Emergency Action Plan (EAP)

Duke Energy Cayuga Station Cayuga Lined Ash Pond Dam Primary Ash Disposal Area #1 **Primary Settling Pond Dam Secondary Settling Pond Dam**

State and National Inventory of Dams (NID) Nos. No NIDs Available Vermillion County, Indiana

> CYS-EAP-00-0002 **Revision Number: 004** April 17, 2017

Operator/Owner Information:

Duke Energy Corporation 550 South Tryon Street Charlotte, North Carolina 28202





Reviewed:

Bill Luke, Station Manager Duke Energy Cayuga Station

Tim Thiemann, CCP Regional General Manager

Duke Energy Cayuga Station

Robert te: 2017.02.24 11:59:19 -05'00' Date: A. Leek

Robert Leek, System Owner Duke Energy Cayuga Station

Brian Weisker, VP CCP Ops. & Mail

Duke Energy Cayuga Station



550 S. Tryon Street

Charlotte, NC 28202

Professional Engineer Seal

Pursuant to 40 C.F.R. § 257.73 (a)(3)(iv), the undersigned, being a qualified professional engineer, as that term is defined under 40 C.F.R. § 257.53, hereby certifies this work product of Duke Energy Carolinas, LLC, being the written Emergency Action Plan for:

- Lined Ash Pond Dam, which has been determined to be a significant hazard potential CCR surface impoundment,
- #1 Ash Disposal Area, which has been determined to be a significant hazard potential CCR surface impoundment,
- Primary Settling Pond Dam, which has been determined to be a significant hazard potential CCR surface impoundment,
- Secondary Settling Pond Dam, which has been determined to be a low hazard potential CCR surface impoundment;

at Cayuga Station, meets the requirements of 40 C.F.R. § 257.73 (a)(3) and includes, without limitation, the following information:

- A. The events or circumstances involving the CCR unit that represent a safety emergency, along with a description of the procedures that will be followed to detect a safety emergency in a timely manner;
- B. The responsible persons, their respective responsibilities, and notification procedures in the event of a safety emergency involving the CCR unit;
- C. Contact information of emergency responders;
- D. Map(s) prepared under separate Professional Engineer seal and responsible charge, dated March 14, 2017 delineating the downstream area(s) that would be affected in the event of a CCR unit failure and a physical description of the CCR unit; and

E. Provisions for an annual face-to-face meeting or exercise between representatives of Duke Energy and the local emergency responders.

[P.E. Signature]

[Date]

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Please leave this page and insert the "Basic EAP Data" tab previously provided.

I. Basic EAP Data

General

The Duke Energy System Owner (SO) manages Cayuga Station Ash and Settling Pond Dams and has overall responsibility for ensuring the dams are operated and maintained in accordance with federal and state regulations. The SO coordinates with the Station/Plant Manager, CCP Operations and Maintenance, and the Regional General Manager on all dam operations. The SO also coordinates with CCP Governance and Operations Support in the maintenance of this Emergency Action Plan. The SO conducts regular and special inspections of the dams to identify any issues or concerns and is responsible for correcting and reporting any deficiencies noted through the use of this Emergency Action Plan. During emergencies that meet the classification categories identified in this plan for Emergency Level 1 or 2, the SO serves as the Technical Advisor/Subject Matter Expert to the Incident Management Team. See Appendix A-2 for specific duties and responsibilities.

Purpose

The purpose of this Emergency Action Plan (EAP) is to prevent or reduce the loss of life or injury and minimize environmental and property damage by implementing procedures to be followed in the event of an emergency associated with the Duke Energy Cayuga Station Ash and Settling Pond Dams. Such emergencies may include, but are not limited to, an unusually large flood or earthquake, a malfunction (hydraulic or structural) of the spillway or discharge structure, malicious human activity such as sabotage, vandalism or terrorism, or failure of the dam. This EAP defines responsibilities and procedures to:

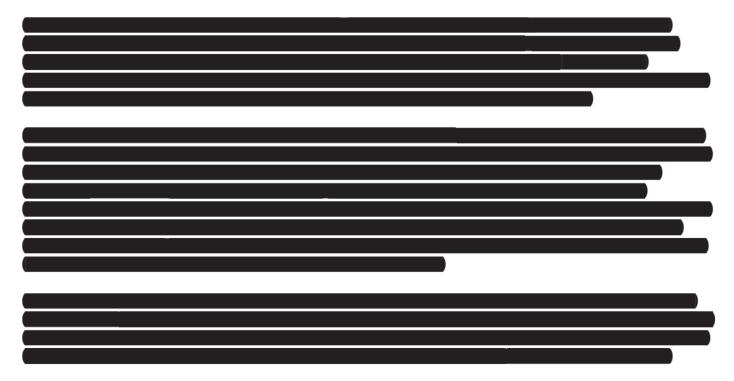
- Identify abnormal conditions that may endanger the dam, including natural, mechanical, or man-made causes, such as terrorist attacks or acts of vandalism or sabotage;
- Initiate remedial actions to prevent or minimize the downstream impacts of a dam failure as a result of any actions as listed above;
- Initiate timely emergency actions to ensure early warning and appropriate notifications to all personnel and facilities that could be affected by an impending or actual failure of the dam; and
- Activate the Incident Management Team to respond to and manage an event to its conclusion.

NOTE 1: The EAP is intended to provide a framework for response to various conditions involving the ash basins and/or cooling ponds, regardless of the cause.

NOTE 2: Although this EAP lists specific basins/impoundments by name or dam ID number, the processes and actions listed in this EAP can be used for events/conditions that occur with other basins/impoundments on site. Examples include, but are not limited to, the following: low-hazard or unrated basins, ash stacks, or storm water ponds.

Potential Impacted Area(s)

Potentially impacted areas were identified by conducting a dam breach and breach inundation analyses for the Ash and Settling Pond Dams.



Dam Description: Lined Ash Pond Dam

Height: <u>50.5 ft.</u> Built: 2008

Latitude: 39:55:7 Longitude: 87:25:40

National Inventory of Dams No.: N/A

Dam State ID Number: N/A

Dam Description: #1 Ash Disposal Area

Height: <u>47 ft.</u> Built: <u>1970</u>

Latitude: <u>39:54:49</u> Longitude: <u>87:25:7</u>

National Inventory of Dams No.: <u>N/A</u>

Dam State ID Number: N/A

Dam Description: Primary Settling Pond Dam

Height: 48 ft. Built: 1970

Latitude: <u>39:54:53</u> Longitude: <u>87:24:52</u>

National Inventory of Dams No.: <u>N/A</u>

Dam State ID Number: N/A

Drainage Area: 0

EPA Hazard Classification: Significant

State Hazard Classification: <u>N/A</u>
Dam Operator: <u>Duke Energy</u>

Major Property Owner: <u>Duke Energy</u>
Dam Designer: <u>Sargent & Lundy</u>

Drainage Area: 0

EPA Hazard Classification: Significant

State Hazard Classification: N/A

Dam Operator: <u>Duke Energy</u>
Major Property Owner: Duke Energy

Dam Designer: Sargent & Lundy

Drainage Area: 0

EPA Hazard Classification: Significant

State Hazard Classification: N/A

Dam Operator: <u>Duke Energy</u>

Major Property Owner: <u>Duke Energy</u>
Dam Designer: <u>Sargent & Lundy</u>

Dam Description: Secondary Settling Pond Dam

Height: <u>24 ft.</u> Drainage Area: <u>0</u>

Built: _1970__ EPA Hazard Classification: _Low_ Latitude: _39:54:49_ Longitude: _87:24:40__ State Hazard Classification: _N/A__

National Inventory of Dams No.: _N/A _ Dam Operator: <u>Duke Energy</u>
Dam State ID Number: _N/A _ Major Property Owner: <u>Duke Energy</u>
Dam Designer: __Sargent & Lundy_

See design data in Appendix B.

Directions to Ash and Settling Pond Dams (See *Vicinity Map*, Appendix B–2 and *Site Map*, Appendix B-3)

From Highway 63, take East County Road 200 N. to Duke Energy Indiana gate house and Ash Ponds are located past the gate house.

Please leave this page and insert the "Incident Command System" tab previously provided.

II. Incident Command System

Duke Energy power generation operations employs the FEMA model for an Incident Command System (ICS), which is a systematic tool used for the command, control, and coordination of an emergency response. ICS is based upon a changeable, scalable response organization providing a common hierarchy and common terminology; within which people can work together to effectively manage an emergency. Personnel may be drawn from multiple departments within Duke Energy that may or may not routinely work together; however, the ICS is designed to give standard response and operation procedures to reduce the problems and potential for miscommunication during such incidents.

ICS procedures should be pre-established, vetted and approved by station personnel and participating departments. Participating personnel should be well-trained prior to an incident. ICS includes procedures to select and form temporary response management hierarchies to control operations, funds, personnel, facilities, equipment, and communications. Personnel are assigned according to established standards and procedures previously vetted and approved. ICS is a system designed to be used or applied from the time an incident occurs until the requirement for management and operations of an incident no longer exist.

ICS is interdisciplinary and organizationally flexible to meet the following management challenges:

- Meets the needs of a jurisdiction to cope with incidents of any kind or complexity;
- Allows personnel of a wide variety from within Duke Energy to meld rapidly into a common management structure with common terminology;
- Provides logistical and administrative support to operational staff;
- Is cost effective by avoiding duplication of efforts and continuing overhead; and
- Provides a unified, centrally authorized emergency organization.

The ICS structure that Duke Energy Power Generation Operations has adopted can be referenced below, and the associated roles and responsibilities can be found in Appendix A-2.

Incident Command Organization Structure

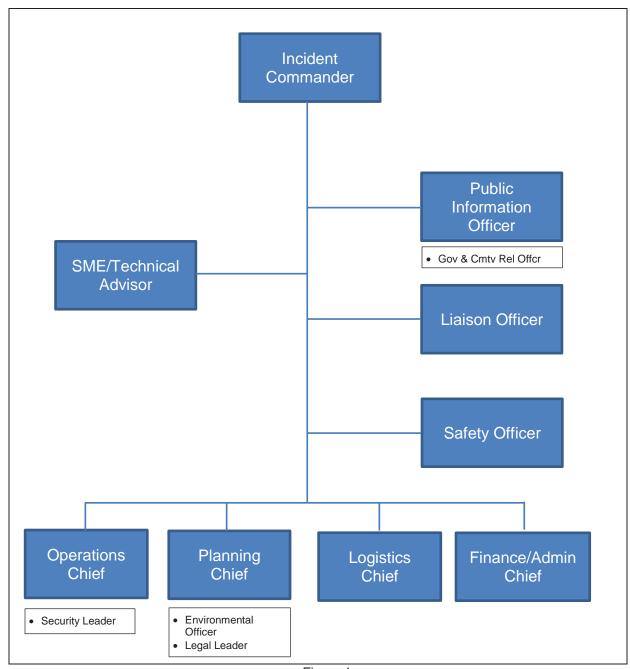


Figure 1

Incident Command Roles / Assignments

*	1-L T21-	Contact Name	Business	Alternate	F!!
	Job Title dent Commander	Contact Name	Phone	Phone	Email
P					
	Station Manager				
P	GM CCD Pagional One &				
	GM CCP Regional Ops & Maint				
_					
Α	VP CCP Ops & Maintenance				
_					
Α	Supv Operations				
_	0 0 1				
Α	Supv Operations				
Α	Supv Operations				
Α	Supv Operations				
Α	Supv Operations				
Α	Supv Operations				
Α	Supv Operations				
Α	VP CCP Engineering				
Α	GM CCP Proj Plng &				
	Initiation				
Α	VP CCP Governance & Ops				
	Support				
Α	GM CCP Project				
	Management				
Α	GM CCP Project				
	Management			,	
Sub	ject Matter Expert/Technical	Advisor			
Р	System Owner				
Α	CCP Engineer				
Α	Mgr CCP Regional Engg				
Оре	erations Chief				
Р	Supt Operations				
	Fnergy – Cayuga Station, Ash at	10 (11)			

*	Job Title	Contact Name	Business Phone	Alternate Phone	Email
Α	Supv Operations		THORE	THORE	2.114.11
	nning Chief				
Р	Supt Maintenance				
Α	Coord Operations				
Log	istics Chief				
Р	Contract Resource				
	Coordinator				
Α	Scheduler Work				
	Management				
	ance and Administration Chie	f			
P	Sr Financial Analyst				
_	D'- MAY EUO E'-				
Α	Dir MW FHO Finance				
Pub	lic Information Officer				
P	Lead Communcations				
.	Cnslt				
Α	Sr Communications Cnslt				
Safe	ety Officer				
Р	Sr H&S Professional				
Α	H&S Professional II				
Α	Manager H&S				
	son Officer				
Р	Govt & Comm Relations				
	Mgr				
P	Govt & Comm Relations Mgr				
Loc	al Leader				
P	Corporate Legal				
	Corporate Legal				
Α	Corporate Legal				

*			Business	Alternate	
•	Job Title	Contact Name	Phone	Phone	Email
Env	rironmental Leader				
Р	Lead EHS Professional				
Α	Site Environmental Coordinator				
Sec	urity Leader				
Р	Sr Security Specialist				
Α	Developmental Assignment Leader				

NOTE: For CCP related events, initial Incident Command will be managed by site personnel. Once qualified CCP individuals arrive on site, they will take the Incident Commander role for CCP related events.

Table 1

Incident Management Team Activation

The Duke Energy Representative or his/her alternate is responsible for activating the Incident Management Team and will utilize procedures established in this EAP for incident/event activation. The Incident Management Team will be activated for all level 1 and level 2 events and can be activated at level 3. At an Event Level 3 activation, the Incident Commander will determine which team members are needed for response activities, or will decide to place the entire team in a standby status until such time as needed. The Incident Management Team, when activated, will meet in one of the following locations:

Туре	Building Name	Physical Address
Primary		
Alternate		

Table 2

Regional Incident Management Team Activation

The Regional Incident Management Team (RIMT) provides support to the stations within their region as necessary in response to an event or incident. The Incident Commander will, based on his/her assessment will contact the FHO or the CCP Regional VP and will request activation of the RIMT based on the following criteria:

- The incident resolution will require multiple operational periods.
- Incident is or may be highly publicized, requiring significant coordination of off-site resources.
- The incident is complex, and is being managed as a unified command with multiple external agencies.
- Management discretion.

Once approval has been given, the RIMT will be activated by notifying personnel for your region as identified in enclosure 1 of FHO Regional Incident Management Team Procedure FHG-PRC-NA-AD-0032.

Aviation Resources

The use of aviation resources to assist in conducting assessments during an emergency is a valuable tool that can be used for all types of emergencies at the site. Aviation resources, e.g., helicopters or drones, should be considered and requested early in the response phase for planning and damage assessment purposes. These resources can be obtained by

Please leave this page and insert the "Preparation" tab previously provided.

III. Preparation

Duke Energy's Cayuga Station Emergency Action Plan is designed to implement procedures to be followed in the event of an emergency. The steps taken in preparation for an incident/event facilitate the response as well as prevent, moderate, or alleviate the effects of the incident/event. The sections listed below discuss actions taken by Cayuga Station in preparing Cayuga Station and Duke Energy personnel to respond in emergency situations.

Training and Exercises

All personnel assigned an Incident Command System (ICS) role are required to meet the minimum training requirements established by Duke Energy for emergency response. Personnel assigned to an ICS position will complete initial training and will participate in annual refresher training. It is recommended that personnel take additional training for the positions assigned to enhance their proficiency and effectiveness during emergencies.

Cayuga Station will conduct a periodic test of this EAP at least once every twelve months. The periodic test should consist of a tabletop exercise at a minimum, conducted at Duke Energy's Cayuga Station. If the Cayuga Station incurs an actual level 1 event, then the station is not required to conduct another exercise during that 12 month period. Vermillion County emergency management agencies will be invited to participate in the annual exercise. A site and EAP orientation should be completed prior to exercise participation by those agencies responding to an actual emergency. The orientation will enhance coordination and response capabilities and can be conducted in conjunction with the tabletop exercise or as a separate event.

As the Cayuga Station reaches competency in the conduct of its tabletop exercises, an increase in complexity to a functional and eventually a full scale exercise should be planned and exercised to test and evaluate all phases of the emergency response capabilities, to include the coordination with external local, county, and state agencies. To reach this goal it is recommended that the station conduct a drill at least quarterly (based on a calendar year), exercising different functions within the EAP. The long term goal of the station is to progress and be fully capable of conducting a full-scale exercise on the ash basin or cooling pond/lake EAP within 5 years and on 5 year intervals thereafter.

Annual Face-to-Face Meeting or Exercise

Duke Energy Cayuga Station is required in accordance with 40 CFR Part 257.73(a)(3)(i)(E) to hold an annual face-to-face meeting with Vermillion County emergency responders or ensure their participation in a Duke Energy Cayuga Station exercise. To address this requirement, Duke Energy Cayuga Station will have a documented annual meeting with Vermillion County emergency responders. The template in Appendix A-8 must be filled out to provide the necessary documentation of this annual meeting. The following topics at a minimum are to be covered at each annual meeting:

- 1. Overview of EAP;
- 2. Discussion on emergency levels and actions taken by all;
- Station hazards (e.g., potential flooding from cooling ponds or environmental damage from ash ponds);
- 4. Notification protocols;

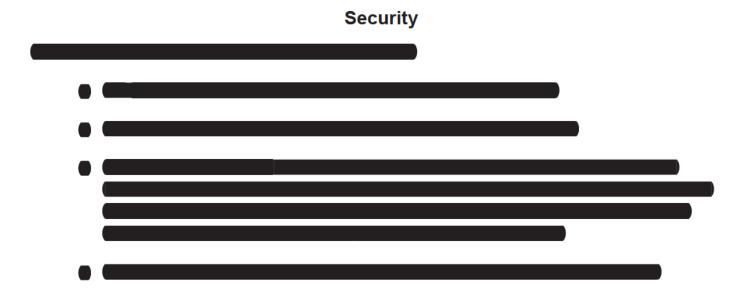
- Training and exercises;
- 6. Station familiarization; and
- 7. Contact information updated.

This meeting enhances familiarization, cooperation, and coordination for Vermillion County emergency responders and is the preferred process for meeting this requirement. However, Duke Energy Cayuga Station will invite Vermillion County to participate in drills along with the annual meeting.

Monitoring

The dams are monitored regularly to identify changes in conditions. Additional monitoring of the dams is required before, during and after natural or man-made events. Personnel have been trained to identify issues through the following process:

- Weekly/Biweekly/Monthly inspections conducted by the System Owner or his/her designee.
- Special inspections after a significant rain or severe weather event, seismic event, or other special event, meeting or exceeding the standard established in the O&M manual.
- Observations by station personnel.
- Technology used to monitor dam levels.



