APPENDIX B

QUESTIONS AND RESPONSES RELATED

TO

INITIAL NRC REVIEW

OF

OPERATING LICENSE APPLICATION

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HAVE BEEN INTENTIONALLY DELETED.

12.0 Conduct of Operations

REQUEST:

12.1 Provide an organization chart of corporate management showing the scope and relationship of the corporate structure to the onsite operating organization. The organization for corporate, consultant, vendor, and other technical support should be delineated in more detail with regard to the technical expertise available to specifically support the nuclear plant.

RESPONSE:

Refer to FSAR Figures 12.1-2 and 15.6.1, and pages 12.1.1-1 and 12.1.1-2, and Figure 6.1 of the Technical Specifications.

REQUEST:

12.2 The Facility Organization Chart (Figure 12.1-1) does not clearly or adequately depict the nuclear plant operating organization described in Section 12.1.1, especially with respect to single vs. dual unit operation. Please provide the following additional information:

a. Justification for the adequacy of the proposed six man dual unit staffing in order to determine whether or not the proposed crew size is sufficient to adequately cope with plant operating requirements during routine, abnormal, and emergency situations affecting both nuclear units.

b. The facility organization chart should be modified to show the complete shift crew operating organization for single and dual unit operation. The generic term "plant operators", used on the existing organization chart, coupled with the absence of the crew disposition for single and dual unit operation, does not adequately delineate the shift crew organization and their attendant responsibilities.

c. In addition to personnel position requirements and qualifications, a brief description of the duties, responsibilities, and authorities of individual plant positions should be indicated. What is the function of the "Plant Engineer - Results"? Specifically, what kind of personnel are assigned under his supervision and what are their functions? Is the "Nuclear Operator" referred to in Section 12.1.1 (but not shown in Figure 12.1-1) a licensed reactor operator or is he equivalent to an "Auxiliary Operator"?

d. Indicate the experience level of maintenance repairmen who will perform maintenance and repair of-the-nuclear plant and its components and auxiliaries.

RESPONSE:

a. Refer to FSAR page 12.1.1-2.

b. Refer to FSAR Figure 12.1-1 and page 12.1.3-23.

c. Refer to FSAR pages 12.1.3-18 and 12.1.3-24.

d. Refer to FSAR page 12.1.3-25.

REQUEST:

12.3 The actual qualifications of some key plant personnel appear to be substantially less than the minimum qualification, requirements (nuclear) stated for those key positions in the FSAR. This observation is based upon apparent deficiencies in the critical areas of nuclear power plant operating experience coupled with deficiencies in associated reactor technical areas such as reactor core physics, nuclear plant maintenance, chemistry, and radio-chemistry. Provide justification for the adequacy of technical expertise in the above areas.

RESPONSE:

Refer to FSAR Section 12.1.3.

REQUEST:

Indicate the position title of the individual who is responsible for the conduct and administration of the nuclear power training program.

RESPONSE:

Refer to FSAR page 12.2.1-1.

REQUEST:

12.5 Indicate the scope and content of training programs that have been provided for reactor plant technicians, auxiliary operators, or their equivalents, turbine operators, and repairmen.

RESPONSE:

Refer to FSAP page 12.2.3-1.

REQUEST:

12.6 Provide information concerning the course entitled "Operation Aspects of Radiation Surveillance - 1969" with regard to length and content of course and where conducted (This course is listed under education and training for "Plant Engineer - Chemistry and Health Physics")

RESPONSE:

Refer to FSAR page 12.2.1-3.

REQUEST:

12.7 Indicate the scope and content of the retraining (refresher) program, and state which positions will receive formal retraining. The maximum retraining program cycle should be indicated.

RESPONSE:

Refer to FSAR page 12.2.1-4.

REQUEST:

12.8 Indicate the scope and content of the replacement training program unless it is your intention to utilize the "Westinghouse Reactor Operator Training Program" for subsequent replacement personnel, in which case a statement to that effect should be included in the FSAR.

RESPONSE:

Refer to FSAR page 12.2.2-1.

