DUKE POWER COMPANY
POWER BUILDING
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Certified By

January 25, 1982

Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Re: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Mr. O'Reilly:

The responses to the Preparedness Improvement Items of the Emergency Preparedness Appraisal, Appendix B to your letter dated December 31, 1981, are provided as Attachments 1 and 2. Attachment 3 describes the actions taken or planned to correct the Emergency Plan Deficiencies listed in Appendix C to your letter dated December 31, 1981.

Very truly yours,

William O. Parker, Jr.

JFK/php
Attachments

cc: Mr. B. Grimes, Director
Division of Emergency Preparedness
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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ATTACHMENT 1

RESPONSES TO
PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Oconee Nuclear Station Emergency Preparedness Program conducted August 24-September 3, 1981, the following responses are provided. (References are to the Section in OIE Report No. 50-269/81-13, 50-270/81-13, 50-287/81-13.)

1. Establishing a mechanism to ensure retraining in the areas of emergency planning is accomplished satisfactorily (3.2).

Response: A list of station personnel who will be trained has been developed by the station emergency preparedness coordinator and will be updated periodically. Station Directive 2.9.2 has been reviewed to ensure that annual retraining is addressed.

2. Improving the provisions for obtaining a primary coolant sample under accident conditions (4.1.1.5).

Response: Procedures CP/1/A/2002/4A, CP/2/A/2002/4A, and CP/3/A/2002/4A submitted January 5, 1982 improve the provisions for obtaining a primary coolant sample under accident conditions.

3. Improving the provisions for obtaining a containment air sample under accident conditions (4.1.1.6).

Response: A new procedure will be developed by April 30, 1982.

4. Improving the provisions for obtaining gas and particulate effluent samples under accident conditions (4.1.1.7).

Response: A new procedure will be developed by April 30, 1982.

5. Improving the provisions for obtaining liquid effluent samples under accident conditions (4.1.1.8).

Response: Procedures referenced in Item 2 and CP/1/A/2002/4B, CP/2/A/2002/4B, and CP/3/A/2002/4B submitted January 5, 1982 improve the provisions for obtaining liquid effluent samples under accident conditions.

6. Assuring that both offsite assembly areas will be available and accessible (4.1.2.1).

Response: An agreement letter has been signed for Daniel High School. Keys for access are in the possession of the control room shift supervisors in their security boxes. Security and shift supervisors can provide access to the facilities.

7. Providing the emergency kits at the offsite assembly areas (4.1.2.1).

Response: The kits are in place and stocked. HP procedure HP/0/B/1009/08 will allow maintenance and inventory of the kits on a quarterly basis.

8. Securing a written agreement for the use of Daniel High School (or equivalent facility) as offsite decontamination location (4.1.2.3).

Response: The agreement letter has been executed.

9. Stocking decontamination kits at the offsite decontamination locations (4.1.2.3).

Response: HP/0/B/1009/08 lists the inventory of the kits and the schedule for review and maintenance of supplies in the kits.

10. Establishing a list of supplies to be drawn from the station supply room in the event onsite decontamination is to be accomplished (4.1.2.3).

Response: Attachment 2 is the list of supplies to be drawn from the station supply room in the event onsite decontamination is to be accomplished.

11. Justifying that the offsite source of meteorological data is considered representative of the Oconee site (4.2.1.4).

Response: A letter detailing our justification will be submitted no later than February 28, 1982.

12. Justifying the use of unmodified wind speed and wind direction from the 46 m level of the primary tower (4.2.1.4).

Response: A letter detailing our justification will be submitted no later than February 28, 1982.

13. Installing a system to make severe weather information available to control room operators (4.2.1.4).

Response: A system to make control room operators aware of severe weather conditions will be installed by June 30, 1982.

14. Evaluating and resolving communications problems discovered during drills and exercises (4.2.3).

Response: Duke has evaluated the communications problems discovered in drills and exercises. A nuclear station modification request for the PA system has been initiated based on the problems noted. At present, the means for resolving the problem and date for resolution is still under review.

