Filing Receipt

Received - 2022-04-18 04:50:12 PM
Control Number - 53385
ItemNumber - 446

Chamon Power LLC

Emergency Operations Plan (EOP)

Executive Summary

(Per 16 TAC Sect. 25.53)

Submitted to:

PUC of Texas, PUC Document No.: 53385
ERCOT via ERCOT MIS Service Request

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. Chamon Power LLC 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

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 Chamon Power LLC 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 have been made to EOP since the last Version.

Pleading Documenting Changes: N/A

Attestation: N/A

1.4 Contents and Policies

(page numbers indicate starting page number)

- 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 36
  - Demonstrates Chamon Power 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

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

Tile	Name	Date of access to and/or training on this EOP
Plant Manager	Jerry Perry	4/18/2022
Operations and Maintenance Supervisor	Gene Robins	4/18/2022
O&M Technician	Riaan September	4/18/2022
EHS Manager	Precious Durousseau	4/18/2022
Plant Administrator	Khara Mason	4/18/2022

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

Emergency Contact Name	Title	Phone	Email
Jerry Perry	Plant Manager	702-527-9129	Jerry.Perry@naes.com
Gene Robins	O&M Supervisor	361-655-8813	gene.robins@peakerpowerholdings.com
JL Nelson	Operations Director	252-532-7327	JL.Nelson@naes.com
Mike Tulk	Rockland Operations Asset Manager	727 251-2709	mike.tulk@rocklandcapital.com
Elena Delaunay	Rockland Commercial Asset Manager	917 774-6911	elena.delaunay@rocklandcapital.com

NIMS Certified Personnel

Name	Title	Phone	Email
Precious Durousseau	EHS Manager	832-525-9150	Precious.Durousseau@naes.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 James Maiz, 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 with respect to Chamon Power LLC:

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. Drills have been conducted to the extent required per 16 TAC Sect. 25.53, or, 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 12, 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.

Signature of Affiant
James Maiz, 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

Chamon Power LLC

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

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)]

The plant will be evacuated during severe emergency events such as Hurricanes, severe storms, a shortage of water, pandemics, and other events determined appropriate by Management. There will be limited supplies on-site for emergencies due to the staffing level.

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. Chamon Power LLC ("Chamon") 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 maintenance and execution of these plans.

   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 designate an Emergency Coordinator to adequately cover all periods when the facility is occupied, or if the emergency requires personnel to evacuate.

   Responsible for ensuring all personnel are trained regarding fire routes, exits, storm shelters, the location and use of emergency equipment, and understanding and following these plans. All personnel who have contractors or visitors at the facility shall ensure that they are familiar with these plans.

2. O&M Tech (or designee)

   Shall account for all operation and maintenance activities.

3. Emergency Coordinator

   The Emergency Coordinator shall maintain communications with the Remote Operating Center and keep a head count of all evacuated plant personnel and contract personnel in order to report the status to the Remote Operating Center. The Emergency Coordinator may be any qualified plant employee including the O&M Tech, Plant Manager, Operations Director (NAES), or other qualified designee.

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 – Required Sections) 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.

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	Jerry Perry

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), the 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.

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)]

Chamon 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, Chamon 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)]

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 addresses 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.

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

2.10.1 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 designated Emergency Coordinator will serve as the single point of contact for all response events to the Public Utility Commission, Office of Public Utility Council (OPUC), local and state government entities, officials, and emergency operation centers, as appropriate for the entity.

The Commercial Asset Manager will act as the point of contact for Gas Suppliers and the QSE.

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 will be 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 Chamon's Officers. The Emergency Coordinator will craft messages, with assistance from the Plant Operations Director 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 an Officer of Chamon or designee.

"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:	1-800-267-2562
	Cell:	1-346-204-9152
Kinder Morgan Gas Control	Main:	1-713-369-8800
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
Harris County Emergency Management Coordinator	Office:	(281)-822-4444
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

Chamon 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: Reliabiltiy 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.

2.10.2 NIMS Training

At least one member of the Chamon Power 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.

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

Emergency Supplies are identified in the Section 3.1 Weather Emergency Annex. Annually, the Plant Manager of Chamon 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 Chamon will staff the facility with personnel according to the procedures outlined in the Section 3.1 Weather Emergency Annex.

Once it has been determined that a pandemic outbreak is in full force, a determination will be made as to whether Chamon will be operated either locally or remotely based on the location of the outbreak outlined in Section 3.4 Pandemic and Endemic Annex.

If Chamon is operated locally, there will be limited staff available on-site (personnel totaling two or three at the most). Chamon can be operated remotely with no staff on-site, if it becomes necessary.

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

Chamon operations staff conduct daily meetings with their QSE in which, among other things, the weather forecast is reviewed along with any implications to generator availability. Additionally, Chamon 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 Houston region, Chamon staff will activate the applicable EOP under the following guidelines:

- Cold Weather: Chamon will activate its Cold Weather Emergency Response Operational Plan if (a) ERCOT issues an OCN for severe winter weather and/or freezing conditions that directly affect the Houston region.
- Hot Weather: Chamon will activate its Hot Weather Emergency Response Operational Plant if (a) ERCOT issues an OCN for above normal temperatures that directly affect the Houston region.
- Hurricanes: Chamon will activate its Hurricane Preparedness and Response Plan if a storm classified as a Tropical Storm or higher enters the Gulf of Mexico and is expected to make landfall in the vicinity of the facility. Phase I of the Hurricane Procedure should be activated as soon as the storm enters the Gulf of Mexico, but not less than 96 hours prior to the projected landfall.

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)]

The North American Electric Reliability Corporation (NERC) Reliability Guideline for Generating Unit Winter Weather Readiness – Current Industry Practices provides electric utilities and power generation companies with guidance on how to maintain facility reliability during winter weather conditions.

The Texas Administrative Code (TAC), Substantive Rules Chapter 25, Subchapter C, Article 25.53 (c) requires electric utilities and power generation companies to prepare and file an emergency operations plan. Weatherization plans and procedures are required by the emergency operations plan.

ERCOT Nodal Protocol 3.21(2) requires each Resource Entity to provide a current weatherization plan for each Generation Resource. The weatherization plan must include a description of the Generation Resource's ability to withstand extreme cold, a description of materials and devices used to ensure operation during extreme weather, and practices and procedures undertaken in preparation for winter and summer.

3.1.1 General Severe Weather

In the event of impending severe weather, plant personnel will monitor the local emergency weather broadcast.

In the event of a severe weather threat, Chamon will implement the applicable sections of NAES Safety Manual Procedure SMP-02 Emergency Response Plan (Attachment C).

- 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 Plant Manager Designee 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.

3.1.2 Cold Weather - Emergency Response Operational Plan

As required under PUCT Electric Substantive Rules 25.55 and 25.53 & ERCOT Nodal Protocols Section 3.21, NAES Corporation and Chamon has prepared a weatherization plan, Winter Weather Readiness Procedure CMN-OP-106 (Attachment D), to address measures taken to prepare for extreme winter weather events.

CMN-OP-106 includes the following elements:

1. List of critical systems and equipment.
2. System diagrams of piping and instrumentation and/or heat trace circuits as available.
3. Annual cold weather preparations to be performed prior to October 15 and monthly from November through March (Section 6.0).
4. List of Cold Weather Inventory.
5. Operational plan for execution upon ERCOT's issuance of an OCN for severe winter weather and/or freezing conditions that directly affect the Houston region (Section 7.0) with staffing plan.
6. Annual Cold Weather Drill description with Attendance Log (Section 8.0).

3.1.3 Verification of Fuel Switching Equipment

During normal operations, natural gas is supplied to plant via an interconnect to the Kinder Morgan Tejas pipeline. Chamon burns pipeline quality natural gas exclusively and has no provisions for on-site storage of natural gas.

3.1.4 Cold Weather Emergency Response Checklists

Checklists associated with Sections 6.0, 7.0 and 8.0 are included in CMN-OP-106 (Attachment D). All executed Checklists associated with CMN-OP-106 should be filed in the Winterization Binder in PDC and maintained for future records and audit.

