

**Tennessee Valley Authority
Regulatory Submittal for Kingston Fossil Plant**

**Documents submitted:
Construction Site Security Plan (Revised)**

**Date submitted
8/ 14/ 2009**

**Submitted to whom
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Concurrence

Received

Not Applicable

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- David Stephenson, TVA
- Michelle Cagley, TVA
- Greg Signer, TVA
- KIF Incident Document Control
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- Gretchen Wahl, Jacobs
- Dannena Bowman, EPA
- Jeff Gary, Jacobs

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TVA KIF Ash Recovery Project
Construction Site Security Plan

Goals of Site Security Plan:

- 1) To protect the public from inadvertently or purposefully entering the project site and being injured.
- 2) Ensure timely response of emergency responders in the event of an emergency call.
- 3) Secure on-site materials and equipment.
- 4) Support safe and efficient transportation of materials, equipment, and personnel on and off the project site.
- 5) Control site access and limit vehicular traffic thereby limiting the generation of dust and preventing migration of ash off-site.
- 6) Control unauthorized access to the ash recovery site.

Methodology:

This plan establishes clear, well controlled physical boundaries which limit access to the site. The site is separated from Swan Pond Road by jersey barriers. Near the junction of Swan Pond Road and Swan Pond Circle the jersey barriers transition to a permanent guard rail system. The guard rail system continues along Swan Pond Circle where Swan Pond Circle borders the project site. The remainder of the site is enclosed by snow fencing. The attached aerial plan shows the exclusion zone boundaries and site access points. Site access by vehicle is controlled through the following gates or posts (see attached aerial plan):

- 1) Security Post {A} Adjacent to Ash Recovery administrative offices near railroad crossing.
Post A # 865 755-4952.
- 2) Security Gate/Post {B} off Swan Pond Road South of Swan Pond Circle.
Post B # 865 755-3440
- 3) Security Gate/Post {C} Main TVA plant entrance: "South" gate.
Post C # 865 717-2165.
- 4) Security Post {D} off Swan Pond Road, near Baptist Missionary Church. (Yard Ops Rd.)
Post D # 865 755-4979.
- 5) Through automatic security pad controlled motorized gate {E} at Berkshire Road.
- 6) Through automatic security pad controlled motorized gate {F} at Lakeshore Road.

From Security Post - A, C, and D, Exclusion Zone vehicle access is from the South end of Sluice Ditch Rd. This is an Exclusion Zone entry point only (Vehicle Entry Control Point 1) and is not to be used for an exit except during an emergency. VECPI is manned by TVA Police and may be reached at 865 755-3104.

Security Gate/Post - B is the primary vehicle and equipment entry/exit point of the site (Vehicle Entry Control Point 2) and provides access to a clean Support Zone delivery location as well as access to the Exclusion Zone.

Security Gate - E provides vehicle access to the north embayment Support Zone and Exclusion Zone and requires an access code for entry. Contact the Jacobs security liaison for access needs.

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Security Gate - F provides vehicle access to the Support Zone on the north edge of the project and requires an access code for entry. Exclusion Zone access from this Support Zone is personnel only (no vehicle entry).

The security contract is managed by the TVA Police. The guards are instructed to limit site access to appropriately badged personnel and visitors escorted by their host company.

Access Badges:

Badges are issued by TVA-Logistics in the Trailer #1 Annex, phone number 717-6506. Rear view mirror parking passes are issued by the TVA Project Coordinator administrative assistant in Trailer #1. Part of the badging process is fingerprinting for criminal background checks, which are routinely conducted by TVA. All full time personnel assigned to the site will be fingerprinted. All site workers must be issued a project badge. If individuals already possess a TVA hard badge, they do not need a project badge for support zone access but would need a project badge for access into the contamination reduction zones (CRZ) and exclusion zones (EZ). A proper color coded project badge is as follows:

- **White header bar:** Support zone personnel who are site workers. These personnel may only access the CRZ and EZ with authorized escorts and may not perform hands on work in the CRZ or EZ. TVA hard badges are acceptable for support zone access only.
- **Red header bar:** 24hr Hazwoper Trained: May access the site unescorted and may perform limited scopes of work within the EZ such as land surveying and ground water monitoring.
- **Blue header bar:** 40hr Hazwoper Trained: May access the site unescorted and may perform hands on work without restriction.
- **Green header bar:** 40 hr Hazwoper and 8 hr Supervisor Trained: May access the site unescorted and may perform hands on work as well as have the authority to supervise, direct, and control work in the EZ.

