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SUBJECT: Forwards evaluation of compliance w/emergency response facility criteria presented in Suppl 1 to NUREG-0737,per 830415 ltr.Several areas identified that depart from criteria.

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NIAGARA MOHAWK

NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

January 3, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Dear Mr. Vassallo:

Our April 15, 1983 letter stated that we would review our Emergency Response Facilities against the criteria presented in Supplement 1 to NUREG 0737. That review has identified several areas where departure from those criteria exists. The attachment to this letter discusses those areas.

Very truly yours,

C. V. Mangan
Vice President
Nuclear Engineering and Licensing

CVM/BDW:ja
Attachment

A003
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Niagara Mohawk Power Corporation
Evaluation of Compliance With
Emergency Response Facility Criteria
Contained in Supplement 1 to NUREG 0737

January 3, 1984

Supplement 1 to NUREG 0737 contains a distillation of the fundamental criteria for nuclear plant Emergency Response Capability. Section 8 of the Supplement pertains to Emergency Response Facilities.

Niagara Mohawk's April 15, 1983 letter indicated that we would review our Emergency Response Facilities for compliance with the criteria presented in Supplement 1 to NUREG 0737. We have completed our review and find that compliance with most of the criteria can be demonstrated. However, several areas were identified where departure from the criteria exists. Provided below is a discussion of those areas. These departures consist mainly of using alternative methods to those presented in Supplement 1 to accomplish the intended functions.

Technical Support Center

Criterion 8.2.1a:

During periods of activation, the Technical Support Center will operate uninterrupted to provide plant management and technical support to plant operations personnel...

Discussion:

The Nine Mile Point Unit 1 Site Emergency Plan indicates that the Technical Support Center will be activated during a concurrent loss of offsite and all station AC power. Our review indicates that the Technical Support Center could not be activated in this instance because power to the Technical Support Center would not be available. However, our Site Emergency Plan states that when the Technical Support Center is not operational, the Alternate Emergency Operations Facility (AEOF) will be manned. This assumes power will be available at the Alternate Emergency Operations Facility. We are currently reviewing the design of the power supply to the Technical Support Center for potential improvements.

Criterion 8.2.1f:

The Technical Support Center will be provided with radiological protection and monitoring equipment necessary to assure that radiation exposure to any person working in the Technical Support Center would not exceed 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident.

Discussion:

Our December 23, 1983 letter indicated that the control room is currently being evaluated to ensure adequate radiological protection during an accident at Nine Mile Point Unit 1. The evaluation will be extended to include the Technical Support Center and the new Emergency Operations Facility. As noted in that letter, the evaluation is expected to be complete by January 31, 1984.

Criterion 8.2.1g:

The Technical Support Center will be provided with reliable voice and data communications with the control room and Emergency Operations Facility and reliable voice communications with the Operational Support Center, Nuclear Regulatory Commission Operations Centers, and state and local operations centers.

Discussion:

The reliability of the Technical Support Center communications systems has not been quantified. The adequacy of the emergency response communications network has been demonstrated during drills and exercises. Additionally, in accordance with the Site Emergency Plan, the communication systems are periodically tested. As deficiencies are identified, steps are taken to correct them.

Criterion 8.2.1k:

The Technical Support Center will be designed taking into account good human factors engineering principles.

Discussion:

Formal human factors criteria were not identified during the design of the Technical Support Center. However, drills and exercises have demonstrated the adequacy of the design with respect to functional performance. Evaluation of spacing, lighting, information display and communications are within the scope of these drills and exercises. As deficiencies are identified, steps are taken to correct them.

Emergency Operations Facility

A new Emergency Operations Facility for Nine Mile Point is currently under construction. Our June 24, 1983 letter identified the location of the new Emergency Operations Facility relative to the station. We anticipate that the new Emergency Operations Facility will be operational by the spring of 1985. This should not be construed as a firm commitment, since unforeseen delays may occur. The existing Emergency Operations Facility will be used until the new Emergency Operations Facility is operational. The discussion provided below generally applies to both the existing and future Emergency Operations Facility. Clarification is provided where it applies to one or the other.

Criterion 8.4.1a:

The Emergency Operations Facility is a licensee controlled and operated facility. The Emergency Operations Facility provides for management of overall licensee emergency response, coordination of radiological and environmental assessment, development of recommendations for public protective actions and coordination of emergency response activities with federal, state and local agencies.

Discussion:

Radiological assessment and protective action recommendations are performed concurrently at the Technical Support Center and Emergency Operations Facility. However, the Radiological Assessment Coordinator is stationed at the Technical Support Center. He may relocate to the Emergency Operations Facility, if so desired. Final decisions regarding protective actions are made by the Corporate Emergency Director, stationed at the Emergency Operations Facility.

Criterion 8.4.1b:

The Emergency Operations Facility will be located and provided with radiation protection features as described in Table 1 and with appropriate radiological monitoring systems.

Discussion:

The present Emergency Operations Facility does not have special radiation protection features, nor does it have ventilation isolation with HEPA filtration. However, should the Emergency Operations Facility become uninhabitable, functions would be transferred to the alternate Emergency Operations Facility.

As noted in the response to Criterion 8.2.1f, an evaluation is underway to determine the adequacy of the radiological protection features of the control room, Technical Support Center and the new Emergency Operations Facility. The evaluation will be complete by January 31, 1984.

Criterion 8.4.1f:

The Emergency Operations Facility will be provided with reliable voice and data communications facilities to the Technical Support Center and control room and reliable voice communication facilities to Operational Support Center and to Nuclear Regulatory Commission, state and local emergency operations centers.

Discussion:

See discussion for Criterion 8.2.1g.

Criterion 8.4.1i:

The Emergency Operations Facility will be staffed using Table 2 as a goal.

Discussion:

Section 5.0 of our Site Emergency Plan describes staffing during an emergency. Justification for the staffing levels is provided in our March 3 and April 1, 1981 letters.

Criterion 8.4.1k:

The Emergency Operations Facility will be designed taking into account good human factors engineering principles.

Discussion:

The adequacy of the existing Emergency Operations Facility design has been demonstrated during drills and exercises. No major human engineering deficiencies have been noted.

The design of the new Emergency Operations Facility considered several human engineering related concepts. These included methods to keep noise levels at a low level, centrally located displays for ease of visibility and designation of specific function/task areas. As drills and exercises are conducted at the new Emergency Operations Facility, improvements may be identified. Potential improvements will be evaluated and disposed as they are identified.