask for coaching or talking points if you are asked to speak in public.

DON'T

- Say "No comment." Most often, it leaves the impression of hiding information from the public.
- Instead, refer questions to media relations.
- Try to handle a hostile reporter on your own.
- Immediately agree to an interview.
- Approach the media on your own or solicit media stories on behalf of the company.

"What do I do when contacted by the media?"

If the media tries to contact you or shows up at your location, your first step should be to contact the Operations Director and facility Plant Manager before any other kind of response.

COMMUNICATION PLAN CONTACTS

CONTACT NAME	Line Detail	PHONE
Qualified Scheduling Entity (QSE)	Main:	1-877-336-3480
	Cell:	1-713-597-1821
Kinder Morgan - Tennessee Gas Pipeline	Office:	361-782-1686
Energy Transfer Gas (Houston)	Toll-free:	1-800-392-1965
PUCT Assistance	Hotlines:	1-888-782-8477
	Hotlines:	1-512-936-7120
Office of Public Utility Counsel (OPUC)	Austin:	1-512-936-7500
	Toll-free:	1-877-839-0363
	Fax:	1-512-936-7525
Victoria County Emergency Management Coordinator	Office:	(361) 580-5770
Texas Division of Emergency Management (TDEM)	Main Number/Texas State Operations Center:	1-512-424-2208

	ASSISTANT CHIEF:	1-281-517-1353
	SECTION CHIEFS:	1-409-504-0390
		1-215-952-9061
	DISTRICT COORDINATOR 16D:	1-281-633-4827
Texas RE	Main:	1-512- 583-4900

Reliability Coordinator

Victoria WLE will be in compliance with NERC-EOP-004-4 Event Reporting. Upon investigating and confirming a Reportable Event, Plant Manager and NAES will perform internal communications in accordance with AMP-108 Appendix A (Attachment B).

Plant Manager will submit a Reportable Event by completing the following forms:

- NERC Reliability Standard EOP-004-4 Attachment 2: Event Reporting Form, or
- Department of Energy form: DOE-OE-417

Texas Reliability Entity, Inc.

Lewis De LaRosa: Reliability Engineer, Senior

805 Las Cimas Parkway, Suite 200

Austin, Texas, 78746

Office: 512-583-4984

Cell: 512-228-2194

Lewis.DeLaRosa@TexasRE.org

www.texasre.org

COMMUNICATION REPORTS

In accordance with NAES AMP-108 (Attachment B), incident notifications will be made to the Operations Director within the time frames listed below. Subsequent notifications to NAES internal groups and Owner representatives may be made by the Plant, Operations Director, provided all applicable notifications are completed as listed below. Written incident reports and AMP-108 investigations must be completed and distributed as listed below.

3.8.2 NIMS Training

Victoria WLE emergency management personnel will have received training in the following National Incident Management Training (NIMS) Courses. The courses are available online or locally available for scheduling via the FEMA National Incident Management System (NIMS) training website.

- ICS-100: Introduction to the Incident Command System
- ICS-200: ICS for Single Resources and Initial Action Incidents
- IS-700: National Incident Management System, An Introduction
- IS-800: National Response Framework, An Introduction

Certification will be maintained, and recertification will be performed per NIMS requirements.