Cold Weather Emergency Response Checklists are to be reviewed annually and updated with lessons learned from past weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

1.

3.1.5 Hot Weather – Emergency Response Operational Plan

Chamon 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.

NAES Corporation and Chamon has prepared a weatherization plan, Summer Readiness Procedure CMN-OP-107 (Attachment E), to address measures taken to place the plant into a Hot Weather readiness condition for operation.

CMN-OP-107 includes the following elements:

1. List of critical systems and equipment.
2. Annual hot weather preparations to be performed prior to May 15 and monthly from June through September (Section 6.0).
3. List of Hot Weather Inventory.
4. Operational plan for execution upon ERCOT's issuance of an OCN for above normal temperatures that directly affect the Houston region (Section 7.0).
5. Annual Hot Weather Drill description with Attendance Log (Section 8.0).

3.1.6 Hot Weather Emergency Response Checklists

Checklists associated with Sections 6.0, 7.0 and 8.0 are included in CMN-OP-107 (Attachment E). All executed Checklists associated with CMN-OP-10 should be filed in the Summer Binder in PDC and maintained for future records and audit.

Hot Weather Emergency Response Checklists are to be reviewed annually and updated with lessons learned from weather emergencies to ensure necessary supplies and personnel are available through the weather emergency.

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

Water is used in the process of generating electricity at Chamon solely to control emissions. Chamon maintains a 50,000-gallon tank on site to store water for this purpose. If the water supply is interrupted, stored water can be used for approximately 10 hours of run time depending on loading level. Unless TCEQ has issued a notice of Enforcement Discretion, ~~I~~n the event of an emergency shortage of water, the plant will first utilize remaining stored water, but will be made unavailable in order to comply with its air permit once stored water has been exhausted.

Currently, the plant's only source of water is a 250,000-gallon tank located on an adjacent property and maintained by a third party. Water is supplied to this tank from local groundwater wells and groundwater in the area is typically drought resistant. However, should drought conditions occur, or should a water shortage occur due to equipment failure Port Comfort will attempt to:

- Bring demineralized water in by truck.
- Contact TCEQ to request enforcement discretion if an Emergency Condition exists.

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

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.

A Pandemic is defined as "(of a disease) prevalent over a whole country or the world." An Endemic is defined as "(of a disease or condition) 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. 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 Chamon will be operated either locally or remotely based on the location of the outbreak.

If Chamon is operated locally, there will be limited staff available on-site (personnel totaling two or three at the most). Chamon can be operated remotely with no staff on-site, if it becomes necessary.

3.4.2 Contract Support

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

Chamon has a list of the employee's telephone and cell phone numbers in case of an emergency in accordance with NAES SMP-20 Appendix E – Employee Contact Information. 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, 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 hard to obtain, the facility will stock extra amounts of appropriate PPE and made 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 PDC 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:

Harris County Public Health Environmental Public Health
101 S. Richey Suite G Pasadena, TX 77506
(713) 274-6300

(713) 755-5050 (Emergency)

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.

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

Chamon has a Hurricane Preparedness procedure CMN-OP-108 (Attachment F). This procedure establishes plant policy for actions during periods of severe weather during commercial operations.

Guidelines are developed to protect the employees, while making every attempt to continue operating the plant. It is understood that no employee is to be placed in any situation that has potential to cause injury or harm.

3.5.1 Initiation of Hurricane Procedures

In accordance with Local Emergency Planning Committees' 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 Category	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	156+ mph	19+ ft.

Activities involved within the plan are related by expected land fall of the hurricane at or near the plant site, and designated by a "Phase Code" as follows:

Phase 1	96-72 Hours Away
Phase 2	72-36 Hours Away
Phase 3	36-24 Hours Away
Phase 4	Authorized to Return

NOTE: Established action should be carried out no later than the time indicated but can be accomplished prior to that time frame if conditions are warranted.

The topic of the monthly safety meeting in June of each year shall be Hurricane Preparedness. An annual review of this procedure should take place at this meeting. Any proposed changes should be discussed at this time.

3.5.1.1 Phase Actions

PHASE 1 – STORM WATCH INITIATED

Based on available information concerning the size, intensity, rate and direction of travel of the disturbance, Phase I of the Hurricane Procedure should be activated as soon as the storm enters the Gulf of Mexico, but not less than 96 hours prior to the projected landfall. Phase I should be

completed no less than 72 hours prior to the arrival of gale force winds (55 mph). Phase I includes daily meetings, taking inventory of supplies, and testing equipment.

- VERIFY required supplies are in stock
- VERIFY all equipment which is not under planned or unplanned maintenance is operable.
- ESTABLISH a plan for work requirements to prepare for entering Phase II.
- DISTRIBUTE an action sequence for hurricane preparedness upon activation of Phase I.
- Management CONTACT the following to discuss timing and preparations for shutting down the plant and evacuation of the site.
    - Owners
    - Asset Manager
    - Shell
    - CenterPoint
- SCHEDULE Initiation of shutdown by Plant Manager accordingly.
    - Timing for the evacuation of the site will be determined by the Plant Manager in conjunction with Port Authority of Houston
    - Shutdown should be no later than the time that an evacuation order of the area is issued by Emergency Management Officials.
- At Plant Manager's discretion, EVACUATE non-essential personnel evacuated.
- ESTABLISH A central communications contact person / phone number for employees to call following evacuation.
- ENSURE All employees given central communications contact information prior to evacuation.
- FILL all tanks in the plant.
- CANCEL AND POSTPONE all planned visitors.
- UNPLUG all non-essential electrical devices.
- SCHEDULE Daily meeting for all onsite personnel in the PDC.
- Any personnel not at the site need to be notified and placed on alert.
- All supplies inventoried and equipment checked.
- Check all communication equipment.
- Check gas and diesel supplies (specifically in/for generators).

PHASE II – SITE PREPARATION FOR HURRICANE CONDITIONS

Phase II should be started not less than 72 hours in advance of the anticipated arrival of gale force winds (55 mph) and completed 36 hours prior to the arrival of gale force winds.

Phase II includes the preparation of the plant to meet hurricane conditions and the purchasing, collection, and organization of all equipment and supplies. The Harris County Local Emergency Planning Commission (LEPC) should be contacted to find out when they will hold their hurricane planning meeting. Someone from Chamon should attend this meeting if at all possible.

Port Authority of Houston Contacts:
Colin Rizzo – 713-670-3620 (Emergency Manager) Emergency Dispatch – 713-670-3611
Emergency Operation Center Contact – 713-670-3666
Port Command Center Line – 713-670-3600

- CONDUCT daily conference call between onsite personnel and Remote Operating Center to discuss
    - the status of preparations
    - location of the hurricane,
    - expected arrival date
    - anticipated location of landfall.
- SECURE plant for gale force winds.
- BOARD Windows
- SECURE any and all loose objects (trash cans, etc.) should be taken inside if possible or secured.
- PERFORM the site- specific shutdown layup checklist (See Appendix A to this procedure).
- UPDATE important backup records, catalog and store all records that will be evacuated from the plant.
- Plant Manager MAY DESIGNATE employees to bring certain information with them to keep secure during evacuation.
- INSPECT all fire protection equipment.

PHASE III – SHUTDOWN REMAINING EQUIPMENT

Phase III should be started not less than 24 hours prior to the anticipated arrival of the storm and should be completed within that 24-hour period.

- SECURE CenterPoint back feed to the plant
- EVACUATE the plant,
- ENSURE checklist is complete.
- Upon evacuation, the O&M Tech OBTAIN AND SECURE;
    - SWPP Book
    - LOTO Book
    - Operations Logbook.

PHASE IV- RESTORATION

Following the hurricane, once authorization to return to the area has been received from Local Emergency Management;

- All essential personnel RETURN to the site to assess damages.
- All non-essential personnel INFORM Plant Manager or central contact person daily
    - current location
    - a contact number
    - when to report to the site.
- Once damages are assessed, CONTACT AND BRIEF Operations Director / Asset Manager.
- All employees on site INSPECT damages AND PRIORITIZE tasks to be done.
- MAINTAIN accurate report of all damage and repairs made
- DOCUMENT via photographs all damages incurred by the plant.
- Before main electrical switch is closed, O&M Tech INSPECT electrical system;
    - DETECT AND REPAIR damage
    - OBTAIN approval of the Transmission Operator and Plant Manager or designee.
- COMPLETE Building damage inspection before occupancy is allowed
- After inspection for broken valves, lines, etc., OPEN main gas valve.
- PERFORM restoration of systems in accordance with Business Continuity Plan.
- PERFORM Restoration to Service procedure as applicable.