15. Marking ceiling panels in the TSC and EOF to identify the location of emergency telephone plugs (4.2.3).

Response: Ceiling panels were marked on September 30, 1981 to allow easy identification of phone locations.

16. Performing operational checks of emergency communications as provided by procedure PT/0/B/2000/04 (4.2.3).

Response: Operational checks for the 3rd and 4th quarters of 1981 have been performed and are documented in the station's completed procedure file. Future checks will be completed.

17. Installing posters in the plant describing the station emergency signals and required actions (4.2.3).

Response: Duke continues to make station, General Office, and contractor personnel aware of station emergency signals in the unescorted access training program. It is not felt that posters would appreciably improve personnel awareness of emergency signals.

18. Titling the various station procedures related to the emergency plan such that the scope and content of the procedures are clearly identified (5.1).

Response: Emergency Plan Implementing Procedures titles have been reviewed by station and General Office personnel, Procedure PT/0/B/2000/04 was retitled on October 13, 1981 as a result of this review. The other procedures are adequately titled.

19. Change procedure HP/0/B/1009/13 to include requesting weather conditions as part of information required from National Weather Service; alternating communications checks among shifts; and recording concurrent onsite meteorological data with offsite data (5.4.2).

Response: Procedure HP/0/B/1009/13 will be revised April 30, 1982 to include a log sheet for National Weather Service information received and concurrent plant meteorological data as well as provisions to check the communications on differenct shifts.

20. Change Station Directive 3.8.5 to include use of 15-minute averaged meteorological data; clarification of the procedure for the case when primary or rivertower data is not available; and clarification of the 22.5 degree wind shift criterion to determine need for assessment (5.4.2).

Response: Station Directive 3.8.5 will be revised by March 31, 1982. The new dose calculation methodology will be easier for control room operator use and will clarify the windshift and primary/supplemental tower unavailability situations.

21. Providing appropriate disposition of data sheets utilized by the environmental monitoring teams (5.4.2.1, 5.4.2.2).

Response: Those responsible for distribution and logging of monitoring team data have been made aware of the problem. Also, procedure CP/0/B/4003/01 has been revised to require monitoring teams to distribute their documentation appropriately when they return.

22. Developing procedures which contain methods for analyzing high-activity primary coolant samples in accordance with NUREG-0737 (5.4.2.5).

Response: A new procedure will be developed for analysis of high activity primary coolant samples by April 30, 1982.

23. Upgrading the procedures for the sampling and analysis of containment atmosphere and gas/particulate effluents under accident conditions (5.4.2.6, 5.4.2.7, 5.4.2.8, 5.4.2.9).

Response: A new procedure will be developed by April 30, 1982.

24. Upgrading the procedures for the sampling and analysis of high-activity liquid effluents (5.4.2.10, 5.4.2.11).

Response: A new procedure will be developed by April 30, 1982 for the analysis of high activity liquid effluent samples.

25. Provide for informing personnel of radiological conditions which could prevent them from reaching and/or remaining at their respective assembly areas during a Station Assembly. (5.4.3.2).

Response: The Shift Supervisor will announce over the PA system, assembly or other areas of the plant with unfavorable radiological conditions. Further, if a particular area does have high radiation levels, area radiation monitors will alarm and indicate the problem.

26. Providing procedures which delineate the composition and individual responsibilities of search and rescue teams (5.4.3.3).

Response: The Oconee Nuclear Station Emergency Plan will be revised by March 31, 1982 (Part B.5) to include the composition and responsibility of the search and rescue teams (by title). Station Directive 2.9.2 will be revised by March 31, 1982 to include the composition and responsibility of the search and rescue teams (by individuals).

27. Identifying, in the Crisis News Group Implementing Plan, your coordination with the news information function of other organizations, including rumor information (5.4.7).

Response: The Crisis News Group Implementing Plan for McGuire Nuclear Station has been revised to include rumor control procedures. The Crisis News Group Plan for Oconee will be revised by February 15, 1982 to include similar provisions for rumor control and coordination with the news function of other organizations.