3.9 Business Continuity Plan [§25.53(c)(4)(C)(v)]

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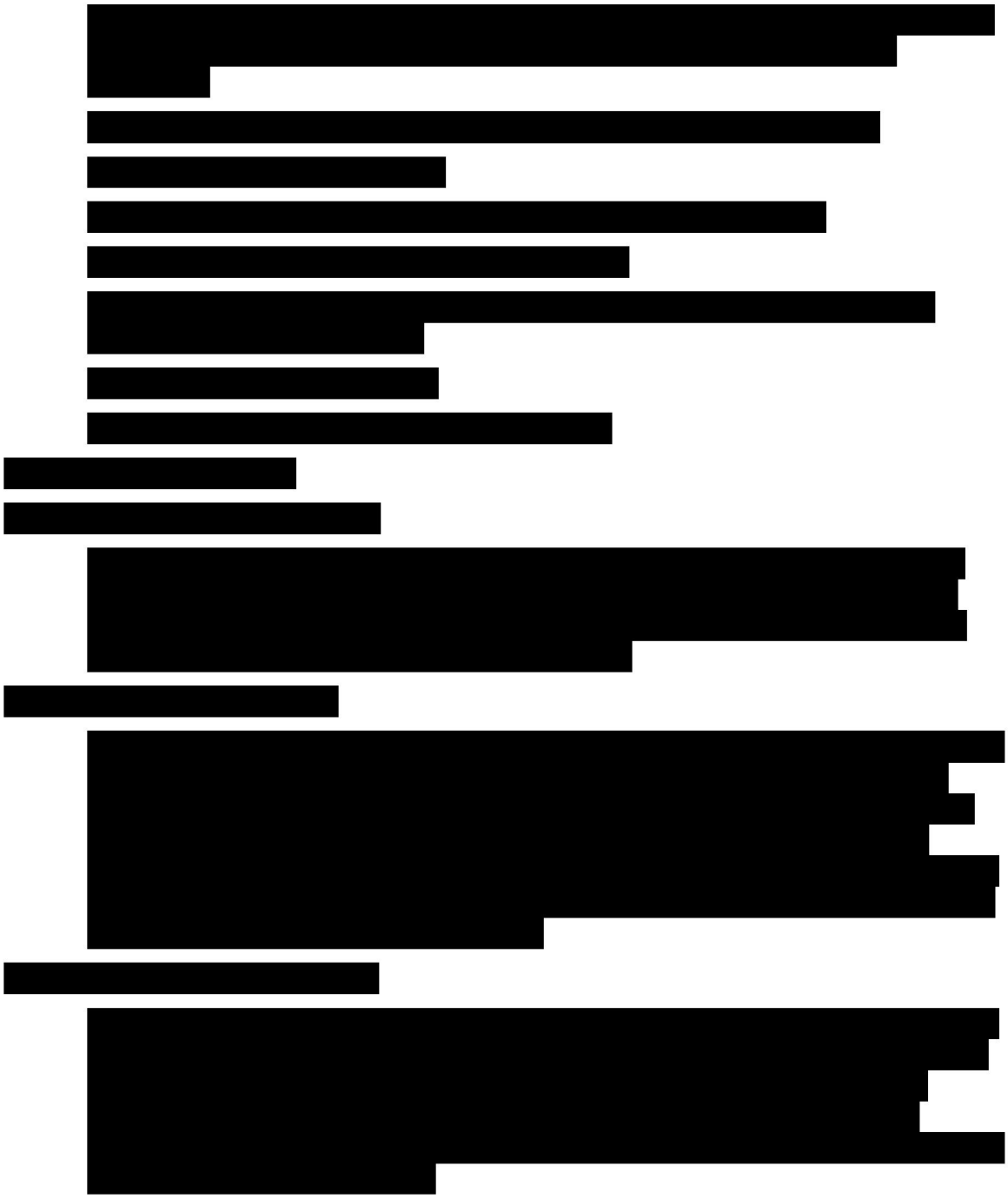
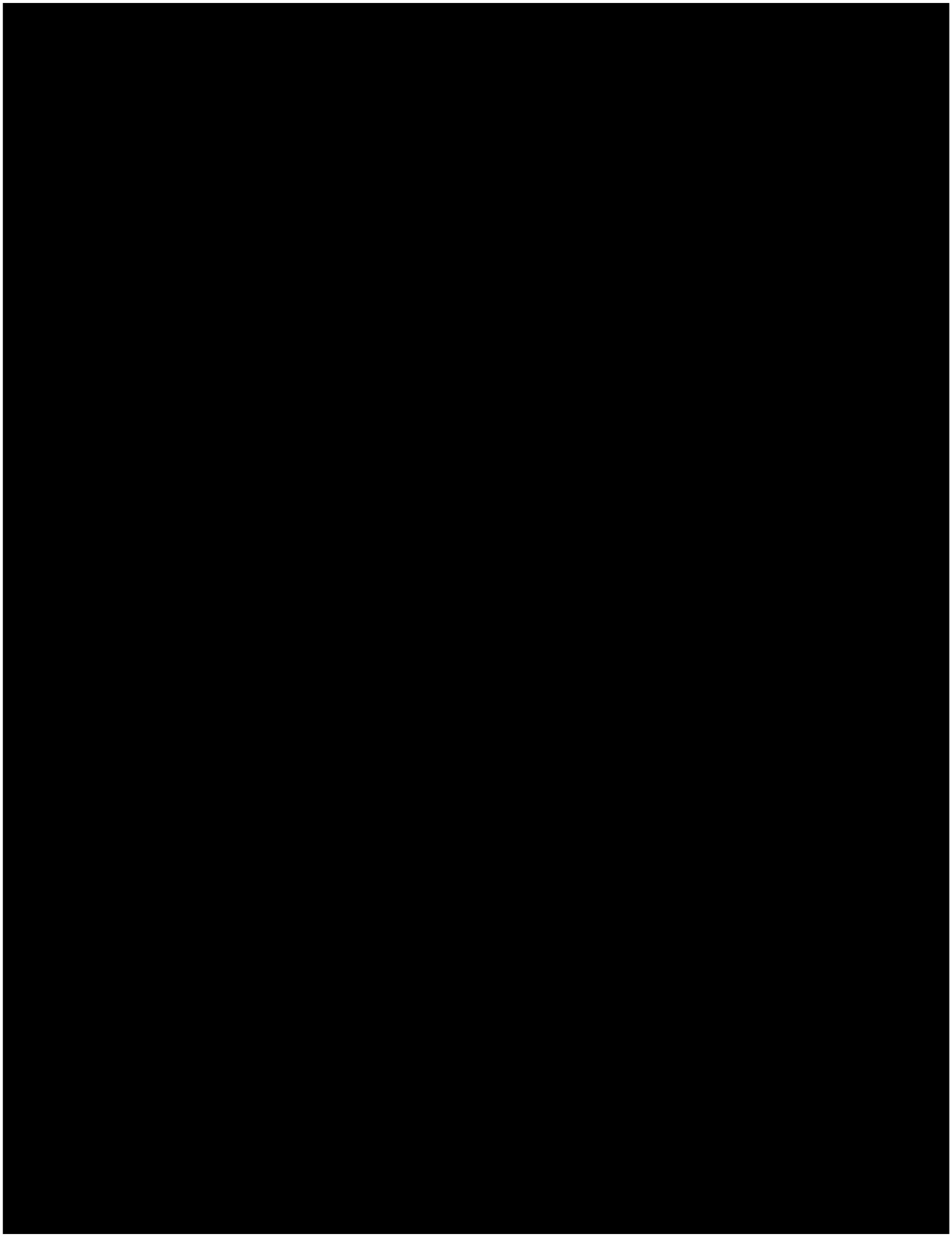
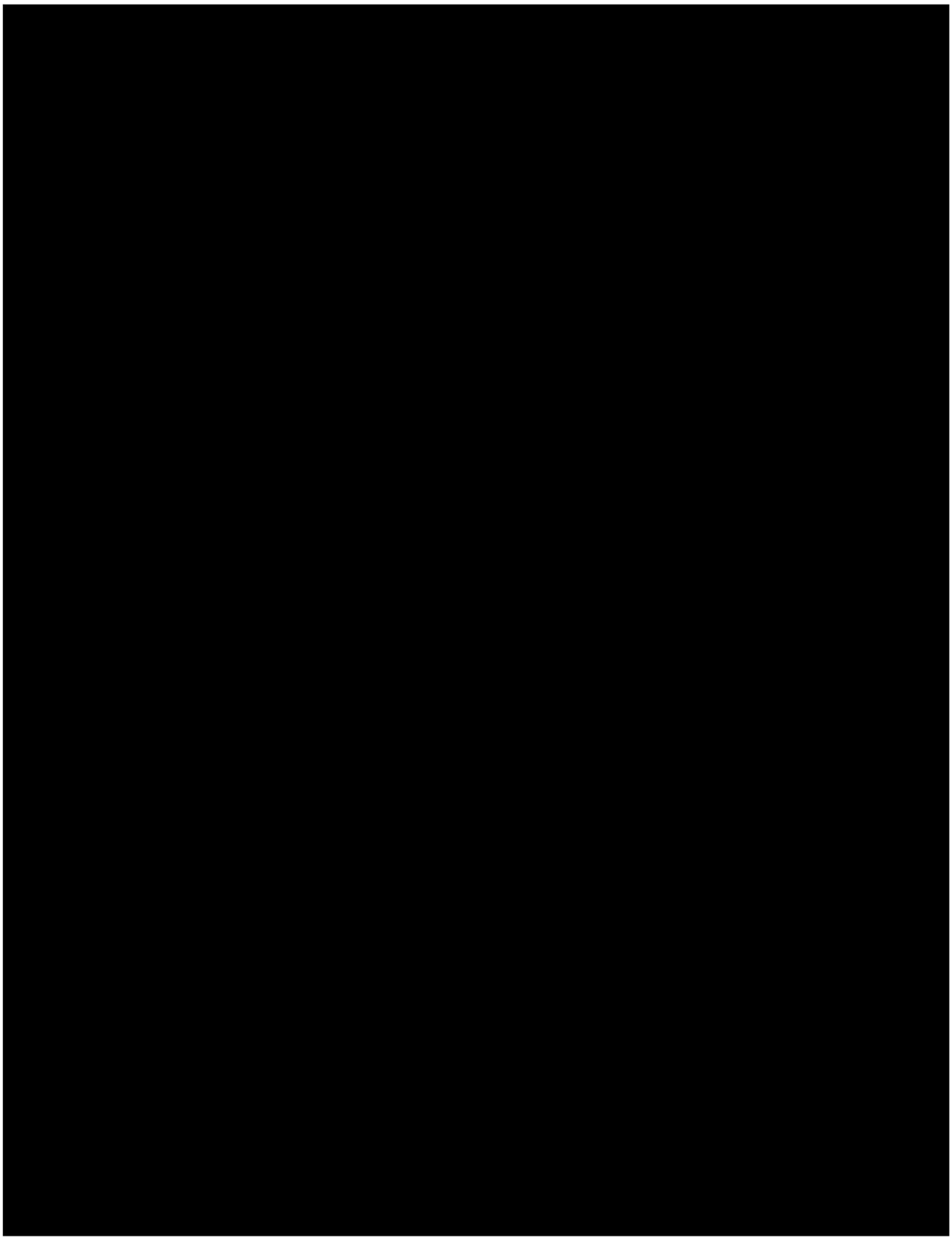
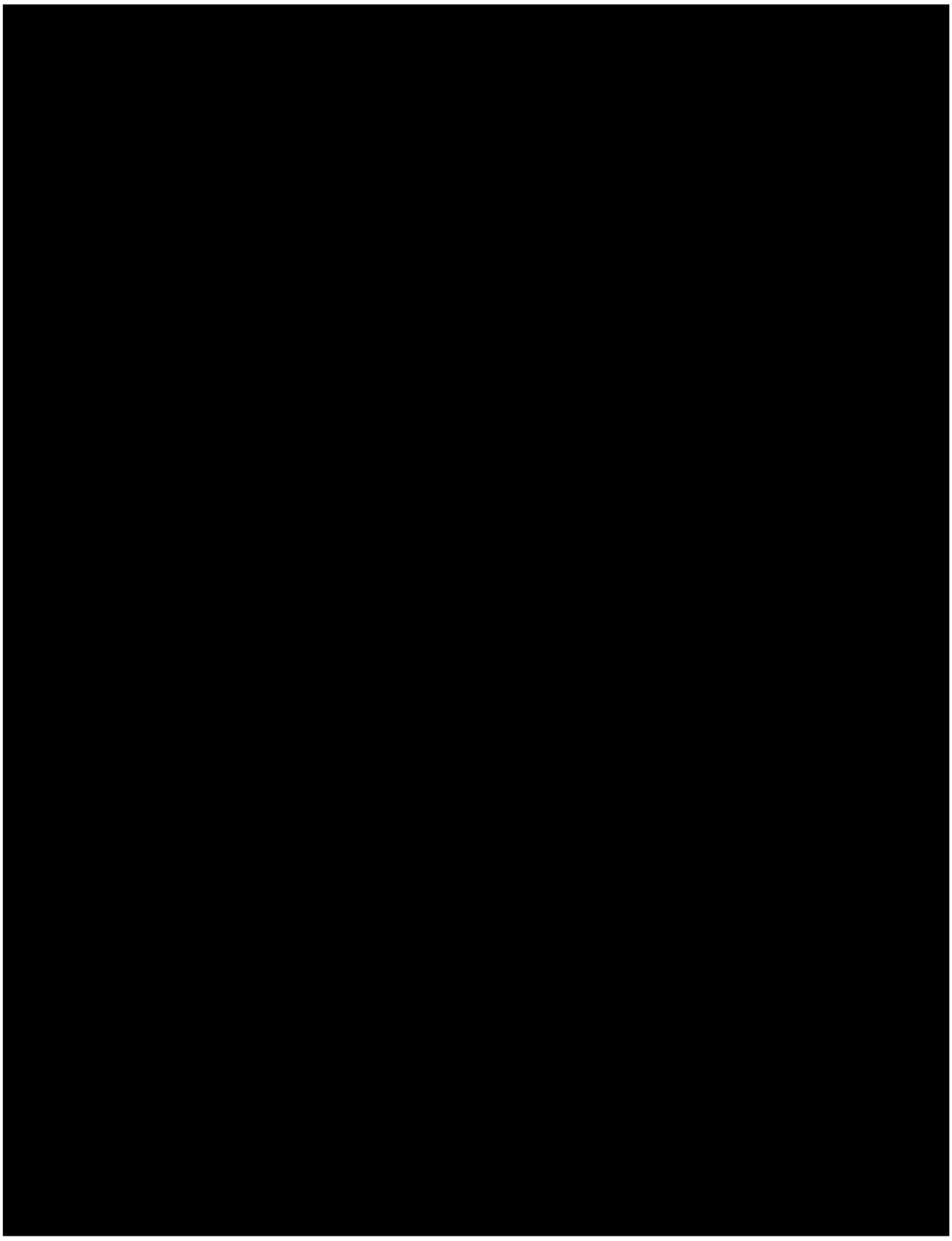
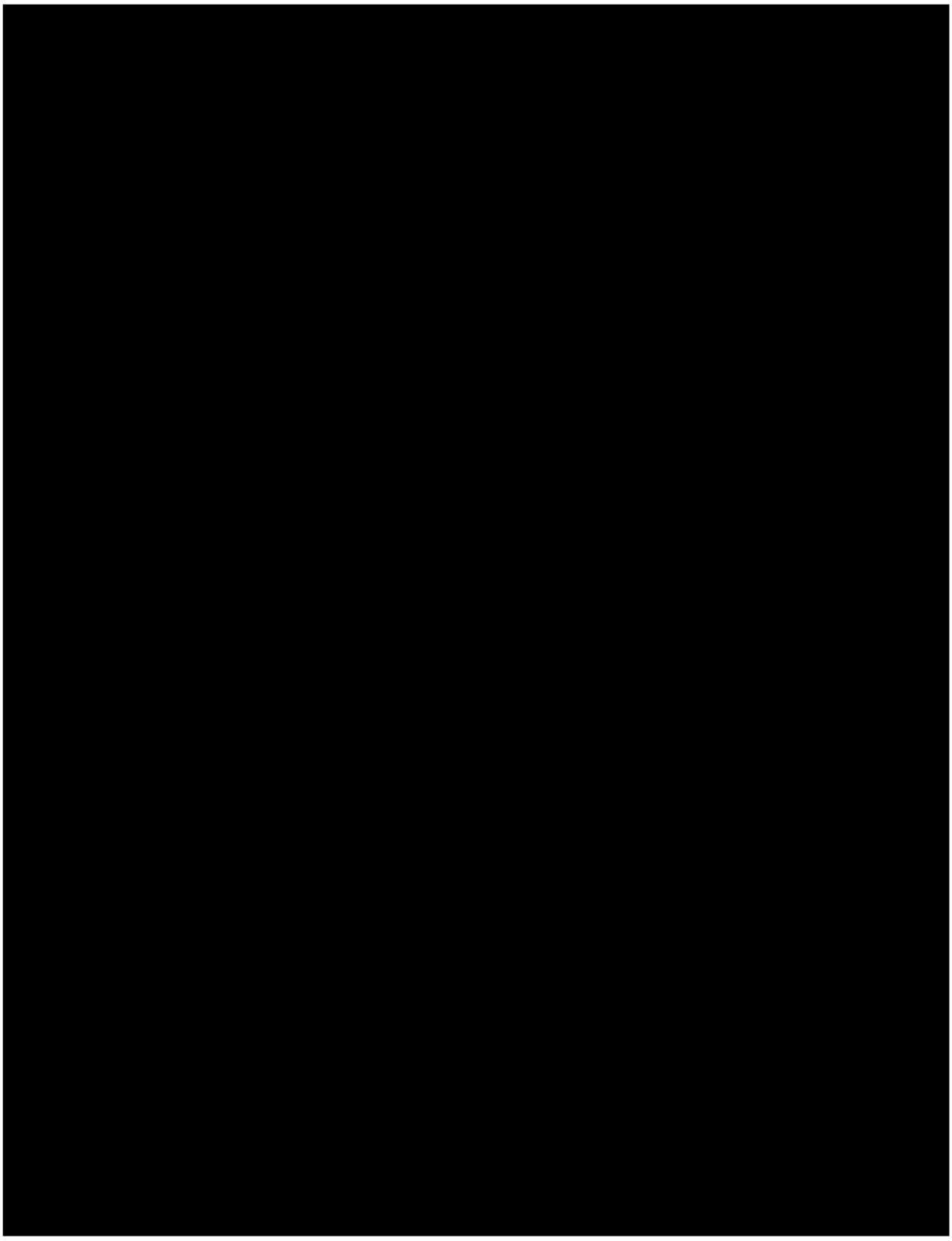