3.5.5 Evacuation Procedures

Evacuation Procedure is based upon placing Chamon in a layup state to minimize damage to the facility.

1. NOTIFY CenterPoint and QSE prior to shut down.
2. SHUTDOWN gas turbines.
3. FILL Demin tank
4. SHUTDOWN Demin plant.
5. SECURE plant water systems.
    a. CLOSE raw water supply valve.
6. SECURE Demin Tank.
    a. CLOSE inlet valve.
    b. CLOSE outlet valve.
7. SECURE natural gas pipeline.
    a. CLOSE main gas block valve.
    b. CLOSE main gas bypass valve.
8. Secure ammonia system.

a. Ensure ammonia tank filled (if needed).

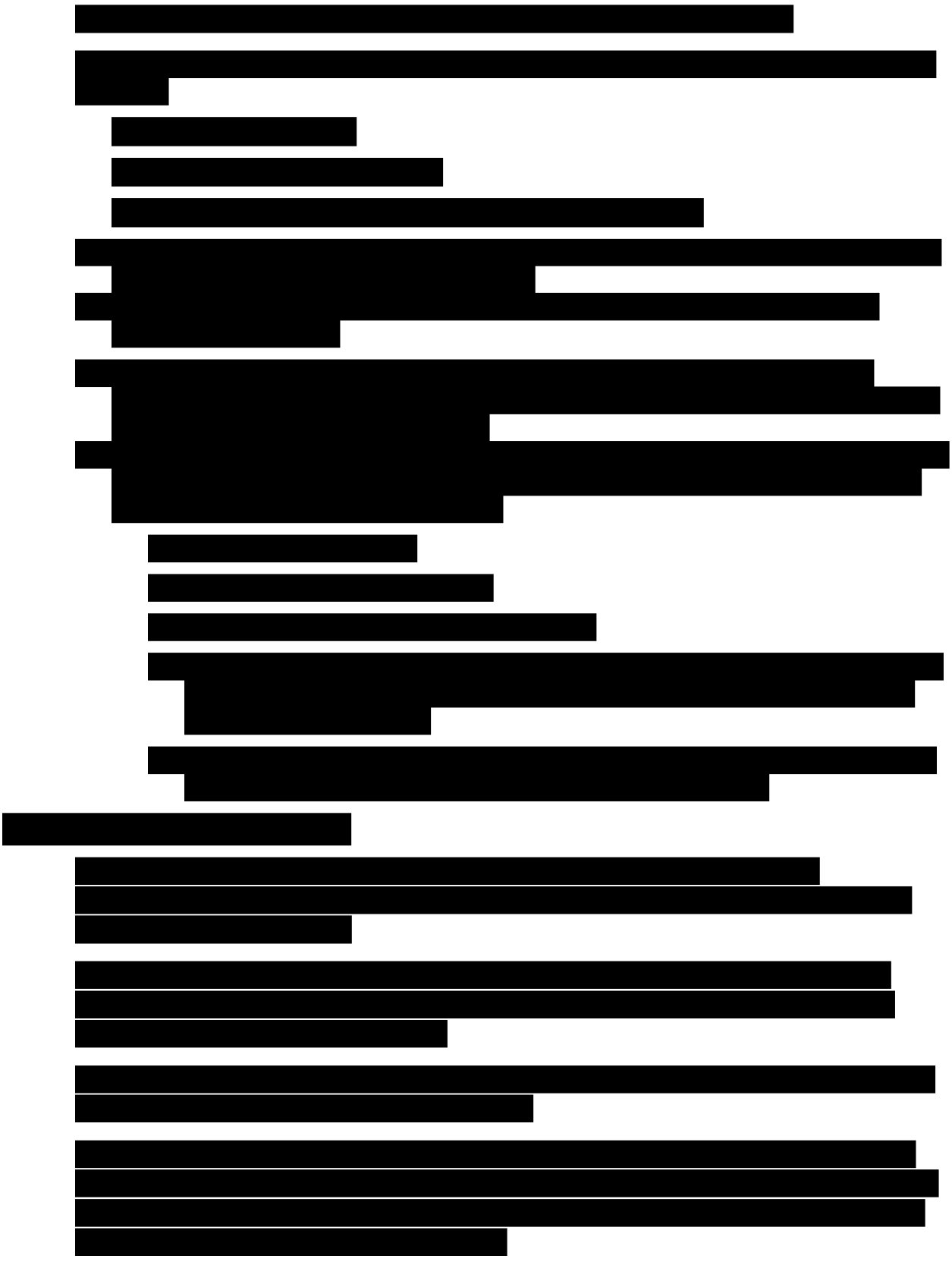
b. CLOSE tank valves.

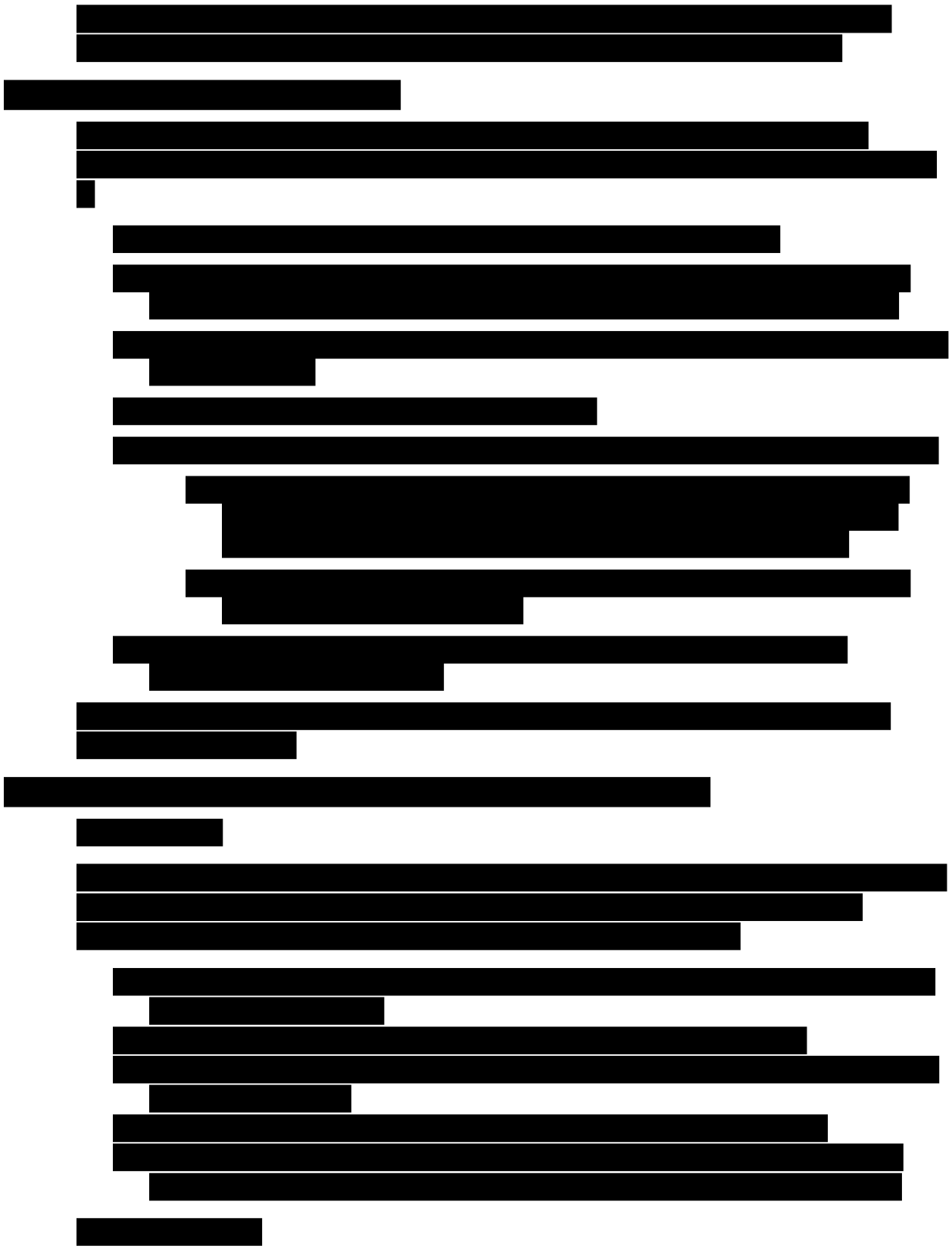
c. CLOSE loading valves.

