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February 21, 1980 IPN-80-19

Director of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Mr. Albert Schwencer, Chief Operating Reactors Branch No. 1 Division of Operating Reactors

Subject: Indian Point 3 Nuclear Power Plant Docket No. 50-286 Emergency Plan Revision

Reference: IPN-79-80, J. R. Schmieder (PASNY) to A. Schwencer (NRC), "Emergency Plan", dated November 9, 1979

Dear Sir:

In response to comments made by the Commission at the December 18, 1979 emergency planning meeting, the Authority herewith forwards forty (40) copies of the revised pages of the Indian Point Unit 3 Emergency Plan. Each of the Commission comments, numbered 1 through 25, are provided in Attachment A and the revised pages of the Plan are provided in Attachment B.

Verv truly yours, George T. Berry

George T. Berry President and Chief Operating Officer

cc: Mr. T. Rebelowski
Resident Inspector
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ATTACHMENT A

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> NRC Comments on Indian Point No. 3 Nuclear Power Plant Emergency Plan

Power Authority of the State of New York Indian Point No. 3 Nuclear Power Plant Docket No. 50-286

February 18, 1980

NRC Comments on the Indian Point No. 3 Nuclear Power Plant Emergency Plan

Attachment A consists of NRC Technical Review Comments concerning the Indian Point No. 3 Nuclear Power Plant Emergency Plan followed by the Power Authority's response to each comment.

The revised pages referred to below are provided in Attachment B.

1. In Section 1, delete the definition of the "Low Population Zone" since the LPZ concept for emergency planning purpose has been superseded by Emergency Planning Zones as discussed in NUREG-0396.

Page 1-2 has been revised in response to this item.

2. In Section 1, amend the Emergency Planning Zone (EPZ) definition to include the specific geographical area encompassed by the plume exposure EPZ and the ingestion EPZ.

Page 1-2 has been revised in response to this item.

3. In Section 1, the relationship of the "Plant Emergency Procedures" to the "Emergency Plan Procedures Document" is not clear. Describe the relationship and interface, if any, between these documents.

Page 1-3 has been revised in response to this item.

4. In Section 2, it is indicated that the Westchester County Office of Disaster and Emergency Services is the principal agency charged with the responsibility of coordinating any required off-site response. However, the Westchester County Response Plan appears to limit the scope to response within the county. Revise this section to clearly indicate how the potential response activities within the plume exposure Emergency Planning Zone would be coordinated.

Page 2-1 has been revised and page 2-2 has been aded in response to this item.

5. Revise Sections 3.2 and 4.0 utilizing the emergency classification system set forth in NUREG-0610. Include in the description of each class, the information contained in NUREG-0610 under the headings "Class Description," "Purpose", and "Release Potential." Also include the specific actions for each class as listed under the headings "Licensee actions" and "State and/or Local Offsite Authority Actions."

Page 3-1 and Section 4 have been revised in response to this item.

Expand section 4 utilizing the initiating conditions identified in NUREG-0610 for the four emergency classes, to establish specific criteria, including Emergency Action Levels, for each classified of emergency. The Emergency Action Levels should be explicit in terms of parameter values, setpoint levels, duration of reading, etc. Also the particular instrumentation channels and the associated parameter values should be specified, in place of the general criteria currently identified in section 4, such as "loss of coolant accident, high containment pressure and loss of spent fuel pool cooling".

Section 4 has been revised in response to this item.

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7. In section 4, your discussion of projected doses omits classifying conditions representing 1 to 5 Rem whole body and 5 to 25 Rem thyroid. Revise your plan to include conditions which could result in such projected doses under the site emergency class.

Section 4 has been revised in response to this item.

8. In section 4.1.5, replace "low population zone" with "Emergency Planning Zones" in the discussion for which the New York State Department of Health would be notified and provided with information to aid in planning and initiating protective actions.

Section 4 has been revised in response to this item.

9. There are implications in the discussion of a general emergency in section 4.1.5 and for a site emergency in Table 6-2, that the declaration of these classes require confirmation by field radiation readings. It is our position that the declaration of these emergency classes will be based on predetermined Emergency Action Levels readily available from instrumentation in the control room. Further, it is our position that the capability shall exist for declaring a site or general emergency and notification of same to the offsite authorities responsible for implementing protective measures, within 15 minutes following the onset of such a severe accident. Ensure that the times specified in Table 4-2 and in setion 6.4.1 clearly reflect this position.

Section 4.1.4 and Table 4-2 have been revised in response to this item.