Response during Periods of Darkness

Nighttime response provides its own set of hazards in addition to the emergency situation. Safety of all response personnel is the first concern and every effort should be taken to ensure the safety of all personnel in the area. Areas should be lit or lighting made available as soon as possible to enhance response capabilities. All areas are required to be marked with a permanent identification marker. Maps that layout the basins or dams should be available while operating in the area.

During all periods of operation, the Cayuga Station control room monitors instruments associated with the ash basins and cooling ponds. If an instrument change is noted, whether during the period of darkness, or through observation, the control room will advise the Operations Supervisor, who will investigate the situation and report back to the control room what was found. If it is determined that a problem exists, the Operations Supervisor will activate the EAP to determine the level of response required and implement all notifications and actions as appropriate, which might include activation of the Incident Management Team in addition to contacting the System Owner (or his/her designee).

Response during Weekends and Holidays

To implement an effective emergency response during weekends and holidays, contact information on all personnel required to respond should be current and easily accessible to the person or persons required to make notifications. A test of the contacts should be made to ensure connectivity to all required personnel and contractors. The frequency of these tests is at the discretion of the station manager. Please refer to Appendix A-1 and B-1.

During all periods of operation, the Cayuga Station control room monitors instruments associated with the ash basins and cooling ponds. If during the weekend or holiday an instrument change is noted, or if through a routine area check a discrepancy is noted, the control room will advise the Operations Supervisor who will investigate the situation and report back to the control room of what was found. If it is determined that a problem exists, the Operations Supervisor will coordinate with the System Owner/CCP Engineer and activate the EAP to determine the level of response required; and implement all notifications and actions as appropriate, to include activation of the Incident Management Team. The System Owner or his designee will notify the control room of who is on-call during the weekend or holiday and be available to respond upon notification.

Response during Adverse Weather

Adverse weather conditions hamper the ability of the station and personnel to respond effectively during emergencies and should be taken into account in advance preparation steps. Planning and preparation steps should be established for the following conditions:

- Flooding
- Wind
- Ice
- Snow
- Severe Thunderstorms
- Tornados

In situations where adverse weather conditions provide advance warning, Cayuga Station will take necessary steps to ensure the safety of all personnel, and implement procedures to secure the station as much as possible, including the pre-staging of personnel and equipment as necessary to ensure an effective response. Additional equipment and materials would include the following:

- Salt
- Sand
- Snow Plows

Based on weather reporting and the issue of weather watches or warnings received from the National Weather Service for severe or adverse weather, the Cayuga Station control room will advise the Operations Supervisor, who will activate the Duke Energy Cayuga Station Natural Disaster Emergency Response Plan (NDERP) and this EAP, taking all actions in accordance with the NDERP/EAP in preparation for, and actions required at the conclusion of, the severe weather event. The Operations Supervisor should notify and brief personnel in accordance with the NDERP/EAP for the designated emergency level condition established based on the degree of severity of the storm. Once the Incident Commander is notified, a determination will be made to activate the full Incident Management Team.

During severe weather operations, the Cayuga Station control room monitors instruments associated with the dams and cooling ponds. If, during severe weather, an instrument change is noted, or if through observation a discrepancy is noted, the control room will advise the Operations Supervisor, who will determine, based on weather conditions and safety, the best opportunity to investigate the situation and report back to the control room of what was found. Once weather conditions permit, an inspection of the area should be conducted immediately. If it is determined that a problem exists, the Operations Supervisor will activate the EAP to determine the level of response required and implement all notifications and actions as appropriate, to include activation of the Incident Management Team.

Stockpiling Materials and Equipment

Cayuga Station has determined the minimum equipment and materials necessary to provide an effective initial response to the most severe of the emergencies listed within this EAP. A review of the equipment and materials maintained should be conducted annually to ensure sufficient equipment and materials are on hand. The EAP will be updated to reflect any changes in equipment and materials at the next annual EAP review. The review should also include materials and equipment required to respond during adverse weather conditions. If materials are used during an actual response, it is the responsibility of the System Owner to ensure materials are replenished as soon as possible. Refer to Appendix B-1 for a list of materials maintained on site.

In the event more resources are needed than the minimum maintained on site, Cayuga Station has identified and coordinated with commercial vendors to make the equipment or materials available on a 24 hour basis, 7 days a week. Refer to Appendix B-1 for a list of vendors identified to provide additional resources.

Staging Areas

Staging areas will be established for the receipt and transition of personnel, equipment, supplies and materials. The location for the staging area should be established in an area that allows easy access and does not interfere with movement within the incident/event area. The staging area can be on or offsite with a primary and alternate location identified. Cayuga Station will utilize the following locations:

Туре	Building Name	Physical Address
Primary	Incident Commander will identify location at the time of	

	the incident.	
Alternate		

Table 3

The staging area for news personnel should be away from the Incident Command Center and at a location that does not interfere with the movement of emergency response personnel and equipment. This location should be outside of the station.

The below listed locations have been selected as the primary and alternate staging area for the press.

Туре	Building Name	Physical Address
Primary	Incident Commander will identify location at the time of the incident.	
Alternate		

Table 4

Evacuation Responsibilities

Evacuation planning and implementation for the local community is the responsibility of Vermillion County emergency management authorities. (Local/County Name) plans will be followed in the event a potential for evacuation exists, or an evacuation of residents is required. Inundation maps in the appendix identify areas at risk of flooding. This helps Vermillion County in the development of warning and evacuation plans.

The Vermillion County emergency management authorities will be notified through the EAP call tree to prepare for and activate their evacuation plans if needed. In the event of a dam failure, procedures are also in place to evacuate non-essential personnel, if deemed necessary.

IV. Reporting

Duke Energy CCP Regulatory Affairs must provide to the State Director and/or appropriate Tribal authority (if applicable) notification of the availability of all the required documentation in the Duke Energy operating record or its publicly accessible internet site. All notifications must be made not later than the close of business 30 days from the date the document is posted to the Duke Energy Cayuga Station operating record. Notification must be given to the posting of the following required documents:

Latest version of the EAP with all amendments.

- Documentation recording the annual face-to-face meeting or exercise between representatives of Duke Energy and the local emergency responders. See Appendix A-9.
- Detailing the corrective measures taken to remedy a deficiency or release.
- Documentation recording all activations of the EAP.

V. The EAP Process

This EAP must be implemented once events or circumstances that represent a safety emergency are detected, including conditions identified during periodic structural stability assessments, annual inspections, and inspections by a qualified person. The Duke Energy Representative or his/her alternate is responsible for activation of this EAP.

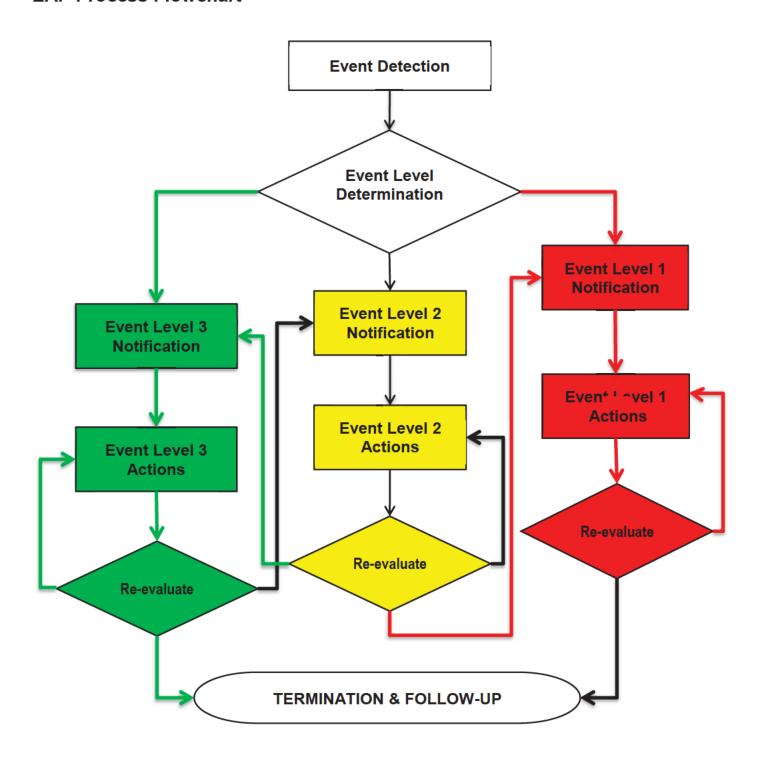
Activation of the EAP can be as simple as identifying an "abnormal event," Level 3, clearing the problem, completing the Abnormal or Emergency Event Log, and finally closing out the situation. Activation of the EAP could also be extensive to the point of activating the Incident Management Team at a Level 1 or Level 2.

A four-step process is used to negotiate the many issues associated with an event. These steps will assist personnel in completing all actions, reduce the stress level on all personnel, and increase efficiency and timeliness in the response effort. The four steps are as follows:

- **Step 1** Event Detection and Level Determination: Identify the event and classify the urgency of the action level.
- **Step 2** Notification: Ensure notification of appropriate personnel and open communications with all appropriate parties.
- **Step 3** Expected Actions: Respond to the event by following the recommended actions in the Action Data Sheets.
- **Step 4** Termination and Follow-up: Follow procedures governing the termination of an event and the follow on discussion reviewing all actions.

This EAP also includes information related to potential targets, security procedures and emergency procedures, the disclosure of which would jeopardize public safety and increase the risk of harm to Indiana citizens and natural resources.

EAP Process Flowchart



Please leave this page and insert the "Step 1: Event Detection" tab previously provided.

Step 1: Event Detection

This step describes the detection of an abnormal or emergency event and provides information to assist the dam operator in determining the appropriate emergency level for the event.

Abnormal or emergency events may be detected by:

- Observations at or near the dam by Duke Energy personnel, visitors to the dam, or the public.
- Earthquakes felt or reported in the vicinity of the dam.
- Forewarning of conditions that may cause an abnormal event or emergency event at the dam (for example, a severe weather or flash flood forecast).
- Evaluation of instrument data.

The collection of information during this step is important to ensure the correct response action is being initiated. The person receiving the notification of an event should secure as much information as they can from the individual reporting the incident, ensuring not to jeopardize the individual's safety. This information is utilized for determining the type of event and the emergency level classification for the conditions identified from the notification.

The information gained from this step will also determine the requirement for activation of the Incident Management Team (IMT). Activation of the IMT is automatic for all Emergency Level 1 or 2 events and at the discretion of the Incident Commander (IC) for Emergency Level 3 events, which will be based on the type of event being responded to and the chance the Level 3 event could escalate to a Level 2 or Level 1. The IC has the discretion at Emergency Level 3 to place the IMT on standby until such time as they are released.

Emergency Level Determination

Once an abnormal or emergency event is detected or reported, the Duke Energy Representative or his/her alternate is responsible for classifying the event into one of the following three emergency levels:

Emergency Level 1—Urgent! Dam failure is imminent or in progress:

This is an extremely urgent situation when a dam failure is occurring or obviously is about to occur and cannot be prevented. Flash flooding will occur downstream of the dam. This situation is also applicable when flow through the earth spillway is causing downstream flooding of people and roads.

Emergency Level 2—Potential dam failure situation, rapidly developing:

This situation may eventually lead to dam failure and flash flooding downstream, but there is not an immediate threat of dam failure.

This emergency level is also applicable when flow has or is expected to result in flooding of downstream areas, and people near the channel could be endangered. Emergency Management should be on alert to initiate evacuations or road closures if the flooding increases.

Emergency Level 3—Abnormal event, slowly developing:

This situation is not normal but has not yet threatened the operation or structural integrity of the dam, but possibly could if it continues to develop.

The Duke Energy Representative or his/her alternate will utilize the following Action Data Sheet Index as a guide to determine the type and severity of the event, classifying it in one of the emergency levels as indicated by the event. If the event occurring is not identified in the Action Data Sheet Index, the Duke Energy Representative or his/her alternate will contact the Geo-Technical Engineer for guidance and direction to initiate a response action.

Action Data Sheet Index

Event	Situation	Emergency Level*	Action Data Sheet
A. Dam Failure	Imminent or Total Dam Failure from a known or unexpected event.	1	A-1
	Discharge pipe exhibits abnormal condition with no active erosion.	3	B-3
	Visible erosion damage to dam embankment	2	B-2
B. Discharge Pipe Abnormal Condition	Discharge pipe is flowing with advancing erosion that is threatening the embankment stability.	1	B-1
	Discharge pipe flow is uncontrolled and has damaged the embankment.	1	B-1
	Reservoir water surface elevation at the emergency spillway is flowing with no active erosion.	3	C-3
	Emergency Spillway flowing with active erosion.	2	C-2
C. Emergency spillway flow	Spillway flow could result in flooding of people downstream if the reservoir level continues to rise.	2	C-2
	Spillway flowing with advancing erosion that is threatening the control section.	1	C-1
	Spillway flow that is flooding people or properties downstream.	1	C-1
D. Embankment	Reservoir or river level is rising as a result of heavy rain and/or operational inflows that are less than three feet but greater than one foot below the dam crest.	3	D-3
overtopping	Reservoir or river level 1 foot or less than the dam crest.	2	D-2
	Water from the reservoir or the river is flowing over the top of the dam	1	D-1

Event	Situation	Emergency Level*	Action Data Sheet
	New seep in the dam	3	E-3
E. Seepage	New or existing seep with cloudy discharge and greater than 5 gallons per minute.	2	E-2
	Seepage with discharge greater than 10 gallons per minute that is not a controlled seep.	1	E-1
	Observation of slope depression in reservoir area or on embankment that may be indicative of a sinkhole.	3	F-3
F. Sinkholes	Observation of new sinkhole in reservoir area or on embankment.	2	F-2
	Rapidly enlarging sinkhole.	1	F-1
	Debris is blocking one or both inlet risers causing the water level to rise	3	G-3
	Noticeable flow that exceeds historic measurement.	3	G-3
G. Pipes and Culverts	Noticeable change of condition of the pipe with no leak.	3	G-3
Garrente	Noticeable structural and or Operations and Maintenance deficiencies in the pipe with flow.	2	G-2
	Discharge pipes located beneath the Dam may have failed or are rapidly deteriorating.	1	G-1
H. Embankment	New bulging/surficial sloughing/slippage of the embankment slope. (Does not include historic bulges and sloughs).	3	H-3
movement	Large incremental movement/slippage of the embankment slope	2	H-2
	Sudden or rapidly proceeding bulges or slides of the embankment slopes.	1	H-1
I. Earthquake	Earthquake felt or magnitude 3.0 or higher reported on or within 50 miles of the dam.	3	I-3
	Bomb threat	3	J-3
J. Security threat/ Sabotage/	Suspicious package	3	J-3
Vandalism	Suspected intentional damage to the dam or appurtenances with or without impact to the functioning of the dam	3	J-3

^{*} Emergency Level 1: Urgent! Dam failure is imminent or in progress

* Emergency Level 2: Potential dam failure situation, rapidly developing

* Emergency Level 3: Abnormal event, slowly developing

^{*} N/A: Not Applicable

Please leave this page and insert the "Step 2: Notification" tab previously provided.

Step 2: Notification

Due to the type of events that can occur, notification becomes an important step in initiating response actions. Events that may occur can not only impact Cayuga Station but could have an adverse impact on the local community and the environment, thus requiring the incorporation of local, state and or tribal emergency management agencies into the call tree. Each has its own responsibilities in activating their emergency action or response plans to prevent or minimize the loss of life and damage to property or the environment and rely on Caygua Station to provide proper and timely notification.

Once the event has been identified and the emergency level has been determined, whether Emergency Level 1, 2, or 3, notification of agencies, incident command response and company personnel are important to ensure timely response actions are taken to prevent or minimize the loss of life, and damage to property and the environment. Call trees have been developed to notify the appropriate personnel at each emergency level and are to be completed as soon as possible after event identification. If the degree of the emergency is urgent, the person initiating the call tree may utilize additional personnel to assist in making the calls.

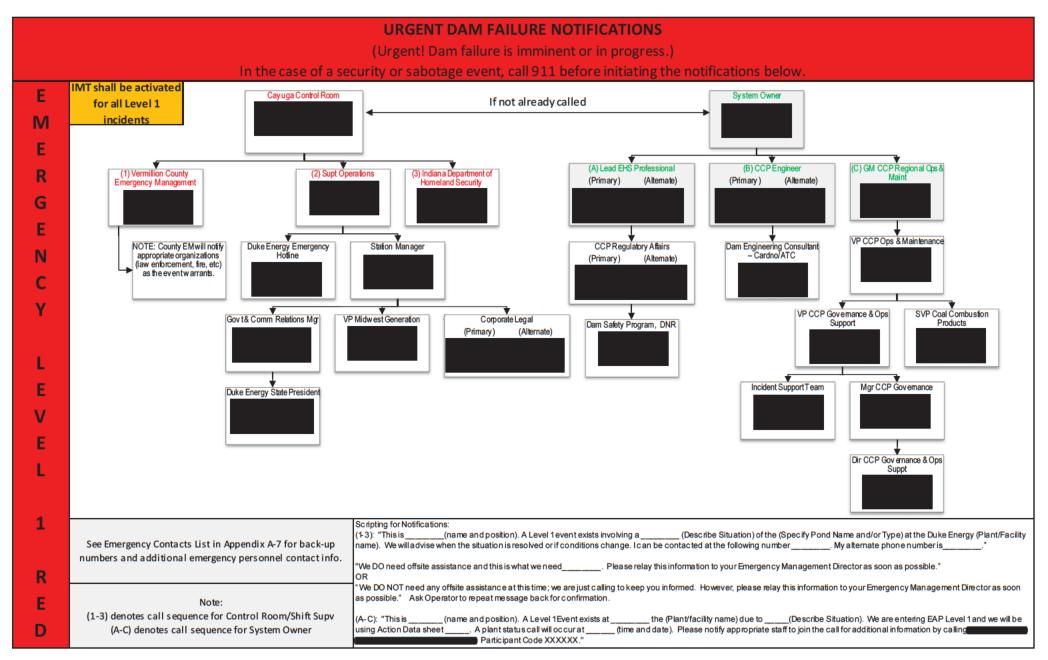
Because call trees have been developed for each emergency level, notification must be made for each level. If there is a change in the emergency level, notification must be initiated for that corresponding level. As an example:

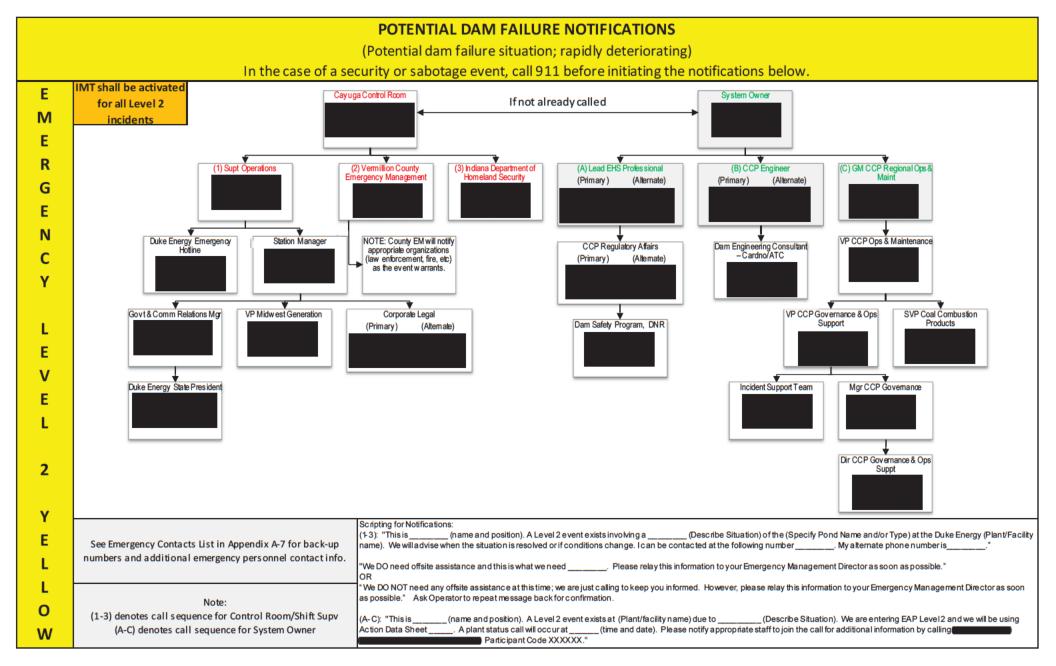
An incident was initiated at Emergency Level 2 and all notifications were made. Later it was determined that the situation was deteriorating and the failure of the dam was imminent, classifying it as an Emergency Level 1 Event. This would require the initiation of the Emergency Level 1 Event Notification Call Tree.

