

P.O. Box C4010, La Crosse, WI 54602-4010 Phone 303-741-7009 Fax: 303-741-7806 John L. Donnell, P.E., Project Director

June 15, 1998

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Director

Office of Nuclear Material Safety and Safeguards U.S. Nuclear Regulatory Commission Washington, D.C. 20555

# SUPPLEMENTAL RESPONSE TO RAIS PRIVATE FUEL STORAGE FACILITY DOCKET NO. 72-22 / TAC NO. L22462 <u>PRIVATE FUEL STORAGE L.L.C.</u>

References: 1) NRC Letter, Delligatti to Parkyn, Request for Additional Information, dated April 1, 1998

- 2) PFSLLC Letter, Parkyn to Director, Office of Material Safety and Safeguards, Response to Request for Additional Information, dated April 29, 1998
- 3) PFSLLC Letter, Parkyn to Director, Office of Material Safety and Safeguards, Responses to Request for Additional Information, dated May 19, 1998

Please find enclosed Private Fuel Storage responses (original plus 15 copies) to the NRC Request for Additional Information (Ref. 1) for three of the four responses scheduled for June 15, 1998 in accordance with Reference 2. The fourth response scheduled for June 15, 1998, LA 1-6, is expected to be transmitted later this week. These responses supplement the information provided in Reference 3.

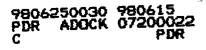
If you have any questions regarding this response, please contact me at 303-741-7009.

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John Donnell Project Director Private Fuel Storage L.L.C.

Enclosure

c: Mr. Leon Bear Ms. Denise Chancellor Mr. Mark Delligatti Mr. Jay Silberg



# SAR CHAPTER 2 - SITE CHARACTERISTICS

# Section 2.5.1 Regional Characteristics

- 2-3 Provide the following information relative to the withdrawal and use of water on or near the proposed Private Fuel Storage Facility (PFSF):
  - (a) A map that shows where water withdrawal is occurring on or in the vicinity of the PFSF site with particular reference to the proposed storage pad. At the least, include all wells located within a minimum 8-km (5 mi) radius of the PFSF.
  - (b) For each identified well-
    - Depth to water
    - Formation from which water is withdrawn
    - Quantity of water withdrawn annually and pumping rates
    - Discussion of use of the water from each well with particular reference to any consumption by humans or animals
  - (c) If no water wells are located within the specified 8-km radius of the proposed PFSF site, include a specific statement such as "No groundwater is extracted within the 8-km (5 mi) radius of the proposed PFSF."
  - (d) Potentiometric contours of groundwater at and around the proposed PFSF site (if relevant).
  - (e) Classification of the aquifer beneath the PFSF site based on class of use and water quality (if relevant).
    - NUREG-1567 (Section 2.4.5), Subsurface Hydrology, indicates this information should be provided.

# RESPONSE

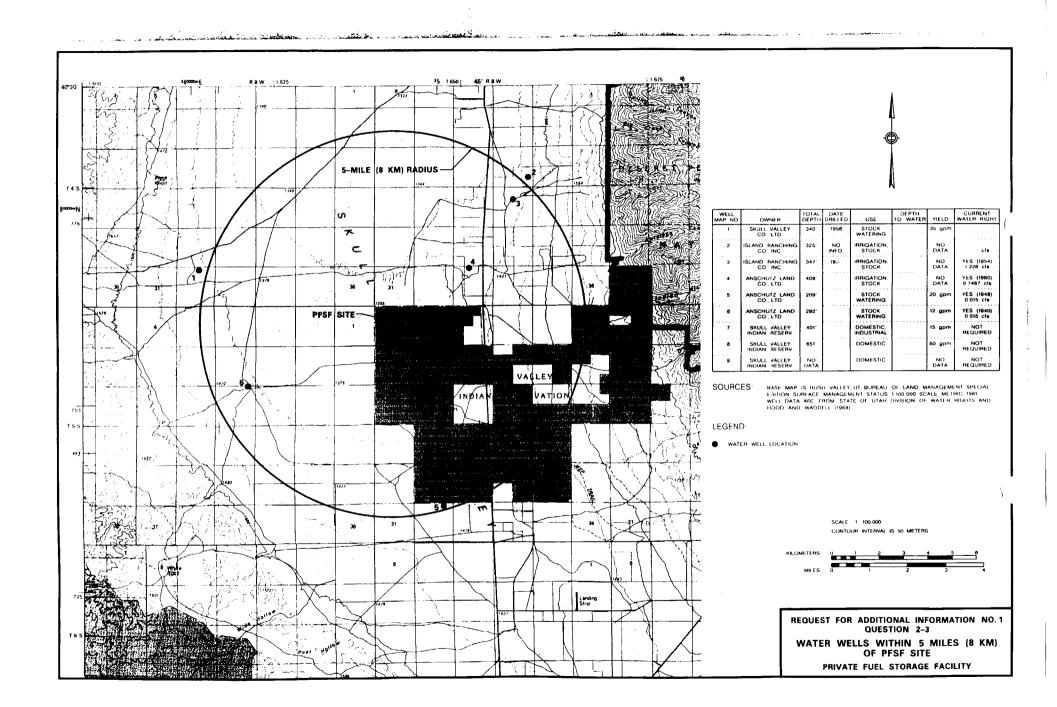
- (a) The enclosed figure indicates the locations of all known water wells within 5 miles (8 km) of the PFSF. Other off-Reservation wells may have been drilled within five miles of the PFSF but they do not have a current water right on-file with the State's Division of Water Rights. Some of the wells in the table appear to be abandoned or have not been utilized in many years, such as the wells to the west and south of the Reservation, but the water right has been maintained.
- (b) The enclosed figure includes a table listing the requested information, where available. No crops for human consumption are grown with water from irrigation wells listed in the table.