9. SECURE chemicals.
    a. FILL totes.
    b. SHUTDOWN chemical pumps.
    c. SECURE totes.
10. ENSURE all lose objects are moved inside or strapped down.
    a. Oil drums
    b. Trash cans
    c. Gas cylinders
11. PERFORM any other isolations as necessary.
12. CLOSE all doors, board windows and ensure conex's are secure.
13. SECURE plant electrical system.
14. WHEN plant is completely shut down, OPEN all DC power breakers.

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

[redacted]

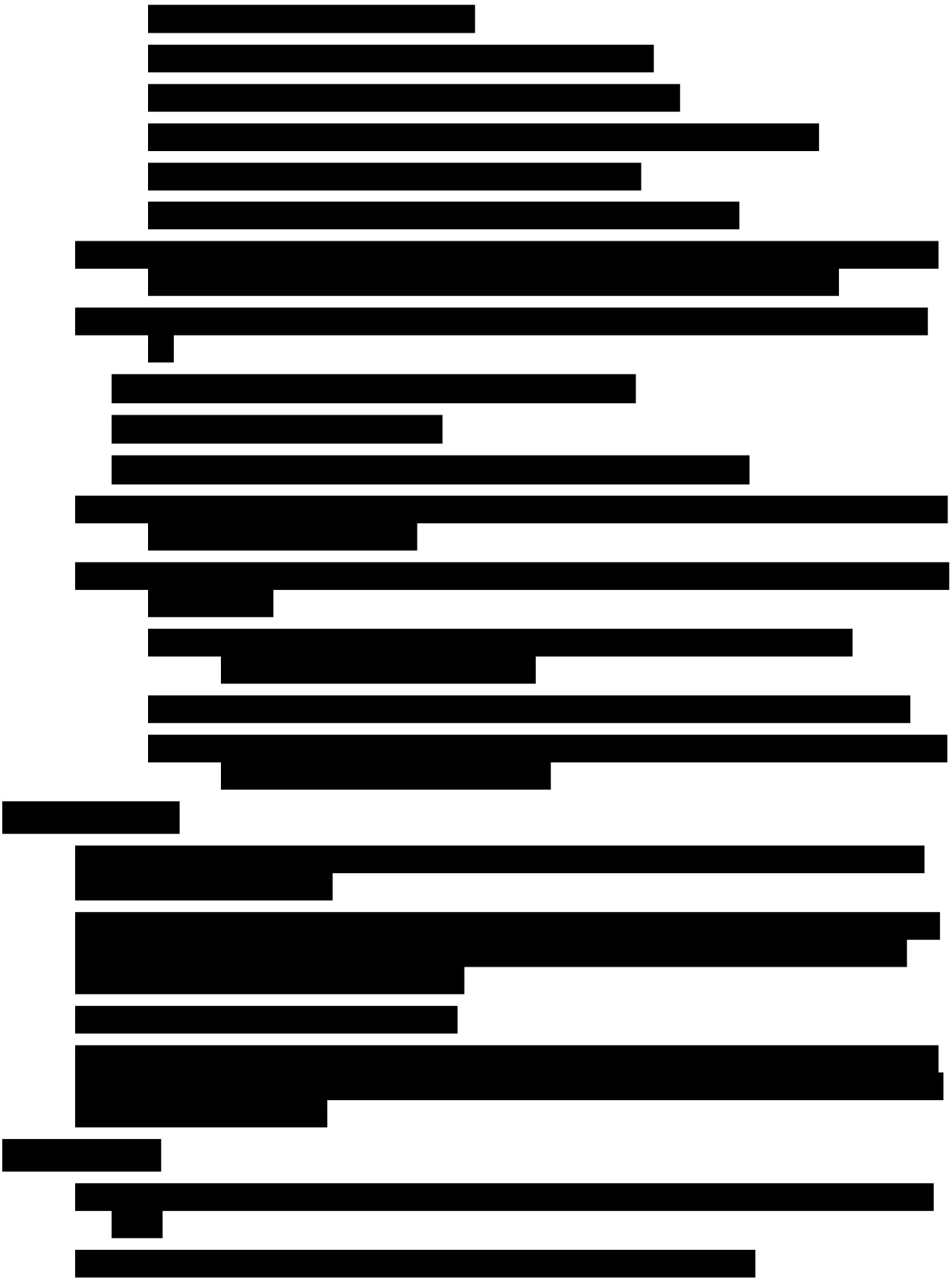


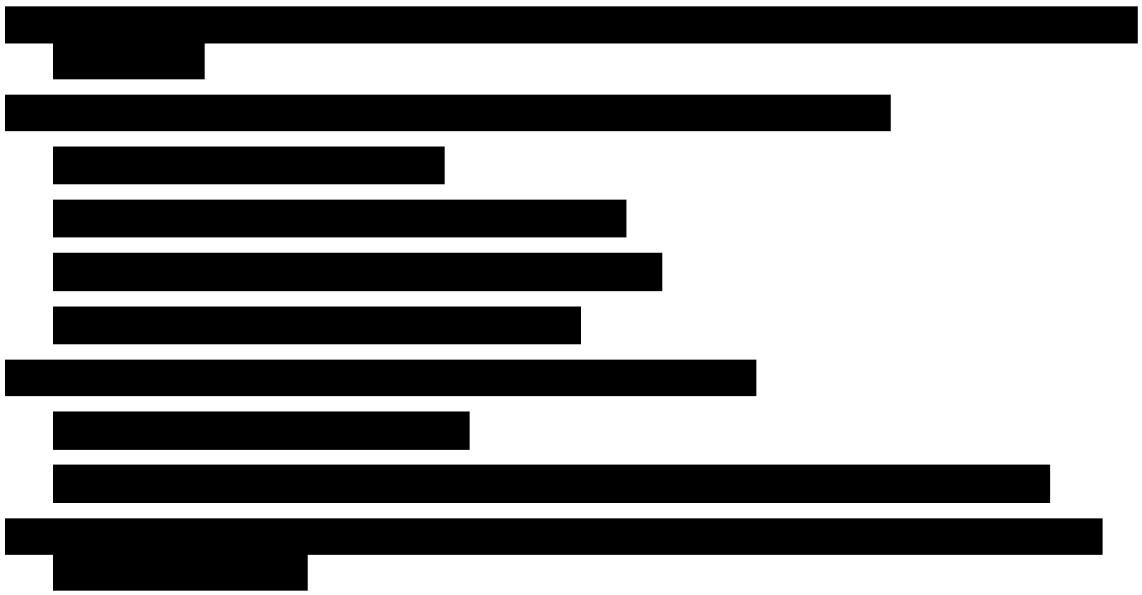


[redacted]

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

[redacted]





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

[redacted]

NAES	Incident Reporting Administration Manual Program (AMP)

Introduction

Purpose:

The purpose of this document is to outline the proper steps, analyses and reporting that must be accomplished in the event of an "Incident". These "Incidents" include, but are not limited to, the following.