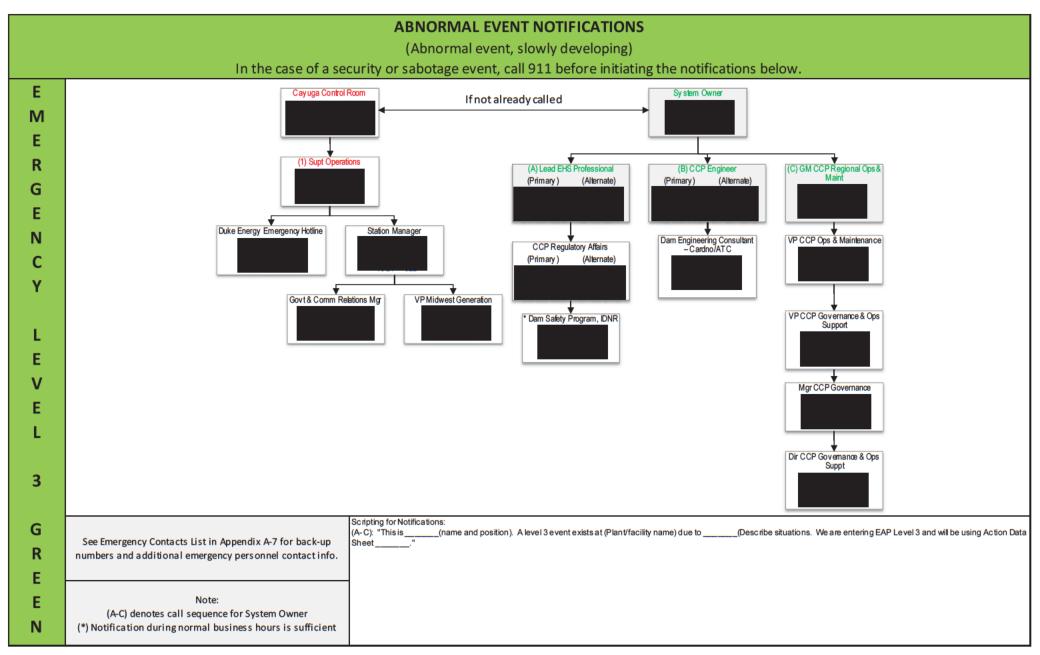
All personnel responsible for initiating the call trees in the event of an emergency should become familiar with each of the emergency level notification call trees to minimize any confusion during a real event. The call trees below are used to identify the structure of the notifications based on each emergency level. In Appendix A-1A, A-1B, and A-1C, you will find a more user-friendly version for clarification of the steps and the notification process. Cayuga Station will be provided with standalone notification forms to be utilized and completed for each event activation.

To ensure a clear and concise message is delivered, a script has been created for each emergency level and is to be utilized when notifying agencies and company personnel of an event. Personnel should not deviate from this script to prevent the passage of incorrect or misleading information. Personnel should become familiar with, but always use the scripts as identified at the beginning of each call tree. See Appendix A-1A, A-1B, and A-1C.

In addition to utilizing the call trees to initiate emergency response at all levels, the Incident Management Team is activated for all Event Level 1 and Level 2 events. However, it is important to contact the IC regardless of the level of incident that has been identified. It is the decision of the Duke Energy Representative or his/her alternate or the IC to activate the IMT. Utilize the Incident Command Roles and Assignments document to activate the Incident Management Team.







Please leave this page and insert the "Step 3: Expected Actions" tab previously provided.

Step 3: Expected Actions

Emergency remedial actions

Immediate implementation of remedial actions outlined on the following Action Data Sheets may delay, moderate, or prevent the failure of the dam. Several of the listed adverse or abnormal conditions may be apparent at the dam at the same time, requiring implementation of several modes of remedial actions. Close monitoring of the dam must be maintained to confirm the success of any remedial action taken at the dam. Time permitting, any remedial action should be developed through consultation with Duke Energy CCP Engineering and, if warranted, the IDNR, Land Resources. See *Resources Available* (Appendix B–1) for sources of equipment and materials to assist with remedial actions. An assessment process led by Duke Energy CCP Engineering working in collaboration with Station Operations will be performed to determine further resource requirements depending upon the various potential emergency conditions.

Action Data Sheets

Event: DAM FAILURE	Sheet
LEVEL: 1 RED	A-1

Situations:

Imminent or Total Dam Failure from a known or unexpected event.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2, and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Notify the Operations Superintendent or Designee to initiate evacuation procedures as appropriate in accordance with Enclosure 5 of the FHO EAP.
- D. Ensure personnel remain a safe distance from the dam.
- E. Review all inundation maps to identify impacted areas as a result of imminent or total dam failure.
- F. Initiate and record all information, observations, and actions on the Abnormal or Emergency Event Log provided in Appendix A-3.
- G. Contact the <u>Duke Energy CCP Engineer(s)</u> to report the latest observations and conditions.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- I. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants downgrade and transition if there is no longer an impending threat of dam failure with no additional rainfall occurring yet there is damage to the dam that prevents safe impoundment of water.
- C. The event may be terminated only when either:
 - The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
 - The dam has failed and there is no longer a threat to the downstream public.
- D. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

Based on this determination, follow the appropriate actions below.

A. EVENT LEVEL 1	B. DOWNGRADE & TRANSITION	C. TERMINATION
Continue recommended actions on this sheet	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: Discharge Pipe Abnormal Condition	Sheet
LEVEL: 3 GREEN	B-3

• Discharge pipe exhibits abnormal condition with no active erosion.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. Conduct constant surveillance for the following conditions:
 - Basin elevation and rate of rising;
 - Observation of changes in dam embankment slope conditions at spillway outlet;
 - Is discharge coming from under or around the pipe;
 - Blockage or obstructions on the crest of the emergency spillway;
- C. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- D. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 3 if there is no change in situation.
- B. The event warrants escalation to Event Level 2 if the following is noted: Discharge pipe spillway flowing with active erosion; visible erosion damage to the dam embankment.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 3	B. ESCALATION	C. TRANSITION	D. TERMINATION
Continue recommended actions on this sheet	Go to Event Level 2 this event	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: Discharge Pipe Abnormal Condition	Sheet
LEVEL: 2 YELLOW	B-2

Visible erosion damage to dam embankment.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the prescripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Conduct constant surveillance of the discharge pipe for the following conditions:
 - Size of eroded area;
 - Estimated discharge and nature of the discharge (clear or cloudy);
 - Is discharge coming from around the pipe exterior or through the pipe
 - Recent weather conditions;
 - Fluctuations in the pool;
- D. Use the temporary siphon, or pumps to drawdown the water level and reduce discharge pipe flow. Caution must be taken to route these discharges away from any active erosion areas.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.
- **G.** Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- H. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the *Duke Energy Incident Command and CCP Engineer(s)* as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 2 if there is no change in situation, weather forecast predicts significant precipitation will occur within the next 24 hours period, or the condition of the spillway has been compromised as determined by the Duke Energy CCP Engineer(s).
- B. The event warrants escalation to Event Level 1 if the following is noted: inflow is not decreasing and water level still rising, uncontrolled erosion, sediment loss in large quantities, a whirlpool or sudden change in pool level, scarps or cracks, sinkholes, sand boils, mud spouts, or quicksand-like conditions.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event warrants downgrading if the situation is being managed with no threat of further erosion of conditions.
- E. The event can be terminated when, in coordination with the CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- F. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. ESCALATION	C. TRANSITION	D. DOWNGRADE	E. TERMINATION
Continue recommended actions on this sheet	Go to Event Level 1 this event;	Go to the event level of the appropriate event type.	Go to Event Level 3 this event.	Go to Termination and Follow-up

Event: Discharge Pipe Abnormal Condition	Sheet
LEVEL: 1 RED	B-1

- Discharge pipe is flowing with advancing erosion that is threatening the embankment stability.
- Discharge pipe flow is uncontrolled and has damaged the embankment.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Conduct constant surveillance of the discharge pipe conditions for the following conditions:
 - Basin elevation and rate of rising;
 - Observation of changes in dam embankment slope conditions at spillway outlet;
 - Is discharge coming from around the pipe exterior or through the pipe;
 - Blockage or obstructions at the pipe inlet or outlet.
- D. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- E. Contact the <u>Duke Energy CCP Engineer(s)</u> as necessary to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below
- **F.** Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- **G.** Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants downgrade to Level 2 after immediate response actions have reduced the incident to Level 2 response actions.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- E. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 1	B. DOWNGRADE	C. TRANSITION	D. TERMINATION
Continue recommended actions on this sheet	Go to Event Level 2 this event.	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: Emergency Spillway Flow	Sheet
LEVEL: 3 GREEN	C-3

• Reservoir water surface elevation at the emergency spillway is flowing with no active erosion.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. Observe and inspect every part of the dam; this should be done without compromising the safety of anyone performing these tasks.
- C. Monitor water levels and spillway area for erosion twice daily, or as conditions warrant.
- D. Monitor Off-site areas and instrumentation.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.
- G. Monitor weather for rain events that could potentially increase reservoir height and flow from the spillway.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 3 if there is no change in situation.
- B. The event warrants escalation to Level 2 when spillway flows produce active erosion of channel or spillway flow that may result in flooding of people downstream if water continues to rise.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 3	B. ESCALATION	C. TERMINATION
Continue recommended actions on this sheet	Go to Event Level 2	Go to Termination and Follow-up (Step 4)

Event: EMERGENCY SPILLWAY FLOW	Sheet
LEVEL: 2 YELLOW	C-2

- Emergency spillway flowing with active erosion.
- Spillway flow could result in flooding of people downstream if the reservoir level continues to rise.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the prescripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Conduct constant surveillance of the spillway flow conditions and record the following:
 - Basin, lake or Afterbay pool elevation and rate of rising;
 - Observations of changes in slope conditions on the emergency spillway;
 - Blockages or obstructions to flow in the approach channel on the crest of the emergency spillway or in the receiving waters:
 - Weather conditions:
- D. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- E. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.
- F. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- G. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly. Determine whether:

- A. The event remains at the current Event Level 2 if there is no change in situation, weather forecast predicts significant precipitation will occur within next 24 hour period, or the condition of the spillway has been compromised as determined by the Duke Energy CCP Engineer(s).
- B. The event warrants escalation to Event Level 1 if inflow is not decreasing and water level still rising, flow is threatening to compromise the spillway, or inflow is not decreasing and spillway is blocked.
- C. The event warrants downgrade if inflow has decreased such that water level is no longer rising, weather forecast predicts the precipitation event has passed, and no part of the spillway has been compromised as determined by the Duke Energy CCP Engineer(s).
- D. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- E. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- F. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	В.	C.	D. TRANSITION	E. TERMINATION
	ESCALATION	DOWNGRADE		
Continue recommended	Go to Event	Go to Event	Go to the event level of the	Go to Termination and
actions on this sheet	Level 1	Level 3	appropriate event type.	Follow-up (Step 4)

Event: EMERGENCY SPILLWAY FLOW	Sheet
LEVEL: 1 RED	C-1

- Spillway flowing with advancing erosion that is threatening the control section.
- Spillway flow that is flooding people or properties downstream.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Conduct constant surveillance of the emergency spillway flow conditions and record the following:
 - Basin, lake or Afterbay pool elevation and rate of rising;
 - Observations of changes in slope conditions on the emergency spillway;
 - Blockages or obstructions on the crest of the emergency spillway;
 - Weather conditions.
- D. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- E. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.
- F. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- G. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants downgrade if inflow has decreased such that water level is no longer rising, weather forecast predicts the precipitation event has passed, and parts of the spillway that have been compromised have been repaired as determined by the Duke Energy CCP Engineer(s).
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- E. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 1	B. DOWNGRADE	C. TRANSITION	D. TERMINATION
Continue recommended actions on this sheet		appropriate event type.	Go to Termination and Follow-up Step 4

Event: EMBANKMENT OVERTOPPING	Sheet
LEVEL: 3 GREEN	D-3

• Reservoir or river level is rising as a result of heavy rain and/or operational inflows that are less than three feet but greater than one foot below the dam crest.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. Conduct constant surveillance of the spillways flow conditions and record the following:
 - Basin and river elevation and rate of rising;
 - Estimated outflow at the lake/basin spillway;
 - Measurements of basin/pond inflows from station operations or outside sources;
 - Observations of changes in slope conditions on the spillways;
 - Blockages or obstructions to flow on the spillways;
 - Weather conditions. Monitor water levels and spillway area for erosion twice daily, or as conditions warrant.
- C. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- D. Begin staging siphon and/or pumps in case the basin/pond level continues to rise. Consider staging other types of materials (e.g. sand bags, aggregate materials) for use in emergency response.
- E. If safety permits the following emergency remedial actions should be taken as appropriate:
 - If the water level in the reservoir is no longer rising, place sandbags along the low areas of the top of the dam
 to control wave action, reduce the likelihood of flow concentration during minor overtopping, and to safely
 direct more water through the spillway.
 - Cover the weak areas of the top of the dam and downstream slope with riprap, sandbags, plastic sheets, or
 other materials to provide erosion resistant protection.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command.</u> If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 3 if there is no change in situation.
- B. The event warrants escalation to Level 2 if water continues to rise to 1 foot or less than the dam crest.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 3	B. ESCALATION	C. TRANSITION	D. TERMINATION
Continue recommended	Go to Event Level 2	Go to the event level of the	Go to Termination and Follow-up
actions on this sheet.		appropriate event type.	Step 4

Event: EMBANKMENT OVERTOPPING	Sheet
LEVEL: 2 YELLOW	D-2

• Reservoir or river level 1 foot or less than the dam crest.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Conduct constant surveillance of the spillways flow conditions and record the following:
 - · Basin and river elevation and rate of rising;
 - Estimated outflow at the spillway;
 - Measurements of basin/ponds inflows from station operations or outside sources;
 - Observations of changes in slope conditions on the spillways;
 - Blockages or obstructions to flow on the spillways;
 - Weather conditions. Monitor water levels and spillway area for erosion twice daily, or as conditions warrant.
- D. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- E. Ensure siphon, pumps, sand bags, aggregate and other emergency response materials/equipment are staged and ready.
- F. If safety permits the following emergency remedial actions should be taken as appropriate:
 - If the water level in the reservoir is no longer rising, place sandbags along the low areas of
 the top of the dam to control wave action, reduce the likelihood of flow concentration during
 Minor overtopping, and to safely direct more water through the spillway.
 - Cover the weak areas of the top of the dam and downstream slope with riprap, sandbags, plastic sheets, or other materials to provide erosion resistant protection.
 - Activate level control device(s) (i.e., gate valves, stop logs, etc.).
 - Contact environmental to arrange for proper sampling.
- G. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate. CONTINUED ON NEXT PAGE

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 2 if there is no change in situation.
- B. The event warrants escalation to Level 1this event if water begins to overtop the embankment.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event warrants downgrade if inflow has decreased such that water level is no longer rising, weather forecast predicts the precipitation event has passed, and no part of the spillway has been compromised as determined by the Duke Energy CCP Engineer(s).
- E. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or permanent repairs have been completed.
- F. Enter Recovery Operations, as needed.

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. ESCALATION	C. TRANSITION	D. DOWNGRADE	E. TERMINATION
Continue recommended actions		Go to the event level of the appropriate	Go to Event Level 3	Go to Termination and
on this sheet.		event type.		Follow-up Step 4

Event: EMBANKMENT OVERTOPPING	Sheet
LEVEL: 1 RED	D-1

• Water from the reservoir or the river is flowing over the top of the dam

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications on the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. The <u>Duke Energy Incident Command</u> should consider lowering the pool level if feasible. If attempts are made to lower the pool level, monitor the upstream side of the embankment for cracks and/or other slope movement. If these conditions are noted during pool lowering, slow the rate of pool lowering. Continuously monitor the impoundment and associated structures for the following conditions:
 - · Overtopping of embankment and severe erosion;
 - Sudden drop in pool level;
 - Cracks and/or slope movement;
 - Excessive seepage or piping; and
 - Blockages in discharge outlet structures.
- D. <u>Duke Energy Incident Command</u> has made prior arrangement for use of locally available off-site materials and equipment for temporary repairs in case of emergency. See Resources Available (ref. EAP Appendix B-1) for sources of equipment and materials to assist with remedial actions.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly refer to the Re-Evaluation/Decision process below.
- G. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- H. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the Duke Energy Incident Command and CCP Engineer(s) as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants downgrade if inflow has decreased such that water level is decreasing, weather forecast predicts the precipitation event has passed, and damaged parts of the spillway have been repaired as determined by the Duke Energy CCP Engineer(s).
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event warrants transition if the overtopping event cannot be controlled and a total dam failure is imminent.
- E. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- F. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 1		B. DOWNGRADE	C. TRANSITION	D. TERMINATION
Continue recommended	Go to	Event Level 2 this	Go to the event level of the	Go to Termination and Follow-up
actions on this sheet	event		appropriate event type.	(Step 4)

Event: SEEPAGE	Sheet
LEVEL: 3 GREEN	E-3

New seep in the dam

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications on the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. The System Owner should make careful observation and inspection of every part of the dam; this should be done without compromising the safety of anyone performing these tasks.
- C. Monitor water levels and seepage points for cloudy discharge or increased flow rates every two hours.
- D. If conditions permit:
 - If the inflow source of the seepage is within the reservoir, plug the flow with available material bales, bentonite, or plastic sheeting.
 - Place an inverted filter (layered sand and gravel) over the exit area to hold soil material in place.
 - Activate level control features/equipment (i.e., bottom drain, installed siphon or pumps gate valves, etc.)
 to provide additional drawdown of the water level. Caution must be taken to not add additional flooding
 to properties downstream.
- E. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 3 if there is no change in situation.
- B. The event warrants escalation to Event Level 1 or 2 if discharge becomes cloudy or increased flow rate.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the CCP Engineer(s), it has been determined the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 3	B. ESCALATION	C. TRANSITION	D. TERMINATION
Continue recommended actions on this sheet	Go to Level 1 or Level 2 this event.	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: SEEPAGE
LEVEL: 2 YELLOW
Sheet
E-2

Situations:

New or existing seep with cloudy discharge and greater than 5 gallons per minute.