REQUEST:

12.9 What means will be provided to evaluate the effectiveness of the training, retraining, and replacement training programs?

RESPONSE:

Refer to FSAR page 12.2.1-5.

REQUEST:

12.10 Has a general employee training program been incorporated in the training program to ensure that all plant personnel are trained in (1) Industrial Safety, (2) First Aid, (3) Radiological Health and Safety, (4) Industrial Security, (5) Use of Protective Clothing and Equipment, and (6) Appropriate Plans and Procedures?

RESPONSE:

Refer to FSAR page 12.2.1-5.

REQUEST:

12.11 Provide a listing (by titles) of written procedures specified for station operation.

RESPONSE:

Refer to FSAR Section 12.3.

REQUEST:

12.12 Indicate the normal locations and accessibility of various written procedures and plans specified for station operation.

RESPONSE:

Refer to FSAR Section 12.3.

REQUEST:

12.13 Describe the method you will use for assuring that procedures have been distributed, read and understood, and are complied with by station personnel.

RESPONSE:

Refer to FSAR Section 12.3.

REQUEST:

12.14 List those procedures for which check-off lists are specified. How are check-off lists completed and approved?

RESPONSE:

Refer to FSAR Section 12.3.

REQUEST:

12.15 Provide a complete listing (by titles) of the specific types of records to be kept. Are training records and personnel experience/qualification records kept? Are Quality Assurance Control records kept? What are the titles of the general types of operating records kept?

RESPONSE:

Refer to FSAR page 12.4.1-1.

REQUEST:

12.16 What recording methods (recorder, computer, manual) are employed for the various types of records?

RESPONSE:

Refer to FSAR page 12.4.1-1.

REQUEST:

12.17 Indicate the position title of the individual who has direct responsibility for records management.

RESPONSE:

Refer to FSAR page 12.4.1-1.

REQUEST:

12.18 The brief description of industrial security appearing in Section 12.5 (administrative control) should be expanded to include the specific types of security measures to be employed to guard against and detect unauthorized access to the reactor site, reactor control areas, and principal buildings or other critical areas of the facility (e.g. are personnel identification badges, perimeter lighting, alarms, television etc. employed?).

RESPONSE:

Refer to FSAR page 12.5-1.

REQUEST:

12.19 Indicate the methods of controlling the various types of expected visitors.

RESPONSE:

Refer to FSAR Section 12.5.

REQUEST:

12.20 The controls or methods specified for guarding critical plant features against acts of sabotage should be indicated.

RESPONSE:

Confidential policy matters will be the subject of a separate proprietary document.

REQUEST:

12.21 The spectrum of emergencies classified and defined in Section 12.3.2 (Emergency Procedures) are properly a part of the Section 12.3.3 (Emergency Control Plan). However, in addition to classification and definition of emergencies, the consequences of the various types of accidents or emergencies should be considered in the Emergency Plan. The consequences of radiological accidents ranging from accidents affecting only local operating personnel to the design basis accident which could affect site and neighboring environment, should be considered in greater depth than currently appears in Section 12.3.2.

RESPONSE:

Refer to FSAR page 12.3.3-1, Table 12.3.3-1, and the Emergency Control Plan.

REQUEST:

12.22 The various locations of Emergency Procedures, drawings and diagrams of the plant, required in the event of implementation of the Emergency Control Plan; should be specified.

RESPONSE:

Refer to FSAR page 12.3.2-1.

REQUEST:

12.23 Protective measures and corresponding protective action levels should be specified for each emergency or accident in the spectrum of emergencies or accidents considered in the "Emergency Control Plan." The technical basis for each of the Protective Measures should be supported in the plan along with a description of the available plant instrumentation and other instrumentation (including portable monitoring equipment) which is used as a basis for the development of the various Protective Action Levels.

RESPONSE:

Refer to FSAR page 12.3.3-1 and Table 12.3.3-1 and Section 11.2.3.

REQUEST:

12.24 Are individual facility (unit) Emergency Control Plans to be developed? Is a compatible site Emergency Plan to be developed? Consideration should be given to accident consequences and emergency procedures for one-unit (fossil or nuclear) affecting another unit.