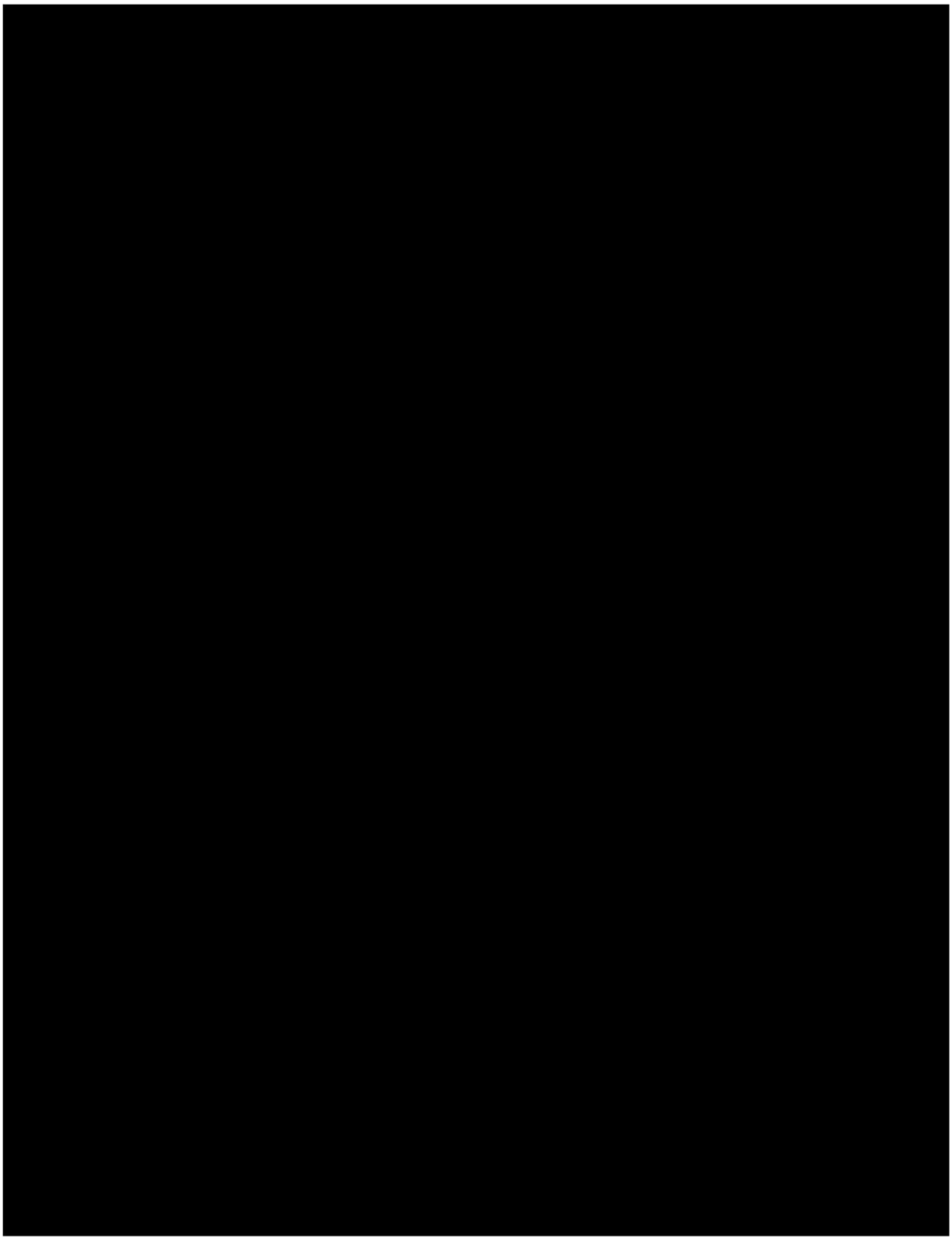
Attachment A – NAES AMP-108

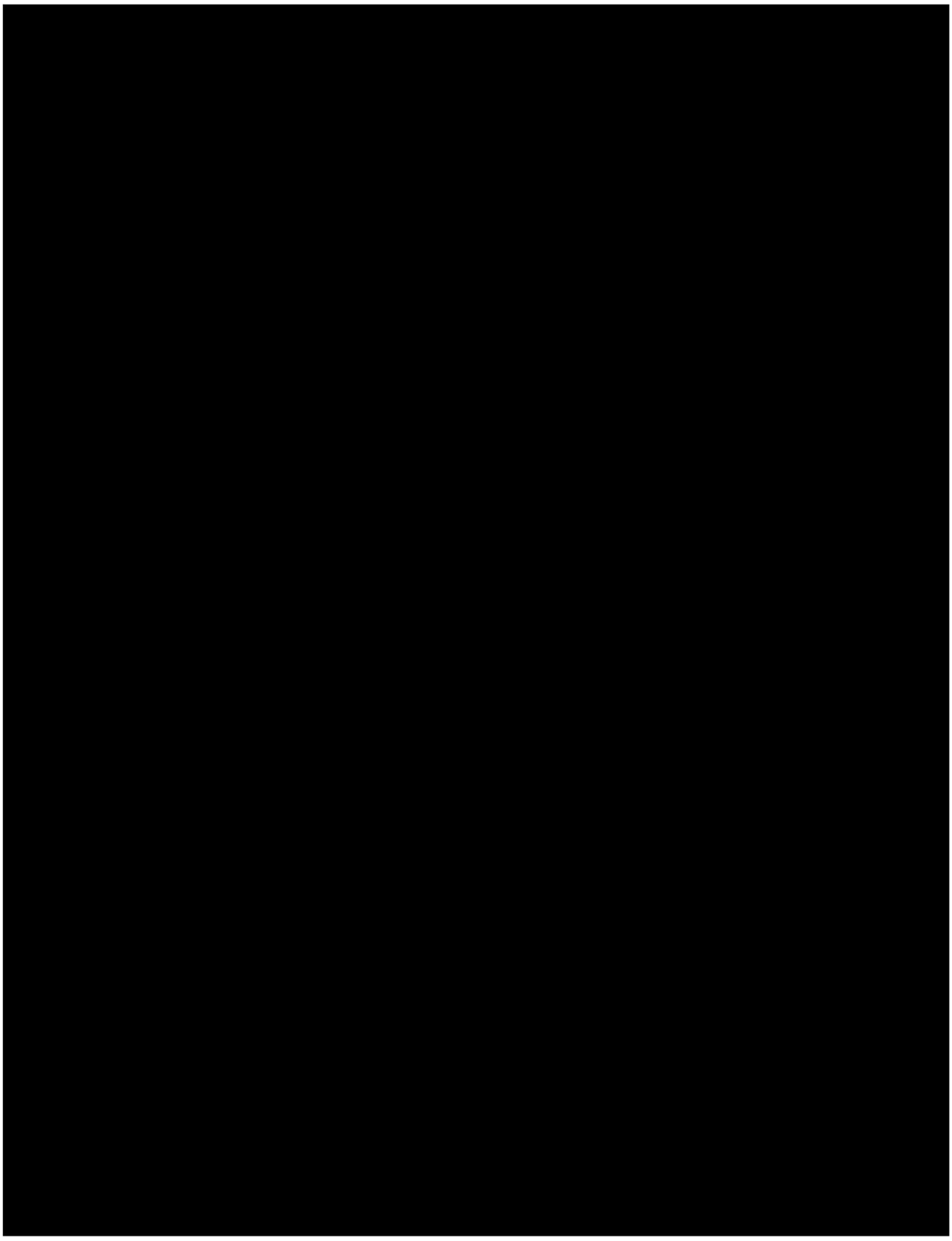




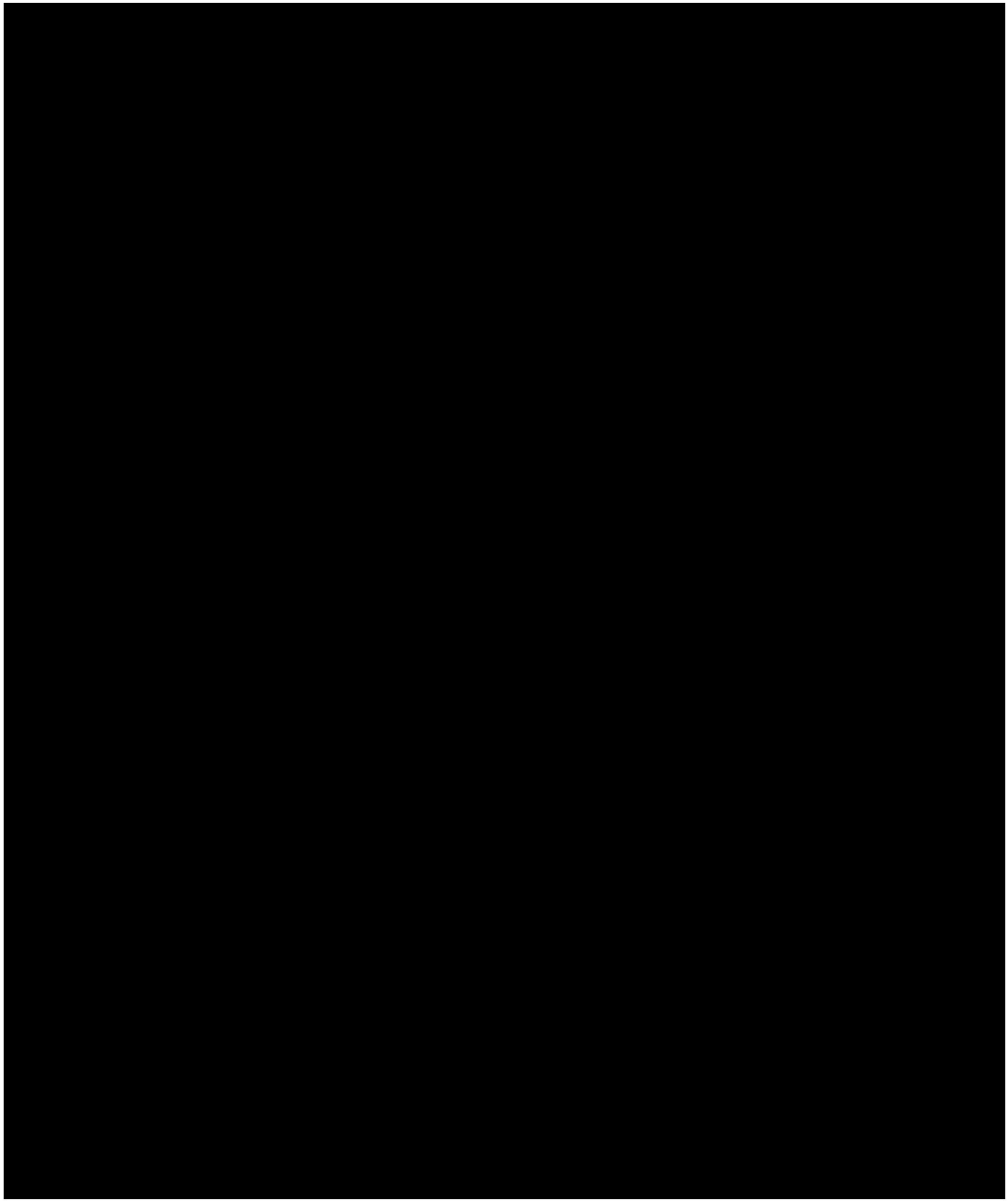








Attachment B – NAES AMP-108 Appendix A



NAES	Emergency Response Plan (no ICP) Safety Manual Program (SMP)

Introduction

Purpose:

The purpose of this procedure is to ensure that workers have the necessary equipment, know where to go, and know how to keep themselves safe when an emergency occurs. The procedure establishes 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.