10. Discuss the relationship of the containment accident monitor R-10 readings of 360 mr/hr (site emergency) and 2100 mr/hr (general emergency) with respect to projected offsite doses. Specifically, show how this satifies criteria II.A.2 in Review Guideline Number One, including the methodology for relating the above Emergency Action Levels of the EPA Protective Action Guides.

Page 10.3-1 has been revised in response to this item.

11. In section 5.4.1, it appears that the offsite notification for a general emergency does not satisfy criteria II.A.5 insofar as it does not provide for immediate notification <u>directly</u> to the offsite authorities responsible for implementing protective measures within the plume exposure Emergency Planning Zone. Furthermore, inconsistencies exist in the notification procedures and the information to be transmitted in Section VII.C of the New York State Emergency Plan for Radiation Accidents, Section III.A of the New York State Specific Operating Procedures for the Indian Point Station, and Section VII of the Westchester County Response Plan for Indian Point Facility. Revise these plans to meet the aforementioned criteria and eliminate the identified inconsistencies. Also describe the procedures to be used for prompt notification of the counties of Orange, Putnam and Rockland.

Section 5.4.2 has been revised in response to this item.

12. The potential delay in the notification process described in Sections 5.4.1 and 6.4.1 is not acceptable. Revise your plan the notification process accordingly to tisfy criteria II.B.5 in Review suideline Number One.

Section 5.4.2 has been revised in response to this item.

13. In Section 5.4.6, provide a schedule for the completion of the emergency response plans for the counties of Orange, Putnam and Rockland.

Page 5-13 has been revised in response to this item.

14. Revise Section 6 utilizing the emergency categories identified in NUREG-0610. Identify the personnel resources that will be available to augment the minimum onsite emergency organization within 60 minutes for all classes of emergencies above the "notification of unusual event" level.

Section 6 has been revised in response to this item.

15. Revise Section 6.1 to provide activation of the Technical Support Center, Operations Support Center, and the Emergency Operations Center for classes of emergencies above the "notification of unusual event" level.

Section 6.1 has been revised in response to this item.

16. Revise Section 6.1 and Table 6-1 to include provisions for activating emergency response personnel in the counties of Orange, Putnam and Rockland.

Section 6.1 has been revised in response to this item.

17. In Section 6.2.4, identify the provisions for obtaining current meteorological data in the Unit 3 control room. Include the schedule for the installation of the planned readout identified in Section 7.5.1.

Section 6.2.3 has been revised in response to this item.

18. Revise the "offsite area" portion of Section 6.4.1 to cover the plume exposure Emergency Planning Zone in place of the Low Population Zone. Also, the section should reflect that, for serious accidents, the New York State Plan provides for initiation of offsite protection actions by the local county Office of Disaster and Emergency Services without prior approval by the State Commissioner of Health.

Page 6-13 has been revised in response to this item.

19. Ammend Section 7 to include the provisions for communications between the Technical Support Center, the Operational Support Center, and the Emergency Operations Center.

Section 7.4 has been revised in response to this item.

20. In Section 7.4, expand your discussion to include the onsite communications capability for assuring contact with the four county authorities responsible for implementing protective measures including a primary and backup means of communications in accordance with criteria II.A.6 of Review Guideline Number One.

Pages 7-4 and 7-5 have been revised in response to this item.

21. In Section 7.5.1, identify the specific monitoring systems that will be used to initiate emergency measures, as well as those to be used for continuing assessment in accordance with Section 7.3 of Regulatory Guide 1.101. Include the primary coolant saturation meter in accordance with the position set forth in Section 2.1.3.b of NUREG-0578.

Section 7.5.1 has been revised in response to this item.

22. In Section 7.5.1, describe the interim provisions to be used, as set forth in the NRC letter regarding Lessons Learned Short Term Requirements, dated October 30, 1979, for quantifying radioactivity releases should the existing effluent instrumentation go offscale, such as you indicate could be the case for the Plant Vent Gas Monitor R-14 under certain conditions which would initiate the declaration of a General Emergency.

Section 7.5.1 has been written in response to this item.

23. In accordance with Section 8.1.2 of Regulatory Guide 1.101, amend Section 8.1.2 to include provisions for a quarterly drill for fire brigade members.

Pages 8-7 and 8-8 have been revised in response to this item.

24. In Section 8.4, describe the method and frequency for dissemenation of educational information to the public within the plume exposure Emergency Planning Zone regarding the potential warning methodology in the event of a serious accident.

Page 8-11 has been revised in response to this item.

25. Appendix 10.4 discusses an expanded evacuation analysis currently being done for a 10 mile radius around the Indian Point facility. Provide a schedule for its completion and a copy, when available, as part of this appendix.

The New 10 mile Evacuation Analysis has been included in Appendix 10.4.