

AUG 21 1981

Docket Nos. 50-003
50-247

Consolidated Edison Company of
New York, Inc.
ATTN: Mr. John D. O'Toole
Vice President - Nuclear
Engineering and Quality Assurance
4 Irving Place
New York, New York 10003

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Gentlemen:

Subject: Emergency Preparedness Appraisal

To verify that licensees have attained an adequate state of onsite emergency preparedness, the Office of Inspection and Enforcement is conducting special appraisals at each operating power reactor site. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives of the appraisal at each facility are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements, but also for effecting improvements in NRC requirements and guidance.

During the period of May 11-20, 1981, the NRC conducted an appraisal of the emergency preparedness program for Units 1 and 2 of Indian Point Nuclear Generating Station. Areas examined during this appraisal are described in the enclosed report. Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, and interviewed personnel.

The findings of this emergency preparedness appraisal indicates that significant deficiencies exist in your emergency preparedness program. These are discussed in Appendix A, "Significant Preparedness Deficiencies", and in summary include the following:

- (1) Ineffective administration of the development and implementation of the emergency preparedness program;
- (2) Ill-defined emergency organization and nonspecific assignment of personnel to the various functional areas of emergency activity;

RI:EP&PSB Terc/mjd <i>[Signature]</i> 8/19/81	RI:EP&PSB Bones <i>[Signature]</i> 8/21/81	RI:DEP&OS Snyder <i>[Signature]</i> 8/21/81	RI:DEP&OS Smith <i>[Signature]</i> 8/21/81	RI:DR&PI Brunner <i>[Signature]</i> 8/21/81	RI:DEP DIR Allan <i>[Signature]</i> 8/21/81	RI:DIRECTOR Grier <i>[Signature]</i> 8/21/81
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- (3) An incompletely defined program for training personnel assigned to the various functional areas of emergency activity;
- (4) Improperly equipped emergency facilities, and lack of onsite emergency equipment; and,
- (5) The existence of incomplete and deficient procedures for implementing the Emergency Plan.

Significant deficiencies for which you have made acceptable commitments to resolve were discussed in the confirmatory letter dated June 12, 1981. These deficiencies are included in Appendix A. A copy of the letter dated June 12, 1981, is enclosed for your convenience.

The findings of this appraisal also indicate that there are areas for improvement in your emergency preparedness program. These are discussed in Appendix B, "Preparedness Improvement Items".

In conjunction with the aforementioned appraisal, emergency plans for your facility were reviewed by the Emergency Preparedness Licensing Branch. The results of this review indicate that certain deficiencies exist in your emergency plan. These are discussed in Appendix C, "Emergency Preparedness Evaluation Report".

We recognize that an explicit regulatory requirement pertaining to each item identified in Appendices A, B, and C may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty (30) days of the date of this letter, describing your planned actions for improving each of the items identified in Appendix A and the results of your consideration of each of the items in Appendix B. This description is to include, (1) steps which have been taken, (2) steps which will be taken, and (3) a schedule for completion of actions for each item. With regard to Appendix C, you are requested to provide to this office within 90 days of the date of this letter, page changes to the emergency plan correcting each deficiency or provide written justification as to why you believe a revision should not be made. This request is made pursuant to Section 50.54 (f) of Part 50, Title 10, Code of Federal Regulations.

This is to inform you that in accordance with 10 CFR Part 50.54(s)(2), should the deficiencies addressed in the confirmatory letter of June 12, 1981, are not corrected by the commitment dates provided, or if the other deficiencies in Appendix A are not corrected within four (4) months of the date of this letter, the Nuclear Regulatory Commission will determine whether the reactor shall be shut down until such deficiencies are remedied or whether other enforcement action is appropriate.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and

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(b) submit within 30 days from the date of this letter a written application to this office to withhold such information. Section 2.790(b)(1) requires that any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons on the basis which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room. The telephone notification of your intent to request withholding should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you. Should you have any questions concerning the items of Appendix C, please contact Ray Priebe, Emergency Preparedness Licensing Branch at (301) 492-9695.

Sincerely,

/s/ Boyce H. Grier

Boyce H. Grier
Director

Enclosures:

1. Appendix A, Significant Preparedness Deficiencies
2. Appendix B, Preparedness Improvement Items
3. Appendix C, Emergency Preparedness Evaluation Report
4. Office of Inspection and Enforcement Combined Inspection Report Nos. 50-003/81-01 and 50-247/81-06
5. Letter to Consolidated Edison dated June 12, 1981

cc w/encls:

C. W. Jackson, Vice President, Nuclear Power
K. Burke, Director, Regulatory Affairs
W. D. Hamlin, Assistant to Resident Manager
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Region I Docket Room (w/concurrences)
Chief, Operational Support Section (w/o encls)