NOTE:
Reference your, "**Site Safety Master File**" (**Document # XXX-SMF-01**) for site specific policy considerations, and exclusively USE appendices in your "**Site Safety Master File**" to ensure all site considerations and customization needs are met.

Appendices included at the base of each SMP are Standard Sample Documents and may not fully meet the needs of your site.

Scope:

All Site Personnel, All NAES Employees

Responsibilities

① PLANT MANAGER

Is responsible 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.

② 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.

③ CONTROL ROOM OPERATOR

Acts as the Emergency Coordinator until relieved by management.
Accounts for all personnel on-site.

④ EVACUATION COORDINATOR

MAINTAINS communication with Emergency Coordinator.

REPORTS status of evacuated personnel to Emergency Coordinator.

The Evacuation Coordinator may be any qualified plant employee.

⑤ ALL PERSONNEL

PARTICIPATE in training on their work areas regarding fire routes, exits, the location and use of emergency equipment, and understanding and following this plan.

ENSURE contractors or visitors at the facility are familiar with this plan.

Policy

① 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 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).

② HAZARDOUS WASTE OPERATIONS & EMERGENCY RESPONSE (HAZWOPER)

A. **Spill Response**

The following steps will be performed immediately 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 the Hazardous Material Spill Training and Follow-up section below.

A.1. **NOTIFY** Control Room Operator or Designee and all personnel on site of spill/release.

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.

A.2. **ENSURE** all personnel are evacuated from the spill area.

A.3. **ATTEND** to any injured personnel.

A.4. **IF** necessary, **THEN EVACUATE** the entire plant via designated route shown in Appendix A.

Personnel may 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.

a. Plant Manager or Designee **DESIGNATES** evacuation route and muster location.

b. **IF** evacuation of plant is undesirable, **THEN EVACUATE** as directed to secondary location.

A.5. **IF** Emergency involves toxic airborne release, **THEN**:

a. Plant Manager or Designee **EVALUATES** release and wind conditions.

NOTE
The shelter-in-place concept is preferable in the situation where a high concentration cloud of toxic gas passes a building containing people.

b. **DETERMINE** whether to evacuate 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.

c. **IF** the gas cloud is moving in the direction of the control room, **THEN:**

1. **SHUT DOWN** all air conditioning and ventilation systems.

2. All personnel **ENTER** control room area.

3. **CLOSE** all doors leading to control room area.

A.6. **IF** safe option exists, **THEN STOP** the spill at source provided this can be accomplished without causing physical injury.

Examples include:

- **SHUT OFF** pumps,
- **CLOSE** valves,
- **DISCONTINUE** loading/unloading operations.

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.

A.7. Plant Manager will **INSTRUCT** plant personnel further on spill response measures.

a. **IF** Plant Manager **DETERMINES** that the spill or measures to prevent, contain, control or clean up the spill is beyond the capability of the facility's ability, training, manpower, or equipment, **THEN CONTACT** Outside Hazardous Materials Emergency Responders and remediation contractors to help control/clean up the spill.

A.8. **IF** spill or release may place the public at risk, **THEN INITIATE** Public Warnings through local emergency agencies listed on the *Emergency Response Contact List* (Appendix F).

A.9. Plant Manager or designee **MAINTAINS** plant security and communications.

a. Owner Representative only **APPROVES** admission to members of the press.

b. Owner Representative or designee **COORDINATES** all public relations, press releases, and outside inquiries.

A.10. **UTILIZE** every reasonable effort to maintain spill on plant property.

A.11. **IF** the material has been released from the containment system, **THEN PREVENT** spill from entering storm sewers, public waters, or from escaping the facility property as long as it is safe to do so.

A.12. **REFERENCE** Safety Data Sheets (SDS) for proper use of personal protective equipment.

A.13. **Take action** to stop the flow of the spill; examples may include:

- **BUILD** berms,
- **PLACE** absorbent materials,
- **PLUG** storm drain inlets, culverts, and ditches leaving the plant

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.

A.14. **DOCUMENT** all events in detail as soon as possible.

A.15. **FOLLOW UP** with all emergency response organizations, NAES headquarters, and the Owner Representative to ensure all reporting requirements have been met.

A.16. **REPORT** all injuries in accordance with *Injury Response & Reporting* (SMP).

B. **Hazardous Material Spill Training & 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.

B.1. Overview of Hazardous Materials

The chemicals listed in Appendix H 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.

B.2. 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 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 at Appendix H 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 off-site emergency response organizations shall be contacted. Refer to the *Emergency Response Contact (Phone) List* in (Appendix F).

Refer to SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.

B.3. 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. The clean-up may be delegated to a 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. Note: the Fire Department has the authority to take over the position of Incident Commander upon advisement.

B.4. 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.

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.

B.5. 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:

- An understanding of what a hazardous substances are, and the risks associated with them in an incident.
- An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- The ability to recognize the presence of hazardous substances in an emergency.
- 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.
- The ability to realize the need for additional resources, and to make the appropriate notifications to the communications center.

B.6. 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:

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

B.7. Spill Response

1. Upon observation of a release of a hazardous material, chemical, or oil, employees IMMEDIATELY **NOTIFY** Plant Manager with information concerning the spill:
   - Employee name
   - Location of spill
   - Type and quantity of material spilled
   - Actions and result of actions taken to mitigate the spill
   - Circumstances that caused the spill
2. Plant Manager or Designee **NOTIFIES** necessary organizations and governmental agencies listed on the Emergency Contact (Phone) List in Appendix F.
3. **IF** necessary, Plant Manager or Designee **CONTACTS** outside Hazardous Materials Emergency Response organizations and/or hazardous waste clean-up contractors to assist in the remediation of the spill.
4. Plant Manager or Designee **NOTIFIES** NAES management and Owner Representative of all spills regardless of quantity and type as soon as practical.
5. Plant Manager or Designee **PROVIDES** the following information in the agency notification:

a. Facility name, exact location, and phone number

b. Source and cause of spill

c. Type (chemical name), volume of material released, and whether the material is classified as extremely hazardous

d. The estimated volume that reached navigable waters

e. Time, date, and duration of the spill

f. Medium of release (air, soil, water) and anticipated release movement

g. Actions taken and anticipated

h. State whether evacuation is needed

i. Weather conditions, if applicable

j. Known health risks and required medical attention

k. Names of other parties contacted

l. Names of other parties to be contacted

6. **WHEN** recording notifications, **DOCUMENT** the following:

   a. **REPORT** factual notifications,

   b. **AVOID** speculation,

   c. **MAINTAIN** record of all notifications made including all instructions given by parties contacted using the *Emergency Response Call Record Form* shown on Appendix E.

WARNING
Under no circumstances shall any plant personnel provide information to media or the general public concerning the spill

7. **REFER** all inquiries from the media and the public to the Plant Manager or designee.

8. Plant Manager **REFERS** all inquiries to the Owner Representative.

9. For plants with fuel oil:

   Per 40 CFR 112.4, in the event that a discharge of 1,000 gallons of oil escapes the containment systems and enters into the navigable waters of the United States in a single spill event or a discharge of harmful quantities in two spill events within any twelve month period occurs, the Plant Manager will submit notification in writing to the EPA Regional Administrator as per EPA regulations:

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

   a. A complete copy of the SPCC plan

   b. Name, phone number, and address of the facility (*)

   c. Owner and operator name and address (*)

   d. Date and year of initial facility operation (*)

   e. Maximum storage capacity and average daily use (*)

   f. Description of the facility (*)

   g. Quantity and type of material spilled

   h. Cause(s) of the spill(s)

   i. Corrective actions

   j. Additional preventative measures

   k. Other pertinent information

10. Within 24 hours, Plant Staff shall initiate an **INVESTIGATION** of any incident that resulted in, or could reasonably have resulted in, a release of hazardous materials.

B.8. Managerial Responsibilities

Managerial responsibilities following a Hazmat release include;

- Determining origin of incident
- Investigating effectiveness of this procedure
- Evaluating potential need for modifications to 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:

- Date of incident and investigation
- A description of the incident
- The factors that contributed to the incident
- 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.

B.9. 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.

- Recovered pure product for possible refining and reuse
- Contaminated PPE for separate disposal
- Oiled debris for separate disposal, i.e., wood products, beauty bark, etc.
- Contaminated soils for possible incineration or separate disposal
- 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 approved 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 identified as a hazardous waste in accordance with state and federal hazardous waste regulations. 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 SDS.

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.

③ FIRE RESPONSE PROCEDURE

A. In the event of any fire, immediately **REPORT** fire to the Control Room Operator (CRO) via plant radio, cell phone, or other means.

A.1. The report to the CRO shall include the following:

- Your name
- Nature of event – "Fire"
- Location of the fire
- Severity of the fire
- Your planned action (e.g., evacuate or use fire extinguisher)

NOTE
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.

B. **IF** fire is in incipient stage **AND** Respondent is properly trained, **RESPOND** using appropriate fire response equipment. EXCEPTIONS: site SOP's for handling coal fires will take precedence over this procedure.

WARNING

PERSONNEL INJURY or DEATH may occur if fire progresses to a life-threatening event, so evacuate the area immediately .and notify the Control Room

C. **IF** fire progresses beyond incipient stage, **THEN EVACUATE** immediate area to safe place.

D. **IF** fire is beyond the incipient stage **AND** requires outside emergency response, **THEN** the CRO will:

D.1. **CONTACT** 911,

D.2. **SOUND** plant evacuation alarm.

E. To facilitate a quick response, Plant **DESIGNATES** liaison to meet the Fire Response Service at the main entrance gate.

F. Plant personnel **EVACUATE** to Primary Evacuation Area identified in Appendix A.

F.1. **IF** necessary, **THEN DETERMINE** a secondary evacuation area based upon site conditions and wind direction (as determined by the wind sock).

G. **UTILIZE** the Visitor Logbook from the Administration Building to aid in accounting for all personnel.

NOTE
In the event of a natural gas leak of any size, immediately shut the Fuel Emergency Stop Valve (i.e.. slam shut valve) from the control room.

④ FIRE RESPONSE DRILL

A. Annually **CONDUCT** Fire Evacuation Drills.

A.1. **MAINTAIN** written record of all drills performed.

A.2. **CORRECT** deficiencies observed during drills.

B. At a minimum, **TEST** Plant Evacuation Alarm monthly.

⑤ 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:

- Your name
- Nature of event – "chemical spill/release"
- Location of the spill/release
- Chemical identity and severity of the spill/release (estimate quantity)
- Your planned action (e.g. 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.

NOTE
Immediately call 911 for any emergency that is considered a threatened, uncontrolled release of any hazardous material.

⑥ MEDICAL EMERGENCY

A. **REPORT** all injuries to the supervisor, no matter how minor.

B. First Aid/CPR trained personnel **RESPOND** to minor first aid injuries.

C. **IF** someone is seriously hurt, **THEN NOTIFY** the CRO of the following;

- Location of the injured person
- Nature of the injury
- Any other important information related to the incident scene (ex. down power line next to injured person, chemical drum spill, etc.).