Scope:

All NAES Personnel, All Site Personnel

Policy

① INTRODUCTION

A. Injury/Illness

B. Notice of Non-Compliance (NON), or Violation (NOV) from a regulatory authority.

C. Environmental Permit Exceedance

D. Permit Deviation

E. Release or Exposure

F. Reliability Compliance, NERC, FERC, Other

G. Fire, Bomb Threat, Natural Disaster, Media Interest Event

H. Property/Equipment Damage

I. Plant Upsets, Derates and/or Trips

J. Near Miss, Lessons Learned

K. Outside Agency Inspections [See Administrative Manual Program 107 (AMP-107) for procedures to follow during and after an Outside Agency Inspection.]

NOTE:
Specific notification, reporting and documentation requirements for a personal injury/illness are detailed in SMP-14, Accident and Injury/Illness Reporting. Specific notification, reporting and documentation requirements for NERC, FERC and other reliability compliance are detailed in EOP-004. Specific notification, reporting and documentation requirements for other emergencies are detailed in SMP-2, Emergency Response Procedure.

(2) DISCUSSION

This procedure ensures that incidents, abnormal events and near misses are not treated with complacency. Corrective actions and Lessons Learned shall be documented and implemented to help NAES prevent similar events from happening and ensuring continual improvement.

(3) RESPONSIBILITIES

A. The Plant Manager or designee shall ensure uniform implementation and compliance with this program by all employees.

B. Plant employees shall immediately report all accidents, injuries, plant upset events, equipment damage, exceedances, deviations, spills, missed obligations, hazards, and near misses to their supervisor and assist as requested in investigations, critiques, analysis, and report preparations.

C. The Plant Manager is responsible for investigating all reported incidents, near-miss incidents or hazards, and assigning plant employees to assist in the investigation as appropriate.

D. The Plant Manager shall develop and maintain a site-specific emergency contact list to be followed for events that require notification of NAES management, client personnel, support services, outside regulatory agencies, and insurance providers.

NOTE:
The Emergency Contact list will be maintained in this procedure as Exhibit A, Incident Notification and Reporting Matrix.

E. The Operations Director shall confirm the receipt of incident notifications from the plant in accordance with Section 4 below and shall assist the Plant Manager with the internal distribution of incident information to ensure that internal notifications and reports are completed in accordance with Exhibit A, Incident Notification and Reporting Matrix.

F. The NAES Home Office/O&M Services shall administer and provide training and support on the NAES "Gensuite" Incident Reporting database, which serves as the NAES system for entering incident information and tracking and reviewing NAES fleet incident data.

G. Plant Managers shall identify at least one Lessons Learned from each RCA.

H. Plant Managers shall search this database for applicable lessons learned in advance of any high-risk evolution. High-risk evolution is defined as any activity, plant configuration, or condition where the plant is more susceptible to a safety, environmental, reliability compliance, derate, forced outage, or equipment damage event.

I. The O&M Services group shall issue to Operations Directors any Lessons Learned whose timely re-enforcement may prevent a reoccurrence of an adverse event.

J. Operations Directors shall reinforce these Lessons Learned throughout their organizations.

K. The Engineering Services group will examine all reported incidents to proactively identify and drive resolution of equipment performance, material condition and other technical issues by working collaboratively with the plants.

④ INCIDENT NOTIFICATION

The Operations Director must be notified as outlined in Appendix A. 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.

If a personal injury has occurred, regardless of the severity, follow the notification and documentation requirements of SMP-14, Accident and Injury Reporting. Follow-up investigations and reporting shall be accomplished in accordance with this procedure.

⑤ CALIFORNIA PLANTS

A. REPORTING INJURIES, INCIDENTS, AND EMERGENCIES TO THE CALIFORNIA PUBLIC UTILIITES COMMISSION (CPUC)

Plant Management whose facility generates 50 MW or greater are required to report, within 2 hours during working hours and 4 hours outside of working hours at 1-866-924-9757, any incident which results in:

- A fatality or personal injury rising to the level of an in-patient hospitalization
- Are the subject of significant public attention or media coverage; or
- Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.

The facility should follow up with an email or fax update within 24-hours and a final report within 20 days to the CPUC.

- http://www.cpuc.ca.gov/emrep/ See excerpt from Appendix B to D.06 04 055.
- The report shall identify the time and date of the incident
- The time and date of the notice to the Commission
- The location of the incident
- Casualties which resulted from the incident,
- Identification of casualties and property damage.

Additionally, facilities must report, within 2 hours during working hours and 4 hours outside of working hours, incidents which involve the release of gas and

- A fatality or personal injury rising to the level of an in-patient hospitalization
- Are the subject of significant public attention or media coverage;
- Damage to property of the utility or others estimated to exceed $50,000 and are attributable or allegedly attributable to utility owned facilities.

The facility should follow up with full report on the designated form within 30 days to the CPUC. See excerpts from GO 112-E and CFR 49 § 191.9.

The report shall include a description of the utility's response to the incident and the measures the utility took to repair facilities and/or remedy any related problems on the system which may have contributed to the incident.

⑥ INCIDENT REPORTING

In addition to the incident notification step above, all incidents must be entered into the Incidents and Measurements (I&M) application in Gensuite. Entering an incident into Gensuite does NOT satisfy the incident notification requirements of section 4 above, because initial notification must be made by phone or email as required by Exhibit A. However, entering incident information into Gensuite does replace the need to enter incident data onto a hard copy report form.

If an incident spans more than one of the incident types below, data for each incident type should be recorded in separate I&M case files. The Plant Manager shall review all Incident Reports and assign responsibilities and required dates for the associated corrective actions.

Within 24 hours of an AMP-108/SMP-14 Incident occurring, the plant must enter the Event/Injury & Illness into the I&M module within Gensuite. Utilize the "multiple email CC" for those who need to be notified that are not set up in Gensuite. This same Incident Report can be provided to the plant owner's representatives as deemed appropriate. If the incident cannot be completed and closed within five (5) days due to on-going investigative actions, the plant shall manage the incident until it is closed.

Events/Injury & Illness Incidents should be completed as soon as practical but within two weeks of the incident. Status reports of the incident investigation and corrective actions must be provided weekly until the final report is issued.

AMP-108A investigations (RCA or Equivalent) shall be completed in accordance with the AMP-108A and submitted to the Operations Director for review and distribution. If a final RCA cannot be completed per AMP-108A in a timely manner the plant shall provide a timeline for the final submission that must be approved by the Operations Director.

NOTE:
The Plant Manager shall follow the plant-specific procedures and applicable permits and regulations for determining whether and when the incident is reportable to the regulatory agencies or local emergency responders.

(7) LESSONS LEARNED

In addition to the data-gathering and analyses conducted in response to specific incidents or problems, the use of "Lessons Learned" helps to identify problems and make the organization aware of problems and actions.

Lessons Learned entry should be completed in Gensuite by the Plant for incidents and problems where knowledge was gained on how to perform better and/or prevent future problems.

Lessons Learned are required for all incidents or situations that result in an employee injury or environmental enforcement/Notices of Violation, unless the Operations Director approves otherwise.

The Plant may request assistance or input from NAES internal support groups when preparing Lessons Learned.

The Lessons Learned report is prepared by entering the appropriate information into the Gensuite Best Practices application. The Plant Manager will review and approve the

Lessons Learned report, stripping it of any confidential information that cannot be shared with other NAES plants. The Plant Manager will then inform the Operations Director via email that they have completed a Lessons Learned report in the Gensuite.

The NAES Home Office/O&M Services group shall review and, as appropriate, revise Lessons Learned events created by Plants in the Gensuite Best Practices application. Confidential information or references to the plant name will be removed. When appropriate, review and comment from internal support groups will be done prior to publishing a Lessons Learned.

As Lessons Learned reports are received at NAES Plants, the Plant Manager will review the reports for applicability to the plant and determine and implement appropriate actions

Attachments

STD-AMP-108: Appendix A- Incident Notification and Reporting Matrix

Revision Management

Revision History Log:

Revision #:	Date:	Nature of Change:	Recorded By:
R0	9/25/2019 10:09 AM	Final QC prior to Publication Conducted - Moved to R0 - Published to Portal	Bo Barker
D1.0	5/14/2019 12:09 PM	New document	Kerby Duewel

Attachment B – NAES AMP-108 Appendix A

NAES	Incident Notification and Reporting Matrix Appendix A

In accordance with Section 3 & 4 of this procedure, 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-108a investigations must be completed and distributed as listed below.