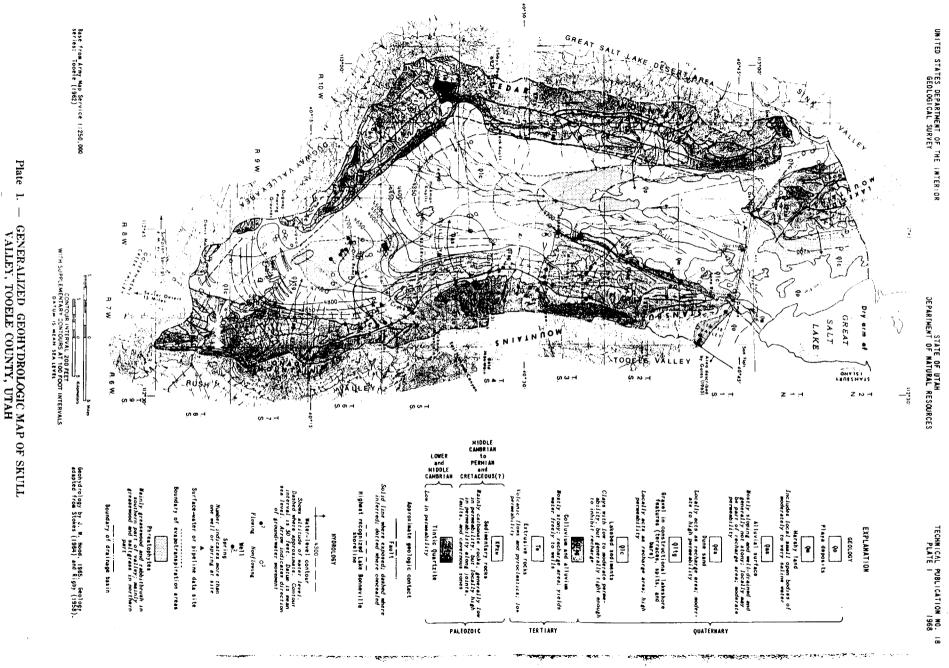
(c) See response to (a), above.

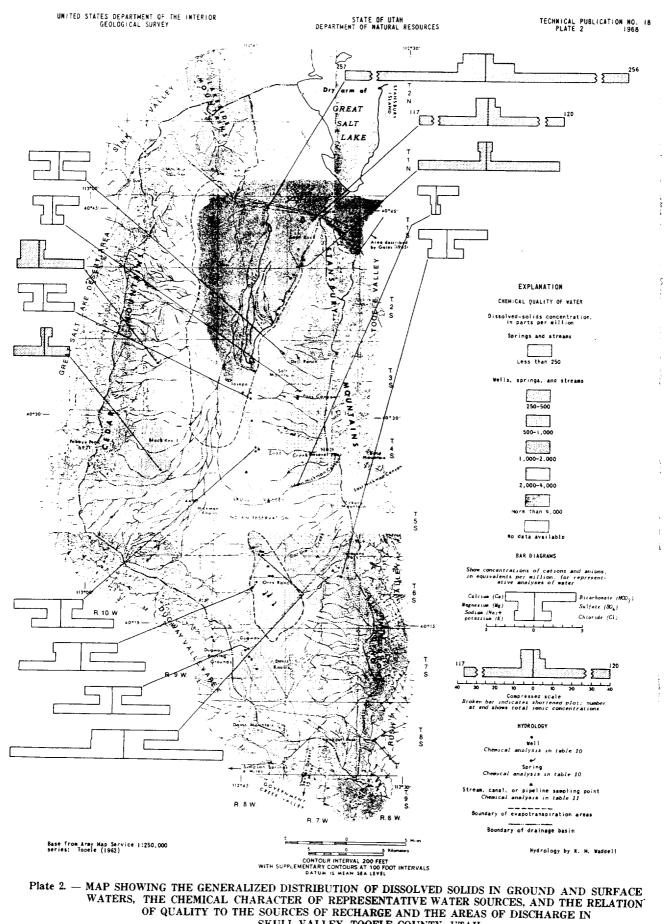
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- (d) The potentiometric map (Plate 1) from Hood and Waddell is included as part of this response.
- (e) The State has not applied an aquifer classification system to the aquifer in Skull Valley. A water quality map (Plate 2) from Hood and Waddell is included as part of this response.