RECOMMENDED ACTIONS

<u>Duke Energy Station Manager or Designee (Incident Command):</u>

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. If a rapid increase in seepage rate or cloudy discharge is noted, begin to look for sinkholes on or near the embankment, and/or a whirlpool (eddy) in the reservoir. Boils at or near the downstream toe may be indications that piping is beginning. Conduct daily surveillance of the seepage and note the following information:
 - Location:
 - Size of affected area;
 - Estimated discharge and nature of the discharge (clear or cloudy),
 - Recent weather conditions;
 - Fluctuations in the pool level; and
 - Increase in piezometer levels.
- D. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- E. If safety permits, emergency remedial actions should be taken as appropriate:
 - If the entrance to the seepage origination point is observed in the reservoir (possible whirlpool) and is accessible, attempt to reduce the flow by plugging the entrance with readily available materials such as hay bales, bentonite, soil or rock fill, or plastic sheeting.
 - Cover the seepage exit area(s) with several feet of sand/gravel to hold fine-grained embankment or
 foundation materials in place. Alternatively, construct sandbag or other types of ring dikes around
 seepage exit areas to retain a pool of water, providing backpressure and reducing the erosive nature
 of the seepage.
 - Prevent vehicles and equipment from driving between the seepage exit points and the embankment to avoid potential loss from the collapse of an underground void.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- G. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- H. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate. CONTINUED ON NEXT PAGE

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly. Using the Guidance for Determining the Emergency Level under Step 1 – Event Detection, determine whether:

- A. The event remains at the current Event Level 2 if there is no change in situation.
- B. The event warrants escalation to Event Level 1 if any of the following is noted: uncontrolled seepage, sediment in large quantities, a whirlpool or sudden change in pool level, scarps or cracks, sinkholes, sand boils, mud spouts, or quicksand-like conditions.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event warrants downgrade if inflow has decreased such that water level is no longer rising, weather forecast predicts the precipitation event has passed, and no part of the spillway has been compromised as determined by Duke Energy CCP Engineer(s).
- E. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- F. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. ESCALATION	C. TRANSITION	D.DOWNGRADE	E. TERMINATION
Continue recommended actions on this sheet	Go to Event Level 1 this event	Go to the event level of the appropriate event type.	Go to Event Level	Go to Termination and Follow-up (Step 4)

Event: SEEPAGE	Sheet
LEVEL: 1 RED	E-1

Seepage with discharge greater than 10 gallons per minute that is not a controlled seep.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. If an uncontrolled seepage flow, which causes severe erosion of the dam materials at the point of discharge:
 - Begin to observe the dam for possible cracking and slope failures within or near the area of seepage;
 - Inspect inside the impoundment to observe for potential creation of a vortex (aka whirlpool or eddy) within pool;
 - A whirlpool or sudden change in pool level, scarps or cracks, sinkholes or undulations in the ground surface, sand boils, mud spouts, or quicksand-like conditions are all indications of imminent failure due to excessive uncontrolled seepage.
- D. <u>Duke Energy Incident Command</u> may consider using level control features/equipment (i.e., bottom drain, installed siphon or pumps gate valves, etc.) for lowering the pool level. During draining, monitor the upstream side of the embankment for cracks and/or other slope movement. If these conditions are noted during pool lowering, slow the rate of pool lowering.
- E. <u>Duke Energy Incident Command</u> has made prior arrangement for use of locally available off-site materials and equipment for temporary repairs in case of emergency. See Resources Available (ref. EAP Appendix B—1) for sources of equipment and materials to assist with remedial actions.
- F. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- G. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- I. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- C. The event warrants downgrade if inflow has decreased such that water level is no longer rising, weather forecast predicts the precipitation event has passed, and no part of the spillway has been compromised as determined by Duke Energy CCP Engineer(s).
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.

 CONTINUED ON NEXT PAGE
- Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination. Based on this determination, follow the appropriate actions below.

CONTINUED ON NEXT PAGE

A. EVENT LEVEL 1	B. TRANSITION	C. DOWNGRADE	D. TERMINATION
1	Go to the event level of the	Go to Event Level 2 or 3	Go to Termination and
actions on this sheet	appropriate event type.	this event	Follow-up (Step 4)

Event: SINKHOLES	Sheet
LEVEL: 3 GREEN	F-3

Observation of slope depression in reservoir area or on embankment that may be indicative of a sinkhole.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. Shallow undulations or depressions in the reservoir area or embankment slope could be evidence of a developing sinkhole. A small diameter shallow hole containing collapsed materials may also represent early signs of a developing sinkhole. If a shallow undulation/depression or shallow hole is observed, note the following information:
 - Location:
 - · Size and depth of affected area; and
 - Photograph the area.
- C. Report the identified area to the Duke Energy CCP Engineering Group, including photographs.
- D. If safety permits safety measures should be taken as appropriate:
 - Isolate the area using appropriate barricades and flagging, to prevent personnel, vehicles and equipment from driving in or around the area.
 - Communicate finding to appropriate Station personnel that may be affected by the potential sinkhole.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.

Duke Energy CCP Engineer(s):

The Duke Energy CCP Engineering Group or a qualified representative should visually inspect the suspected area within 24 hours of notification.

IDEM State Dam Safety Agency Staff:

The Duke Energy CCP Engineering Group will coordinate with DEQ Department of Dam Safety Agency Staff for decision and technical support to the Duke Energy Incident Command and Technical Representatives as appropriate.

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly. Using the Guidance for Determining the Emergency Level under Step 1 – Event Detection, determine whether:

- A. The event remains at the current Event Level 3 if there is no change in situation or formal determinate by the Duke Energy CCP Engineering Group.
- B. The event warrants escalation to Event Level 2 if any of the following is noted: evidence of seepage and sediment in the vicinity or downstream of the suspected area, observed whirlpool or eddy within the reservoir.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT	B. ESCALATION	C. TRANSITION	D. TERMINATION
LEVEL 3			
Continue	Go to Event Level 1 or Level	Go to the event level of the	Go to Termination and
recommended	2 this event	appropriate event type.	Follow-up (Step 4)
actions on this sheet			

Event: SINKHOLES
LEVEL: 2 YELLOW
Sheet
F-2

Situations:

• Observation of new sinkhole in reservoir area or on embankment.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Sinkholes that develop on the embankment could be signs that piping has begun, and may be followed by a whirlpool in the lake surface and then a rapid and complete failure of the dam. The first indication of a sinkhole will be a shallow undulation in the ground surface or a small diameter, shallow hole containing collapsed materials. If a small undulation or shallow sinkhole is observed, note the following information:
 - Location:
 - Size and depth of affected area;
 - Estimated flow of seepage discharge (if any); and
 - Color of discharge (if any).
- D. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- E. If safety permits, emergency remedial actions should be taken as appropriate:
 - If the entrance to the seepage origination point is observed in the reservoir (possible whirlpool) and is accessible, attempt to reduce the flow by plugging the entrance with readily available materials such as hay bales, bentonite, soil or rock fill, or plastic sheeting.
 - Cover the seepage exit area(s) with several feet of sand/gravel to hold fine-grained embankment or
 foundation materials in place. Alternatively, construct sandbag or other types of ring dikes around
 seepage exit areas to retain a pool of water, providing backpressure and reducing the erosive nature of
 the seepage.
 - Prevent vehicles and equipment from driving between the seepage exit points and the embankment to avoid potential loss from the collapse of an underground void.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- G. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- H. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide Decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate. CONTINUED ON NEXT PAGE

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly. Using the Guidance for Determining the Emergency Level under Step 1 – Event Detection, determine whether:

- A. The event remains at the current Event Level 2 if conditions have not changed.
- B. The event warrants escalation to Event Level 1 if the sinkholes are rapidly increasing in size, whirlpool or sudden change in pool level occurs, scarps or cracks are noted, muddy seepage is associated with the sinkhole, or sand boils, mud spouts, or quicksand-like conditions are noted near the toe of the embankment.
- C. The event warrants downgrade to Event Level 3 if water levels in the lake/basin are lowered below bottom level of sinkhole.
- D. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- E. The event The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed

.Enter Recovery Operations, as needed Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. ESCALATION	C. DOWNGRADE	D. TRANSITION	E. TERMINATION
Continue recommended actions on this sheet	Go to Event Level 1 this event	Go to Event Level 3	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: SINKHOLES	Sheet
LEVEL: 1 RED	F-1

Rapidly enlarging sinkhole.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. If the sinkhole is rapidly enlarging in size or multiple sinkholes are appearing on embankment:
 - Observe the holes for loss of material;
 - If seepage is apparent, immediately inspect inside the impoundment for observations of a vortex (aka whirlpool or eddy) within pool.
 - A whirlpool or sudden change in pool level, scarps or cracks, sinkholes or undulations in the ground surface, sand boils, mud spouts, or quicksand-like conditions are all indications of imminent failure due to excessive uncontrolled seepage and/or piping.
- D. <u>Duke Energy Incident Command</u> may consider lowering the pool. During draining, monitor the upstream side of the embankment for cracks and/or other slope movement. If these conditions are noted during pool lowering, slow the rate of pool lowering.
- E. <u>Duke Energy Incident Command</u> has made prior arrangement for use of locally available off-site materials and equipment for temporary repairs in case of emergency. See Resources Available (ref. EAP Appendix B-1) for sources of equipment and materials to assist with remedial actions.
- F. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- G. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command.</u> If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation. **IDEM State Dam Safety Agency Staff:**

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- C. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- D. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 1	B. TRANSITION	C. TERMINATION
Continue recommended actions on	Go to the event level of the	Go to Termination and Follow-up (Step 4)
this sheet	appropriate event type.	

Event: PIPES AND CULVERTS	Sheet
LEVEL: 3 GREEN	G-3

- Debris is blocking one or both inlet risers causing the water level to rise.
- Noticeable flow that exceeds historic measurement.
- Noticeable change of condition of the pipe with no leak.

RECOMMENDED ACTIONS

Duke Plant Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. If a noticeable flow that exceeds previously identified drips or leaks:,
 - Begin to observe the dam for possible cracking;
 - Inspect inside the impoundment to observe for potential creation of a vortex (aka whirlpool or eddy) within pool.
 - A whirlpool or sudden change in pool level, scarps or cracks, sinkholes or undulations in the ground surface, sand boils, mud spouts, or quicksand-like conditions are all indications of imminent failure due to excessive uncontrolled seepage.
- C. <u>Duke Incident Command</u> may consider level control features/equipment (i.e., bottom drain, installed siphon, pumps or gate valves, etc.) for lowering the pool level. During draining, monitor the upstream side of the embankment for cracks and/or other slope movement. If these conditions are noted during pool lowering, slow the rate of pool lowering.
- D. <u>Duke Incident Command</u> has made prior arrangement for use of locally available off-site materials and equipment for temporary repairs in case of emergency. See Resources Available (ref. EAP Appendix B–1) for sources of equipment and materials to assist with remedial actions.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Dam Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.

Duke Dam Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Incident Command</u>. If necessary, contact local emergency contractors and/or other individuals that may be able to assist in monitoring the situation.

(NC DEQ) Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 3 if there is no change in situation.
- B. Go to Level 2 if flow begins to increase or the change of condition of the pipe begins to deteriorate
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the CCP Engineer(s), it has been determined the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A) EVENT LEVEL 1	B)ESCALATION	C) TRANSITION	D)TERMINATION
Continue recommended actions on this sheet	thic event	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: PIPES AND CULVERTS	Sheet
LEVEL: 2 YELLOW	G-2

Noticeable structural and or Operations and Maintenance deficiencies in the pipe with flow.

RECOMMENDED ACTIONS

Duke Plant Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. If a noticeable flow is observed, which causes moderate erosion of the dam materials at the point of discharge, begin to observe the dam for possible cracking and slope failures within or near the area where the discharge pipe has failed. Also, inspect inside the impoundment to observe for potential creation of a vortex (aka whirlpool or eddy) within pool. A whirlpool or sudden change in pool level, scarps or cracks, sinkholes or undulations in the ground surface, sand boils, mud spouts, or quicksand-like conditions are all indications of **imminent failure** due to excessive uncontrolled seepage.
- D. <u>Duke Incident Command</u> may consider level control features/equipment (i.e., bottom drain, installed siphon, pumps or gate valves, etc.) for lowering the pool level. During draining, monitor the upstream side of the embankment for cracks and/or other slope movement. If these conditions are noted during pool lowering, slow the rate of pool lowering.
- E. <u>Duke Incident Command</u> has made prior arrangement for use of locally available off-site materials and equipment for temporary repairs in case of emergency. See Resources Available (ref. EAP Appendix B-1) for sources of equipment and materials to assist with remedial actions.
- F. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- G. Contact the <u>Duke Dam Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Dam Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Incident Command</u>. If necessary, contact local emergency contractors and/or other individuals that may be able to assist in monitoring the situation.

(NCDEO) Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 2 if there is no change in situation. The event warrants escalation Level 1 if noticeable cracking and slope failure is noticed. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- B. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.

Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A) EVENT LEVEL 1	B)ESCALATION	C) TRANSITION	D) TERMINATION
Continue recommended actions on this sheet	Go to Event Level 1this event	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

Event: PIPES AND CULVERTS	Sheet
LEVEL: 1 RED	G-1

• Discharge pipes located beneath the Dam may have failed or are rapidly deteriorating.

RECOMMENDED ACTIONS

Duke Plant Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. If an uncontrolled flow, which causes severe erosion of the dam materials at the point of discharge, begin to observe the dam for possible cracking and slope failures within or near the area where the discharge pipe has failed. Also, inspect inside the impoundment to observe for potential creation of a vortex (aka whirlpool or eddy) within pool. A whirlpool or sudden change in pool level, scarps or cracks, sinkholes or undulations in the ground surface, sand boils, mud spouts, or quicksand-like conditions are all indications of **imminent failure** due to excessive uncontrolled seepage..
- D. <u>Duke Incident Command</u> may consider using level control features/equipment (i.e., bottom drain, installed siphon, pumps or gate valves, etc.) for lowering the pool level. During draining, monitor the upstream side of the embankment for cracks and/or other slope movement. If these conditions are noted during pool lowering, slow the rate of pool lowering.
- E. <u>Duke Incident Command</u> has made prior arrangement for use of locally available off-site materials and equipment for temporary repairs in case of emergency. See Resources Available (ref. EAP Appendix B-1) for sources of equipment and materials to assist with remedial actions.
- F. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- G. Contact the <u>Duke Dam Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Dam Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Incident Command</u>. If necessary, contact local emergency contractors and/or other individuals that may be able to assist in monitoring the situation.

(NCDEQ) Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate the situation as events progress, or whenever conditions change. Determine whether:

- A. The event remains at the current Event Level 1 if there is no change in situation.
- B. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- C. The event warrants downgrade if actions taken have resulted in control of the event and to the appropriate event for response.
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- E. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A) EVENT LEVEL 1	B) TRANSITION	C) DOWNGRADE	D) TERMINATION
Continue recommended	Go to the event level of	Go to Event Level	Go to Termination and Follow-up (Step
actions on this sheet	the appropriate event type.	2 or 3	4)

Event: EMBANKMENT MOVEMENT	Sheet
LEVEL: 3 GREEN	H-3

 New bulging/surficial sloughing/slippage of the embankment slope. (Does not include historic bulges and sloughs).

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications in the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.
- B. The System Owner should make careful observation and inspection of every part of the dam; this should be done without compromising the safety of anyone performing these tasks. Monitor water levels and development of new cracks or movement twice daily, or as conditions warrant.
- C. If conditions permit:
 - Activate level control features/equipment (i.e., bottom drain, installed siphon or pumps gate valves, etc.)
 to provide additional drawdown of the water level. Caution must be taken to not add additional flooding
 to properties downstream.
 - Stabilize slides on the downstream slope by weighting the toe area below the slide with additional soil, rock or gravel.
- D. Monitor Off-site areas "and instrumentation."
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least twice daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly Determine whether:

- A. The event remains at the current Event Level 3 if cracks have not been repaired or seepage is not controlled.
- B. The event warrants escalation if the integrity of the dam appears to be threatened by sudden or rapidly proceeding slides.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event can be terminated when, in coordination with the CCP Engineer(s), it has been determined the abnormal condition has been resolved.
- E. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. ESCALATION	C. TRANSITION	D. TERMINATION
•	Go to Event Level 2 this	Go to the event level of the	Go to Termination and Follow-
actions on this sheet	event	appropriate event type.	up (Step 4)

Event: EMBANKMENT MOVEMENT	Sheet
LEVEL: 2 YELLOW	H-2

Large incremental movement/slippage of the embankment slope

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications on the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. The System Owner should make careful observation and inspection of every part of the dam; this should be done without compromising the safety of anyone performing these tasks. Monitor water levels and development of new cracks or movement twice daily.
- D. If conditions permit:
 - Activate level control features/equipment (i.e., bottom drain, installed siphon or pumps gate valves, etc.) to provide
 additional drawdown of the lake/basin level. Caution must be taken to not add additional flooding to properties
 downstream.
 - Stabilize slides on the downstream slope by weighting the toe area below the slide with additional soil, rock or gravel.
- E. Monitor Off-site areas and instrumentation.
- F. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- G. Contact the <u>Duke Energy CCP Engineer(s)</u> at least twice daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below.
- H. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the *Duke Energy Incident Command and CCP Engineer(s)* as appropriate.

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly. Determine whether:

- A. The event remains at the current Event Level 2 if cracks have not been repaired or seepage is not controlled.
- B. The event warrants escalation if the integrity of the dam appears to be threatened by sudden or rapidly proceeding slides.
- C. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- D. The event warrants downgrade to Event Level 3 if sufficient repairs are made and the dam appears stable as determined by Duke Energy CCP Engineer(s). All contacts on Emergency Level 2 Notifications shall be notified of termination of Level 2.
- E. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- F. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. ESCALATION	C. TRANSITION	D. DOWNGRADE	E. TERMINATION
1	l	Go to the event level of the appropriate event		Go to Termination and Follow-up (Step 4)
		type.		