RESPONSE:

Refer to FSAR page 12.3.3-1 and the Emergency Control Plan.

REQUEST:

12.25 The role of the offsite support groups, their authorities, and their responsibilities with regard to a plant emergency, should be described in the Emergency Control Plan. Are agreements with offsite support groups being confirmed in writing? Local law enforcement agencies and civil defense agencies are not mentioned as offsite support groups. What are their roles?

RESPONSE:

Refer to FSAR page 12.3.3-1 and the Emergency Control Plan.

REQUEST:

12.26 The significant features of the medical plan (referred to in Section 12.3.2 as "being developed with the medical school and hospital") should be reflected in the Emergency Control Plan. The scope of available local medical support, experienced and trained in treating victims of radiological accidents, should be indicated.

RESPONSE:

The medical support is being developed.

REQUEST:

12.27 The scope of Emergency Control Plan training and drills should be addressed. Will training and drills involve all support groups? How often will drills be held?

RESPONSE:

Refer to FSAR page l2.3.3-6.

REQUEST:

12.28 It is implied in Section 12.3.3 that the plant security guards are furnished by a contract guard service company. The guard on duty at the facility is identified as a member of the Emergency Monitoring Team with training in the use of radiation survey instruments. What is the scope of this training and who is responsible for conducting it? Are there enough replacement guards trained in the use of the equipment what assurance exists that only these specially trained personnel will be used to guard the nuclear power plant?

RESPONSE:

Guards will not be used for Emergency Monitoring.

REQUEST:

12.29 What are the "established criteria" and "prescribed limits" (referred to in Section 12.3.2) for putting the offsite vs onsite portions of the Emergency Plan into effect? What are the provisions for emergency dosimetry and tracking of offsite releases?

RESPONSE:

Refer to the Emergency Control Plan.

REQUEST:

12.30 Have alternate personnel been designated to man hey positions within the Emergency Control Plan Organization? (e.g., the Conservation Supervisor on Emergency Monitoring Team)

RESPONSE:

Refer to FSAR Section 12.3.2 Conservation Supervisor duties have been changed.

REQUEST:

12.31 Describe distinguishing feature of various alarms associated with the Emergency Control Plan. Has a test been conducted to ascertain auditibility in all required areas, particularly in areas of high noise level or acoustically insulated areas?

RESPONSE:

Refer to FSAR page 12.3.3-4.

REQUEST:

12.32 Has a plan been developed which makes adequate provision for coordination and dissemination of public information released following an accident?

RESPONSE:

Refer to FSAR page 12.3.2-2 and 12.3.2-3.

13.0 Initial Tests and Operations

REQUEST:

13.1 Provide details of the organizational structure for pre-operational testing, fuel loading, startup, and initial testing of the operating reactor. Position titles, station-groups (operations, technical, maintenance) to which assigned, functional roles, responsibilities, and qualifications of any augmenting personnel should be indicated during the above phases of operations. Planned augmentation of regular shift crew personnel should be indicated along with a summary of functional roles, responsibilities and qualifications.

RESPONSE:

Refer to FSAR Section 13.1.1.

REQUEST:

13.2 The summary of the initial testing of the operating reactor (tables 13.3-1A through 13.1-1D) omits a "Plant Trip Test." In the case of two other current Westinghouse PWR plants, such a test has been listed "to verify reactor control performance" under conditions of "full load rejection from 30% and 100%." Section 14.1.10 of the FSAR indicates that "the unit is designed to accept a 50 percent step loss of load without actuating a reactor trip. "Was this test inadvertently omitted or will it not be performed? If it will not be performed state your reasons.

RESPONSE:

Refer to FSAR Table 13.3-1c.

REQUEST:

13.3 Provide a bar-type chart illustrating the sequential and concurrent scheduling of the entire testing program relative to plant temperature, pressure, and power level. Special applicable plant configurations such as "head off" or "head on", should be indicated.

RESPONSE:

Refer to FSAR page 13.1-4.

PAGES B-50 THROUGH B-51

HAVE BEEN INTENTIONALLY DELETED.