

REGULATORY DOCKET FILE COPY

AUG 26 1980

Docket Nos. 50-275
and 50-323

Mr. Malcolm H. Furbush
Vice President, General Counsel
Pacific Gas and Electric Company
77 Beale Street
San Francisco, California 94106

Dear Mr. Furbush:

SUBJECT: EMERGENCY PLAN - DIABLO CANYON PLANT, UNITS 1 AND 2

The staff has completed its initial review of the Diablo Canyon Power Plant, Units 1 and 2 Emergency Plan, February, 1980. As you are aware, new acceptance criteria for evaluating licensee, state and local emergency plans have been jointly developed by NRC and FEMA. These criteria are contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants". Accordingly, the Diablo Canyon, Units 1 and 2 Emergency Plan for full power operation, will be reviewed and evaluated for conformance with the provisions delineated in NUREG-0654.

Our initial review has indicated the the enclosed additional information and commitments are required in order to continue our evaluation of your emergency preparedness program.

Your response to the enclosed request should be submitted as soon as possible. Please contact Mr. Bart Buckley, the NRC Project Manager if you have any questions regarding these requests.

Sincerely,

Original signed by
Robert L. Tedesco

Robert L. Tedesco, Assistant Director
for Licensing
Division of Licensing

Enclosure:
Request for Additional
Information

cc: See next page

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OFFICE	DOL:LB#3	DOL:LB#3	AD/LB#3		
SURNAME	BBuckley:ph	ASchwencer	RTedesco		
DATE	08/27/80	08/27/80	8/29/80		

*See previous Councils

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DATE	08/22/80	08/22/80	8/25/80			



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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A handwritten signature in cursive script, reading "Robert L. Tedesco", is written over the typed name.

Robert L. Tedesco, Assistant Director
for Licensing
Division of Licensing

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Information

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DIABLO CANYON *

A. Assignment of Responsibility (Organization Control)

- A.1.d. Identify by title an individual in the State government who would take charge of State efforts.
- A.4 Identify the individual, by title, who will be responsible for assuring continuity of resources in the State government.

B. Onsite Emergency Organization

- B.4 Some responsibilities of the Site Emergency Coordinator may not be delegated to other individuals. Please clearly specify these.
- B.5 Revise the information in Chapter 5 to show that your emergency staffing conforms with minimum requirements in table B-1 of NUREG-0654.
- B.7 Describe the framework for long-term augmentation of your emergency organization. The Recovery Organization recommended by the Atomic Industrial Forum in their document "Nuclear Power Plant Emergency Response Plan" dated October 11, 1979, would provide an acceptable framework.
- B.8 Specify the corporate management, administrative, and technical support personnel who will augment the plant staff in the area of technical support for reentry/recovery operations.

C. Emergency Response Support and Resources

- C.2 Provide for the dispatch of a representative to principal offsite governmental emergency operations centers. Also, arrange to have representatives from principal offsite organizations at the EOF after it is activated.
- C.3 Identify radiological laboratories which can be used in an emergency. List their capabilities and expected response times.

* Requests are numbered according to items in Section II of NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of N-Power Plants".

D. Emergency Classification Systems

- D.1 NUREG-0654 requires that specific instruments, parameters or equipment status be shown for establishing each emergency class. The information presented in Section 4.2.1, "Notification of Unusual Event", should be accordingly quantified. (For example, terms such as "high", "abnormal", "rapid", etc. should be quantified).
- D.2 All the initiating conditions in NUREG-0610 and all postulated accidents in the FSAR should be included in the plan. A number of these have been omitted for the four classes of events. Please revise the text accordingly.
- D.3 Explain how the State/local governments' classification of emergency conditions correspond to your emergency action levels.

E. Notification Methods and Procedures

- E.3 Provide a standard format for the initial and follow-up emergency messages which will be used when contacting offsite authorities.
- E.4 The message content should be based on the information requirements specified.

F. Emergency Communications

- F.2 Each organization shall conduct periodic testing of the communications system. Describe tests and test frequencies, especially for systems that are not used routinely.

G. Public Information

- G.5 Describe your program designed to acquaint news media with emergency plans and information concerning radiation.

H. Emergency Facilities and Equipment

- H.6.a. Make provisions for offsite geophysical monitors.
- H.7 Identify offsite meteorological capability in the vicinity of your facility.
- H.8 Your description of meteorological instrumentation and procedures is too brief. Provide information on your compliance with Appendix 2 of NUREG-0654.

I. Accident Assessment

- I.7 Each organization shall have a capability to detect and measure iodine concentrations in air in the vicinity of the site as low as 5E-08 uCi/cc. State the ranges of your air sampling capabilities.

J. Protective Response

- J.2 Subsection 5-3-2-5 of your plan indicates that an agreement has been reached with Field Ranch to use a private road across the property as an alternate emergency evacuation route. No such agreement is present in Appendix 7. Please correct your statement or provide a copy of the agreement.
- J.8 Include as an appendix to your plan the time estimates for evacuation within the plume exposure EPZ. Discuss how this information is used to determine protective actions recommended offsite.
- J.10 Provide the following as part of your planning interface with off-site authorities for the implementation of protective measures with respect to the plume exposure pathway:
- a. Maps showing evacuation routes, sectors, relocation centers in host areas, shelter areas, hospitals, and other medical facilities.
 - b. Population distribution around the nuclear facility using the format specified in Table J-1 of NUREG-0654.
 - c. Means of notifying all segments of the transient population within the plume exposure EPZ.
 - d. Means for protecting those persons whose mobility may be impaired due to such factors as institutional confinement.
 - e. Provisions for the use of radioprotective drugs, particularly for emergency workers, including quantities, storage and means of distribution.
 - f. State and local organizations' plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency, and the predetermined conditions under which such drugs may be used by offsite emergency workers.
 - m. The bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded in residential units for direct and inhalation exposure, as well as evacuation time estimates.
- J.11. Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated food-stuffs. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify procedures for detecting contamination for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation.

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K. Radiological Exposure Control

- K.2 Identify individuals, by title or position, who can authorize emergency workers to receive doses in excess of 10 CFR Part 20 limits.
- K.4 (See P. 7 of State Plan)
- K.3 Describe in the plan the provisions for 24-hour dose determination and the records to be maintained for emergency workers who are to arrive onsite or at the EOF. Who performs these functions during an emergency?
- K.5 Specify your action levels for determining the need for decontamination and the means for decontaminating emergency personnel, supplies, instruments and equipment, and waste disposal.
- K.6 Describe onsite contamination control measures to include area access control, drinking water and food supplies, and the criteria for permitting return of areas and items to normal use.
- K.7 Describe your capability for decontaminating relocated onsite personnel, including provisions for extra clothing and decontaminants suitable for the type of contamination expected.

L. Medical and Public Health Support

- L.2 Each State shall develop maps showing the physical location of all public, private and military medical facilities within the State or contiguous States considered capable of providing medical support for victims of a radiological accident. These emergency medical services should be able to monitor contaminated personnel, and have facilities and trained personnel able to care for victims of radiological accidents.

N. Exercises and Drills

- N.1 Provide commitment to conduct an emergency response exercise prior to adoption of the operator, State and local plans and prior to issuance of an OL.
- N.2 State the frequency of all drills.
- N.4 Qualified observers from Federal, State and local governments should be present to observe and critique the required exercises. State your commitment to involve these governments, and propose means to incorporate comments generated by these observers.
- N.5

P. Responsibility for the Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans

- P.8 Provide an index of plan which covers any state and local plans attached. If the format of NUREG-0654 is not used, provide a cross reference between your plan and each criteria in the NUREG document.