Event: EMBANKMENT MOVEMENT	Sheet
LEVEL: 1 RED	H-1

Sudden or rapidly proceeding bulges or slides of the embankment slopes.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications on the EAP Process Step 2 and the Emergency Level 1 Notifications have been made using the pre-scripted message.
- B. Make contact with impacted State and County Emergency Management Agencies to notify/clarify the details of the current situation.
- C. Recommend to the Incident Commander "Immediate Evacuation" of the area downstream of the dam.
- D. Stay a safe distance from the dam.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Conduct a conference call with appropriate staff to provide a situation report on a regular frequency, appropriate for the complexity of the event.
- G. Consider requesting drone/air support for emergency inspection. If aviation/drone support is needed then contact Duke Aviation Scheduling.

Duke Energy CCP Engineer(s):

Provide decision support and technical support as appropriate. Advise Duke Energy leadership of dangerous conditions at the dam.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly Determine whether:

- A. The event remains at the current level if the integrity of the dam appears to be threatened by sudden or rapidly proceeding slides.
- B. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- C. The event warrants downgrade to level 2 if there is no longer an immediate impending threat of dam failure and water levels in the lake is lowered below bottom level of embankment fill yet there is damage to the dam that prevents downgrade to level 3
- D. The event can be terminated when, in coordination with the Duke Energy CCP Engineer(s), it has been determined that actions taken have stabilized the dam until permanent repairs can be made or a permanent repair has been completed.
- E. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 1	B. TRANSITION	C. DOWNGRADE	D. TERMINATION
Continue recommended actions on this sheet	Go to the event level of the appropriate	of to Event Ecver 2 this event	Go to Termination and Follow-up (Step 4)
	event type.		

Event: EARTHQUAKE	Sheet
LEVEL: 3 GREEN	I-3

Earthquake felt or magnitude 3.0 or higher reported on or within 50 miles of the dam.

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Make sure notifications on the EAP Process Step 2 and the Emergency Level 2 Notifications have been made using the pre-scripted message.
- B. If an earthquake is felt or magnitude 3.0 or higher is reported within 50 miles of the dam, inspect all parts of the dam for the following conditions without compromising safety:
 - Sudden change in pool level;
 - Increase in piezometer levels;
 - Change in seepage flow rate or turbidity;
 - · Scarps or cracks, settlement, sink holes, or undulations in the ground surface;
 - · Lateral spreading, mud flows, sand boils, mud spouts, or quicksand-like conditions; and
 - Displacement or deformation of appurtenant structures including concrete cracking or broken structural connections or members.
- C. If there is visible damage to the dam or appurtenances as a result of a seismic event, but the impoundment is not compromised, document the type of damage that occurred and monitor the dam for additional damage that may develop over time. The damage could correspond to other Events described in this emergency action plan (i.e. embankment seepage, cracking, movement, etc.), and the corresponding recommended actions should be reviewed for guidance with regard to the recommended course of action that closely monitors the situation, potential problems and dangers, and temporary corrective action that must be taken to help avoid dam failure and minimize damage downstream.
- D. If safety permits, additional emergency remedial actions should be taken as appropriate:
 - Perform a field survey to determine if there has been any settlement and movement of the dam embankment, spillway, and low-level outlet works.
 - Drain the reservoir, if required.
- E. Record all information, observations, and actions on the Abnormal or Emergency Event Log provided in EAP Appendix A-3.
- F. Contact the <u>Duke Energy CCP Engineer(s)</u> at least daily to report the latest observations and conditions. If conditions change significantly, refer to the Re-Evaluation/Decision process below

Duke Energy CCP Engineer(s):

Review all pertinent information and dictate appropriate actions to the <u>Duke Energy Incident Command</u>. If necessary, contact local Engineering consultants and/or other individuals that may be able to assist in monitoring the situation.

IDEM State Dam Safety Agency Staff:

Provide decision support and technical support to the <u>Duke Energy Incident Command and CCP Engineer(s)</u> as appropriate.

RE-EVALUATION/DECISION

Evaluate conditions at least twice daily, and whenever conditions change significantly. Determine whether:

- A. The event remains at the current Event Level 3 until all residual aftershocks have ceased and a final inspection completed.
- B. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- C. The event can be terminated when, in coordination with the CCP Engineer(s), it has been determined the abnormal condition has been resolved. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 2	B. TRANSITION	C. TERMINATION
Continue recommended actions	Go to the event level of the appropriate event	Go to Termination and Follow-up (Step
on this sheet	type.	4)

Event: SECURITY THREAT/SABOTAGE/VANDALISM	Sheet
LEVEL: 3 GREEN	J-3

- Bomb threat
- Suspicious package
- Suspected intentional damage to the dam or appurtenances with or without impact to the functioning of the dam

RECOMMENDED ACTIONS

Duke Energy Station Manager or Designee (Incident Command):

- A. Notify the Control Room of any bomb threat or suspicious.
- B. Assist the Control Room with completing the bomb threat checklist.
- C. Notify the Control Room of any suspected sabotage or vandalism.
- D. Ensure you and other employees/contractors are in a safe location.
- E. Follow all instructions from the Control Room.
- F. Coordinate with the Control Room to make sure notifications on the EAP Process Step 2 and the Emergency Level 3 Notifications have been made using the pre-scripted message.

RE-EVALUATION/DECISION

Evaluate conditions. Determine whether:

- A. The event remains at the current Event Level 3 if the situation has not changed.
- B. The event warrants transition if conditions of the event have changed such that use of a different Action Data Sheet are needed.
- C. The event can be terminated when, in coordination with the CCP Engineer(s), it has been determined the abnormal condition has been resolved.
- D. Enter Recovery Operations, as needed

Ensure notifications are made for any changes in the Emergency Event Level or for event termination.

A. EVENT LEVEL 3	B. TRANSITION	C. TERMINATION
Continue recommended actions on this sheet.	Go to the event level of the appropriate event type.	Go to Termination and Follow-up (Step 4)

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Please leave this page and insert the "Step 4: Termination" tab previously provided.

Step 4: Termination and Follow-up

When the EAP has been activated and an emergency level has been declared, all EAP actions must be completed and an assessment and evaluation of all steps taken before declaring the emergency over. Once all actions are completed, the EAP operations will be terminated and follow-up procedures completed.

Demobilization

Throughout the activation, personnel, equipment and supplies will be needed and acquired to support the response effort. However, as resources and personnel are no longer needed, actions should be taken to release unneeded resources and people to prevent waste and allow operations to return to normal. It is most important that, prior to event termination, all personnel and resources are accounted for. Documentation completed at closeout should include the following:

- Total man hours consumed
- Equipment used for response effort
- Materials used for response effort
- Accommodations and Food
- Safety Report
- External resources needed for the response

Each Section Chief should ensure all functions have been completed with all the necessary documentation and that everything has been reported to the Incident Commander. The Operations Section Chief should account for all documentation prior to event termination.

Termination responsibilities

- 1. The Incident Commander is responsible for terminating EAP operations (in consultation with the Unified Command, if applicable) and relaying this decision to FHO/CCP Senior Management.
- 2. Prior to termination of an Emergency Level 1 or Emergency Level 2 event, Duke Energy CCP Engineering, and if the State Dam Safety Official deems it necessary, will inspect the dam to ensure that any repairs made has mitigated the emergency and/or the dam is in a safe condition until permanent repairs can be made. If it is determined that these conditions have been met, the Incident Commander, or Unified Command, can terminate the event, or downgrade the EAP activation level.
- 3. Each person that made notifications during the event will notify the same group of contacts they previously notified that the event has been terminated. Notifications will be made based on the highest emergency event level reached during the event.
- 4. The System Owner shall ensure that the *Contact Log, Appendix A-1* (A,B, or C, as applicable); *Abnormal or Emergency Event Log, Appendix A-3*, and the *Dam Safety Emergency Situation Report* (Appendix A–4) are completed for all emergency levels to document the emergency event and all actions that were taken.
 - a. The System Owner shall forward a copy of these forms to CCP Emergency Preparedness via email to: ccpemergencyprep@duke-energy.com.
 - b. CCP Emergency Preparedness shall ensure a copy is placed in the station operating

record and shall distribute copies of the completed report to Duke Energy Station Operations and the CCP System Owner.

5. CCP Regulatory Affairs must submit to the State Director, and/or appropriate Tribal authority, a copy of the Dam Safety Emergency Situation Report if requested, when such information is not otherwise available on the Duke Energy publicly accessible internet site (CFR 40 Part 257.105d). A copy of the Dam Safety Emergency Situation Report must be posted to the Duke Energy publicly accessible internet site within 30 days of placing the document in the station operating record.

Follow-up

At the conclusion of all events, the Incident Commander should conduct a "Hot Wash" as soon after the event as possible (preferably before the team leaves the Incident Command Post). The object of the "Hot Wash" is to bring all personnel who worked within the event together to discuss all facets of the response effort. Information should be gathered to document what went well and areas for improvement with the response effort.

During this process, time should be taken to discuss the EAP. Questions to be asked should include: "Were there any issues encountered with the EAP? Did the procedures work as they were expected?" Participants should provide recommendations for EAP improvement.

CCP Emergency Preparedness and the site System Owner should coordinate to conduct an "After Action Review" consisting of a team that includes System Owners, Station Managers, CCP Engineers, Safety, Environmental, and CCP Governance and Operations Support. Personnel will review all comments received from the Hot Wash, as well as any new items for discussion, and decide on the action to be taken on each item.

VI. Maintenance—EAP Review and Revision

EAP annual review

The Duke Energy CCP Governance and Operations Support will coordinate with the System Owner to conduct an annual review of the EAP. The EAP annual review will include the following:

- Verify all contacts in the Emergency Event Level 1, 2, and 3 notification charts in the EAP.
- Verify contact information for all external local, county, and state emergency responders listed and update information on the point of contact for each. Request the contact provide the date and revision number of the copy being maintained.
- Complete a review of the Action Data Sheet Index and Action Data Sheets and update as necessary.
- Verify locally available resources, contractor's phone numbers, addresses, and services are current.
- Verify and update materials and supplies maintained on site.
- Verify and update equipment maintained on site.
- Verify and update materials and supplies available off site.
- Verify and update equipment available off site.

Revisions

Duke Energy is responsible for revising the EAP annually or whenever there is a change in conditions that would substantially affect processes, procedures and change in personnel. Duke Energy maintains the electronic master document. When revisions occur, Duke Energy will revise the EAP and provide an electronic revised copy to all the EAP document holders. Hard copies of the revised EAP will be printed and distributed to the document holders. The document holders are responsible for replacing the outdated copy of the respective document(s) whenever revisions are received.

VII. Record of Holders of Control Copies of this EAP

Copy Number	Organization	Person Receiving Copy
A-1	Duke Energy – Cayuga Station	Station Manager
A-2	Duke Energy – Cayuga Station	Site EHS Professional
A-3	Duke Energy – Cayuga Station	Operations Superintendent/ Manager
A-4	Duke Energy – Cayuga Station	Control Room Staff
A-5	Duke Energy – Cayuga Station	CCP System Owner
A-6 (Notification only via email)	Duke Energy – Cayuga Station	CCP CCP Engineer
A-7 (Notification only via email)	Duke Energy – Cayuga Station	CCP Regional Manager
B-1	Dam Safety Program, IDNR, Land Quality Section Central Office	
B-2	IDEM, Land Quality Section Regional Office	Staff
B-3	Vermillion County Emergency Mnmgt	
B-4		

VIII. Record of Revisions and Updates Made to EAP

Revision Number	Date	Revisions made	By whom
1	9/18/2015	Updated ICS team, Record of Copy Holders, Emergency Contacts, Resources, Vendors; removed first page signatures and Concurrences page—these can be found in the 2014 EAP.	Jennifer Montague
2	2/2/2016	Major Re-write to include new EAP template including new CCP Call Trees, additional Action Data Sheets for level 3 events, updated contact lists, elimination of redundant information, added guidance for responses after hours and during inclement weather, revised Appendices A-1A, B, C (contact tracking lists), inserted new Appendix A-9 (Record of Annual Meeting with Local Emergency Responders).	Michelle Austin
3	5/16/2016	Updated names and contact information listed in EAP, Updated Call Trees and Call Logs with Duke Energy State President contact information and IMT activation language.	Michelle Austin
4	4/17/2017	Review and update of: Action Data Sheets, onsite and offsite materials & resources, IMT lists, Call Tree and Call Logs, added page for Professional Engineer to seal EAP. For a detailed list of revisions, please see the Revision Tracker on Sharepoint.	Jeromy Witmore

IX. Concurrences

By my signature, I acknowledge that I, or my representative, have reviewed this plan and concur with the tasks and responsibilities assigned herein for my organization and me.

Robert A. Leek

Digitally signed by Robert A. Leek
DN: cn=Robert A. Leek, o=OMS, ou=Fossil Hydro,
email=Robert.Leek@duke-energy.com, c=US
Date: 2017.02.23 09:05:33 -05'00'

Signature

Organization

Date

Robert Leek, Duke Energy Station System Owner, Cayuga Station

. / slittcom Signature

Organization

Date

Bill Luke, Duke Energy Station Manager, Cayuga Station

3.

Signature

Organization

Date

Tim Thiemann, Duke Energy Regional General Manager, Cayuga Station

X. Appendices—Forms, Glossary, Maps, and Supporting Data

Appendix A

A-1A Contact Log – Emergency Level 1 A-1B Contact Log – Emergency Level 2 A-1C Contact Log – Emergency Level 3 A-2 Detailed Roles and Responsibilities for ICS A-3Abnormal or Emergency Event Log A-4 Dam Emergency Situation Report Form A-5ICS Forms A-6 Glossary of Terms A-7 **Emergency Contacts List EAP Annual Review Verification Statement** A-8 A-9 Record of Annual Meeting with Local Emergency Responders

Appendix B

- B–1 Resources Available
- B-2 Vicinity Map
- B–3 Site Map
- B–4 Inundation/Downstream Hazards Map and Associated Panels
- B–5 Residents/Businesses/Highways at Risk
- B–6 Plan View of Dams
- B–7 Profile of Principal Spillway
- B–8 Reservoir Elevation-Area-Volume and Spillway Capacity Data
- B–9 State and National Inventory of Dams (NID) Data

Appendix C

C-1 EAP Review and Follow-up Documentation

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Please leave this page and insert the "Appendix A" tab previously provided.

Use this script for notifications to 1-3:

APPENDIX A

Appendix A-1A

Contact Log - Emergency Level 1

"This is (name and position). A Level 1 Event exists involving a (Describe Situation) of the (Specify the Dam Name and Type) at the Duke Energy (Plant/Facility name). We will advise when the situation is resolved or if conditions change. I can be contacted at the following number My alternate phone number is
We DO need offsite assistance and this is what we need Please relay this information to your Emergency Management Director as soon as possible."
OR
We DO NOT need any offsite assistance at this time, we are just calling to keep you informed. However, please relay this information to your Emergency Management Director as soon as possible." Ask Operator to repeat message back for confirmation.
Use this script for notifications to A-C:
"This is (name and position). A Level 1 Event exists at the (Plant/facility name) due to (Describe Situation). We are entering EAP Level 1 and we will be using Action Data sheet A plant status call will occur at (time and date). Please notify appropriate staff to join the call for additional information by calling Participant Code XXXXXXX."
NOTE : See Emergency Contacts in Appendix A of the EAP for contact information for back-ups to the person shown below and other emergency personnel. Numbers () denotes call sequence.
The IMT shall be activated for all Level 1 incidents."
The grayed area represents the initiator of their respective call tree. Except for the Shift Supervisor/System Owner, each individual is responsible for calling the next person below them. If that person does not answer then they must call the next person on the list.

In Case of a terrorist attack or other security or sabotage event, call 911 before initiating the notifications below.					
Call Date and			Name of Person Contacted Call Notes (e.g., "left message",	Name of Calley	
Caller:	Emergency Contact Cayuga Control Room	Comments	"Spoke with", "no answer", etc.)	Name of Caller	
Calleri	System Owner				
	(1) Vermillion County Emergency Management				
	(2) Supt Operations				
	(3) Indiana Department of Homeland Security				
Caller:	Supt Operations				
	Station Manager				
	Duke Energy Emergency Hotline				

LEVEL 1 NOTIF			Alfrancia and Indiana	
Call Date and	ist attack or other security or sabotage event, call Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller
Caller:	Station Manager			
	Corporate Legal			
	Corporate Legal			
	Govt & Comm Relations Mgr			
	VP Midwest Generation			
Caller:	Govt & Comm Relations Mgr			
	Duke Energy State President			
Caller:	System Owner			
	Cayuga Control Room			

LEVEL 1 NOTIFICATIONS						
In Case of a terro	orist attack or other security or sabotage event, co	all 911 before initiating the				
Call Date and			Name of Person Contacted Call Notes (e.g., "left message",			
Time	Emergency Contact	Comments	"Spoke with", "no answer", etc.)	Name of Caller		
	(A) Lead EHS Professional					
	(A) Site Environmental Coordinator					
	(A) Site Environmental Coordinator					
	(B) CCP Engineer					
	(B) Mgr CCP Regional Engg					
	(C) GM CCP Regional Ops & Maint					
Caller	_					
	CCP Regulatory Affairs					

LEVEL 1 NOTIF	FICATIONS						
In Case of a terror	In Case of a terrorist attack or other security or sabotage event, call 911 before initiating the notifications below.						
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller			
	CCP Regulatory Affairs						
Caller:	CCP Engineer						
	Dam Engineering Consultant – Cardno/ATC						
Caller:	CCP Regulatory Affairs						
	Dam Safety Program, IDNR						
Caller:	GM CCP Regional Ops & Maint						
	VP CCP Ops & Maintenance						
Caller:	VP CCP Ops & Maintenance						
	VP CCP Governance & Ops Support						

In Case of a terrorist attack or other security or sabotage event, call 911 before initiating the notifications below.						
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller		
	SVP Coal Combustion Products					
Caller:	VP CCP Governance & Ops Support					
	Incident Support Team					
	Mgr CCP Governance					
Caller:	Mgr CCP Governance					
	Dir CCP Governance & Ops Suppt					

Appendix A–1B Contact Log - Emergency Level 2

lloo thi	ic carint	forno	tification	o to 1	2.
use tni	is scribt	tor no	tification	IS to 1	-3.

