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 RECIPIENT NAME      RECIPIENT AFFILIATION  
 BUTLER, W.R.      Project Directorate I-2

SUBJECT: Responds to open items noted in Insp Repts 50-387/85-14  
           50-388/85-14 re radiation emergency near-site monitoring  
           equipment kit. Corrective actions: respirators removed from  
           radiation emergency near-site monitoring equipment kits.

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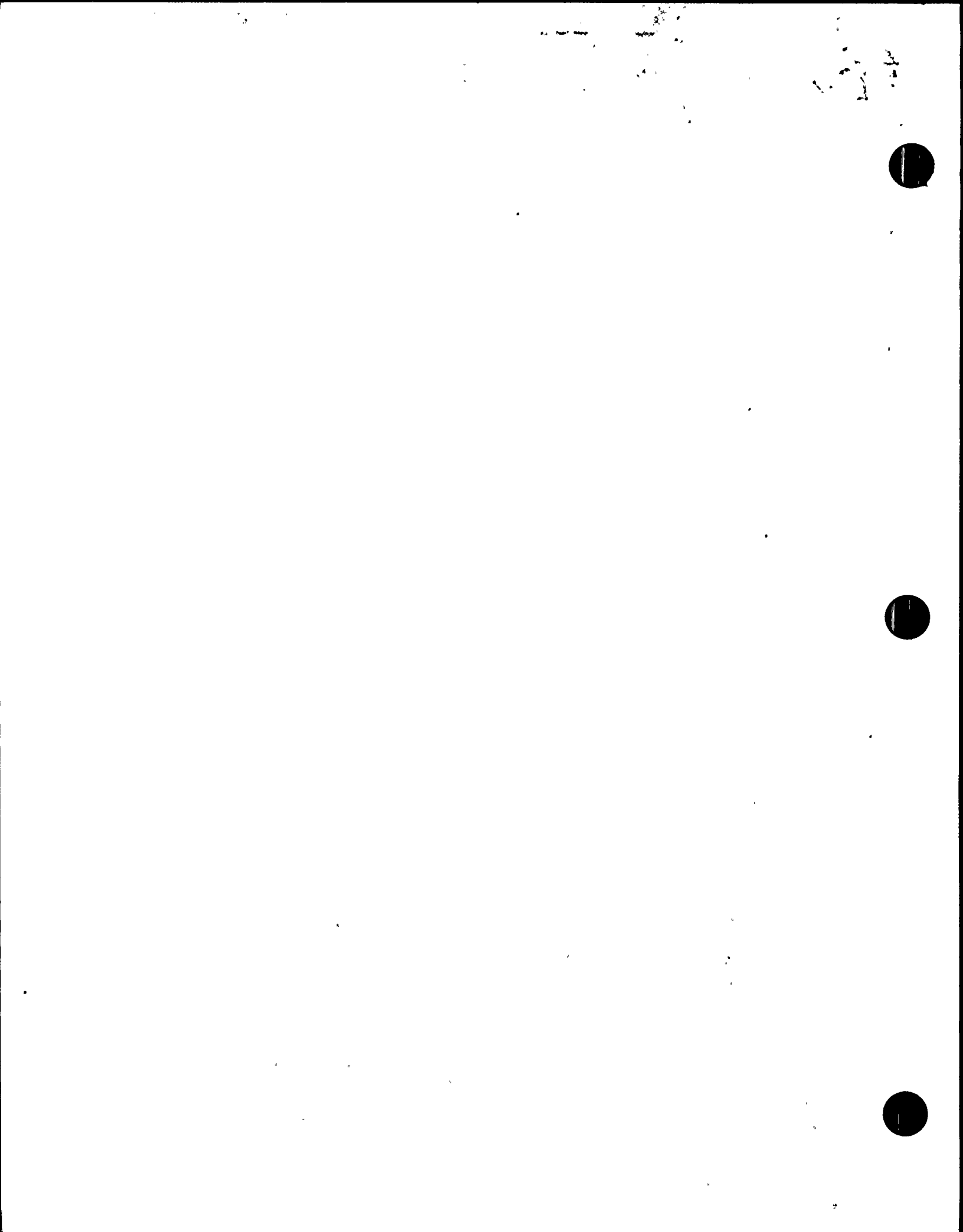
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**APR 29 1991**

Director of Nuclear Reactor Regulation  
Attn: Dr. W. R. Butler, Project Director  
Project Directorate I-2  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
EMERGENCY PLANNING - REMOVAL OF  
RESPIRATORS FROM NEAR-SITE MONITORING  
EQUIPMENT KIT  
PLA-3556 FILE R36,A17-13**

**Docket Nos. 50-387  
and 50-388**

Dear Dr. Butler:

Respirators were added to the Radiation Emergency Near-Site Monitoring Equipment Kit in response to concerns raised under NRC Open Items 50-387/85-14-02; 50-388/85-14-02. We have re-evaluated our position on this issue and have removed the respirators from this kit. Justification for our action is provided below. This change does not reduce the effectiveness of the Susquehanna SES Emergency Plan as delineated in 10 CFR 50.47(b) and 10 CFR 50, Appendix E, Section IV.

The near-site monitoring team is manned by members of the Susquehanna SES plant staff from groups other than health physics. This team normally monitors as directed within two miles of the release point, in areas that may be inside or outside the Emergency Planning Boundary (EPB) or the site boundary. The primary purpose of the near-site team is to provide indications of the magnitude of exposures in areas accessible to members of the public and to characterize plume location, dimensions, and deposition onto ground surfaces at greater distances from the plant than the on-site team, but closer in than the far-site teams.

Members of the near-site team are not called upon to perform monitoring in areas that would require them to wear respirators. Unlike the on-site team, the near-site team is not called to locate areas of peak exposure close to the plant. If levels of radioactivity are sufficiently high that teams beyond the site boundary cannot periodically travel through or into them to take measurements without the need for respiratory protection, then the conditions necessitating protective actions for members of the public obviously exist, and the usefulness of further centerline data collection by the near-site team during the plume exposure period is greatly diminished. In such cases, the team would be used to document plume boundaries, the time history of the leading edge travel, and the non-existence of the plume in politically sensitive areas which are affected.

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Additionally, the normal job assignments for members of the near-site team members are typically such that they do not have a history of respirator use. A person's ability to wear a respirator is determined by their medical and psychological condition, age, history of respirator use, type of respirator, duration of use, and work environment. Given that there is no one test or set of tests that can unequivocally determine in advance if a person can safely wear a respirator, it is not wise to expect individuals without a history of respirator use to function safely and effectively in the stressful environment of emergency response with respiratory protection.

Finally, the near-site team will be positioned, subject to frequent dosimetry monitoring, and rotated if appropriate, being mindful that the team members are not provided with respirator protection.

Based on the above, respirators have been removed from the Radiation Emergency Near-Site Monitoring Equipment Kits.

Should you have any questions regarding this action, please call Mr. J. M. Minneman at (717) 542-3233.



H. W. Keiser

cc: ~~NRC Document Control Desk (original)~~  
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Mr. G. S. Barber, NRC Sr. Resident Inspector  
Mr. W. T. Russel, Regional Administrator, Region I  
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12-1-54