28. Documenting the resolution of deficiencies/improvements identified in drills and exercises (5.5.2).

Response: Drill and Exercise PT/O/B/2000/01 has been revised from the July 14, 1981 version listed in the appraisal document. The new version provides for management control in the assignment of responsibility for corrective action, assignment of completion dates, followup on action item responses, and adequate resolution of action items.

29. Identifying specifically the person responsible for the review and distribution of the emergency plan and procedures (5.5.4).

Response: The Station Emergency Plan has been revised to identify the person responsible for the review and distribution of the emergency plans and procedures (See part P of the December, 1981 revised Station Emergency Plan).

30. Providing a means to ensure phone numbers on call lists are maintained correct (5.5.4).

Response: The station emergency preparedness coordinator has devised a means for maintaining phone numbers on call lists as correct. Documentation on the quarterly check is available in the coordinator's files.

ATTACHMENT 2

EMERGENCY DECONTAMINATION SUPPLIES

50 bars	Ivory soap
2 bundles	Cotton glove liners
2 boxes	PVC gloves
50 pairs	Disposable Shoe Covers
50 pairs	Disposable coveralls (blue)
50 each	Large poly bags
50 each	Small poly bags
100 each	Nucon smears
1 roll	2" masking tape
1 roll	50 yards barricade tape (magenta and yellow)
50 each	Caution: Radiation/Radioactive Material Rags
2 each	Caution sign with Radiation Area, Radioactive Material, and Contaminated Area inserts
10 each	STEPOFF pads
2 bottles	4324 Turco Decon soap
5 each	Nail brushes
5 packages	Cotton swabs
1 pair	Scissors
2 cans	Hand cream
5 bottles	Prell shampoo
100 each	Cloth towels
1 box	Black marker pens
1 box	Pens
1 box	Pencils
2 pads	Writing tablets

ATTACHMENT 3

DUKE ACTIONS TAKEN TO CORRECT
EMERGENCY PLAN DEFICIENCIES

Based on the results of the NRC's review of the Oconee Nuclear Station Emergency Plan, Duke Power Company has taken the following actions to correct these deficiencies. (References in parentheses are to criteria of NUREG-0654, Rev. 1.)

1. (B.4) The Plan does not clearly specify which responsibilities may not be delegated to other elements of the emergency organization.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

2. (B.5) Table 5.0-1 of the Plan does not satisfy staffing criteria as follows: (1) no on-shift capability is provided for mechanical maintenance, electrical maintenance, or radiation protection; (2) no augmentation is provided before 60 minutes; and (3) no senior management augmentation is provided.

Action: (1) This item was corrected in the December 1981 revision to the Station Emergency Plan. Figure B-12 of the December, 1981 revision to the Station Emergency Plan describes the onshift and augmentation capability for Oconee. Mechanical maintenance is now provided for. Three HP technicians are available for performing surveys, radiation protection, dose assessment, and other HP duties. Electrical maintenance is not shown as being available; however, there are 8 excess people (above Technical Specification requirements) on shift who, potentially, could perform the jobs of the 5 deficient positions.

(2) This item was corrected in the December 1981 revision to the Station Emergency Plan. Figure B-12 lists augmentation personnel who are available in 30 to 60 minutes.

(3) This item was corrected in the December 1981 revision to the Station Emergency Plan. The Station Emergency Plan Figure B-12 will be revised by March 31, 1982 to indicate that the Emergency Coordinator will perform the function of the Recovery Manager until the EOF is operational.

3. (B.8) The Plan does not specify contractor and private organizations which would assist in an emergency.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

4. (B.9) No letter of agreement for fire-fighting support is included in the Plan.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

5. (D.1) The emergency action levels listed in the Plan do not identify the parameter values and equipment status for each emergency class.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

6. (E.6) The Plan does not describe the means and time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

7. (G.1, G.2) The Plan does not identify the means for the actual dissemination of information to the permanent and transient population, address the special needs of the handicapped, or provide for the annual dissemination of information.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

8. (G.5) The Plan does not provide for annual dissemination of information to the news media.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

9. (H.1) The Plan does not describe nor provide for a TSC which meets the criteria of NUREG-0696.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan. The Oconee TSC is described in the Revised Oconee Emergency Plan and was the subject of a June 1, 1981 letter from W. O. Parker, Jr. to Harold R. Denton. In both documents the TSC is described as a facility meeting the intent of NUREG-0696.