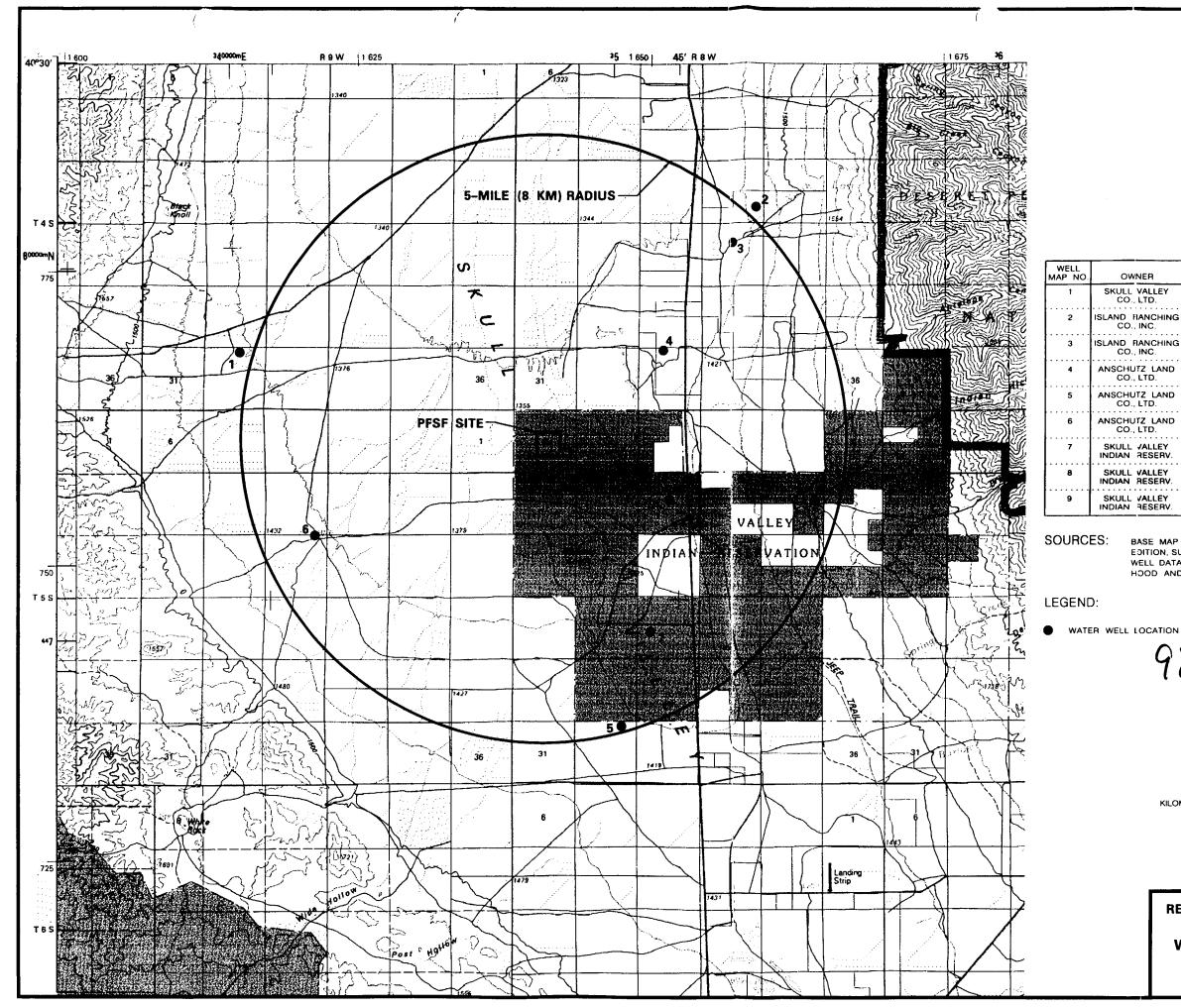
Hood, J.W., and Waddell, K.M., Hydrologic Reconnaissance of Skull Valley, Tooele County, Utah, DNR Tech Pub. No. 18, 1968







SKULL VALLEY, TOOELE COUNTY, UTAH





OWNER	TOTAL DEPTH	DATE DRILLED	USE	DEPTH TO WATER	YIELD	CURRENT WATER RIGHT
CO., LTD.	340'	1956	STOCK WATERING		35 gpm	
AND RANCHING CO., INC.	325	NO INFO	IRRIGATION STOCK		NO DATA	cis
AND RANCHING CO., INC.	347	190	IRRIGATION, STOCK		NO DATA	YES (1954) 1.226 cfs
SCHUTZ LAND	408'		IRRIGATION, STOCK		NO DATA	YES (1960) 0.7487 cfs
SCHUTZ LAND	209		STOCK WATERING		20 gpm	YES (1948) 0.015 c/s
SCHUTZ LAND	292'		STOCK WATERING		12 gpm	YES (1940) 0.015 cfs
SKULL VALLEY IDIAN RESERV.	401'		DOMESTIC, INDUSTRIAL		15 gpm	NOT REQUIRED
KULL VALLEY DIAN RESERV.	651'		DOMESTIC		60 gpm	NOT REQUIRED
KULL VALLEY	NO DATA		DOMESTIC		NO DATA	NOT REQUIRED

BASE MAP IS RUSH VALLEY, UT, BUREAU OF LAND MANAGEMENT SPECIAL EDITION, SURFACE MANAGEMENT STATUS, 1:100,000 SCALE METRIC, 1981. WELL DATA ARE FROM STATE OF UTAH, DIVISION OF WATER RIGHTS AND HOOD AND WADDELL (1968).