"This is (name and position). A Level 2 event exists involving a (Describe Situation) of the (Specify Dam Name and Type) at the Duke Energy (Plant/Facility name). We will advise when the situation is resolved or if conditions change. I can be contacted at the following number My alternate phone number is
We DO need offsite assistance and this is what we need Please relay this information to your Emergency Management Director as soon as possible."
OR
We DO NOT need any offsite assistance at this time, we are just calling to keep you informed. However, please relay this information to your Emergency Management Director as soon as possible."Ask Operator to repeat message back for confirmation. Ask Operator to repeat message back for confirmation.
Use this script for notifications to A-C:
"This is (name and position). A Level 2 event exists at (Plant/facility name) due to (Describe Situation). We are entering EAP Level 2 and we will be using Action Data Sheet A plant status call will occur at (time and date). Please notify appropriate staff to join the call for additional information by calling Participant Code XXXXXXX."
NOTE : See Emergency Contacts in Appendix A of the EAP for contact information for back-ups to the person shown below and other emergency personnel. Numbers () denotes call sequence.
"The IMT shall be activated for all Level 2 incidents."
The grayed area represents the initiator of their respective call tree. Except for the Shift Supervisor/System Owner, each individual is responsible for calling the next person below them. If that person does not answer then they must call the next person on the list

LEVEL 2 NOTIFICATIONS In the case of a security or sabotage event, call 911 before initiating the notifications below. Name of Person Contacted Call Date and Call Notes (e.g., "left message", Name of Caller **Emergency Contact** "Spoke with", "no answer", etc.) Time Comments Caller: Cayuga Control Room System Owner (1) Supt Operations (2) Vermillion County Emergency Management (3) Indiana Department of Homeland Security **Caller: Supt Operations** Station Manager **Duke Energy Emergency Hotline**

LEVEL 2 NOTIFICATIONS In the case of a security or sabotage event, call 911 before initiating the notifications below. Name of Person Contacted Call Date and Call Notes (e.g., "left message", Name of Caller **Emergency Contact** "Spoke with", "no answer", etc.) Time Comments Caller: Station Manager Corporate Legal Corporate Legal Govt & Comm Relations Mgr **VP Midwest Generation** Caller: Govt & Comm Relations Mgr **Duke Energy State President** Caller: System Owner Cayuga Control Room

LEVEL 2 NOTIFICATIONS In the case of a security or sabotage event, call 911 before initiating the notifications below. Name of Person Contacted Call Date and Call Notes (e.g., "left message", Name of Caller **Emergency Contact** "Spoke with", "no answer", etc.) Time Comments (A) Lead EHS Professional (A) Site Environmental Coordinator (B) CCP Engineer (B) Mgr CCP Regional Engg (C) GM CCP Regional Ops & Maint Caller: Lead EHS Professional **CCP Regulatory Affairs**

	LEVEL 2 NOTIFICATIONS					
	In the case of a security or sabotage event, call 911 before initiating the notifications below.					
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller		
	CCP Regulatory Affairs		, , , , , , , , , , , , , , , , , , , ,			
Caller:	CCP Engineer					
	Dam Engineering Consultant – Cardno/ATC					
Caller:	CCP Regulatory Affairs					
	Dam Safety Program, IDNR					
Caller:	GM CCP Regional Ops & Maint					
	VP CCP Ops & Maintenance					
Caller:	VP CCP Ops & Maintenance					
	VP CCP Governance & Ops Support					

	LEVEL 2 NOTIFICATIONS						
	In the case of a security or sabotage event, call 911 before initiating the notifications below.						
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller			
	SVP Coal Combustion Products						
Caller:	VP CCP Governance & Ops Support						
	Incident Support Team						
	Mgr CCP Governance						
Caller:	Mgr CCP Governance						
	Dir CCP Governance & Ops Suppt						

Appendix A–1C Contact Log – Emergency Level 3

INFORMATIONAL MESSAGE ONLY

Use this script for notifications:	
"This is (name and position). An (notification condition) exists at (Plant/facility name). We are entering EAP Level (State Emergency Action Level) and we will be using Action Data sheet.	
NOTE: See Emergency Contacts in Appendix A of the EAP for contact information for back-ups to the person shown below and other emergency personnel.	
The grayed area represents the initiator of their respective call tree. Except for the Shift Supervisor/System Owner, each individual is responsible for calling the next person below them. If that person does not answer then they must call the next person on the list.	

	LEVEL 3 NOTIFICATIONS						
	In the case of a security or sabotage event, call 911 before initiating the notifications below.						
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller			
Caller:	Cayuga Control Room						
	System Owner						
	(1) Supt Operations						
Caller:	Supt Operations						
	Station Manager						

	LEVEL 3 NOTIFICATIONS					
	In the case of a security or sabotage event, call 911 before initiating the notifications below.					
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller		
	Duke Energy Emergency Hotline					
Caller:						
	Govt & Comm Relations Mgr					
	VP Midwest Generation					
Caller:						
	Cayuga Control Room					
	(A) Lead EHS Professional					
	(A) Site Environmental Coordinator					

	LEVEL 3 NOTIFICATIONS					
	In the case of a security or sabotage event, call 911 before initiating the notifications below.					
Call Date and Time	Emergency Contact	Comments	Name of Person Contacted Call Notes (e.g., "left message", "Spoke with", "no answer", etc.)	Name of Caller		
	(B) CCP Engineer					
	(B) Mgr CCP Regional Engg					
	(C) GM CCP Regional Ops & Maint					
Caller:						
	CCP Regulatory Affairs					
	CCP Regulatory Affairs					
Caller:	CCP Engineer					
	Dam Engineering Consultant – Cardno/ATC					

	LEVEL 3 NOTIFICATIONS					
	In the case of a security or sabotage event, call 911 before initiating the notifications below.					
Call Date and	Farance Contact	6	Name of Person Contacted Call Notes (e.g., "left message",	Name of Calley		
Time	Emergency Contact CCP Regulatory Affairs	Comments	"Spoke with", "no answer", etc.)	Name of Caller		
Callel.	Dam Safety Program, IDNR					
Caller:	GM CCP Regional Ops & Maint					
	VP CCP Ops & Maintenance					
Caller:	VP CCP Ops & Maintenance					
	VP CCP Governance & Ops Support					
Caller:	VP CCP Governance & Ops Support					
	Mgr CCP Governance					
Caller:	Mgr CCP Governance					
	Dir CCP Governance & Ops Suppt					

Appendix A-2

Detailed Roles and Responsibilities for ICS

Incident Commander

Responsibilities:

The Incident Commander (IC) is responsible for all incident activities, including the development of strategies and tactics and the ordering and the release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site.

- Determine the nature and magnitude of the incident.
- Determine if "Accounting of all Station Personnel" is required.
- Determine if "Station Evacuation" is required.
- Establish and manage incident objectives.
- Ensure incident safety.
- Determine station personnel health threats.
- Determine the public health threats: local residents, boaters, train, school, etc...
- Determine if there are any injuries or casualties.
- Determine if there is any danger in extracting individuals.
- Determine the environmental impacts.
- Determine the need to secure and isolate the area.
- Determine the regulatory involvement.
- Establish overarching goals.
- Develop and issue assignments, plans, procedures, and protocols.
- Provide clear tactical direction to on-going response efforts.
- Establish specific, measureable objectives for various activities.
- Gather information and prioritize.
- Consider and request aviation resources early in the response phase for planning and damage assessment purposes.
- Manage efforts to attain defined strategic objectives.
- Document results to measure performance and facilitate corrective actions.
- Manage response through meetings, briefings, and conversations; communicate meeting times in advance and describe expectations for the meeting.
- Establish an ICS organizational structure.
- Ensure the ICS structure is adequate to protect the safety of the responders and citizens, to control the spread of damage, and to protect the environment.
- Appoint an IC Deputy or deputies, if the incident warrants.
- A deputy must be as qualified as the Incident Commander and can be from the same agency or other agencies.
- Establish an Incident Command Post.
- Be visible in the Incident Command Post; provide focused direction and encouragement.
- Determine if emergency services needs to be called to assist with the incident.
- Determine if the Person/-(State/County) Authority needs to assist with warning boaters and lake residents.

- Approve requests for additional equipment, personnel, and services, as appropriate.
- As emergency services arrive, update the "Organization Assignment List (ICS Form 203)" to help account for personnel involved and who they are assigned too.
- Examine key financial issues and monitor cost.
- Brief the Level 2 PGO Mgmt. Team, if activated.
- Provide information services to internal and external stakeholders; keep the corporate
 office appraised of the situation and status of ongoing response.

Safety Officer

Responsibilities:

The SO is a member of the Command Staff, which includes the Public Information Officer (PIO) and Liaison Officer (LNO). The SO carries out staff functions needed to support the Incident Commander (IC). The Command Staff carries out responsibilities for key activities not specifically identified in the General Staff functional elements.

The SO monitors incident operations and advises the IC on all matters relating the operational safety, including the health and safety of emergency responder personnel. The ultimate responsibility for the same conduct of incident management operations rests with the IC and supervisors at all levels of incident management. The SO is, in turn, responsible to the IC for the set of systems and procedures necessary to ensure ongoing assessment of hazardous environments, coordination of multiagency safety efforts, and implementation of measures to promote emergency responder safety, as well as the general safety of incident operations. The SO has emergency authority to stop and/or prevent unsafe acts during incident operations.

- Ensure incident safety.
- Monitor and assess safety hazards or unsafe situations and for developing measures for ensuring personnel safety.
- Appoint assistants, if the incident warrants.
- Assess hazardous and unsafe situations.
- Develop measures to assure responder safety.
- Assign personnel to monitor responders.
- Evaluate safety of station personnel.
- Oversee the accounting of station personnel. Utilize all forms of communication to locate missing personnel.
- Evaluate public health and safety threats
- Evaluate risk to area boaters. Notify and evacuate boaters, if they are in area of concern.
- Notify and provide instructions to Contractors.
- Ensure personnel in the work zones are wearing proper PPE.
- Review and distribute copies of the MSDS to response personnel.
- Prepare the Site Safety and Health Plan.
- Ensure Job Hazard Analysis are completed and shared with personnel involved in the incident response.
- Ensure participation in "Pre-Job Briefs" with personnel involved in the incident response, prior to the initiation of on-site activities and at the beginning of each shift.

- Assign qualified assistants to monitor and evaluate safety and health concerns, perform field audits, prevent unsafe conditions, and analyze special/unique hazards.
- Investigate any accidents or personnel injuries; prepare accident reports.
- Maintain awareness of active and developing situations; exercise emergency authority to stop or prevent unsafe acts.
- Participate in planning meetings to identify health and safety concerns inherent to the strategic work plan.

Public Information Officer

Responsibilities:

The Public Information Officer (PIO) is a member of the Command Staff, which includes the Safety Officer and Liaison Officer. The PIO carries out staff functions needed to support the Incident Commander (IC). The Command Staff carries out responsibilities for key activities not specifically identified in the General Staff functional elements.

The PIO is responsible for interfacing with the public and the media and for coordinating messaging with external-facing staff who communicate with elected officials about incident-related information requirements. The Governmental Community Relations Officer (GCRO) is responsible for interfacing with elected officials about incident-related information requirements and will coordinate messaging with the PIO. The PIO develops accurate and complete information on the incident's cause, size, and current situation; resources committed; and other matters of general interest for both internal and external consumption. The PIO and GCRO will monitor public information and public and external stakeholder response to the incident. Only one incident PIO and GRO should be designated. Assistants may be assigned from other agencies or departments involved. The IC must approve the release of all incident-related information.

- Works with corporate Communications Management to evaluate the need to open/activate the Joint Information Center and/or media centers to coordinate and disseminate messages to internal and external stakeholders.
- Coordinates the development and release of information about the incident to the public, news media, Duke Energy leadership and corporate staff with external-facing responsibilities, including district managers, the CCC/CSC, Regulatory Affairs, Government Relations, Investor Relations and others who will share information with appropriate external agencies and organizations.
- Develop and disseminate information about the issue to internal stakeholders and employees through the Portal and other communications tools as appropriate.
- All information should be reviewed and approved for accuracy by the IC prior to release.
- Works with Corporate Communications to schedule, organize, and facilitate (moderate) media briefings.
- Schedule, organize, and facilitate (moderate) elected official briefings. Not the PIO, but the GCRO.
- Assist in preparing fact sheets, Q&A documents, brochures, etc. on the company and basic coal ash release response methodology.
- Ensure that social media is being monitored for information released as it pertains to the incident.

- Ensure that an incident website is launched to effectively communicate incident details with the general public, government agencies, politicians, news media, local officials, company shareholders, as needed.
- Support general public and stakeholder knowledge through community forums and "town Hall" meetings. The GRO will be responsible for organizing and presenting these types of meeting.
- Work with Corporate Communications to keep the general public and stakeholders informed through external websites, periodic situation status reports and other methods as needed.

Operations Section Chief

Responsibilities:

The Operations Section Chief is responsible to the Incident Commander for the direct management of all incident-related operational activities. The Operations Section Chief will develop and manage the Operations Section to accomplish the incident objectives set by the Incident Commander. The Operations Section Chief is normally the person with the greatest technical and tactical expertise in dealing with the problem at hand. The Operations Section Chief may have one or more Deputies assigned. The assignment of Deputies, from other agencies, may be advantageous in the case of multijurisdictional incidents.

Span of Control:

The Operations function is where the tactical fieldwork is done and the most incident resources are assigned. Often the most hazardous activities are carried out here. The following supervisory levels can be added to help manage span of control:

- Divisions Divisions are used to divide an incident geographically. Example: East Division & West Division
- Groups Groups are used to describe functional areas of operation. Example: Emergency Services Group, Law Enforcement Group, etc...
- Branches Branches are used when the number of Divisions or Groups exceeds the span of control and can be either geographical or functional. Example: Law Enforcement Branch oversees the Perimeter Control Group & Investigation Group.

Operations Section Chief Responsibilities:

- Directs and coordinates all incident tactical operations.
- Establishes tactical objectives for each operational period.
- Consider and request aviation resources early in the response phase for planning and damage assessment purposes.
- Participate in the development (and manage the execution) of prioritized strategies outlined in the Incident Action Plan (IAP).
- Attend the Tactics Meeting and Planning Meeting; assess the current Incident Action Plan against work progress and established objectives and provide recommendations for the development of both short-term and long-term plans.

- Provide over the Operations Briefing(s); distribute copies of the IAP and review assignments, tactical plans, and strategic objectives.
- Maintain close coordination with Branch Directors, Division Managers, and Group Supervisors, plus contractor representatives, to ensure work is proceeding as planned.
- Oversee and manage operational tasks relating to the incident.
- Recommend the release/demobilization of personnel and equipment, as they are no longer needed in support of the response.

Logistics Section Chief

Responsibilities:

The Logistics Section Chief (LSC) is a member of the General Staff. The LSC carries out staff functions needed to support the Incident Commander (IC). The LSC is responsible for providing facilities, services, and material in support of the incident. The LSC is responsible to:

- Oversee the provision of facilities, services, and materials to all organizational components involved in the response.
- Outline protocols to facilitate the ordering, procurement, receiving, and delivery of response equipment and supplies.
- Identify (and outfit) potential locations for the Incident Command Post (ICP), staging area(s), interim waste storage areas, rehabilitation centers, equipment decontamination stations, and other such areas as needed.
- Address food, lodging, communications, medical, transportation, supply, and security issue relating to daily work plans.
- Participate in Tactics Meeting; advise on current service and support capabilities and estimate future resource demands and service/support requirements for planned and expected operations.
- Attend the Planning Meeting; verify support for the tactical plan and confirm the availability of required resources, ensuring they will arrive in time to support the response during the next operational period.
- Assist with the development of service and support elements of the Incident Action Plan (IAP).
- Coordinate the release of non-tactical resources, in conformance with the Demobilization Plan, at the termination of the response.

The Logistic Section is responsible for the following support areas:

- **IT&T** Responsible for developing plans for the effective use of incident computers and communications equipment and facilities, installing and testing of equipment, distribution of equipment to incident personnel, and maintenance/repair of equipment.
- Facilities Responsible for the layout and activation of incident facilities including the traffic, parking, security and lighting plans for the for the Base, Camp, and Incident Command Posts. The basic functions or activities include layout, implementation and demobilization of facilities including security and general maintenance services.
- **Meals and Lodging** Responsible for acquiring and assigning Hotels/Lodging, transporting personnel, and providing meals to personnel.

- **Fleet and Equipment** Responsible for acquiring, assigning, maintaining and repairing vehicles and equipment for the incident.
- Supply Chain Responsible for ordering equipment, and supplies; receiving and storing all supplies for the incident; maintaining an inventory of supplies; and servicing nonexpendable supplies and equipment.
- **Medical** Responsible for the development of the Medical Plan, obtaining medical aid and transportation for the injured and ill, and preparation of reports and records.

Planning Section Chief

Responsibilities:

The major activities of the Planning Section may include:

- Coordinate response planning and collection, evaluation, dissemination, and use of incident-related information.
- Consider and request aviation resources early in the response phase for planning and damage assessment purposes.
- Facilitate the respective daily meetings and briefings.
- Institute an Operational Periods Planning Cycle and outline a daily meetings schedule
- Preparing and documenting Incident Action Plans.
- Prepare overall strategic and tactical objectives for use in the planning process.
- Conducting long-range and/or contingency planning.
- Developing plans for demobilization.
- Maintaining incident documentation.
- Tracking resources assigned to the incident.
- Collect all electronic and physical documentation from staff involved with emergency response.

The Planning Section consists of a Planning Chief and can be further staffed with additional units, if needed. Additional units may include:

- Resource Unit Conducts all check-in activities and maintains the status of all incident resources. The Resources Unit plays a significant role in preparing the written Incident Action Plan (IAP).
- Situation Unit Collects and analyzes information on the current situation, prepares situation displays and situation summaries, and develops maps and projections.
- Documentation Unit Provides duplication services, including the written IAP. Maintains and archives all incident-related documentation.
- Demobilization Unit Assists in ensuring that resources are released from the incident in an orderly, safe, and cost-effective manner.
- Technical Specialists Specialists in their respective field, such as Duke Energy CCP Engineering.

Subject Matter Expert (SME)/Technical Advisor

Responsibilities:

The System Owner serves as the SME/Technical Advisor to the Incident Commander and Operations during emergencies.

- Conducts special dam inspections to determine the nature and magnitude of the event.
- Classifies the event and establishes the Emergency Event Level of response.
- Briefs the Incident Commander of the nature, magnitude and corresponding notification level of the event.
- Initiates and coordinates recommended actions within the appropriate Action Data Sheets.
- Determines equipment and material needs for the repair of the dam.
- Coordinates with the Incident Management Team on strategy, equipment and personnel to initiate repairs.
- Coordinates with the Duke Energy CCP Engineering on all remedies to the dam.
- Monitors dam repair.
- Coordinates with the Safety Officer to establish safe zones around the dam.
- Provides constant updates of repairs to the Incident Commander and Operations.
- Consults with State Dam Representative on nature and magnitude of the event.
- Consults with the State Dam Representative on strategy and course of action to remedy the damage.
- Completes Abnormal or Emergency Event Log and the Dam Emergency Situation Report.