10. (H.2) The Plan does not describe nor provide for an EOF which meets the criteria of NUREG-0696.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan. The EOF for Oconee (in our terms the Crisis Management Center - CMC) is described in the Crisis Management Plan, and was described in the June 1, 1981 letter listed above. In both documents it is described as a facility meeting the intent of NUREG-0696.

11. (H.8) The Plan does not describe nor provide for meteorological instrumentation and procedures which satisfy the criteria of Appendix 2 to NUREG-0654.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan. The meteorological instrumentation and overall program are described in Appendix 2 of the Station Emergency Plan. Also, a December 21, 1981 letter describes the planned upgrade to the meteorological system to meet the intent of NUREG-0654 Appendix 2 and to provide a reliable system for emergency response.

12. (H.9) The Plan contains insufficient information on supplies available in the OSC (Part H).

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

13. (I.2) Resources to provide initial values and continuing assessment of emergency conditions are available; however, post-accident sampling capability and containment radiation monitoring is not addressed in the plan.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

14. (I.3) The techniques for determining the source term of release of radioactive material within the plant system is not addressed nor is the technique for determining the magnitude of release based on plant system parameter and effluent monitors.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

15. (I.4) The licensee has not established in the Plan, the relationship between effluent monitor readings and onsite and offsite contamination for various meteorological conditions.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

16. (I.5) The Plan does not indicate that meteorological data can be assessed by the EOF. Also, the plan does not address making meteorological data available to the State.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

17. (I.6) The Plan does not address a method for determining the release rate/projected dose if instrumentation is offscale or inoperable.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

18. (I.10) The licensee has not established, in the Plan, a means for relating various measured parameters to dose rate for key isotopes and gross radioactivity measurements. In addition, the Plan does not address estimating integrated dose from projected and actual dose rates and comparing these numbers with protective action guides.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

19. (I.5) Accountability within 30 minutes of the onset of an emergency is not addressed in the Plan.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

20. (J.8) The evacuation time estimates provided in the Plan have been evaluated (NUREG/CR-1856) and rated as poor. The time estimates should provide the information identified in and meet the criteria of Appendix 4 to NUREG-0654.

Action: The evacuation time estimate study has been redone and was submitted for review on January 5, 1982. The plan will be revised by March 31, 1982 to include important parts of the new study.

21. (J.8) Maps included in the Plan are not legible and, therefore, it is not apparent that maps provide information on evacuation routes, radiological sampling and monitoring points, shelter areas and population distribution. The bases for the choice of recommended protective actions is not discussed in the Plan.

Action: Maps from the evacuation time estimate study will be provided in the March 31, 1982 revision to the plan.

22. (K.3) The Plan does not address provisions for 24-hours per day capability to determine doses received by emergency workers. The distribution of self-reading and permanent reading dosimeters is not addressed. Reading of personnel dosimeters and record keeping for emergency workers is not addressed.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

23. (K.5) Action levels for determining the need for decontamination is not addressed in the Plan. Decontamination of supplies, instruments, and equipment and provisions for waste disposal is not addressed.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

24. (K.6) Contamination control including area access control, drinking water and food supplies and returning areas and items to normal use is not addressed.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

25. (L.1) The capability for evaluation of radiation exposure and uptake and preparedness to handle contaminated individuals at the Oconee Memorial Hospital is not addressed.

Action: The Station Emergency Plan will be revised by March 31, 1982 to address the capabilities of the Oconee Memorial Hospital.

26. (M.4) The method for periodically estimating total population exposure is not addressed.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

27. (O.3) The Plan does not specify that first aid training is equivalent to Red Cross Multi-Media.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

28. (O.4) The specialized training and retraining programs contained in this criteria are not addressed in the Plan.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.

29. (P.1) Provisions for the training of individuals responsible for emergency planning are not addressed.

Action: This item was corrected in the December 1981 revision to the Station Emergency Plan.