9806250030-01

SCALE 1 : 100,000 CONTOUR INTERVAL IS 50 METERS



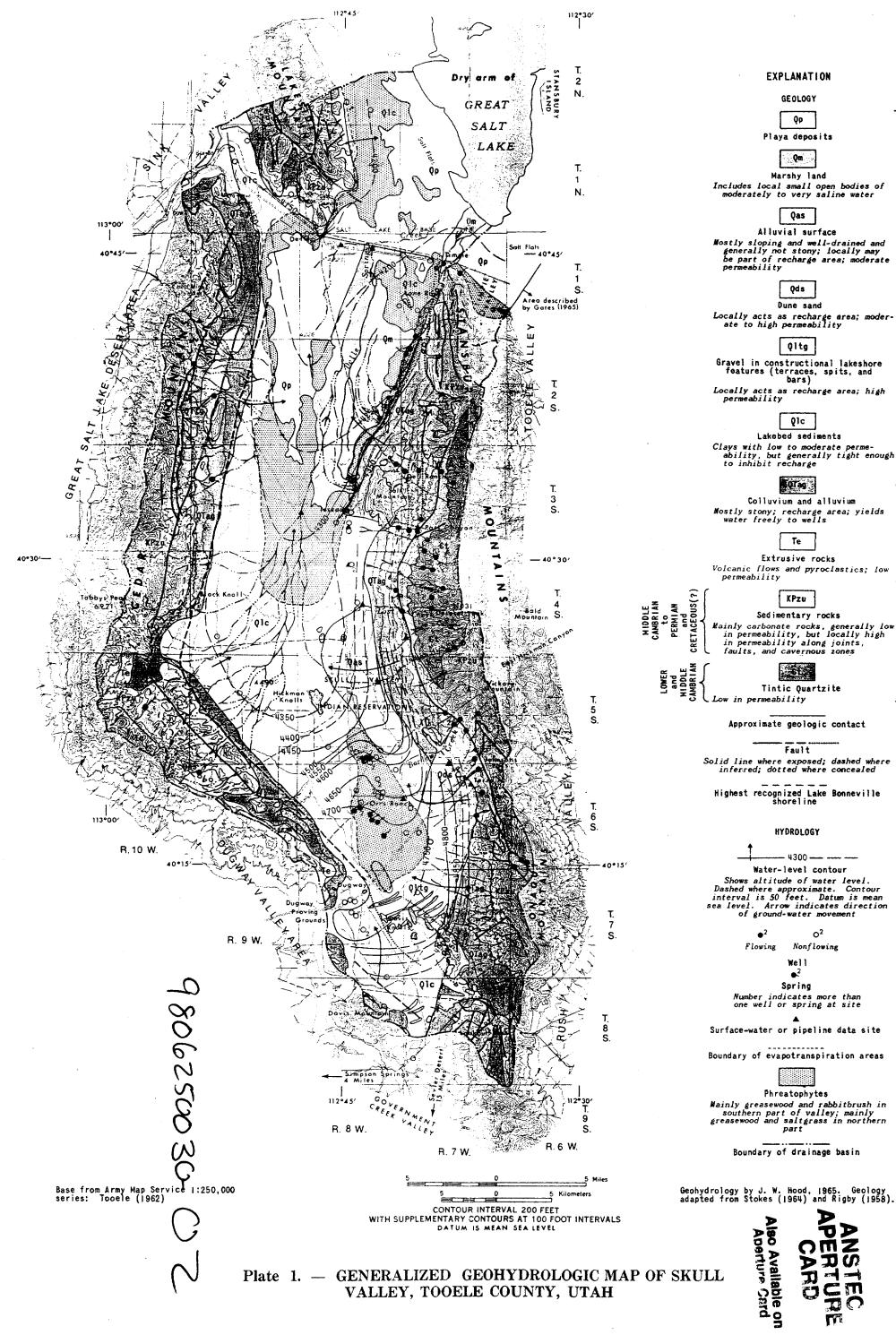
**REQUEST FOR ADDITIONAL INFORMATION NO.1** QUESTION 2-3

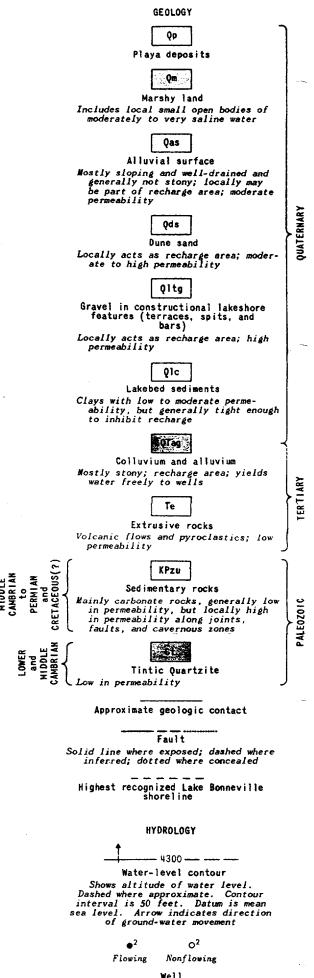
WATER WELLS WITHIN 5 MILES (8 KM) OF PFSF SITE