Liaison Officer

Responsibilities:

The Liaison Officer is a member of the Command Staff, which includes the Safety Officer and Public Information Officer. The Liaison Officer carries out staff functions needed to support the Incident Commander. The Command Staff carries out responsibilities for key activities not specifically identified in the General Staff functional elements.

The Liaison Officer is the point-of-contact for representatives of other governmental agencies, non-governmental organizations, and/or private entities. Representatives from assisting or cooperating agencies and organizations coordinate through the Liaison Leader. Agency and/or organizational representatives assigned to an incident must have the authority to speak for their parent agencies and/or organizations on all matters, following appropriate consultations with their agency leadership. Assistants and personnel from other agencies or organizations (public or private) involved in incident management activities may be assigned to the Liaison Officer to facilitate coordination.

- Serve as the point-of-contact for assisting and cooperating government agencies and stakeholders.
- Provide agency representatives and stakeholders with information and updates on incident status and response operations; solicit input and recommendations.

- Meet with (and profile the needs of) political and environmental stakeholders, in a measure to gain information on possible concerns and perceptions.
- Designate location for a staging area.
- Approve requests for additional equipment, personnel, and services, as appropriate.
- Establish and maintain liaison with other agencies participating in the incident.
- Update the Organization Assignment List to help account for personnel involved and to whom they are assigned as emergency services arrive.
- Provide agency representatives with adequate work space, equipment and supplies, including access to telephones, fax machines, computers, printers, as appropriate.
- Designate entrance and exit routes for responders.
- Distribute copies of the "Incident Action Plan" (IAP) to agency representatives and interested stakeholders.

Finance / Admin Section Chief

Responsibilities:

The Finance/Admin Section Chief (FAC) provides support to incident operations and advises the IC on all matters relating to cost accounting, time recording, contract administration, incident funding and claims. The FAC is responsible to the IC for the set of systems and procedures necessary to ensure ongoing management of financial and cost analysis aspects of the incident.

The Finance Chief is responsible for:

- Contract negotiation and monitoring.
- · Cost tracking.
- Handling claims.
- Manage the financial and cost analysis aspect of the incident.
- Establish charge codes.
- Timekeeping.
- Compensation for injury or damage to property.
- Development of a financial and administrative operating plan to address; 1) cost accounting, 2) time recording, 3) contract administration, 4) incident funding, and 5) claims.
- Participate in the daily Command & General Staffs Meeting; update attendees on the financial status.
- Provide input in all planning sessions involving current and future costs.
- Attend the daily Operations Briefing(s); 1) review the contractor performance issues, 2) equipment status, 3) personnel time recording, 4) claims issues and other related items.
- Utilizes the General Message Form to communicate information related to cost, time recording, contract administration and claims to Incident Leaders.

Environmental Officer

Responsibilities:

The Environmental Officer (EO) is responsible for environmental matters associated with the response, including strategic assessment, modeling, surveillance, and environmental monitoring and permitting. The Environmental Officer prepares environmental data for the IC. Technical Specialists typically assigned to the Environmental Leader includes the Scientific Support, Sampling, Response Technologies, Resources at Risk, Environmental Cleanup, and Disposal Technical Specialists. The Environmental Officer is responsible for the following duties:

- Obtain a briefing and special instructions from the Planning Section Chief (PSC).
- Participate in Planning Section meetings.
- Identify sensitive areas and recommend response priorities.
- Following consultation with natural resource trustees, provide input on wildlife protection strategies (e.g., preemptive capture, hazing, and/or capture and treatment).
- Determine the extent, fate, and effects of environmental contamination.
- Acquire, distribute, and provide analysis of weather forecasts.
- Monitor the environmental consequences of response actions.
- Develop cleanup and assessment plans. Identify the need for, and prepare any special advisories or orders.
- Identify the need for, and obtain, permits, consultations, and other authorizations including Environmental Protection Act (EPA) provisions.
- Provide notification to IDNR as well as other agencies as needed, example such as National Response Center.
- Following consultation with the Federal On-Scene Coordinator (FOSC)'s, identifies and develop plans for protection of affected natural resources.
- Evaluate the opportunities to use various response technologies.
- Develop disposal plans
- Develop a plan for collecting, transporting, and analyzing samples.
- Maintain Unit/Activity Log.
- Investigate any accidents or personnel injuries; prepare accident reports.
- Maintain awareness of active and developing situations; exercise emergency authority to stop or prevent unsafe acts.
- Participate in planning meetings to identify health and safety concerns inherent to the strategic work plan.

Governmental and Community Relations Officer

Responsibilities:

The Governmental Community Relations Officer (GCRO) position has overall responsibility for Duke Energy's (DE) governmental coordination program working with public officials and other identified key leaders before, during and after emergency response efforts. The GCRO will facilitate communication between DE and the local governments providing timely updates. The GCRO will direct resources assigned to their team for the purpose of governmental coordination including EOC representatives, Back up GCL and Administrative Support. The Governmental Community Relations Officer (GCRO) will be headquartered at or near the Incident Command Center working with the Public Information Officer who has overall communication responsibility for the Incident. The GCRO is responsible for:

- Collaborating with local government and key leaders to:
 - Facilitate the coordination of event response by providing on-going updates before, during and after the emergency response.
 - Educate on proper event response and remediation actions.
 - Assist in the resolution of local governmental issues and concerns related to emergency response efforts.
- Collaborating with Duke Energy Public Affairs to communicate with State Level Elected Officials
- Providing direction to a team of Back-up GCRO's who are the main contact positions for communications with public officials, Emergency Management personnel and other identified key leaders before, during and after the emergency response efforts.
- Interacting with the Incident Commander, Liaison Officer, Public Information Officer, Region VP, Public Affairs VP, Director of Environmental and Energy Affairs to gain knowledge of response priorities and efforts.
- Participating in Incident Commander and Public Information Officer meetings and conference calls to:
 - Gain knowledge of response activities, priorities and efforts.
 - Provide update on activities/potential issues in your area of responsibility

Key Interface Points:

- Public Officials, Emergency Management personnel, other key leaders
- Incident Commander
- Liaison Officer
- Public Information Officer
- Manager, Public Affairs
- Regional VP
- Back-up GCRO

Security Leader

Responsibilities:

The Security Leader (SL) has overall responsibility for the security of the station and reports to the Operations Section Chief. The SL is responsible for:

- Establishing primary and alternate controlled access to the site.
- Conducting a security assessment of the site to identify potential gaps in security.
- Assign personnel at required locations to manage access to the station and hazardous areas.
- Provide assistance to the Safety Officer in securing access to areas identified as hazardous or restricted to personnel.
- Coordinating with Logistics, Planning and Operations on the management of personnel and equipment at the staging areas.
- Coordinate with external law enforcement as necessary to prevent or deter additional activity or incidents.

- Participate in incident and operations briefings.
- Coordinate with Enterprise Protective Services on all received threats (verified/unverified)
- Maintain Unit/Activity Log.

Legal Leader

Responsibilities:

The Legal Leader has overall responsibility to assess any potential for legal claims that could arise from incident activities and will advise planning on all legal issues during incident response. Additional responsibilities include:

- Coordinating with the Public Information Officer on all releases of information to the public and governmental agencies.
- Conduct an initial assessment of the incident to identify the potential for legal claims.
- Coordinate with the Safety Officer on all injury reports submitted.
- Identify and oversee documents and information to be retained for legal purposes.

Appendix A–3 Abnormal or Emergency Event Log

(to be completed during emergency and for all emergency levels)

Dam na	ame: D	uke Energy Cayuga Station; Ash and Settling Pond Dams	
County	: <u> </u>		
When a	and how	was the event detected?	
 Weathe	er condit	ions:	
Genera	l descri	otion of the emergency situation:	
Emerge	ency lev	el determination: Made by:	
Date	Time	Action / Event Progression	Taken by
Report	prepare	d by: Dat	e:

Appendix A-4Dam Emergency Situation Report

(to be completed following the termination of the emergency)

Dani name. Duke Energy Cayuga Statio	in, Asir and Settling Fond Da	anis
State Dam ID No.:		
Dam location: (City)	(County)	(Stream/River)
Date:		
Time:		
Weather conditions:		
General description of emergency situation	on:	
Area(s) of dam affected:		
Extent of dam damage:		
Possible cause(s):		
Effect on dam's operation:		
Initial reservoir elevation:		-ime:
Maximum reservoir elevation: Final reservoir elevation:		ime:
Description of area flooded downstream/		
Other data and comments:		
Observer's name and telephone number:	:	
Report prepared by:		Date:

Appendix A-5 ICS Forms and Descriptions

The ICS Forms are designed to include the essential data elements for the ICS process they address. The use of these standardized ICS Forms is encouraged to promote consistency in the management and documentation of incidents, and to facilitate effective use of mutual aid. In many cases, additional pages can be added to the existing ICS Forms when needed, and several forms are set up with this specific provision. The Station EAP Program Coordinator will place copies of these forms in an ICS / Emergency Jump Bag and annually review the ICS Forms link for updates. If updates are made to the ICS Forms, then the Station EAP Program Coordinator will replace the old forms in the ICS / Emergency Jump Bag. The link below will redirect to FEMA's ICS Forms Booklet containing all the forms:

http://www.fema.gov/media-library-data/20130726-1922-25045-7047/ics forms 12 7 10.pdf

The following forms should be placed in the ICS / Emergency Jump Bag, at a minimum:

Communications Form	
ICS-213	Planning Forms
	ICS-201
Incident Command Forms	ICS-209
ICS-201	ICS-213
ICS-202	ICS-230
ICS-207	ICS-231
ICS-209	ICS-233
ICS-213	
	Logistics Forms
Liaison Forms	ICS-211E
ICS-203	ICS-211P
ICS-204	ICS-213
ICS-205	
ICS-205A	Finance/Admin Form
ICS-211	ICS-213
ICS-213	
ICS-213RR	Safety Forms
ICS-214	ICS-206
	ICS-208
	ICS-213
	ICS-215A

ICS Forms and Descriptions

The following table provides a list of ICS forms, the title, a brief description of each form and who typically completes the form. By clicking on the underlined ICS form #, it will take you to an editable and printable version of the form.

ICS Form #	Title	Description	Typically Prepared by
Form 201	Incident Briefing	Provides the Incident Command/Unified Command and General Staffs with basic information regarding the incident situation and the resources allocated to the incident. This form also serves as a permanent record of the initial response to the incident.	Incident Commander
Form 202	Incident Objectives	Describes the basic strategy and objectives for use during each operational period.	Planning Section
Form 203	Organization Assignment List	Provides information on the response organization and personnel staffing.	Planning Section (Resources Unit)
Form 204	Assignment List	Used to inform personnel of assignments. After Incident Command/Unified Command approves the objectives, staff members receive the assignment information contained in this form.	Planning Section (Resources Unit) & Operations
Form 205	Incident Radio Communication s Plan	Provides, in one location, information on the assignments for all communications equipment for each operational period. The plan is a summary of information. Information from the Incident Communications Plan on frequency assignments can be placed on the appropriate Assignment form (ICS Form 204).	Logistics Section (Communications Unit)
Form 205A	Communication s List	Records methods of contact for incident personnel. While the Incident Radio Communications Plan (ICS 205) is used to provide information on all radio frequencies down to the Division/Group level, the ICS 205A indicates all methods of contact for personnel assigned to the incident (radio frequencies, phone numbers, pager numbers, etc.), and functions as an incident directory.	Logistics Section (Communications Unit)

ICS Form #	Title	Description	Typically Prepared by
Form 206	Medical Plan	Provides information on incident medical aid stations, transportation services, hospitals, and medical emergency procedures.	Logistics Section (Medical Unit)
Form 207	Incident Organization Chart	Provides a visual wall chart depicting the ICS organization position assignments for the incident. The ICS 207 is used to indicate what ICS organizational elements are currently activated and the names of personnel staffing each element. An actual organization will be event-specific. The size of the organization is dependent on the specifics and magnitude of the incident and is scalable and flexible. Personnel responsible for managing organizational positions are listed in each box as appropriate.	Planning Section (Resources Unit)
Form 208	Safety message/Plan	The Safety Message/Plan (ICS 208) expands on the Safety Message and Site Safety Plan.	Incident Commander (Safety Officer)
Form 209	Incident Status Summary	Summarizes incident information for staff members and external parties, and provides information to the Public Information Officer for preparation of media releases.	Planning Section
Form 210	Resource Status Change	Used by the Incident Communications Center Manager to record status change information received on resources assigned to the incident. This information could be transmitted with a General Message (ICS 213). The form could also be used by Operations as a worksheet to track entry, etc.	Logistics Section (Communications Unit)
Form 211	Incident Check- In List	Used to check in personnel and equipment arriving at or departing from the incident. Check-in/out consists of reporting specific information that is recorded on the form.	Planning Section (Resources Unit)
Form 213	General Message	Used by: - Incident dispatchers to record incoming messages that cannot be orally transmitted to the intended recipients EOC and other incident personnel to transmit messages via radio or telephone to the addressee Incident personnel to send any	Logistics Section (Communications Unit)

ICS Form #	Title	Description	Typically Prepared by
		message or notification that requires hard-copy delivery to other incident personnel.	
Form 213 RR	Resources Request	Used by all incident personnel to request resources.	One in Each Notebook, as it is used in various positions
Form 214	Activity Log	Provides a record of unit activities. Unit Logs can provide a basic reference from which to extract information for inclusion in any after-action report.	Personnel in various ICS positions as needed or as appropriate
Form 215	Operational Planning Worksheet	Documents decisions made concerning resource needs for the next operational period. The Planning Section uses this Worksheet to complete Assignment Lists, and the Logistics Section uses it for ordering resources for the incident. This form may be used as a source document for updating resource information on other ICS forms such as the ICS 209.	Operations Section
Form 215A	Incident Action Plan Safety Analysis	Communicates to the Operations and Planning Section Chiefs safety and health issues identified by the Safety Officer.	Incident Commander (Safety Officer)
Form 218	Support Vehicle/Equipm ent Inventory	Provides an inventory of all transportation and support vehicles and equipment assigned to the incident. The information is used by the Ground Support Unit to maintain a record of the types and locations of vehicles and equipment on the incident. The Resources Unit uses the information to initiate and maintain status/resource information	Logistics Section (Ground Support Unit)
Form 219- 2	Crew/Team Card	Also known as "T-Cards," these are used by the Resources Unit to record status	Planning Section (Resources Unit)
Form 219-	Engine Card	and location information on resources, transportation, and support vehicles and	
Form 219- 5	Personnel Card	personnel. These cards provide a visual display of the status and location of	
Form 219- 7	Equipment Card	resources assigned to the incident.	
Form 219- 8	Misc. Equipment/Task Force Card		

ICS Form #	Title	Description	Typically Prepared by
Form 219- 10	Generic Card		
Form 221	Demobilization Check-Out	Ensures that resources checking out of the incident have completed all appropriate incident business, and provides the Planning Section information on resources released from the incident. Demobilization is a planned process and this form assists with that planning.	Planning Section (Demobilization Unit)
Form 225	Incident Personnel Performance Rating	Gives supervisors the opportunity to evaluate subordinates on incident assignments. THIS RATING IS TO BE USED ONLY FOR DETERMINING AN INDIVIDUAL'S PERFORMANCE ON AN INCIDENT/EVENT.	Supervisor for each subordinate. Planning Section collects the completed form.

Appendix A-6 Glossary of Terms

Abnormal Event A situation that is not normal but has not yet threatened the

operation or structural integrity of the dam; however, it possibly could

if the situation continues to develop.

Abutment That part of the valley side against which the dam is constructed.

The left and right abutments of dams are defined with the observer

looking downstream from the dam.

Acre-foot A unit of volumetric measure that would cover 1 acre to a depth of 1

foot. One acre-foot is equal to 43,560 cubic feet or 325,850 gallons.

Berm A nearly horizontal step (bench) in the upstream or downstream

sloping face of the dam.

Boil A disruption of the soil surface due to water discharging from below

the surface. Eroded soil may be deposited in the form of a ring

(miniature volcano) around the disruption.

Breach An opening through the dam that allows draining of the reservoir. A

controlled breach is an intentionally constructed opening. An

uncontrolled breach is an unintended failure of the dam.

Conduit A closed channel (round pipe or rectangular box) that conveys water

through, around, or under the dam.

Control section A usually level segment in the profile of an open channel spillway

above which water in the reservoir effluents through the spillway.

Cross section A slice through the dam showing elevation vertically and direction of

natural water flow horizontally from left to right. Also, a slice through a spillway showing elevation vertically and left and right sides of the

spillway looking downstream.

Dam An artificial barrier generally constructed across a watercourse for

the purpose of impounding or diverting water.

Dam failure The uncontrolled release of a dam's impounded water.

Dam Operator The person(s) or unit(s) of government with responsibility for the

operation and maintenance of dam.

Downstream Hazards Map A map showing the geographic area downstream of a dam that

should be evacuated if it is threatened to be flooded by a breach of

the dam or other large effluent.

Drain, toe or foundation,

or blanket

A water collection system of sand and gravel and typically pipes

along the downstream portion of the dam to collect seepage and

convey it to a safe outlet.

Drainage area (watershed) The geographic area on which rainfall flows into the dam.

Drawdown

The lowering or releasing of the water level in a reservoir over time or the volume lowered or released over a particular period of time.

Duke Energy Representative

Any Duke Energy employee working within the scope of his/her duties and responsibilities. For this EAP the following are recognized as Duke Energy Representatives; the Station/Plant Manager, Operations Superintendent, Control Room Operator, System Owner, Regional General Manager, the CCP Engineer and others as necessary operating within the scope of the EAP.

Emergency

A condition that develops unexpectedly, endangers the structural integrity of the dam and/or downstream human life and property, and requires immediate action.

Emergency Action Plan (EAP)

A formal document identifying potential emergency conditions that may occur at the dam and specifying preplanned actions to minimize potential failure of the dam or minimize failure consequences including loss of life, property damage, and environmental impacts.

Emergency Jump Bag

A specially prepared emergency kit focused on ICS responsibilities. The kit includes detailed folders with the applicable ICS forms and responsibilities that fall under each different leader assigned by the IC. It also includes named vests so that personnel onsite have no confusion about who is the leader on the various functions.

Filter

The layers of sand and gravel in a drain that allow seepage through an embankment to effluent into the drain without eroding the embankment soil.

Freeboard

Vertical distance between a stated water level in the reservoir and the top of dam.

Gate, slide or sluice, or regulating

An operable, watertight valve to manage the effluent of water from the dam.

CCP Engineer

An engineer concerned with the engineering behavior of earth materials; evaluates stability of natural slopes and, man-made soil deposits; asses' risks posed by site conditions; design earthworks and structure foundations; and monitor site conditions, earthwork and foundation construction.

Groin

The area along the intersection of the face of a dam and the abutment.