D. CRO **CONTACT** 911 to alert emergency crews. An individual will be designated to meet emergency crews at the main entrance gate.

E. CRO **ANNOUNCES** for all available First Aid/CPR trained personnel to **REPORT** to the incident site.

E.1. The First Aid/CPR trained personnel **ADMINISTER** First Aid and any other measures within their training until the emergency crews arrive at the scene.

F. **IF** the situation warrants the rescue of an unconscious or immobile person from a confined space, a collapsed trench, or an elevated surface or personal fall arrest system, **THEN**:

F.1. CRO **CONTACTS** 911,

F.2. CRO **REPORTS** to emergency personnel the type, location, and hazards of the area.

⑦ EARTHQUAKES, TORNADOS, & SEVERE STORM EMERGENCIES

A. **Earthquakes**

A.1. **Immediately get down on the floor. Most injuries during earthquakes occur when persons are knocked to the ground during tremors. TAKE** cover under a desk or strong table or in a doorway, or sit or stand against an inside wall.

A.2. **STAY** away from windows, glass, bookcases, and outside doors.

A.3. **STAY** inside the building during a severe earthquake because of the hazards of downed power lines, falling debris from the building, etc.

A.4. **MOVE** away from buildings and utility wires.

A.5. **WATCH** for falling glass, electrical wires, poles or other debris.

A.6. **CHECK** for injuries and provide first aid.

A.7. **CHECK** for broken fuel lines and electrical faults.

A.8. **ISOLATE** ruptures and faults.

A.9. **CHECK** for ruptures in systems containing hazardous chemicals. **ISOLATE AND CONTAIN** spills.

A.10. **PLACE** plant in a safe condition by shutting down equipment as necessary.

A.11. **Avoid the use of** the telephone except emergency notifications only.

B. **Tornadoes & 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, **THEN** 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:
  - Small interior rooms on the lowest floor without windows,
  - Hallways on lowest floor away from outside doors and windows,
  - Rooms constructed of reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system.

B.1. **INSTRUCT** Employees to seek shelter areas as near as possible to inside walls, away from window areas.

B.2. CRO **ANNOUNCES** warnings to all personnel of the outside conditions and to seek shelter inside in a safe location.

B.3. **TAKE SHELTER** 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.

WARNING
An automobile is not a safe place to be in these circumstances.

B.4. **STAY INSIDE** the building until dangerous wind levels have subsided.

B.5. **IF** outside, **THEN SEEK** safety in a low-lying depression such as a ditch or ravine.

B.6. CRO **ANNOUNCES** indicating when the tornado or severe storm has passed.

B.7. **DESIGNATE** an investigative team to **INSPECT** for:

- All outside plant areas
- Damage to machinery or dangerous debris
- Down power lines
- Other potentially dangerous conditions

(8) BOMB THREATS & 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 (Bulk Electric System), 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.
- 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 - *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 all plant personnel and visitors shall maintain and enforce a strict site security policy to try to prevent the occurrence of 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:

For any abnormal events that could potentially be acts of Sabotage, refer to *Actions for Suspected Sabotage Events* (Appendix G).

B.1. Phone calls received regarding a Bomb Threat, or other Act of Sabotage, refer to *Bomb Threat Checklist* (Appendix B) 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, **THEN ATTEMPT** to obtain this information.

d. **INFORM** 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.

f. **RECORD** your findings on the checklist.

g. **ATTEMPT** to have the caller speak to a designated member of management.

h. **STAY** on the line until the conversation ends and the caller hangs up.

B.2. **MAINTAIN** security and communications.

a. Plant Manager (or designee) **MAINTAINS** plant security by restricting access so that only essential plant personnel and emergency personnel are admitted.

b. **IF** there are enough people on-site, **THEN MAN** the telephones. Two-way radio communication should be kept free to be used as needed.

c. **RESTRICT** admission to members of the press without the approval of the Owner Representative.

d. Owner Representative or designee **HANDLES** all public relations, press releases, and outside inquiries.

> **WARNING**
> **PERSONNEL INJURY AND DEATH can occur if a suspicious item is touched, moved, jarred, disturbed, or covered.**

B.3. **QUICKLY SEARCH** the plant area for suspicious, unusual, or foreign items (suspected bombs/Sabotage devices).

B.4. **REPORT** any findings.

B.5. **OBSERVE** the precautions listed in Appendix C.

B.6. **WHEN** police arrive, **THEN ASSIST** as necessary with more detailed search of the plant.

B.7. **IF** suspicious item or bomb is located during the search, **THEN PERFORM** the following:

> **WARNIING**
> **INJURY AND DEATH can occur if a suspicious item is touched, moved, jarred, disturbed, or covered.**

a. **ISOLATE** the item.

b. **NOTE** the location, appearance, colors, wires, etc.

c. **CONTACT** civil authorities and management in person.

d. **AVOID** using 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.

B.8. **IF** plant is evacuated at any point, **RETURN** after the police have declared the site safe.

B.9. **UPON** completion of the threat;

a. **ASSEMBLE** Management Team to critique handling of situation.

b. **COLLECT** Recommendations found in critique.

c. **INCORPORATE** recommendations for improvement into the policy.

d. **CONDUCT** re-training with necessary personnel.

C. **Communication**

C.1. **REPORT** the event to the police as soon as possible.

C.2. **PROVIDE** the police with the following information:

- Your name
- Your location and phone number
- A detailed account of the event
- **IF** the event is a threat received (via phone or other method), **THEN 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

C.3. **ENSURE** plant operating personnel are aware of the sabotage event on your facility and any sabotage event that would affect larger portions of the Interconnection.

NOTE
Have all written records or notes of the threat available.

C.4. **WHEN** police arrive at the site, **THEN** Plant Manager (or designee) **BRIEFS** the police as to:

- Location of any emergency control valves or switches,
- Plant overall security status, and
- Any other information regarding the nature of the threat or event.

C.5. **REQUEST** Appropriate assistance from the police including site protection and personnel protection during evacuation.

C.6. **WHEN** the threat has been at least tentatively identified and controlled, **THEN** PERFORM the following:

a. **NOTIFY** the Plant Manager, the Owners Representative, and the NAES Headquarters Operations Director.

b. **REFERENCE** Applicable telephone numbers are listed below for quick access.

c. **UTILIZE** Additional contact information as necessary based on the circumstances of the event provided in Appendix F.

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) to the US Department of Energy according to the OE-417 Form instructions. (http://www.oe.netl.doe.gov/oe417.aspx)

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).

NOTE
NAES NERC procedure RCP-EOP-004-ATT-A contains reporting guidelines for reporting damage or destruction of the Facility that results from actual or suspected intentional human action, as well as any physical threats to the Facility excluding weather or natural disaster related threats, which has the potential to degrade the normal operation of the Facility. Please refer to RCP-NERC-EOP-004-ATT-A for NERC Event Reporting guidelines for these instances.

(9) TRAINING

A. All plant employees shall receive training on emergency response procedures on an annual basis.

B. 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:

- Familiarization with this plan
- Any Hazmat Training that may be applicable
- The use of any firefighting equipment available
- Any special items or needs that may rise

E. All contract employees training must include the following:

- A general overview of this plan
- 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.

Attachments

SMP-02 Appendix A- Facility Evacuation Route Diagram

SMP-02 Appendix B- Bomb Threat Checklist

SMP-02 Appendix C- Suspected Bomb Sabotage Device Safety Precautions

SMP-02 Appendix D- Emergency Response Event Log

SMP-02 Appendix E- Emergency Response Call Record Form

SMP-02 Appendix F- Emergency Response Contact List

SMP-02 Appendix G : Actions for Suspected Sabotage Events

SMP-02 Appendix H : On-Site Hazardous Chemicals

SMP-02 Table 1- Emergency Organizational Telephone Numbers for Threat Control

Revision Management

Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
R0.1	5/27/2020 2:59 PM	Updated reference to Appendix H and SMP-14 Section #4 for details on reporting any accidental release (whether onsite or offsite) which results in a fatality, serious injury, or substantial property damage.	Alex Tan
R0	10/1/2019 7:22 PM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	1/30/2019 10:52 AM	New document	Jason Gammon

Hurricane and Flooding Procedure

The preservation of lives and the safety of personnel shall take precedence over all other considerations when determining the actions to be taken in case of threatened storm or flood damage.

In all situations, the plant operations will be conducted according to instructions from the QSE and ERCOT.

If it is deemed necessary to shutdown plant operations and to evacuate the facility, every precaution possible must be taken to ensure that equipment is shutdown in the proper manner and secured in such a way that windstorm and flood wave action will have minimum impact.

As a power generator, the facility plays a key role in restoration following a natural disaster. Plant Management is responsible for restoring services as quickly as practical and as safely as possible following evacuation and shutdown. Additionally, every effort must be made to maintain power generation in the event of a natural disaster taking into consideration the safety of all personnel.

The Plant Manager or designee will provide continuous update and involvement to the Owner's Representative regarding activities related to the event.

A. DEFINITIONS

1. **Hurricane**. A hurricane is an intense tropical weather system with a well-defined circulation (counterclockwise in the Northern Hemisphere) and maximum sustained winds of 74 mph (64 knots) or higher.
2. **Tropical Storm**. An organized system of strong thunderstorms with a defined circulation and maximum sustained winds of 39 to 73 mph (33 to 63 knots.)
3. **Tropical Depression**. An organized system of clouds and thunderstorms with a defined circulation and maximum sustained winds of 38 mph (33 knots) or higher.
4. **Tropical Disturbance**. A moving area of thunderstorms in the tropics that maintains its identity for 24 hours or more.
5. **Gale Warnings**. Gale warnings may be issued when winds of 39 to 54 mph (34 to 47 knots) are expected.
6. **Storm Warnings**. Storm warnings may be issued when winds of 55 to 73 mph (48-63 knots) are expected.
7. **Hurricane Watch**. A hurricane watch is issued for a coastal area when there is a threat of hurricane conditions within 24 to 36 hours.
8. **Hurricane Warning**. A hurricane warning is issued when hurricane conditions are expected in a specified coastal area in 24 hours or less. Hurricane conditions include winds of 74 mph (64 knots) and/or dangerously high tides and waves. Actions for protection of life and property should begin immediately when the warning is issued.
9. **Storm Levels**. For the purpose of this procedure, Storm levels will be categorized into 4 levels for ease in determining the correct actions to take.

a. ***Level 1***: A hurricane or tropical storm is reported to be within the Gulf of Mexico and may be within 48 hours of reaching landfall within the vicinity of the plant.

b. ***Level 2***: A hurricane or tropical storm is reported to be within the Caribbean or specific region and may be within 24 hours of reaching landfall within the vicinity of the plant.

c. ***Level 3***: A hurricane or tropical storm is reported to be within the Caribbean or specific region and may be within 12 hours of reaching landfall within the vicinity of the plant.

d. ***Level 4***: A hurricane or tropical storm is reported to be within the Caribbean or specific region and may be within 8 hours of reaching landfall within the vicinity of the plant.