PRIVATE FUEL STORAGE FACILITY

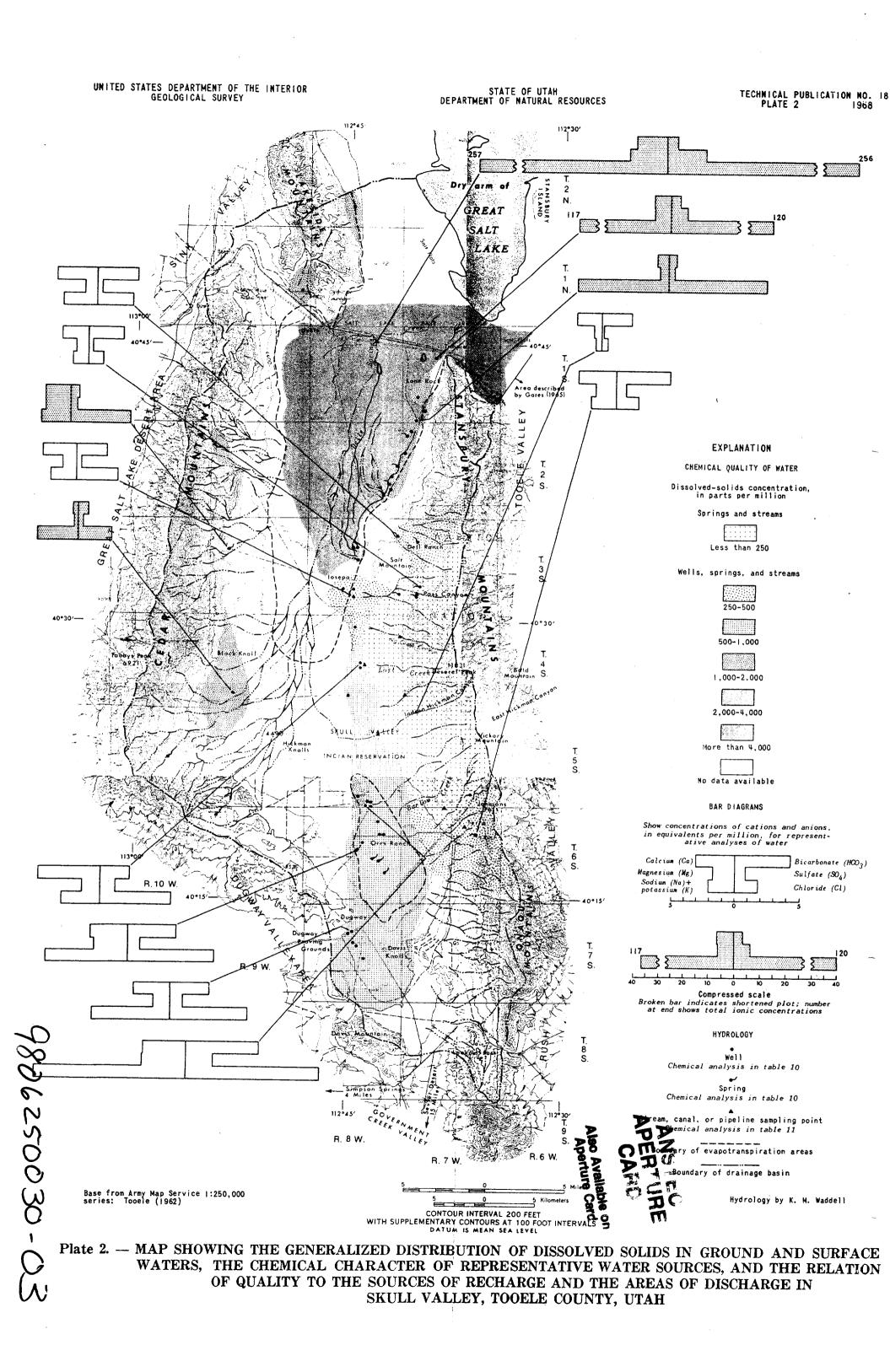


STATE OF UTAH DEPARTMENT OF NATURAL RESOURCES





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# SAR CHAPTER 2 - SITE CHARACTERISTICS

# Section 2.6.1 Basic Geologic and Seismic Information

- 2-4 Provide a column with geologic descriptions summarizing the eastern Great Basin stratigraphy.
  - NUREG-1567 (Section 2.4.6.1), Basic Geology and Seismic Information, indicates this information should be included.

# RESPONSE

A stratigraphic column for the Skull Valley area is shown in the attached figure.

CEDAR MOUNTAINS

Same Barriston Barris

#### Aliuviai & Lake 0.200 Sonneville sediments Valley till in 0-50002 a Skull Vellev a Rhyolite plug L. Basalt Basalto 50-100 0-1000 andesne 300+ Unnamed sandstone North Horn Formation 800+ Major Unconf 7 Gerster Limestone 320 Plympion Formation Meade Pk Mbr. Phosphoria Fm 2400 230 Σ Grandeur Formation 1850 3950 Unnamed unit a. 1950-2750 Unit 5 z Unit 4 2760-300 Virgilia Mo 2560-3000-Unit 3 Desmoine ш а Mor-Alo 715-1400 Unit 2 Unit I 435 Foulled Contact Manning Cenvon Shele 1500 2000 Great Blue Limestone 2440+ Humbug Formation 1015+ v 3

### STANSBURY MOUNTAINS Feet 0-300

0-1300

0-130

0-1800

0-400

1100

100

600

500+

3000 1

8700+

6000+

0-840

980-1300

710-900

650-750

700-1100

130-650

0-215

0-1700

0-260

1100-1300 750-910

20-150

450-500

320-450

100-600

800-1100

600-1200

300

4200

0-230 0-80

200 1600

Alluvial, giacial & Lake

Bonneville sediments

Salt Lake Formation

Basalt flows & dikes

Andesde flowe

breccia tuff

post-thrusting

congiomerate

Theynes Umestone

Woodente

Shale

Park Crtv /

Phosphoria Formation

Diamond Creek Ss undivided

man Limestone &

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Bingham Mine Formation

squivalent

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Butterfield Peaks

Formation

equivalent West Canyon Ls

Manning Canyon Shale

Great Blue Limestone

Humbug Formation

Deseret Formation

Gardison Limestone

Filchville Formation

Pinyon Peak Limestone

Stansbury Formation Simonson ? Dolomite

Sevy Dolomite Laketown Dolomda

Fish Heven Dolomite

Kanosh Shale

Garden City Limestone

Alax Dolomite Corset Spring Shale

Opex Formation Cole Canyon & Bluebird Dolo

Bowman-Herkimer-Dagmar Fras

Teutonic Limestone

Ophir Formation Ploche Formation

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CENOZOIC Quaternary

Alluvial, glacial, and Lake Bonneville sediments - unconsolidated sand, gravel, silt, and clay with some ash beds and mari. Miocene-Pliocene

Salt Lake Formation (or Group) - valley fill deposits - semi to unconsolidated sand, gravel, silt, clay, tuff and freshwater limestone. Basalt flows and dikes - olivine basalts believed to mark beginning of Basin

and Range rifting Eocene-Oligocene

Andesite flows, breccia tuffs - widespread, voluminous rhvolite dacite

latite, andesite, and welded tuff.