Training:

All site workers require minimum ammonia training and the Ash Recovery Project site specific safety orientation training. This training is currently provided daily from 7:30-9:00am. All individuals who have attended the TVA sponsored Hazwoper training provided between June and July 2009 received this site specific training. (Ammonia training is separate from the site specific training.) Based on site activities, task specific training may be required.

All individuals (workers, visitors, deliveries, etc.) shall understand the following:

- Site access and exit via entry control points only by properly Hazwoper trained workers or escorted visitors. Properly color coded Kingston Fly Ash site badges will be required for entry.
- All vehicles entering exclusion zones require proper internal and external cleaning at the entry control point upon every exit from the exclusion zone.
- The interior of vehicles must be kept clean for vehicles left in the exclusion zone. Vacuum stations are set up at each vehicle entry control point. (Individual work crews may also have vacuum facilities.)

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-All personnel exiting the site through a vehicle or personnel entry control point will require a boot wash as a minimum. Hands and face will be washed as needed. Clothing will be cleaned of ash as needed.

-Protective clothing over and above standard work clothes may be required dependent on the task being performed. The clothing may be full body or lower body disposable protective clothing.

-No smoking, dipping, eating, chewing gum or drinking will be allowed in the exclusion zones including vehicles and equipment. There will be a number of designated support zones established within the site where drinking water and restrooms will be available.

Visitors:

Host companies of any visitor onsite for meetings or site tours must notify the appropriate guard and a member of the administrative staff prior to their arrival. The guard shall direct the guest to Trailer #1. All visitors must first sign in with the administrative staff in Trailer #1 before proceeding to either the exclusion zone or to other site locations including the trailer complex. When a visitor arrives, the administrative personnel will call the appropriate site contact/host who will meet their visitor at Trailer #1. Should a visitor be expected after normal business hours, the site host must meet the visitor at the guard shack prior to their being allowed on site. Personnel who visit the ash recovery project site after a site visit to the generating plant must also comply with the site security plan. Site visitors shall be directed to first sign in on the visitor log located in the Ash Recovery Project Trailer #1. All companies and site workers who have initiated a visitor or are the visitor host must inform the visitor of the site expectations. The visitor must receive the video based Visitor Awareness training located at the visitor log table. A visitor may be left unescorted in the office complex area but requires an escort for any site access. Visitors may not perform any hands on work within the EZ. Any EZ or CRZ access by a site visitor requires an authorized escort to accompany them and based on site access needs, the correct PPE. Visitors shall obtain a visitor badge at the visitor log and maintain that badge until departure. Visitors must return the badge and log out of the site on the visitor log.

Equipment and Supply Deliveries:

All companies and site workers who initiate equipment or supply delivery must inform and enforce the site expectations for that delivery. The driver shall be informed, by the host company prior to arrival to the site, of the PPE requirements of hard hat, safety glasses, reflective vest, and safety boots if he/she is to leave the cab of the truck. When possible, deliveries should be planned for the support zone vs. the EZ or CRZ. When arriving at Security Gate/Post - B, the guard shall issue the driver a guidance card and visitor orientation form and notify the host of the arrival. The driver must be briefed by the host on the site rules which apply to them for the activities required to complete the delivery and sign the visitor orientation form. For entry into the EZ or CRZ the untrained (no site specific or Hazwoper training) delivery driver must be escorted with an authorized escort and must not perform any activities which would involve ash handling. The driver shall also be escorted back to the exit of the EZ and directed through the

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equipment and personal cleaning process for exiting an EZ. The driver shall return the guidance card to the guard when exiting the site.

Maintenance and other (hands-on work) vendors:

All companies and site workers who initiate maintenance or other hands-on work vendors must inform and enforce the site expectations for that work. These workers who are performing maintenance or other hands-on work on the site must attend the Site Specific Safety Orientation and ammonia training and any other specific training based on work to be performed. Work performed within an EZ or CRZ also requires either 24 or 40hr Hazwoper training based on the type and extent of work to be performed. These individuals would require badging and training under the same criteria as a site worker.