B. RESPONSIBILITY

1. The Plant Manager or designee will establish and maintain a Hurricane Preparedness Plan. This plan will ensure that the plant is ready to cope with a hurricane in case of a Level 1 Warning. The plan shall include the nomination of a Hurricane Crew with an action Checklist, a Securing Crew with an action Checklist, and a Hurricane Supplies Checklist. The Plant Manager or designee will also be responsible for the following actions:

   a. Designate an estimated date/time for return to the plant.

   b. Coordinate with local authorities and emergency response personnel to advise them of plant storm preparations and the number of personnel remaining at the plant during the storm. Establish both primary and alternate means of communication with local authorities and emergency response personnel.

   c. As necessary and in compliance with state and local laws and regulations, make necessary arrangements for return of essential plant personnel immediately after storm subsidence. This may require providing a list of essential personnel to local authorities so that they will be allowed back into the storm area after the storm is over.

   The O&M Manager (or control room operator in the Operation's Managers absence) will be responsible for the following:

   a. The monitoring of weather conditions for potential problems.

   b. The monitoring of local radio channels and when possible CNN (Cable News Network via internet). In the event that the foregoing is not available, the O&M Manager shall establish contact with the National Weather Service and arrange for the receipt of periodic weather reports.

   c. Keep the Plant Manager advised of any potential threats to the plant. In any event, conditions that may result in a Level 1 storm condition or above must be reported. If a storm reaches Level 2, the storm will be tracked on an hourly basis on a suitable map.

   d. Prior to any storm, O & M manager should contact contractors and suppliers in the area to make prior arrangements for any equipment

or personnel that may be required to restore plant operation. This may include arrangement for cranes, emergency generators, portable, lighting and other measures that may be necessary based on an evaluation of the anticipated storm's intensity. Arrangements may also need to be made for support personnel that may be necessary to support plant restoration including mechanical and electrical contractors as well as the plant water plant contractor.

e. Prior to any storm, O & M manager should contact key plant suppliers to arrange for expedited post-storm delivery of necessary bottled gases, chemicals (such as aqueous ammonia) and other consumables necessary for plant operation. Where possible, such supplies should be topped off prior to any storm.

f. Review the possibility of unusual events and operational conditions that may occur during and after the storm with personnel remaining at the plant during the storm. This may include sudden loss of large blocks of load, voltage surges and other events. Stress the need to communicate with the QSE, transmission operators and other agencies prior to any restoration operations.

2. The Hurricane Crew will consist of the minimum number of people required to safely operate the plant in case of an emergency. The crew shall consist of at least one senior manager. The crew will be responsible for operating the plant during Level 2 through 4 and initial restoration conditions unless the Plant Manager determines that the plant is to be evacuated. Guidance for the Hurricane Crew is provided on the Hurricane Crew Checklist.

3. The Securing Crew will consist of the Hurricane Crew plus personnel required to secure the plant in the event of an impending hurricane. The crew will be responsible for preparing the plant for a potential hurricane but will evacuate the plant in case of a Level 3 condition. Guidance for the Securing Crew is provided on the Securing Crew Checklist.

4. Crews will be determined on a voluntary, first come, first serve basis. Members will serve on the crew for the entire hurricane season May through November. Those employees who volunteer will be exempt from being chosen the following year. In the event not enough employees volunteer, employees will be chosen by lottery. All plant personnel must be available to assist in manual labor to prepare the plant. The required personal safety equipment will be worn by all employees, during the hurricane and flooding procedure.

LEVEL 1 (HURRICANE WATCH)

1. The Plant Manager will activate the Hurricane Crew and the Securing Crew. These crews will then begin to make preparations to stay on site if the need arises.

2. The Hurricane Crew is to initiate the actions defined in the Hurricane Procedure Checklist.

3. The O&M Manager will monitor the local news for an announcement of a Hurricane Watch.

4. Once a Hurricane Watch is issued, notify the plant staff of Level 1 and call a meeting with all plant supervisors to review the hurricane procedures.

5. Check fuel and lube oil inventory levels. If necessary, top off diesel fuel tanks.

6. Perform an inventory of the Hurricane Supplies Checklist, and replenish as needed.

C. LEVEL 2 (HURRICANE WARNING)

1. Once a Hurricane Warning has been issued, notify the plant staff that a Level 2 condition exists and call a meeting with all plant supervisors to check the status of the hurricane procedure and checklists.

2. The Securing Crew is to initiate the actions defined in the Securing Crew Checklist.

3. The Plant Manager will verify that the Securing Crew Checklist actions are complete.

4. The plant will stop all maintenance projects not essential to placing the plant in a safe condition.

5. The Hurricane Crew members must relieve each other as necessary so that they have enough time to sleep and prepare their home for the impending hurricane.

D. LEVEL 3

1. The Plant Manager will determine manning requirements and at an appropriate time evacuate all non-essential personnel from the plant. The decision to evacuate is to be made far enough in advance of the storm so as to allow evacuating personnel adequate time to reach safety prior to the storm's approach. The Hurricane Crew will stay on site to maintain the site safety.

2. The Plant Manager will verify that all precautions have been taken to maintain the safety of the plant and all remaining on site personnel.

3. Notify the Owner's Representatives, the Corporate Compliance Contact, and the Corporate O&M contact in accordance with section 11 Emergency Contacts.

4. Notify the QSE of the plant status and determine actions necessary to maintain communications and coordinate activities. Alternate means of communication should be identified in case primary means are not available.

E. LEVEL 4

The Plant Manager will track the storm and, based on the reported intensity and course, will determine whether or not to continue plant operations.

1. If a complete evacuation of the plant is deemed necessary, the Plant Manager shall:

   a. Notify the QSE, the Owner's Representatives, the Corporate Compliance Contact, and the Corporate O&M Contact of the impending plant shutdown in accordance with section 11 Emergency Contacts.

   b. Shutdown and evacuate the plant. Shutdown of the plant will be performed so as to maximize the prompt plant recovery once storm conditions have cleared.

2. During the storm, all personnel must stay inside, away from doors and windows, close all interior doors, and lie on the floor under a table or other sturdy object during intense periods.

3. Do not be misled by the "eye" or the lull that occurs as the storm center moves overhead. The other side of the hurricane "eye" has winds that will rapidly increase and will come from the opposite direction.

4. Notify Owner Representative and QSE and obtain permission before restarting the plant. Care is to be exercised in reconnecting to the grid because system faults may cause operational problems.

F. FLOODING PRECAUTIONS

Severe flooding may result from heavy rainfall or from storm driven water. Flooding poses the following potential hazards:

1. **Drowning**. In severe cases, personnel may be washed away in strong currents and may drown or be severely injured.

2. **Pollution**. Rising water may cause drains and sumps to overflow causing pollution to the environment.

3. **Equipment Damage**. Machinery and other equipment may be damaged due to rising or flowing water.

4. **Electrocution Hazard**. Rising water may cause electrical short circuits and may become an electric shock hazard.

5. **Subsidence**. Saturated ground may subside. Underground tanks, especially if empty, may be forced to rise. Piping may become distorted or rupture.

6. **Landslides**. Saturated ground may shift or result in land or mud slides. Earthen berms may be threatened with collapse.

7. Snakes and other potentially dangerous animals may seek dry ground.

G. FLOODING ACTIONS

In the event of rising water or continued heavy rains, the Plant Manager should ensure that:

1. Elevate critical spares and equipment sufficiently to ensure that they will not be flooded.
2. Secure all necessary buildings so as to prevent floodwater from entering the structure.
3. Vehicles should be moved to higher ground if possible or evacuated.

AFTER THE STORM

1. Following the passing of the storm, every effort to return the plant to normal operations is to be made.
2. A complete inspection of the facility is to be made with any noted damages reported and photographed for insurance purposes and for repairs. A complete report of the storm and damage must be written and maintained on file.
3. All plant personnel are to contact the site management team using previously established primary or alternate methods such that manpower availability can be determined.
4. All plant personnel will cautiously approach the plant and communicate with onsite staff to check for downed high voltage lines and other personnel/plant hazards before entering the plant.
5. Provide first aid and transport any injured personnel to the nearest clinic/hospital.
6. Proceed cautiously and identify any safety hazards or plant problems. Barricade off unsafe areas.
7. Establish a new plant watch rotation and relieve the hurricane watch team as soon as practical to allow the hurricane watch team the opportunity to check on their homes and family.
8. Identify damaged/missing equipment and make reports to the Plant Manager. Designate reporting codes for ability to return to service: A) not able to repair or is missing, B) Major repair (>8 hours), C) Minor repair (<6 hours) and D) appears to be in working order or no damage noted. Maintain a status board of areas checked and equipment damaged.
9. If plant is still operating, use the control room alarm system to identify areas to investigate.
10. Restore the plant to service, noting that problems may arise as equipment is restored and started.
11. Check equipment that was shut down and isolated, empty containment areas.
12. Take actions to contain any hazardous spills that may have occurred.
13. Clear debris from site.

HURRICANE PROCEDURE CHECKLIST

Completed By:_____ Date:_____

HURRICANE LEVEL: 1 2 3 4 NAME:_____

Procedures:	Completed By	Date/Time
1. Track Map Started		
2. Check Operational Inventory		
3. Hurricane Crew		

Name	Position	Name	Position

4. Securing Crew _____ _____

Name	Position	Name	Position

5. Notify Utility of Evacuation		
6. Notify Owner's Rep. & Corp. Contacts		

Comments:

_____
_____
_____
_____
_____

SECURING CREW CHECKLIST

Completed By:_____ Date:_____

HURRICANE LEVEL: 1 2 3 4 NAME:_____

ITEM		Check Date	Comp.
1.	Check hurricane supplies.	_____	_____
2.	Secure all air and water hoses throughout plant.	_____	_____
3.	All fire extinguishers removed and stored inside if they cannot be secured.	_____	_____
4.	All oil cans and buckets removed and stored.	_____	_____
5.	Secure all trash barrels and lids.	_____	_____
6.	Secure ladders.	_____	_____
7.	Inspect the plant and tie down or bring inside anything not securely fastened to the ground.	_____	_____
8	Tape, board, or shutter all window and door openings.	_____	_____
9.	Secure all manholes and open covers.	_____	_____
10.	Clear all storm drains.	_____	_____
11.	Stage oil dry bags in areas prone to flooding.	_____	_____
13.	Verify all necessary control system and business system backups have been completed and have been stored in a safe location.	_____	_____
14.	Safeguard essential electronic equipment (Computers, lab equipment, etc.) as necessary	_____	_____
15.	Secure a laydown area.	_____	_____
16.	Verify all diesel fuel tanks, company vehicles, UTV/ATV and gas tanks are topped off.	_____	_____
17.	Stage diesel pump in location(s) prone to flooding	_____	_____
18.	Secure all onsite vehicles where possible.	_____	_____

HURRICANE SUPPLIES CHECKLIST

Completed By:_____ Date:_____

HURRICANE LEVEL: 1 2 3 4 NAME:_____

ITEM	Check Date	Comp.
1. Provide food for the Hurricane Crew and Securing Crew (enough for 8 + people for 4 days).		
2. Provide for an adequate source of drinking water ~ 80 gallons (enough for 8 + people for 4 days).		
3. Provide a port-a-can, for the General Services Building.		
4. Provide cots and blankets to accommodate the Hurricane and Securing Crews		
5. Provide flashlights for all members of the Hurricane and Securing Crews		
6. Provide food preparation equipment, including		
Plastic knives, forks, spoons		
Can opener		
Butcher knives		
Camping stove/Alternative cooking stove (fuel for 12-15 meals)		
Matches/Lighter		
Paper plates, coffee cups, and bowls		
7. Provide 2 flat blade shovels		
8. Provide 10 rolls of duct tape.		
9. Provide adequate boards, wood, and other construction materials to secure and board up the plant openings.		
10. Provide a well-stocked first aid kit and ensure that members of the Hurricane and Securing Crews are trained in first aid		
11. Provide batteries (to supply flashlights, radios, weather radios and other equipment.		
12. Provide manlift for securing crew (before and after storm Efforts).		
13. Provide diesel pump for area(s) prone to flooding.		
14. Provide oil dry bags (10 or more)		
15. Provide heavy duty tarps and trash bags.		
16. Provide disposable towels (enough for 8+ people for 4 days)		
17. Provide rope, tie wire and ratchet straps for securing		
18. Provide mosquito fogger and fogging solution (enough solution for 1 week)		

Extreme Cold Weather Procedure

The preservation of lives and the safety of personnel shall take precedence over all other considerations when determining the actions to be taken in case of threatened or actual cold weather event.