Unnamed post-thrusting conglomerate (= North Horn? Formation?) - reddish pebble conglomerate with argillaceous and calcareous matrix.

MESOZOIC

Triassic

Thaynes Limestone - light gray limestone with red-brown to light gray shaley

siltstone and sandstone, minor dolomite. Woodside Shale - reddish-brown, shaley siltstone and cross-bedded, fine to medium-grained sandstone.

PALEOZOIC

Permian

Park CityPhosphoria Formation - light gray to pink, thin to thick bedded limestone with brown-black cherty limestone, phosphorite and phosphatic siltetone

Kirkman Limestone and Diamond Creek Sandstone - Kirkman is light to medium-gray, thin to thick-bedded limestone with chert; Diamond Creek Sandstone is red-brown to light brown, cross-bedded sandstone with some intercalated limestone.

Penn. to Perm

Oquirth Group - cyclic alternation of sandy limestone, brown sandstone and minor shale, siltstone, and quartzite, fossiliferous.

Miss. to Penn.

Manning Canyon Shale - (lower) black shale, (middle) dark gray limestone, and (upper) black shale and quartzite, with some pyrite nodules and chert Mississippian

Great Blue Limestone - medium to massive bedded, nearly pure, gray to dark gray limestone with some chert, dark green calcareous shale near top Humbug Formation - alternating beds of limey sandstone, ortho-quartzite. crinoidal limestone, and sandy limestone, yellow to red-brown and gray alternations

Deseret Formation - dark gray and blue, somewhat clastic limestone with chert banding and blebs (eyes).

Gardison Limestone - dense, bluish-gray limestone, fossiliferous,

Proche Formation - interbedded green phyllitic shale, shale maroon graywacke and quarticle with prominent cross bedding Tintic Quartzile - light colored. (white, light gray, reddish, brown), medium. grained, medium bedded quarizite, with a few beds of micaceous shale in the upper part and pebble conglomerate

Filchville Formation - massive to thin-bedded, light to dark gray dolomite and

Stansbury Formation - highly variable conglomerate, sandstone, and quartizite

Simonson (?) Dolomite - dark gray with minor light gray, medium, to coarse

Sevy Doloinite - very fine crystalline, light gray dolomite with well-defined

Lakelown Dolomite - alternating light to dark gray well-bedded dolomite in

lower part and coarse crystalline, massive to obscurely thick-bedded gray

bedding. Sand layer or dolomilic conglomerate marks the top of the formation

Fish Haver Dolomite - dark gray to black dolomite with some interbeds of light

Kanosh Shale - green to black graptolitic shale with interbeds of argillaceous

argillaceous limestone, interbedded gray argillaceous limestone and green to

Garden City Limestone - cherty limestone and dolomite, medium gray.

brown shale or siltstone, sandy limestone with chert and siltstone bands

Ajax Limestone - Ihick-bedded, dark gray, ledge-forming dolomite with

Corset Spring Shale (= Dunderberg Shale?) ~ thinly bedded, argillaceous

imestone and folomite interbedded with olive to brown-green silty shale.

to fine crystalline dolomite (Bluebird), laminated light and dark gray dolomite

Bowman Herkimer Dagmar Formations - medium gray, crystalline, laminated

dolomite (Dagmar), thin to medium-bedded gray limestone, interbedded light and

dark gray dolomite (Herkimer), olive and tan shale with interbedded blue-gray

Teutonic Limestone - blue-gray to dark gray dolomite, thinly interbedded shale

and limestone, massive gray dolomite, and argillaceous limestone

Ophir Formation - calcareous sandstone and sandy linestone, pisolitic

Cole Canyon and Bluebird Dolomites - thick to massive bedded dark gray, medium

Opex Formation - gray to black politic dolomite, interbedded timestone,

dolomite, and shale, light gray to tan dolomite at top.

limestone green shale dark gray limestone

Pinyon Peak Limestone - thin, platy, silty, or argillaceous limestone

with thin beds of gray limestone and dolomite

PALEOZOIC (CONT.)

Devonian Miss

Devonian

Silutian

dolomite in upper part.

to medium gray dolomite

sandstone and limestone or dolomite

pisolites, oolil ..., and chert nodules.

Ordovician

Cambrian

(Cole Canyon)

Imestone (Bowman)

gray to buil clastic limestone

crystalline, weakly bedded dolomite

### SOURCES

Heylmun, E.B., 1965. Reconnaissance of the Tertiary Sedimentary Rocks in Western Utah. Utah Geological and Mineralogical Survey, Bulletin 75, 38 pp.

Hintze, L.F., 1988. Geologic History of Utah, Brigham. Young University Geology. Studies, Spec Pub. 7, 203 pp

Rigby, J.K., 1958. Geology of the Stansbury Mountains, Tooele County, Ulah Utah Geological Society Guidebook 13, 134 pp.