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.

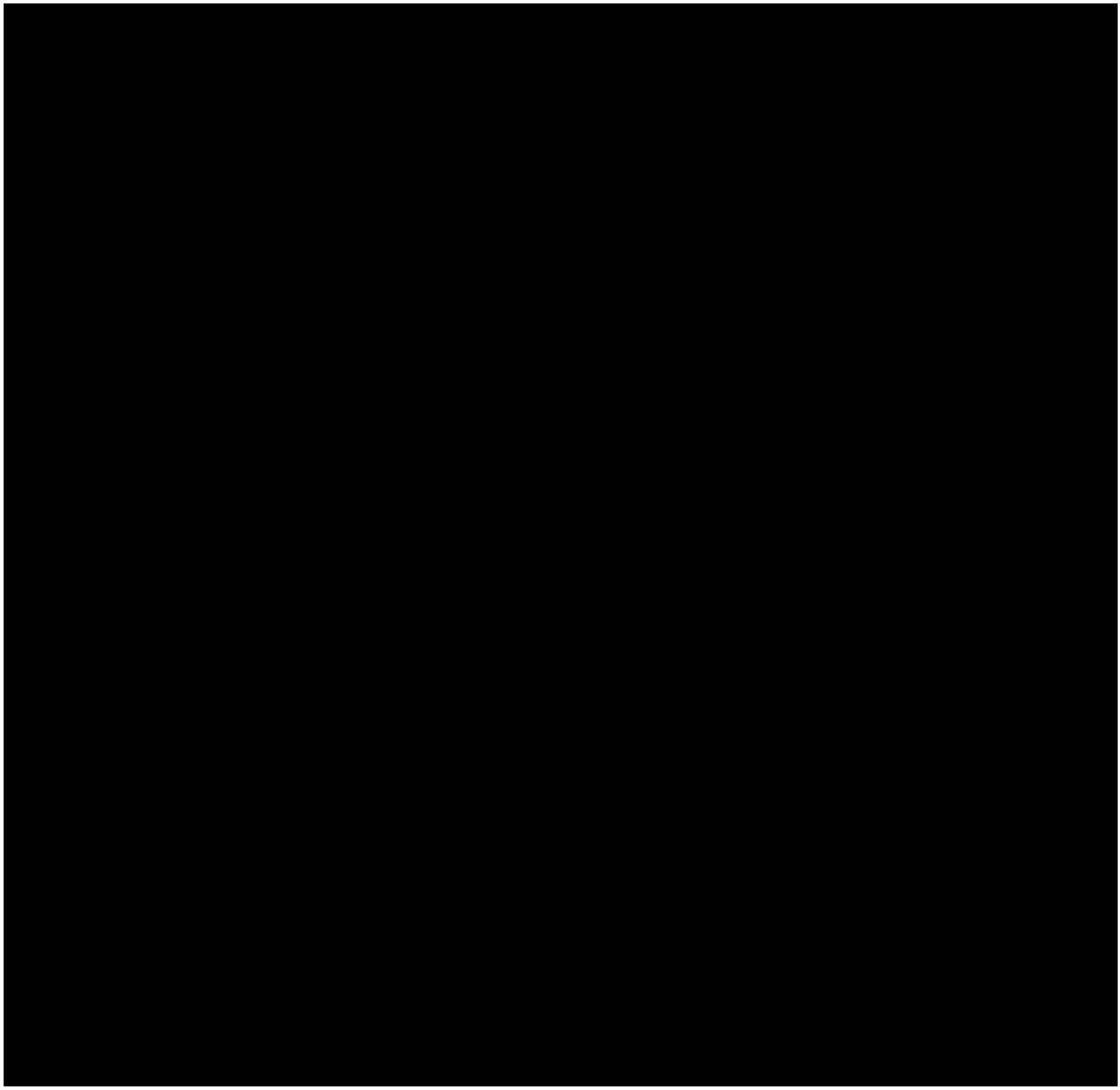
B.5. **IF** outside, **THEN SEEK** safety in a low-lying depression such as a ditch or ravine.

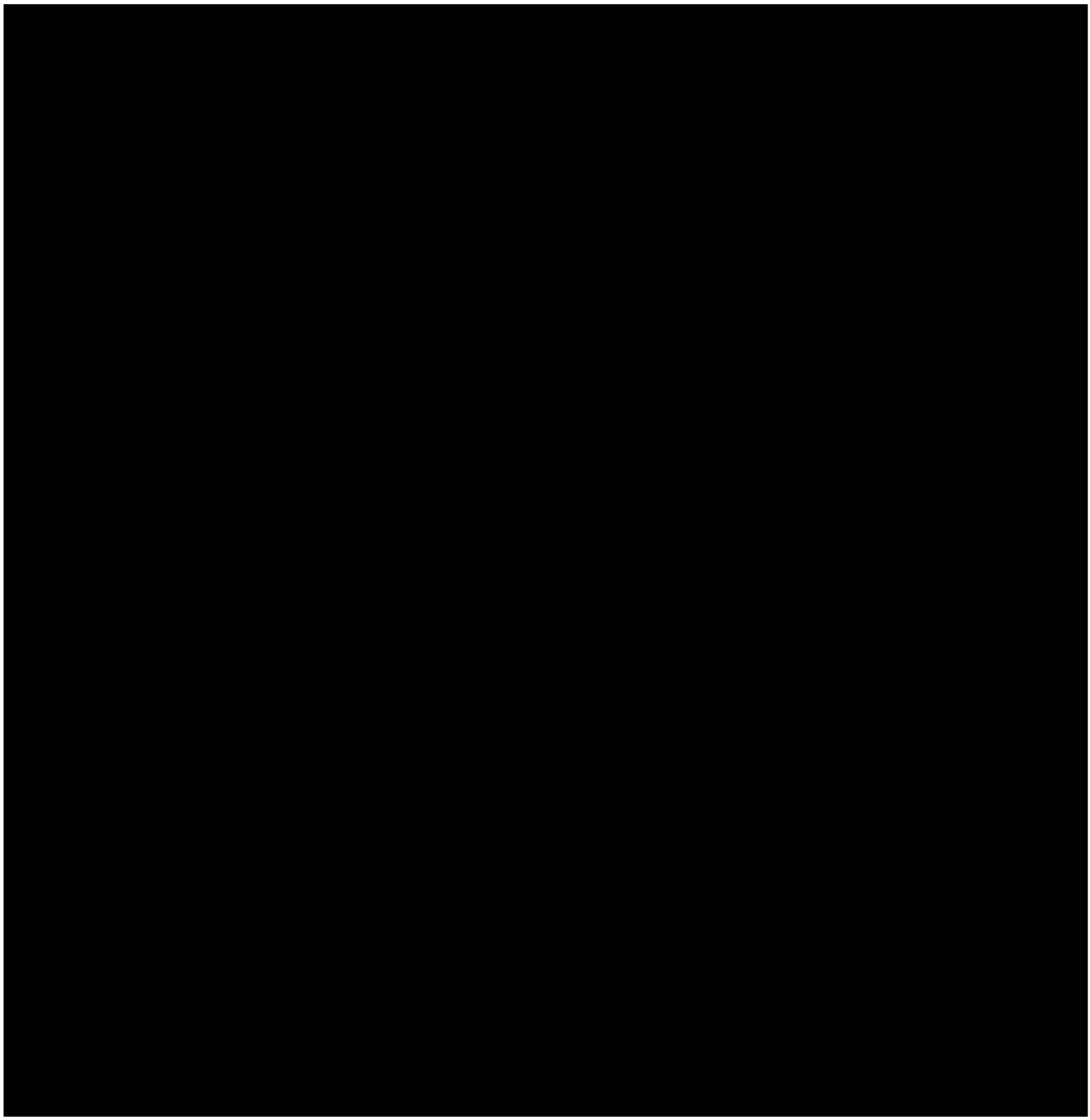
B.6. CRO **ANNOUNCES** indicating when the tornado or severe storm has passed.