Hazard classification

A system that categorizes dams (high, significant, or low) according to the degree of their potential to create adverse incremental

consequences to include, loss of life; property damage; or environmental impacts of a failure or improper operation of a dam.

Height, dam

The vertical distance between the lowest point along the top of the dam and the lowest point at the downstream toe, which usually occurs in the bed of the outlet channel.

Hydrograph, Inflow or Outflow, or breach

A graphical representation of either the flow rate or flow depth at a specific point above or below the dam over time for a specific flood occurrence.

Incident Commander

The highest predetermined official available at the scene of an emergency situation.

Instrumentation

An arrangement of devices installed into or near dams that provide measurements to evaluate the structural behavior and other performance parameters of the dam and appurtenant structures.

Inundation area or map

The geographic area downstream of the dam that would be flooded by a breach of the dam or other large effluent.

Notification

To immediately inform appropriate individuals, organizations, or agencies about a potentially emergency situation so they can initiate appropriate actions.

(principal spillway)

Outlet works An appurtenant structure that provides for controlled passage of normal water flows through the dam

Piping

The progressive destruction of an embankment or embankment foundation by internal erosion of the soil by seepage flows.

Probable Maximum
Precipitation (PMP) or
(Flood (PMF)

The theoretically greatest precipitation or resulting flood that is meteorologically feasible for a given duration over a specific drainage area at a particular geographical location.

Reservoir

The body of water impounded or potentially impounded by the dam.

Riprap

A layer of large rock, precast blocks, bags of cement, or other suitable material, generally placed on an embankment or along a watercourse as protection against wave action, erosion, or scour.

Risk

A measure of the likelihood and severity of an adverse consequence.

Seepage

The natural movement of water through the embankment, foundation, or abutments of the dam.

Slide

The movement of a mass of earth down a slope on the embankment or abutment of the dam.

Spillway (auxiliary or emergency)

The appurtenant structure that provides the controlled conveyance

of excess water through, over, or around the dam.

Spillway capacity

The maximum effluent the spillway can safely convey with the reservoir at the maximum design elevation.

Spillway crest

The lowest level at which reservoir water can flow into the spillway.

Tailwater

The body of water immediately downstream of the embankment at a

specific point in time.

Toe of dam

The junction of the upstream or downstream face of an embankment with the ground surface.

Top of dam (crest of dam)

The elevation of the uppermost surface of an embankment which can safely impound water behind the dam.

Appendix A–7 Emergency Contacts List

1. Emergency Notification Phone List—Internal Resources

	Principle		Office Telephone	Alternate Telephone
Agency/Organization	Contact	Address	Number	Number
Cayuga Control Room				
CCP Engineer				
CCP Regulatory Affairs				
CCP Regulatory Affairs				
Contract Resource Coordinator				
Coord Operations				
Corporate Legal				
Corporate Legal				
Developmental Assignment Leader				
Dir CCP Governance & Ops Suppt				
Dir MW FHO Finance				
Duke Aviation Services				
Duke Energy Emergency Hotline				
Duke Energy State President				

Agency/Organization	Principle Contact	Address	Office Telephone Number	Alternate Telephone Number
GM CCP Proj Plng &				
Initiation				_
GM CCP Project Management				
				-
GM CCP Project Management				
GM CCP Regional Ops &				-
Maint				
Govt & Comm Relations Mgr				
Govt & Comm Relations Mgr				
H&S Professional II				
Incident Support Team				
Lead Communcations Cnslt				Ī
Lead EHS Professional				
Manager H&S				
Mgr CCP Governance				-
Mgr CCP Regional Engg				
Scheduler Work Management				
Site Environmental				
Coordinator				
Sr Communications Cnslt				
Sr Financial Analyst				

Agency/Organization	Principle Contact	Address	Office Telephone Number	Alternate Telephone Number
Sr H&S Professional		- Tuuli Coo		
Sr Security Specialist				_
Ctation Manager				
Station Manager				
Supt Maintenance	-			-
Supt Maintenance				
Supt Operations				-
supt operations				
Supv Operations				-
Supv Sperations				
Supv Operations	•			
Supv Operations				-
Supv Operations				
Supv Operations				
Supv Operations				
				_
Supv Operations				
				_
Supv Operations				
SVP Coal Combustion				_
Products				
110ddct5				
System Owner				
VP CCP Engineering				
VP CCP Governance & Ops				
Support				
VP CCP Ops &				
Maintenance				
VP Midwest Generation				
			ı	

2. Emergency Notification Phone List—External Resources

Agency/Organization	Principle Contact	Address	Office Telephone Number	Alternate Telephone Number
Cayuga Fire Department	·			
Clinton/Dana Fire Department				-
Dam Engineering Consultant – Cardno/ATC				
Dam Safety Program, IDNR				
IDEM Division of Land Resources – Dam Safety				
Indiana Department of Homeland Security				
Indiana Department of Transportation				
National Weather Service				
Newport Volunteer Fire Department				
Rockville-Adams Township Fire Department				
Terre Haute Fire Department				
Vermillion County Emergency Management				
Vermillion County Emergency Management				
Vermillion County Sheriff				

Duke Energy - Cayuga Station

Location:

Appendix A–8 Record of Annual Meeting with Local Emergency Responders

	3300 N. State Road 63 Cayuga, IN 47928
Dat	e:
	ccordance with 40 CFR §257.73(a)(3)(E), the annual meeting between Duke Energy - Cayuga tion representatives and emergency responders from Vermillion County was held.
This	s document will serve as an official record of the meeting and shall be signed by all attendees.
	Meeting Summary / Topics Discussed
	Annual Face-to-Face Meetings are completed for each Duke Energy Coal and
	Combustion Products site every calendar year per the EPA Final CCR Ruling, and all
	documentation is maintained in an official records repository.

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APPENDIX B

Appendix B-1 Resources Available

In the event of an emergency, the following resources will be maintained on the property or available for use within a reasonable amount of time, typically within 24 hours of event notification. The list will be reviewed annually by the Station EAP Program Coordinator to ensure they are available either at the station or from a local rental or supply company. The CCP Operations and Maintenance team can supply any or all of this equipment to any station within 24 hours of notification.

Equipment:

- Excavator
- Front End Loader Or Backhoe
- Dump Truck
- Bulldozer or Skid Steer With Blade Attachment

Support Equipment:

- Sandbags
- Gas Powered Light Kit
- Diesel Driven 6" Pump With 50' of Suction & 300' Discharge Hose
- Oil Booms
- Turbidity Curtains
- Turbidity Curtain Anchors
- Personal Protective Equipment (PPE) will be consistent with Duke Energy standards and in accordance with the task to be performed.

Materials:

- Rip Rap (class 1)
- Washed Stone (No. 57 or 67)
- Sand
- Filter Fabric

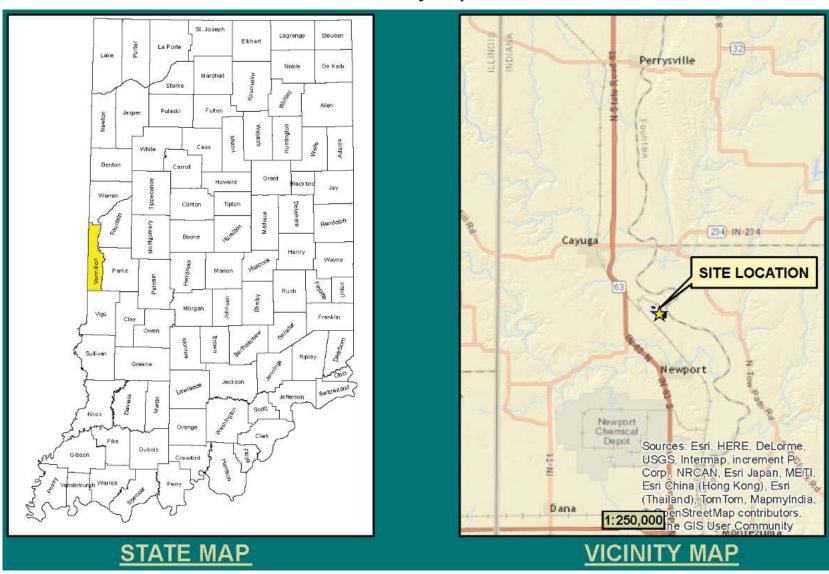
Appendix B-1 (cont'd)

Duke Energy has contracts with the following companies to provide materials, supplies, equipment and services within an appropriate response time. The Station EAP Program Coordinator will review these contracts annually to ensure these companies can provide the materials, supplies, equipment and services required.

Locally available resources include:

Heavy equipment service and rental	Sand and gravel supply	Ready-mix concrete supply
Pumps	Diving contractor	Sand bags
Boom Deployment/Spill Clean-Up		

Appendix B-2 Vicinity Map



Appendix B-3 Site Map



Appendix B-4 Inundation/Downstream Hazards Map

THIS IS A REFERENCE PAGE.

Due to the large size of the inundation maps, they are located in the locations outlined below:

HARD COPY: The Cayga Station Inundation Map can be found at the back of this book under the "Inundation Maps" tab.

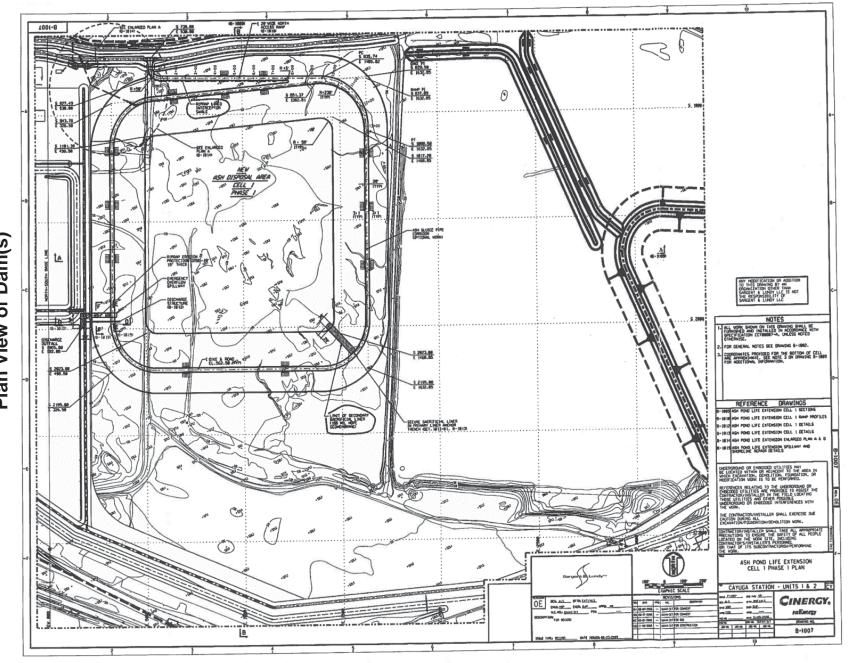
ELECTRONIC COPY: The Cayuga Station Inundation Map can be found in Fusion here:

Lined Ash Pond Northwest:	
Lined Ash Pond South:	
Series Failure:	

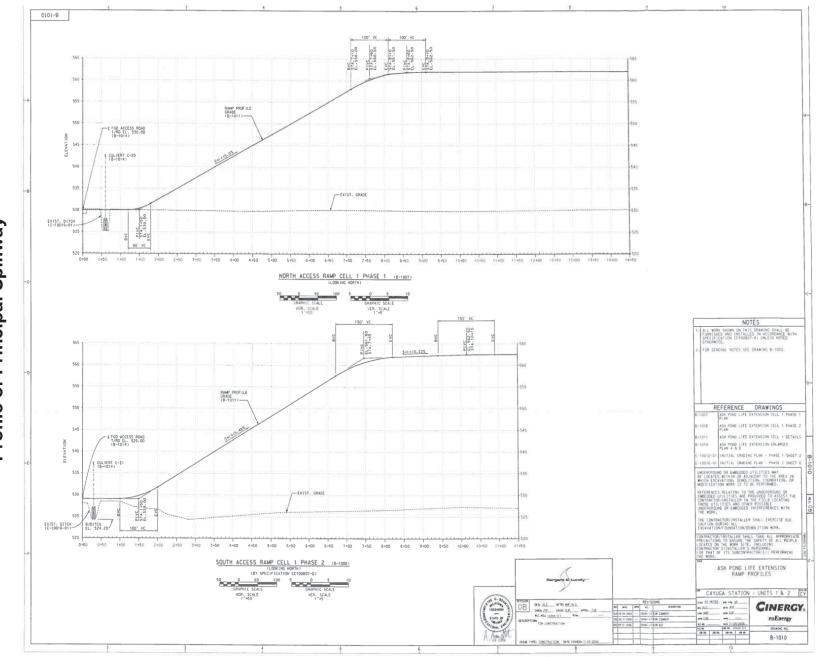
Appendix B-5 Residents/Businesses/Highways at Risk

Local Emergency Managements Services is responsible for the notification of residents and businesses that may be at risk, as well as clearing highways, in the inundation zones if the dam(s) has an Emergency Level 1 incident.

Appendix B-6 Plan View of Dam(s)



Appendix B-7 Profile of Principal Spillway



Appendix B–8 Reservoir Elevation-Area-Volume and Spillway Capacity Data

Duke Energy Cayuga Station, Ash and Settling Pond Dams

Dam Name	Elevation	Reservoir Surface acres	Reservoir Storage acre-ft.	Spillway Effluent ft ³ /s
Ash Pond Dam	50.5	38.5	1400	21
Primary Ash Disposal Area #1	47	78.1	260	N/A
Primary Settling Pond Dam	48	30.2	225	N/A
Secondary Settling Pond Dam	24	11.1	36	N/A

Appendix B-9 State and National Inventory of Dams (NID) Data

Duke Energy Cayuga Station, Lined Ash Pond Dam

Dam name: Lined Ash Pond Dam Design: Sargent & Lundy

State: Indiana Constructed by: N/A

NID ID: N/A Program authority: **Dam Safety**

State Dam ID: N/A Watershed name: Wabash River

Longitude: 39:55:07 O&M insp. resp.: Station & Engineering

Latitude: 87:25:40 O&M insp. current?: Yes

County: Vermillion Population at risk: Yes

Stream: Wabash River Dam height: 50.5 feet

Nearest town: Newport Dam length: N/A

Distance to nearest town: 5 miles Dam volume: N/A

Operator: **Duke Energy** Design hazard potential: Significant

Year constructed: 2008 Current hazard potential: Significant

Max. effluent: N/A Hazard potential class year: 2010

Max. storage: 1400 acre Sediment storage: N/A

Normal storage: N/A Flood storage: N/A

Surface area: 40 acres Surcharge storage: N/A

Drainage area: 0 Other storage: Flyash/Bottom Ash

Inspection frequency: Monthly/Quarterly/Yearly Principal effluent spillway: N/A

State regulated?: N/A Principal effluent spillway length: N/A

State reg. agency: N/A Emergency spillway type: N/A

Appendix B-9 (continued) State and National Inventory of Dams (NID) Data

Duke Energy Cayuga Station, Ash Disposal Area #1

Dam name: Ash Disposal Area #1 Design: Sargent & Lundy

State: Indiana Constructed by: N/A

NID ID: N/A Program authority: **Dam Safety**

State Dam ID: N/A Watershed name: Wabash River

Longitude: 39:54:49 O&M insp. resp.: Station & Engineering

Latitude: 87:25:07 O&M insp. current?: Yes

County: Vermillion Population at risk: Yes

Stream: Wabash River Dam height: 47 feet

Nearest town: Newport Dam length: N/A

Distance to nearest town: 5 miles Dam volume: N/A

Operator: **Duke Energy** Design hazard potential: Significant

Year constructed: 1970 Current hazard potential: Significant

Max. effluent: N/A Hazard potential class year: 2010

Max. storage: N/A Sediment storage: N/A

Normal storage: 260 acre Flood storage: N/A

Surface area: 26 acres Surcharge storage: N/A

Drainage area: 0 Other storage: Flyash/Bottom Ash

Inspection frequency: Monthly/Quarterly/Yearly Principal effluent spillway: N/A

State regulated?: N/A Principal effluent spillway length: N/A

State reg. agency: N/A Emergency spillway type: N/A

Appendix B-9 (continued) State and National Inventory of Dams (NID) Data

Duke Energy Cayuga Station, Primary Settling Pond Dam

Dam name: Primary Settling Pond Dam Design: Sargent & Lundy

State: Indiana Constructed by: N/A

NID ID: N/A Program authority: **Dam Safety**

State Dam ID: N/A Watershed name: Wabash River

Longitude: 39:54:53 O&M insp. resp.: Station & Engineering

Latitude: 87:24:40 O&M insp. current?: Yes

County: Vermillion Population at risk: Yes

Stream: Wabash River Dam height: 48 feet

Nearest town: Newport Dam length: N/A

Distance to nearest town: 5 miles Dam volume: N/A

Operator: **Duke Energy** Design hazard potential: Significant

Year constructed: 1970 Current hazard potential: Significant

Max. effluent: N/A Hazard potential class year: 2010

Max. storage: N/A Sediment storage: N/A

Normal storage: 225 acre Flood storage: N/A

Surface area: 15 acres Surcharge storage: N/A

Drainage area: 0 Other storage: Flyash/Bottom Ash

Inspection frequency: Monthly/Quarterly/Yearly Principal effluent spillway: N/A

State regulated?: N/A Principal effluent spillway length: N/A

State reg. agency: N/A Emergency spillway type: N/A

Appendix B-9 (continued) State and National Inventory of Dams (NID) Data

Duke Energy Cayuga Station, Secondary Settling Pond Dam

Dam name: Secondary Settling Pond Dam Design: Sargent & Lundy

State: Indiana Constructed by: N/A

NID ID: N/A Program authority: **Dam Safety**

State Dam ID: N/A Watershed name: Wabash River

Longitude: 39:54:49 O&M insp. resp.: Station & Engineering

Latitude: 87:24:40 O&M insp. current?: Yes

County: Vermillion Population at risk: Yes

Stream: Wabash River Dam height: 24 feet

Nearest town: Newport Dam length: N/A

Distance to nearest town: 5 miles Dam volume: N/A

Operator: **Duke Energy** Design hazard potential: Significant

Year constructed: 1970 Current hazard potential: Significant

Max. effluent: N/A Hazard potential class year: 2010

Max. storage: N/A Sediment storage: N/A

Normal storage: 36 acre Flood storage: N/A

Surface area: 3 acres Surcharge storage: N/A

Drainage area: 0 Other storage: Flyash/Bottom Ash

Inspection frequency: Monthly/Quarterly/Yearly Principal effluent spillway: N/A

State regulated?: N/A Principal effluent spillway length: N/A

State reg. agency: N/A Emergency spillway type: N/A

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APPENDIX C

Appendix C-1 EAP Review and Follow-up Documentation

(This page intentionally blank for inclusion of documentation from the review and follow-up associated with the termination of an event requiring implementation of this EAP.)