Teichert, J.A., 1959. Geology of the Southern Stansbury Range, Tooele County, Utah Utah Geological and Mineralogical Survey, Bulletin 65, 75 pp

Witkind, LJ , 1983. Overthrusts and Salt Diapirs, Central Utah, in D.M. Miller et al., editors, Tectonic and Stratigraphic Studies in the Eastern Great Basin Geological Society of America, Memoir 157, pp. 45-59

**REQUEST FOR ADDITIONAL INFORMATION NO. 1** QUESTION 2-4 STRATIGRAPHIC COLUMN FOR

SKULL VALLEY AREA PRIVATE FUEL STORAGE FACILITY

## **CEDAR MOUNTAINS**

				Feet	_	
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ω	-		Basalt	50-100	1	
⊬_	lit		lasaltic	0-1000		
	ω	a	ndesite			
~			named	300+		
$\mathbf{r}$	<u> </u>		ndstone th Horn ?			
		Fc	800+	Major		
z		Gerste	r Limestone	320	Unconf.	
∢			on Formation	2400	1	
-		Meade Pk M	br, Phosphoria Fm	230		
Σ			ur Formation	1850		
æ	ļ	Unn	amed unit	3950		
ш с		Wolfcampian	Unit 5	1950-2750		
N A N A	Oquirrh Group	Virgilian	Unit 4	2760-3000		
>		-				
		Mo	Unit 3	2560-3000+		
N Z		Desmoines	Unit 3			
Z ш		Mor-Atok	Unit 2	715-1400		
		MUPAUK	Unit 1	435	-	
		Manning	Canyon Shale	1500-2000	<u> </u> (	
N N -		Great Bl	2440+			
а 		Humbu	1015+			

				Feet	
	σ		Alluvial, glacial & Lake	0-300	
		ļ	Bonneville sediments		
	2	1	Salt Lake Formation	0 1 200	
			Sail Lake Formation	0-1300	
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	0		Basalt flows & dikes	0-130	
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			0-1800		
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	ш		post-thrusting	0-400	
	L	ļ	conglomerate		
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	₹		Thaynes Limestone	1100	
	ď	<u> </u>	Woodside		
			Shale	100	
	z		Park City /	600	
	<b></b>	L	Phosphoria Formation		
	-	[	Kirkman Limestone &		
	Σ	0	iamond Creek Ss undivided	500+	
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	٩	{	Wolfcampian	3000±	
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	7		& Atukan		
	S		Oquirrh -	6000±	
	z		Butterfield Peaks		
	Г Ш		Formation equivalent		
aulted	<u>م</u>		West Canyon Ls	0-840	
Contact					
			Manning Canyon Shale	200-1600	
	z				
	∢		Great Blue Limestone	980-1300	
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	٩		Humbug Formation	710-900	
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	S S		Deseret Formation	650-750	
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	S	<b></b>			
	S		Gardison Limestone	700-1100	
	-				
	Σ				
	L		Fitchville Formation	130-650	
	>	<u> </u>	Pinyon Peak Limestone	0-215	
	ш		Stansbury Formation	0-1700	
			Simonson ? Dolomite Sevy Dolomite	0-230	
1	S	· · ·	Laketown Dolomite	0-660	
	Ο		Fish Haven Dolomite	0-260	
	ά		Kanosh Shale	0-270	
	0		Garden City Limestone	1100-1300	
			Ajax Dolomite	750-910	
i	z		Corset Spring Shale	20-150	
	∢	<u> </u>	Opex Formation	450-500	
	- 		ole Canyon & Bluebird Dolo	320-450	
	ď	80	wman-Herkimer-Dagmar Fms Teutonic Limestone	100-600 800-1100	
		1	800-1200		
	<u>е</u>				
	Σ		Ophir Formation Pioche Formation		
			Pioche Formation Tintic Quartzite	300	

STANSBURY MOUNTAINS

CENOZOIC	PALE
Quaternary Alluvial, glacial, and Lake Bonneville sediments – unconsolidated sand, gravel,	D Fitch
silt, and clay with some ash beds and marl.	gray
Miocene-Pliocene	D
Salt Lake Formation (or Group) - valley fill deposits - semi to unconsolidated	Pinyo
sand, gravel, sil-, clay, tuff and freshwater limestone. Basalt flows and dikes – olivine basalts believed to mark beginning of Basin	Stans with
and Range rifting.	Simo
Eocene-Oligocene	cryst
Andesite flows, breccia tuffs - widespread, voluminous rhyolite, dacite,	Sevy
latite, andesite, and welded tuff.	bedd
Unnamed post-thrusting conglomerate (= North Horn? Formation?) – reddish pebble conglomerate with argillaceous and calcareous matrix.	Si Lakel
congromerate with argumaceous and carcareous matrix.	lower
MESOZOIC	dolor
Triassic	0
Thaynes Limestone - light gray limestone with red-brown to light gray shaley	Fish
siltstone and sandstone, minor dolomite. <u>Woodside Shal</u> ∈ – reddish–brown, shaley siltstone and cross-bedded, fine to	to m
medium-grainec sandstone.	Kano sand
	Gard
PALEOZOIC	argill
Permian	brow
Park CityPhosphoria Formation - light gray to pink, thin to thick-bedded limestone with brown-black cherty limestone, phosphorite and phosphatic	C
siltstone.	<u>Ajax</u> pisoli
Kirkman Limestone and Diamond Creek Sandstone - Kirkman is light to	Corse
medium-gray, thin to thick-bedded limestone with chert; Diamond Creek	limes
Sandstone is red-brown to light brown, cross-bedded sandstone with some	Opex
intercalated limestone. Penn. to Perm.	dolor Cołe
Oquirrh Group - cyclic alternation of sandy limestone, brown sandstone and	to fir
minor shale, siltstone, and quartzite; fossiliferous.	(Cole
Miss. to Penn.	Bown
Manning Canyon Shale - (lower) black shale, (middle) dark gray limestone, and	dolor
(upper) black shale and quartzite, with some pyrite nodules and chert. Mississippiar	dark limes
Great Blue Limestone – medium to massive bedded, nearly pure, gray to dark gray	Teuto
limestone with come chert; dark green calcareous shale near top.	and
Humbug Formation - alternating beds of limey sandstone, ortho-quartzite,	Ophir
crinoidal limestone, and sandy limestone; yellow to red-brown and gray	limes
alternations. Deseret Formaticn – dark gray and blue, somewhat clastic limestone with chert	Pioch
banding and blebs (eyes).	Tintic
Gardison Limestone – dense, bluish-gray limestone, fossiliferous.	grain
	uppe
201 IDCE 0	
SOURCES	

Heylmun, E.B., 1965. Reconnaissance of the Tertiary Sedimentary Rocks in Western Utah: Utah Geological and Mineralogical Survey, Bulletin 75, 38 pp.