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

[redacted]





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

Attachment D – CMN-OP-106 Winter Readiness Procedure

NAES	Operating Procedure Checklist	
	Chamon	
	CMN-OP-106	Winter Readiness Procedure
	Rev: R1	Rev Date: 04/18/2022

TABLE OF CONTENTS

1.0 PURPOSE AND SCOPE

1.1 Purpose

This Operating Procedure shall be followed by plant personnel to operate this system and any associated auxiliary equipment. Only the most recent revision of this document shall be used. Previous versions shall be destroyed.

1.2 Scope

This procedure is to detail the steps necessary to place the plant into a winter readiness condition for operation, along with verifying that all cold weather preparations and building heat is operating correctly for the winter months. As per the Emergency Operations Plan, CMN-OP-106 is to be completed by October 15th each year and on a monthly basis November through March. If a cold weather forecast is imminent complete Section 7. A cold weather drill (Section 8) should be completed once per season. All forms should be filed in the Winterization Binder in the PDC.

The following major equipment must be prepared for winter operations:

- Demineralized Water System
- Compressed Air System
- Inlet Heating System
- NOx Water System
- Sprint Skid System
- Waste System Piping
- Lube Oil Systems – Turbine, Generator and Hydraulic

2.0 REFERENCES

1. Reference Documents

   PUCT Rule §25.53: Electric Service Emergency Operations Plans

   PUCT Rule §25.55: Electric Service Emergency Operations Plans

   Chamon Emergency Operations Plan

2. Piping and Instrumentation Diagrams

   PID-607 Demineralized Water

PID-608 Demineralized Water

PID-612 Water Injection Skid

3.0 REVISION BLOCK

Rev.	Date	Description of Revision	By
D1	5/23/2019	New plan issued.	Bryan Stout
D2	10/29/2021	Added new items to checklist	Bryan Stout
D3	11/12/2021	Specified Inventory, added monthly requirement, and updated Purpose	Bryan Stout
R0	3/21/2022	Updated format and implementation with NAES Corporation	J.L. Nelson
R1	4/18/2022	Updated Procedure, References	J.L. Nelson

4.0 PRECAUTIONS AND LIMITATIONS

4.1 Precautions

1. All operations shall be in accordance with the plant safety manual.

4.2 Limitations

1. All equipment guards shall be properly installed before starting any rotating equipment.
2. No equipment shall be operated with any safety device, trip or interlock defeated.
3. All construction and/or maintenance debris and tools shall be cleared from the affected equipment and properly secured, prior to equipment start-up.
4. All non-essential personnel shall be cleared from the affected equipment area, or at a minimum be notified of the impending start, prior to equipment start-up.
5. Equipment failures frequently occur in the first 30 minutes of operation. During this time, several checks should be made to verify satisfactory operation of the systems.
6. Attention should be given to normal operating conditions of the system to detect variations from the normal conditions and functions.
7. Report abnormal conditions or malfunctions to the Lead Technician.
8. All essential instrumentation must be properly calibrated with instrument readings in the control room correspond with local instruments.
9. If any breaker or part of the system is not in operation, a log entry must be made in the Operations Logbook that will be kept in the control room. The log entry must explain why the breaker or part of the system is not in operation.

5.0 INITIAL CONDITIONS AND PREREQUISITES

5.1 Initial Conditions

1. None

5.2 Prerequisites

1. OMT **SIGN OFF** (initialed) **AND DATE** all steps in this procedure as being complete.
2. **PERFORM** Section 6 - Winter Checks prior to OCTOBER 15th and on a monthly basis thereafter November - March.

3. **REVIEW** previous winter event issues that could affect plant operation and reliability.
4. **IF** any maintenance work has been done, **THEN VERIFY** the following:
   a. Work has been completed.
   b. Lock Out/Tag Out (LO/TO) has been cleared.
   c. Areas where work was performed have been cleared of tools, rags, etc.
   d. Equipment, circuits, sensors, etc. are ready for operation.

6.0 WINTER CHECKS

1. **PERFORM** a visual inspection of the heat trace system (boxes, cables and junctions) for any damage or wear before the system is energized.	
2. **CONDUCT** annual heat trace testing.	

Date	Initials	Circuit #	Megger (OHMS)	Volts	Amps

3. After turning on the heat tracing system, **PERFORM** Amp draw test a. **COMPLETE** Amp Draw Test b. **VERIFY** proper operation of heat tracing to fuel c. **DOCUMENT** operation of heat tracing.		
4. **COMPLETE** amperage test for heat trace system, recorded in the table below and logged in the winterization logbook. a. Electrician **DON** proper PPE for testing. b. Electrician safely **OPEN** bucket(s) to attach Amp Clamp to phase for reading. c. Electrician **ATTACH** Amp Clamp Meter to phase A – B and record amperage on Attachment C. d. **REPEAT** Steps 4a through 4c for phases B-C and A-C. e. **CLOSE** bucket f. **LOG** entry of test completed in the operator logbook in control room. g. **RECORD** Results in Winterization Logbook.		

5. **VERIFY** health of heat tracing: a. **ENERGIZE** each circuit b. **VERIFY** circuit LED lights are ON.		
6. **PERFORM** verification and visual inspection of insulation quality for: • Demin Water System – from tank, forwarding pumps to CSI Skid, Water Injection Skid and Wash Water Tank. • Lube Oil System – Turbine and Generator to Cooler. • Wastewater System. • Line Instrumentation Systems, instrument sensing lines and control valves		
7. **PERFORM** verification and visual inspection of insulation quality for Line Instrumentation Systems, instrument sensing lines and control valves: • Critical Systems o Transmission system capable of transmitting power generated from the facility. o Telemetering indicating generation to the transmission operator. o Natural gas supply. o Water supply to facility o Demineralizer o Inlet Heating System o Plant Air System o Hydraulic System o Ammonia System o Nox Water System o Lube Oil System • Critical Transmitters o Site Gas Pressure o Site Compressed Air Pressure o AFCU Skid NH3 Supply Pressure o AFCU Skid NH3 Flow Meter o Site Demin Water Storage Tank Level o Site Demin Water Supply Pressure o Site NH3 System Supply Pressure o Raw Water Pressure		
8. **PERFORM** an inspection of the inlet filter system, checking for wear and/or damage.		

9. **PLACE** Inlet Heating System in service **AND PERFORM** valve functionality test.		
10. **CHECK** Wastewater System piping insulation for damage and corrosion.		
11. **VERIFY** correct operation of the compressed air dryer and receiver drains. a. **EVALUATE** Air Dryer Desiccant b. **EVALUATE** Compressed Air Dew Point. Dew Point _____		
12. **VERIFY** that Air Compressor, receiver, and air dryer solenoid blowdown valves are operating properly.		
13. **VERIFY** the lube oil reservoir heaters for the turbine, generator and hydraulic systems are operating properly.		
14. PLACE RO Building Heater in service **AND VERIFY** operation		
15. STAGE portable heaters and halogen lamps; a. Raw Water Forwarding Pump Enclosure b. RO Building Portable Heater c. Air Compressor Enclosure		
16. INSTALL Wind Breaks; a. Unit 1/2 Sprint Skid b. Unit 1/2 Ammonia Forwarding Pumps c. Unit 1/2 Lube Oil Tank d. Unit 1/2 NOX Water Injection Pump e. Unit 1/2 AFCU Skid		
17. **PERFORM** Emergency Winterization Drill once per season.		
18. **VERIFY** Extreme Cold Weather inventory is accurate. • (5) Portable Heaters • (5) Portable halogen lamps • (5) Canvas Tarps • (5) Electrical Cords • (20) Bungee Cords		

• 200' Rope • (3) 10' Plug in heat tracing • (3) 5' Plug in heat tracing • Spare Insulation • Air Compressor (RENT) • Portable Generator (RENT) • (20) Gallons fuel for Portable Generator		