Water Based Operations:

Dredging operations are ongoing 6 days per week, 24 hours per day. The TVA police, Department of Natural Resources, and Coast Guard all patrol the waters around the project site. Mariners have been advised to avoid the work area. If recreational boaters enter the project area, they should be advised to leave immediately. If they refuse, contact the TVA police on marine radio channel 10. All vessels supporting the Ash Recovery project are required to maintain a marine radio set to Channel 10.

Storage facilities will be locked when not in use. Houses and garages used to support the project should also be locked. Guards are present 24 hours per day, seven days per week, so routine locking of trailers inside the project area is not required.

TVA police are available at all times and shall be notified immediately in the event of unauthorized entry to the site at 865 632-3631 or call the TVA police primary point of contact. General orders for the posts are attached.

Emergency Response: See emergency response procedure below. Copies of this plan will be distributed to local emergency responders. They will be offered a site tour to improve their familiarity with the site. Emergency calls should specify a specific gate number for response. The emergency squad will be escorted from the gate to the location of the emergency.

This plan was developed by the Jacobs CM Team. Adjustments may be required to this plan as work progresses and changing job conditions necessitate. Contact the Site Construction Manager with suggested changes or updates.

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Appendix A

EMERGENCY RESPONSE PROCEDURE

On Land

1. Call 911 – request response to one of the six gate locations listed below and shown on attached map.
2. Call TVA Police Command Center 800 824-3861 with information. Make arrangements with TVA Police to escort responders to incident scene or if more than 2 people are at the scene, have one person meet responders at the gate to provide escort.

Gate A – Swan Pond Road at the Ash Recovery administrative offices near railroad crossing.

Gate B – (VECP 2) Swan Pond Road south of intersection with Swan Pond Circle.

Gate C – Main TVA plant entrance: “South” gate.

Gate D – Entrance off Swan Pond Road near Baptist Missionary Church. (Yard Ops Rd.)

Gate E - Berkshire Road Security Gate.

Gate F – Lakeshore Drive Security Gate.

3. Call Site Paramedics at 865 755-2556.
4. Ensure area is safe.
5. If trained, provide care.

On Water

1. Call TVA Police on marine radio Channel 10. They will coordinate rescue.

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Appendix B
Site Personnel Contacts

Jacobs security liaison:
Brian Jacobs, 336-392-7941

TVA Project Coordinator Administrative Assistant:
Kathy Poe 717-6518

Administrative contacts:
Mary McDermott- 865 717-6512
Marsha Bacon-865 717-1653
Kathy Poe- 865 717-6518

TVA Police primary point of contact:
Lt. Greg Roberts (865) 388-6334

Site Construction Manager:
Daniel Quinn, 865 742-1610, or dvquinn@tva.com

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Appendix C
TVA Police General Orders

Revision 3
8-5-09

General Orders for Posts 8 (Swan Pond Road) and Post 9 (Drag Line Road)
Exclusion Entrances and Exits

1. Check exclusion zone badges. The badge will have either a blue, green, or red stripe across the very top of the badge. No one will be allowed to enter without the proper badge or without being escorted by someone with the proper badge. If there is any question, call the TVAP supervisor.
2. Anyone who does not have an exclusion badge, must be escorted into the exclusion site either in a vehicle with someone who has the proper badge, or be met by someone with a proper badge and escorted into the site.
3. Assist the decontamination team, if requested, to assure that all vehicles leaving the site have been through the decontamination process.
4. All drivers of vehicles from outside vendors will be instructed to stay in their vehicle (unless using the porta-potty), and given a card with the exclusion zone rules to read while they wait on their escort. They will also be instructed that there is no smoking, eating or drinking while in the exclusion zone except in designated areas.

Special Notes

1. The exclusion Posts are the highest priority Posts on the Kingston Site and will be manned by TVA Police.
2. Post 8 will be manned 24-7 each day. Post 9 will be manned from 0600-1800 each day or until the gate is locked.
3. Due to the high volume of traffic, TVA Police are to wear their green traffic vests while working these posts.
4. In the event there is lightning detected in the area, the decontamination people will move to a place of safety for 30 minutes. During this time, no vehicles are allowed to leave since they will not have been washed off. They will either have to wait until the decontamination crew returns, or park their vehicles near the ball field and walk to where they have parked their personal vehicle.