Hintze, L.F., 1988. Geologic History of Utah, Brigham Young University Geology Studies, Spec. Pub. 7, 203 pp.

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ANSIEC APERTURE EOZOIC (CONT.) CARD Devonian-Miss. hville Formation - massive to thin-bedded, light to dark gray dolor y to buff clastic limestone <u>Tyon Peak Limestone</u> – thin, platy, silty, or argillaceous limestone. Aperture Card thin beds of gray limestone and dolomite. ionson (?) Dolomite - dark gray with minor light gray, medium to coarse stalline, weakly bedded dolomite. y Doloinite - very fine crystalline, light gray dolomite with well-defined Iding. Sand layer or dolomitic conglomerate marks the top of the formation. Silurian etown Jolomite - alternating light to dark gray well-bedded dolomite in er part and coarse crystalline, massive to obscurely thick-bedded gray omite in upper part. Ordovician Haven Dolomite - dark gray to black dolomite with some interbeds of light medium gray dolomite. osh Shale - green to black, graptolitic shale with interbeds of argillaceous dstone and limestone or dolomite. den City Limestone - cherty limestone and dolomite; medium gray, illaceous limestone; interbedded gray argillaceous limestone and green to wn shale or siltstone; sandy limestone with chert and siltstone bands. Cambrian Limestone - thick-bedded, dark gray, ledge-forming dolomite with plites, polites, and chert nodules. set Spring Shale (= Dunderberg Shale?) - thinly bedded, argillaceous estone and dolomite interbedded with olive to brown-green silty shale. ex Formation - gray to black oblitic dolomite, interbedded limestone, omite, and shale, light gray to tan dolomite at top. e Canyon and Bluebird Dolomites - thick to massive bedded, dark gray, medium ine crystalline dolomite (Bluebird); laminated light and dark gray dolomite le Canyon). vman-Herkimer-Dagmar Formations - medium gray, crystalline, taminated omite (Dagmar); thin to medium-bedded gray limestone, interbedded light and gray dolomite (Herkimer); olive and tan shale with interbedded blue-gray stone (Bowman). tonic Limestone - blue-gray to dark gray dolomite, thinly interbedded shale limestone, massive gray dolomite, and argillaceous limestone.

<u>nir Formation</u> – calcareous sandstone and sandy limestone, pisolitic astone, green shale, dark gray limestone.

che Formation – interbedded green phyllitic shale, shale, maroon graywacke quartzite with prominent cross-bedding.

ic Quartzite – light colored (white, light gray, reddish brown), medium ned, medium-bedded quartzite, with a few beds of micaceous shale in the er part and pebble conglomerate.



REQUEST FOR ADDITIONAL INFORMATION NO. 1 QUESTION 2-4

> STRATIGRAPHIC COLUMN FOR SKULL VALLEY AREA

PRIVATE FUEL STORAGE FACILITY

# CHAPTER 9—CONDUCT OF OPERATIONS

## **Emergency Plan Section 4 Organization**

9-14 Provide a discussion in the EP explaining how radiation monitoring teams and the fire brigade will be staffed by available staff during an alert.

The EP provides insufficient information regarding the staffing of radiation teams and the fire brigade. Staffing requirements for the Emergency Response Organization below the supervisory positions for both normal working hours and off-hours should be provided to support an NRC evaluation of whether or not sufficient staffing is available for functions such as radiological assessment, fire fighting, and security control, among others.

# RESPONSE

The response teams for off-normal events requiring radiation monitoring or firefighting will be staffed through a system of call-in personnel. During normal working hours, the response for a radiological assessment need will be met by maintaining a member of the health physics staff at the site at all times during the weekday day-shift. For off-hours events (weekday nights and evenings and weekends) one member of the health physics staff shall carry a response beeper. Training in emergency procedure techniques will be provided to the security force to ensure the capability for immediate emergency assessment. Members of the security force will always be at the site in accordance with the Security Plan.

Personnel trained in firefighting will provide the response to fires within the facility or approaching the facility. The facility will have two fire trucks available; one on the facility premises and one on the reservation which is within four miles of the facility. All members of the maintenance staff, health physics staff, and security staff will receive firefighting training. For the purposes of firefighting, at least two members of the staff trained in firefighting will be on-call with paging devices. For security control events the on-duty base security staff can be supplemented by an additional security person who will be provided a paging device. This security person will be available for either firefighting or security related response needs. Further supplementation of staff for security control issues, firefighting, or events requiring radiological assessment will be provided through a phone tree with automatic dial capability to ensure the ability to maximize the personnel response available to an off-normal event. It should be noted that the potential for fire (per Emergency Plan Section 3.2, D) is greatest during fuel deliveries (i.e., diesel fuel in trucks or train engines) and, during these deliveries, extra personnel are available for firefighting.