7.0 WINTER FORECAST CHECKS

1. **SCHEDULE** 24-hour coverage.		
2. **VERIFY** heater tracing system is on. Monitor heat trace control panel.		
3. **PERFORM** a visual inspection of the heat trace system (boxes, cables and junctions) for any damage or wear and then daily as part of operator outside rounds.		
4. **PERFORM** verification and visual inspection of insulation quality for instrumentation systems, instrument sensing lines and control valves		
5. **VERIFY** all heat trace breakers/circuits are energized. (On)		
6. **VERIFY** lube oil reservoir heaters and hydraulic oil reservoir heaters are operating properly.		
7. **VERIFY** Inlet Heating System in service.		
8. **VERIFY RO** Building Heater operational.		
9. **VERIFY** the portable heaters are on and operating properly. a. Raw Water Forwarding Pump Enclosure b. RO Building Portable Heater c. Air Compressor Enclosure		
10. Every 4 hours, MONITOR wind breaks; a. Unit 1/2 Sprint Skid b. Unit 1/2 Ammonia Forwarding Pumps c. Unit 1/2 Lube Oil Tank d. Unit 1/2 NOX Water Injection Pump e. Unit 1/2 AFCU Skid		
11. Every 4 Hours, **MONITOR** operation portable heaters		

8.0 COLD WEATHER DRILL

1. **VERIFY** heater tracing system is on. Monitor heat trace control panel.		
2. **PERFORM** a visual inspection of the heat trace system (boxes, cables and junctions) for any damage or wear and then daily as part of operator outside rounds.		
3. **PERFORM** verification and visual inspection of insulation quality for instrumentation systems, instrument sensing lines and control valves		
4. **VERIFY** all heat trace breakers/circuits are energized. (On)		
5. **VERIFY** lube oil reservoir heaters and hydraulic oil reservoir heaters are operating properly.		
6. VERIFY Inlet Heating System in service.		
7. VERIFY RO Building Heater in service **AND VERIFY** operation.		
8. **VERIFY** the portable heaters are on and operating properly. a. Raw Water Forwarding Pump Enclosure b. RO Building Portable Heater c. Air Compressor Enclosure		
9. Every 4 hours, MONITOR wind breaks; a. Unit 1/2 Sprint Skid b. Unit 1/2 Ammonia Forwarding Pumps c. Unit 1/2 Lube Oil Tank d. Unit 1/2 NOX Water Injection Pump e. Unit 1/2 AFCU Skid		
10. **TURN** Water Treatment portable heaters on and monitor operation hourly.		
11. **LOG** attendees that conducted training. Date/Time/Attendees		

Winter Readiness Drill Attendance

Attendee Name	Date	Time

Attachment E – Summer Readiness Procedure

NAES	Operating Procedure Checklist	
	Chamon	
	CMN-OP-107	Summer Readiness Procedure
	Rev: R1	Rev Date: 04/18/2022

TABLE OF CONTENTS

1.0 PURPOSE AND SCOPE

1.1 Purpose

This Operating Procedure shall be followed by plant personnel to operate this system and any associated auxiliary equipment. Only the most recent revision of this document shall be used. Previous versions shall be destroyed.

1.2 Scope

Chamon 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.

This 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, CMN-OP-107 is to be completed by May 15th each year and on a monthly basis June through October. If a extreme hot weather forecast is imminent complete Section 7. A hot weather drill (Section 8) should be completed once per season. All forms should be filed in the Binder in the PDC.

The following major equipment must be prepared for summer operations:

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

2.0 REFERENCES

1. Reference Documents

   PUCT Rule §25.53: Electric Service Emergency Operations Plans

   PUCT Rule §25.55: Electric Service Emergency Operations Plans

3.0 REVISION BLOCK

Rev.	Date	Description of Revision	By
D1	5/23/2019	New plan issued.	Bryan Stout
D2	10/29/2021	Added new items to checklist	Bryan Stout
D3	11/12/2021	Specified Inventory, added monthly requirement, and updated Purpose	Bryan Stout
R0	3/21/2022	Updated format and implementation with NAES Corporation	J.L. Nelson
R1	4/18/2022	Updated Procedure, References	J.L. Nelson

4.0 PRECAUTIONS AND LIMITATIONS

4.1 Precautions

1. All operations shall be in accordance with the plant safety manual.

4.2 Limitations

1. All equipment guards shall be properly installed before starting any rotating equipment.
2. No equipment shall be operated with any safety device, trip or interlock defeated.
3. All construction and/or maintenance debris and tools shall be cleared from the affected equipment and properly secured, prior to equipment start-up.
4. All non-essential personnel shall be cleared from the affected equipment area, or at a minimum be notified of the impending start, prior to equipment start-up.
5. Equipment failures frequently occur in the first 30 minutes of operation. During this time, several checks should be made to verify satisfactory operation of the systems.
6. Attention should be given to normal operating conditions of the system to detect variations from the normal conditions and functions.
7. Report abnormal conditions or malfunctions to the O&M Technician.
8. All essential instrumentation must be properly calibrated with instrument readings in the control room correspond with local instruments.
9. If any breaker or part of the system is not in operation, a log entry must be made in the Operations Logbook that will be kept in the control room. The log entry must explain why the breaker or part of the system is not in operation.

5.0 INITIAL CONDITIONS AND PREREQUISITES

5.1 Initial Conditions

1. None

5.2 Prerequisites

1. OMT **SIGN OFF** (initialed) **AND DATE** all steps in this procedure as being complete.
2. **PERFORM** Section 6 - Summer Checks prior to May 15th and on a monthly basis thereafter June - October.

3. **REVIEW** previous summer event issues that could affect plant operation and reliability.

4. **IF** any maintenance work has been done, **THEN VERIFY** the following:

   a. Work has been completed.

   b. Lock Out/Tag Out (LO/TO) has been cleared.

   c. Areas where work was performed have been cleared of tools, rags, etc.

   d. Equipment, circuits, sensors, etc. are ready for operation.

6.0 SUMMER CHECKS

1. **PERFORM** a visual inspection of the plant HVAC systems.		
2. **VERIFY** correct set points and operation of plant HVAC systems.		
3. **VERIFY** correct operation of any compartment exhaust dampers or fans.		
4. **PERFORM** verification and visual inspection of line instrumentation systems, instrument sensing lines and control valves: • Critical Systems o Transmission system capable of transmitting power generated from the facility. o Telemetering indicating generation to the transmission operator. o CEMS System o Control and Monitoring Systems (DCS and HMI) o Water supply to facility o Demineralizer o Plant Air System o Hydraulic System o Ammonia System o NOX Water System o Lube Oil System		
5. **PERFORM** an inspection of the inlet filter system, checking for wear and/or damage.		
6. **VERIFY** correct operation of the compressed air dryer and receiver drains. a. **EVALUATE** Air Dryer Desiccant b. **EVALUATE** Compressed Air Dew Point. Dew Point _____		
7. **VERIFY** that Air Compressor, receiver, and air dryer solenoid blowdown valves are operating properly.		
8. **VERIFY** operation of CT Sprint Skid system.		
9. **VERIFY** operation of all Transformer cooling fans.		
10. **PERFORM** Emergency Hot Weather Drill once per season.		
11. **VERIFY** Extreme Hot Weather inventory is accurate. • (2) Portable AC units		

• (4) Portable Fans • (5) Electrical Cords		

7.0 HOT WEATHER FORECAST CHECKS

1. **SCHEDULE** 24-hour coverage.		
2. **VERIFY** correct set points and operations of plant HVAC systems.		
3. **VERIFY** correct operations of any compartment exhaust dampers or fans.		
4. **VERIFY** correct set points and operation of Fin Fan Coolers.		
5. **VERIFY** operation of portable AC units and fans.		
6. **VERIFY** operation of CT Sprint Skid system.		
7. **VERIFY** operation of all Transformer cooling fans.		

8.0 HOT WEATHER DRILL

1. **VERIFY** correct set points and operations of plant HVAC systems.		
2. **VERIFY** correct operations of any compartment exhaust dampers or fans.		
3. **VERIFY** correct set points and operation of Fin Fan Coolers.		
4. **VERIFY** operation of portable AC units and fans.		
5. **VERIFY** operation of CT Sprint Skid system.		
6. **VERIFY** operation of all Transformer cooling fans.		
7. **LOG** attendees that conducted training. Date/Time/Attendees		

Summer Readiness Drill Attendance

Attendee Name	Date	Time