In all situations, plant operations will be conducted according to instructions from the QSE and ERCOT.

Routine cold weather preparation is to take place prior to the onset of the winter season. Preparation is to include an evaluation of overall plant preparedness and any equipment condition or issues that might affect plant operation in cold weather.

1. **Annually, prior to October 31 and monthly after, until March 31 the following actions are to be taken:**

- Conduct a heat trace survey, to include a check of all plant heat trace circuits for proper function and make any necessary repairs to heat tracing and insulation systems; Print and Fill Out Form CWP-04 and attach to Work Order Task No. Freeze- Protection in MP2.
- Conduct an inspection of critical instrumentation; Print and Fill Out Form CWP-05 and attach to Work Order Task No. Freeze- Protection in MP2. (Note any deficiencies in heat trace and insulation systems. Requisition repair materials and labor to perform repairs. Repairs are to be completed prior to November 15th; Reference Work Order Task No. Freeze- Protection in MP2 on Repair Work Order.)
- Conduct an inspection of insulation systems that are servicing heat traced piping and instrumentation lines; Print and Fill Out Form CWP-06 and attach to Work Order Task No. Freeze- Protection in MP2. (Note any deficiencies in heat trace and insulation systems. Requisition repair materials and labor to perform repairs. Repairs are to be completed prior to November 15th; Reference Work Order Task No. Freeze- Protection in MP2 on Repair Work Order.)
- Inspect instrument air dryer. Evaluate dryer desiccant condition and replace if required; Reference Work Order Task No. Freeze- Protection in MP2.
- Conduct an inspection of air filters and coalescing devices on control valves. Replace filters and elements as required; Print and Fill Out Form CWP-03 and attach to Work Order Task No. Freeze- Protection in MP2.
- Conduct an inspection of CTG anti-icing system verifying control valve operation; Print Instructions and Fill Out Form CWP-08 and attach to Work Order Task No. Freeze- Protection in MP2.
- Conduct inspection of diesel generators; Print and Fill Out Form CWP-09 and attach to Work Order Task No. Freeze- Protection in MP2.

- Inventory and restock cold weather gloves, ice melt, propane, heat lamps, heating blankets, spare insulation materials and fire-retardant materials for temporary wind blocks. Ensure that all heaters (electric and kerosene) are functioning properly and are staged in a central location (i.e., Maintenance Shop, etc.); Print and Fill Out Form CWP-02 and attach to Work Order Task No. Freeze- Protection in MP2.

2. Annually, prior to December 1, the following actions are to be taken:

- Lock Out Tag Out Evaporative Cooler System.
- Contact contractor support list and request winterization efforts be taken to ensure system reliability. Use Form CWP-10 and attach to Work Order Task No. Freeze-Protection in MP2.
    - **Evoqua**- (Demineralized Water System)
    - **Kinder Morgan-** (Natural Gas Provider)
    - **Scaffold Monkey/Myane/Spartan**- (Scaffold and Insulation)
    - **MMR**- (I&E Support)
    - **Shrieve**- (Sulfuric Acid, Ammonia and Bleach Provider)
    - **Nalco**- (Steammate, Dianodnic/120, Optisperse Po4, AZ8104/3DT199, Flogard/3DT175, Corrshield NT4203 (pails), Cortrol/Eliminox)
- Construct scaffold frames and Install fire retardant wind break material on constructed scaffold frames to form the wind breaks on the top of the HRSG and build wind breaks/warming huts around critical transmitters identified on the critical instrument list and install insulation material on the deck grating inside the boundary of the wind break/warming hut.

3. Upon receipt of a Weather Advisory or other credible information indicating that a cold weather event is anticipated:

- COMPLETE STEPS 1 & 2 of Cold Weather Procedure.
- Complete Cold Weather Checklist. Print and Fill Out Form CWP-01 and attach to Work Order Task No. Freeze- Protection in MP2.
- Move Chemical Tote 175 into the crane bay. Also, move all spare 175 Totes into the crane bay.
- Ensure that the demineralized water storage tanks are maintained at high levels in case of RO system issues;
- Verify that the demineralized water system has been winterized by contractor;
- If the plant is down, check the function of all combustion turbine servo valves in preparation for the plant start;
- Check the instrument air system and the moisture separators installed on critical control valves for proper operation and ensure that any moisture is drained from the traps;
- Check the dew point at the instrument air dryer;

- Ensure that all Turbine Building windows, doors and etc. that can be closed are closed. Board up windows that cannot be closed.
- Secure portable toilets and stage in crane bay in an effort to prepare for loss of water supply;
- Increase day/night shift size by scheduling extra control room board and outside operators for the anticipated duration of the event;
- Increase mechanical and electrical maintenance coverage to around the clock by adding 1 mechanical maintenance and 1 electrical maintenance staff to the day/night shift working a 12-hour shift schedule for the anticipated duration of the event;
- If necessary secure mechanical, electrical & scaffold/insulation contractor support to supplement plant staffing for the anticipated duration of the event;
- Notify the maintenance staff that have not been placed on shift of the need to be available for call out/overtime as required;
- If the unit is offline but otherwise available and in the absence of a day ahead ERCOT dispatch instruction, coordinate with Owner Representatives to determine appropriate start time. It may be necessary to start the unit well in advance of the anticipated weather event in an effort to achieve stable operation prior to temperatures dropping well below freezing;
- Stage heat lamps, extension cords, electric heating blankets, insulating blanket material, and wind block material at the HRSG drum level.

4. **During the weather event** (If ambient conditions are forecasted to be 32 degrees Fahrenheit or below for a sustained period of time >4 hours):

- Deploy electrical cords, heat lamps and/or heating blankets to critical instrument warming huts and turn on prior to reaching freezing temperatures;
- The control room operator has the authority to dispatch additional plant personnel if deemed necessary to maintain the operation and reliability of the plant. The O&M manager and/or plant manager will be notified of the need for additional personnel as soon as practical;
- In the event any identified critical instruments or equipment should fail or start to fail, and have the ability to impact the operation and reliability of the plant, immediate actions will be taken to resolve the issue(s). If the issue(s) are unable to be resolved by onsite personnel, the control room operator will dispatch the necessary personnel to resolve the issue(s). Notification shall be made to the O&M manager and/or plant manager as soon as practical;
- During the weather event, freeze protection rounds with be conducted 3 times per shift checking heat trace breakers, instrument air receivers for moisture accumulation, wind breaks, cooling tower and HRSG chemical injection systems, cooling tower for ice buildup and fuel gas separator for condensate accumulation. The rounds will be logged on the freeze protection round sheet;

NOTE: *If at any point during the cold weather response if Victoria WLE, LP has concerns about controlling emissions below the facilities permitted levels; the "Environmental Incident Reporting" guidelines shall be followed.*

Cold Weather

The preservation of lives and the safety of personnel shall take precedence over all other considerations when determining the actions to be taken in case of threatened or actual cold weather event.

In all situations, plant operations will be conducted according to instructions from the QSE and ERCOT.

Routine cold weather preparation is to take place prior to the onset of the winter season. Preparation is to include an evaluation of overall plant preparedness and any equipment condition or issues that might affect plant operation in cold weather.

NOTE: The following drum level transmitters are located on the North and South side and are typically the ones that can be more problematic during a cold weather event.

HP Drum – 040, 044 & 048

IP Drum – 140,144 & 148

LP Drum – 240, 244 & 248

Victoria Power Station Cold Weather Checklist
1. _____ Check all plant heat trace circuits for proper function and make any necessary repairs. Have IC&E Technician perform amp checks and verify proper functionality.
2. _____ Inspect transmitter insulation (See Cold Weather Insulation Inspection sheet)
3. _____ Verify that an administrative LOTO is in place on the evaporative cooler system.
4. _____ Ensure that Demin Storage tanks are maintained at high levels in case of issues with the R.O. System.
5. _____Verify that the demineralized water system has been winterized by contractor.
6. _____ If the plant is down, check the function of all combustion turbine servo valves in preparation for the plant start.
7. _____ Check the instrument air system and the moisture separators installed on critical control valves for proper operation and ensure that any moisture is drained from the traps. (See Control Valve Air Supply Coalescing Filters Checklist).
8. _____ Check the dew point at the instrument air dryer.
9. _____ Check diesel generators (fuel level, coolant level, oil level, hoses, belts, block heater, etc..)
10. _____ Ensure that all heaters (Electric and Kerosene) are functioning properly and are staged in a central location (i.e. Maintenance Shop, etc...)
11. _____ Ensure that all Turbine Building windows, door and etc. that can be closed are closed.
12. _____ Secure portable toilets and stage in crane bay.
13. _____ Increase Day/Night shift size by scheduling extra control room board and outside operators for the anticipated duration of the event. (See employee contact roster below).
14. _____ Increase mechanical and electrical maintenance coverage to around the clock by adding 1 mechanical maintenance and 1 electrical maintenance staff to the day/night shift working a 12-hour shift schedule for the anticipated duration of the event.
15. _____ Notify the maintenance staff that have not been placed on shift of the need to be available for call out/overtime as required. (See Employee Contact Roster)
16. _____Secure mechanical, electrical & scaffold/insulation contractor support to supplement plant staffing for the anticipated duration of the event if necessary.
17. _____ If the units are offline but otherwise available and in the absence of a day ahead ERCOT dispatch instruction, coordinate with Owner Representatives to determine appropriate start time. It may be necessary to start the unit well in advance of the anticipated weather event in an effort to achieve stable operation prior to temperatures dropping well below freezing.
18. _____ Stage heat lamps, extension cords, portable generator, insulating blanket material, and wind block material at the HRSG drum level. (See Freeze Protection Go Kits Inventory Checklist)
Performed By: Date:

