

John D. O'Toole
Vice President

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January 6, 1982

Re: Indian Point Unit Nos. 1 and 2
Docket Nos. 50-03 and 50-247

Mr. Ronald C. Haynes, Regional Administrator
Office of Inspection and Enforcement
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

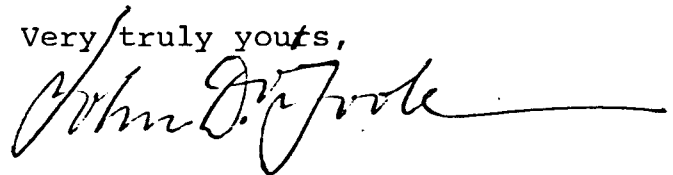
Dear Mr. Haynes:

Provided herewith, as Enclosure I, are the revised pages to the Emergency Plan for Indian Point Unit Nos. 1 and 2 addressing changes requested in Appendix C of the NRC Emergency Preparedness Appraisal Report for Indian Point Unit Nos. 1 and 2 dated August 21, 1981. In addition, Enclosure I contains page revisions resulting from the resolution of items contained in Appendices A and B of the forementioned appraisal report.

Enclosure II, also provided herewith, contains written justification for exceptions taken to specific revisions requested in Appendix C of the NRC Emergency Preparedness Appraisal Report.

Should you or your staff have any questions please contact us.

Very truly yours,



cc: Mr. T. Rebelowski, Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 38
Buchanan, New York 10511

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Enclosure II

Written Justification for Exceptions Taken
to specific revisions requested in Appendix C
NRC Emergency Preparedness Appraisal Report
(August 21, 1981)

Item B-4:

Our commitment to minimum staffing requirements including the times for augmentation from offsite personnel per Table B-1 of NUREG-0654 Rev. 1 was addressed previously in our April 7th 1981 letter to Mr. D. G. Eisenhut, Director, Division of Licensing. That letter stated that we were investigating the feasibility of meeting the "30-minute addition" staffing requirements which are to be implemented by July 1982.

We understand that the response times listed in Table B-1 are not intended as rigid inviolate requirements and on this basis it is our intention to meet the design objective (goal) of Table B-1 of NUREG-0654 Rev. 1.

Item B-6:

All outstanding letters of agreement listed in item B-6 of Appendix C have been incorporated. The Memorandum of Understanding with PASNY (MOU No. 28 Rev. 01/23/78) is still valid as documented by a letter on file extending the MOU with PASNY. Because the MOU has not changed and its validation has been extended by a letter on file it is not our intention to update the MOU presently in the Plan.

Item E-1:

Con Edison does not believe it should include in the content of the initial emergency message the "population in potentially affected areas". Protective action guides, as developed by the EPA, are generic in nature and, as such, are independent of the population density which may exist surrounding any specific nuclear site. When considering the need for initiating a particular protective action, the licensee Emergency Director (ED) evaluates many variables including the approaching or attaining of certain action levels, weather conditions, wind direction and the estimated evacuation times for potentially affected sector(s) and zones. The actual population for a particular site is factored into the development of the evacuation time estimates for the various sectors and zones. Thus, in utilizing estimated

evacuation times for potentially affected sector(s) and zones as one of many considerations for recommending protective actions, the ED does indirectly consider the population in potentially affected areas to the extent necessary to fulfill his responsibilities. It is the responsibility of local authorities to calculate as needed the actual population affected after the licensee has informed local authorities what sector(s) and zones are involved. Population per sector and zone is clearly defined in Appendix G, Population Data: Site Vicinity, in all the county radiological emergency response plans for this purpose. An unnecessary burden would be placed on the licensee Emergency Director (ED) if he were required to take the time to calculate the population in all the sector(s) and zones affected. Such a responsibility would remove the ED from more pressing duties in managing our emergency response.

Item E-2:

Provided in the present submittal of page revisions to the Emergency Plan (EP) for Indian Point Unit Nos. 1 and 2 is a description of the administrative and physical system to be used for the prompt alerting and notification of the public in the event of a serious emergency. It is our position that no useful purpose is served by inclusion of a schedule for the operational readiness of the alert and notification system (ANS). On this basis such a schedule is not included in the description being provided. An estimated schedule for the remaining activities involved in completing the ANS was previously submitted by letter to NRC Region I headquarters dated December 31, 1981.

Item E-3:

The supporting information used by state and county emergency response organizations for generating public messages is supplied from the initial notification fact sheet found in the Emergency Procedures Document (EPD) for Indian Point Unit Nos. 1 and 2. The initial notification fact sheet used in notification of the state and county emergency response organizations is consistent with sample public messages in the state and county plans and the emergency classification scheme.

Item G-1:

The emergency preparedness information booklet for resident and transient population around the site is in the final stages of review and is not included at this time. When the booklet has been completed it will be incorporated into the EP.

Item G-2:

With respect to dealing with rumors and confirming information to the public, we have established the capability to provide information via telephone automatically. For reasons of security and to avoid heavy telephone traffic, which the public information booklet advises against exception in cases of real emergency, the phone number will be announced with emergency public messages, if necessary. This information will not be included in the EP but will be included in Con Edison's Corporate Emergency Response Plan.

Item H-1:

Action is being taken to provide permanent Emergency Response Facilities (ERF) which meet NRC Staff recommendations as detailed in NUREG-0696 on a schedule consistent with NRC direction. Our commitment to schedules consistent with NRC direction was addressed previously in our April 7th 1981 letter to Mr. D. G. Eisenhut, Director, Division of Licensing. A commitment and schedule for permanent ERF has already been supplied in other documentation and does not serve any useful purpose in the EP. On this basis, it has been decided not to include such information in the EP.

Item H-2:

A permanent Operational Support Center (OSC) which meets NRC Staff recommendations as detailed in NUREG-0696 will be provided on a schedule consistent with NRC direction. This permanent OSC will have available those supplies and equipment as listed in Section H-9 of NUREG-0654. The present revision to the EP contains the description of our temporary OSC, which will be used until the permanent facility is available. All the items listed in Section H-9 of NUREG-0654 do not appear in this description because, as previously explained in our response to the NRC Emergency Preparedness Appraisal Report (item A-12), "...During this interim period the OSC will be evacuated in the event it becomes uninhabitable". Equipment and supplies listed in the revised description being provided by this submittal are consistent with the needs of personnel in the temporary OSC should a decision be made to evacuate it.

Item I-1:

A description of the upgraded interim post accident sampling capability does not exist in the Emergency Plan (EP) for Indian Point Unit Nos. 1 and 2. Our permanent post accident sampling capability will be completed shortly in accordance with previous NRC com-

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mitments and it is our position that no useful purpose is served by revising sections of the EP twice in such a short period of time. Our interim post accident sampling capability was upgraded to satisfy the requirements and timetables outlined in the NRC Confirmatory Letter and Emergency Preparedness Appraisal Report, dated June 12, 1981 and August 21, 1981, respectively.

In addition no useful purpose is served by including in the EP a schedule for the permanent upgrading of the post accident sampling capability. Our commitments with respect to that capability have been previously addressed in the above referenced documents as well as in Con Edison's responses to NUREG-0737.

Item I-2:

The Emergency Plan (EP) already addresses the task of relating various measurements in the field to dose rates. Dose rates (beta-gamma field surveys) are measured and environmental particulate and radioiodine samples are obtained, counted in the field and then returned to the plant for future analysis. Based on evaluation of the above rates and analyses, means do exist for relating various measurements in the field to dose rates for the key isotopes listed in Table 3 of NUREG-0654 with the exception of noble gases.