FORM CWP-01

Freeze Protection Go Kits	
Unit	Location
Box#1	Top of HRSG
Qty	Description
4	100" extension cords
2	50" extension cords
4	clamp on heat lamps
4	120 V electric heating blankets
Box#2	Top of HRSG
Qty	Description
8	al poly reflective insulation Blankets
12	250W infrared lamps
1	clamp on heat lamps
POWER DISTRIBUTION	Top of HRSG
Qty	Description
1	480/120 Transformer and Distribution Panel
Date:	
Printed Name & Signature:	

Cold Weather Supplies		
Qnty	Description	Location
2	5-gallon propane bottles	Weld Shop Flammable Cage
2	Hot Spotter Torch Kits	Maintenance Shop
2	100' ext. cords	Maintenance Shop
2	50' ext. cords	Maintenance Shop
10	50 lbs. bags of ice melt	Warehouse
23	Cold weather gloves	Administrator Office
4	120 V electric heating blanket	Warehouse
Date:		
Printed Name & Signature:		

Form CWP-02

Control Valve Air Supply Coalescing Filters

PERFORMED BY:			Date:
Valve	**Description**	**Filter Condition (OK)**	**Manually Operated Drain? (YES)**
TV-02006	HP BYPTO CRH		
YY-02005	HP BYPTO AMP		
HRSG BLWD	HRSG BLWD		
AA742	FILTER HOUSE		
AA743	FILTER HOUSE		
IP-PIC-139	IP/LP DRM PG		
MC-PIC-005	S/U VNT VLV		
PY-24102	IP BLFD PRESS		
PY-24101	IP BLFD PRESS		
TFV-23111	BFW SUCT TEMP		
BL-ZT-061B	HP/IP DRUM		
BL-ZT-061B	IP DRUM		
TV-420B	RH ATMP TMP CTRL		
TC-23110	LP ACM TEMP CTRL VLV		
V-2008	HP BYPASS		
LV-185	LEVEL CNTR IP DRUM		
TC-020B	HP SUPER HEAT ATMP		
BL-LCHP-DRUM			

Form CWP-03

Freeze Protection Current Readings

Name:_____

Date:_____

R.O. Feed Regulator:_____

PT-05101:_____

PT-05101_____

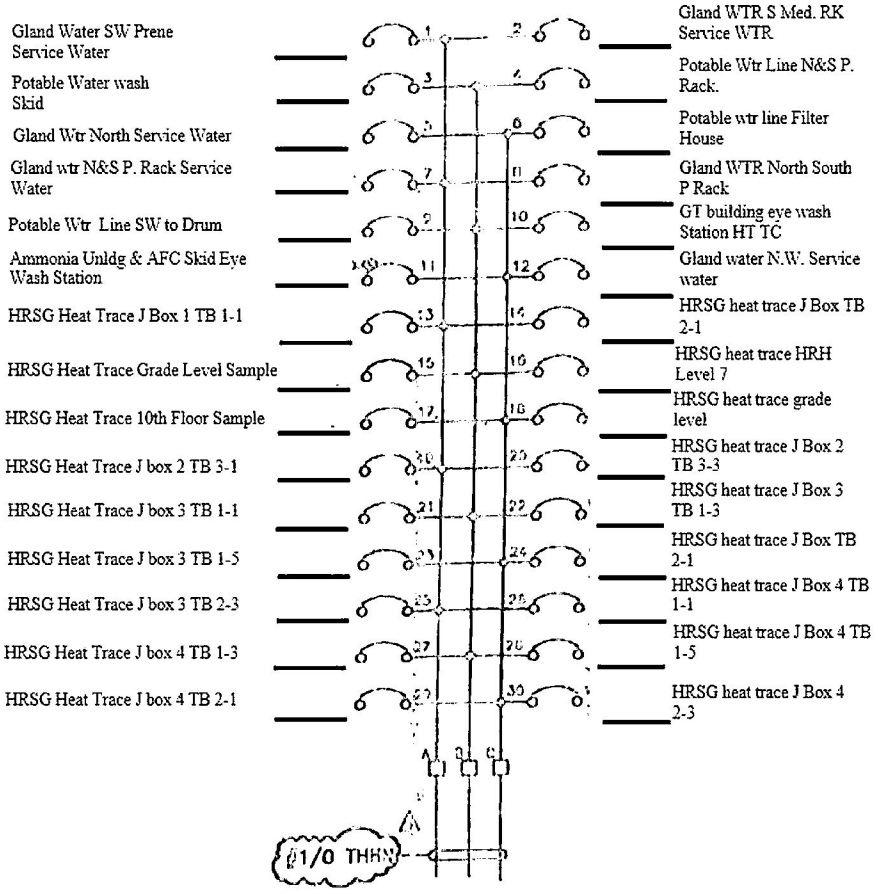
PT-06105 A&B_____

#1A Well_____

#2 Well_____

#4 Well_____

#6 Well_____



Form CWP-04

Victoria Power Station Critical Instruments List

Inspected By:		Date:		
Critical Component Description	**Associated Heat Trace Circuit**	**Circuit Amp Reading**	**Initial Amp Reading**	**Insulation Inspection**
HP Drum Level Transmitter and Sensing Lines- BLL1040	Circuit # 24			
HP Drum Level Transmitter and Sensing Lines- BLL1044	Circuit # 28			
HP Drum Level Transmitter and Sensing Lines- BLL1048	Circuit # 28			
IP Drum Level Transmitter and Sensing Lines- BLL1040	Circuit # 22			
IP Drum Level Transmitter and Sensing Lines- BLL1044	Circuit # 22			
IP Drum Level Transmitter and Sensing Lines- BLL1048	Circuit # 27			
LP Drum Level Transmitter and Sensing Lines- BLL1240	Circuit # 21			
LP Drum Level Transmitter and Sensing Lines- BLL1244	Circuit # 27			
LP Drum Level Transmitter and Sensing Lines- BLL1248	Circuit # 27			

Form CWP-05

Cold Weather Insulation Inspection on Instruments				
Instrument No.	**Level**	**Location**	**System**	**Comments**
BLIPT 041	TOP	SE CORNER	HP	
BLILT 040	TOP	SE CORNER	HP	
CRIPT 106	TOP	S SIDE	CRH	
BLILT 140	TOP	S SIDE	IP	
BLILT 144	TOP	S SIDE	IP	
BLIPT 141	TOP	S SIDE	IP	
BLIPT 145	TOP	S SIDE	IP	
PT 241	TOP	SW CORNER	LP	
LT 240	TOP	SW CORNER	LP	
LT 244	TOP	NW CORNER	LP	
PT 245	TOP	NW CORNER	LP	
PT 249	TOP	NW CORNER	LP	
BLILT 148	TOP	NW SIDE	IP	
PT 149	TOP	NW SIDE	IP	
BLILT 044	TOP	NE SIDE	HP	
BLILT 048	TOP	NE SIDE	HP	
BLIPT 045	TOP	NE SIDE	HP	
BLIPT 049	TOP	NE SIDE	HP	
	MID	N SIDE	HP DESUP	
CRI 101	8	S SIDE	CRH	
CRI 102	8	S SIDE	CRH	
MSIPT 006	6	S SIDE	HP	
LT 27002	4	S SIDE	ACW M/U TANK	
PT 03007	2	SE SIDE	HRH	
FT 2001	1	SE SIDE	HP	
FT 402	GRD	UNDER HRSG	HRH ATTEMP	
PT 64101	GRD	SE SIDE	BMS	
FT 05201	GRD	SE SIDE	BMS	
	GRD	SE SIDE	BMS NEXT TO FT 05201	
PT 02005	GRD	S SIDE	ACW	
PT 27005	GRD	S SIDE	ACW	
FT 202	GRD	SW SIDE	LP BFW	
PT 06006	GRD	SW SIDE	LP BFW	
PT 24102	GRD	SW SIDE	IP BFW	
PT 24101	GRD	SW SIDE		
FT 201	GRD	SW SIDE	LP BFW	
FT 103	GRD	SW SIDE	IP BFW	
FT 003	GRD	SW SIDE	IP BFW	
FT 23102	GRD	SW SIDE	LP RECIRC	
WATER INLET PRESSURE VALVE TO RO SKID	GRD	RO SKID	RO SKID	
Inspected By:				
Date:				

Form CWP-06

Freeze Protection Round Sheet									
Date:	Day Shift			Night Shift					
[redacted]	1st Round-Initials	2nd Round-Initials	3rd Round-Initials	1st Round-Initials	2nd Round-Initials	3rd Round-Initials			
Check Heat Trace Breakers									
Check Instrument Air Reciever for Moisture and Blowdown									
Check all windbreaks- Once per shift		[redacted]			[redacted]				
Check CTG and HRSG chemical pumps, tanks etc.. Verify flow and drawdown									
Check cooling tower for icing conditions									
Check fuel gas separator for distallate									
Day Shift Comments									
Night Shift Comments									

Form CWP-07

Anti-Icing Testing Procedure

1. The anti-icing system only works if the temperature is between 30-40 degrees "F" with 90% humidity or above.
2. Close the block valves located on the east & west side on the CTG air intake (located next to the fisher control valves).
3. Have a maintenance or operations person verify the 4 valves on the CTG in the package are open.
4. Have your ICE person in the control room and have him stroke the fisher control valve from the DCS full open and closed to insure proper operation with the valve.
5. After verifying all control valves are working correctly open the east & west block valves for normal operation.
Performed By: Date:

Form CWP-08

Emergency Generator - Lubrication and Maintenance Service Interval Chart		
Emergency Generator # _____	Performed By: _____ Date: _____	
Item	Initial	Comments
Operate Engine at Rated Speed for 30 Minutes		
Check Engine Oil and Coolant Level		
Check Fuel Filter/Water Bowl		
Check Air Cleaner Dust Unloader Valve and Restriction Indicator Gauge (a)		
Visual Walk Around Inspection		
Ensure Generator Is In Auto		
Ensure Engine Block Heater is working.		

Form CWP-09

Contractor Support Checklist and Contact Info

Contractor	Cold weather preparations to ensure system reliability	Support	Ensure sufficient chemical inventory	As Required
Evoqua (Garrett Lambert 225-264-2128)	X	X		
	Init:	Init:		
Kinder Morgan Dispatch (800-568-7512)	X	X		
	Init:			
Scaffold Monkey (Jesus Rivera 713-449-1290)	X	X		
	Init:	Init:		
MMR (AJ Gaona 361-228-0777)		X		
		Init:		
Shrieve (281-367-4226)		X		
		Init:		
Nalco (Ross Foroodi 949-544-9754)		X		
		Init:		
Myane Insulation (Charlie Salinas 361-701-4870)		X		
		Init:		
Spartan (Mario Canizales 832-799-8170)		X		
		Init:		

(A) Contact Evoqua and request winterization efforts to be taken to ensure system reliability
(B) Contact Kinder Morgan and request winterization efforts to be taken to ensure system reliability
(C) Contact Shrieve and Nalco to ensure plant has proper chemical inventory
(D) Contact MMR for I&E support.
(E) Contact Scaffold Monkey for insulation/windbreak support.
(F) Contact Myane Insulation for insulation/windbreak support.
(G) Contact Spartan for Insulation for insulation/windbreak support

Completed By:	Date:

Form CWP-10