



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

APR - 9 1991

Docket No. 50-397

Washington Public Power Supply System
P. O. Box 968
3000 George Washington Way
Richland, Washington 99352

ATTENTION: G. C. Sorensen, Manager
Regulatory Programs

Gentlemen:

This acknowledges the receipt of your letter of December 27, 1990, File: G02-90-208, by which you submitted Revision 10 to the Washington Nuclear Project - Unit 2 (WNP-2) Emergency Preparedness Plan.

We have reviewed the plan revisions and have determined that most of the plan changes are consistent with the provisions of 10 CFR 50.54(q) pertaining to changes which do not decrease the effectiveness the plan. However, two elements appear not acceptable as indicated in the attached enclosure. These and other elements of the changes were discussed telephonically between A. McQueen and G. Good of my staff and Messrs. R. Chitwood, D. Larson, and F. Klauss of your staff on March 14, 1991. It was indicated that these items would be rewritten to insure no Emergency Plan degradation has occurred. They will be tracked as inspection open items until satisfactorily resolved.

If you have questions, please call me or Art McQueen of my staff at (415) 975-0241.

Sincerely,

Ross A. Scarano, Director
Division of Radiation Safety and
Safeguards

Enclosure:
As stated.

cc w/enclosure

Mr. J. W. Baker, WNP-2 Plant Manager
Mr. A. G. Hosler, WNP-2 Licensing Manager
Mr. G. D. Bouchey, Director, Assurance & Licensing
Mr. G. E. Doupe, Esq., WPPSS
Mr. A. Lee Oxsen, Deputy Managing Director
State of Washington
Mr. M. H. Philips, Esq., Winston & Strawn
Terry Strong, Dept. of Health, Olympia, Washington
R. Donovan, FEMA, Region X

MAY 4
cut

IE35

bcc w/enclosure
Docket File
Project Inspector
Resident Inspector
G. Cook
B. Faulkenberry
J. Martin
P. Eng, NRR/PD5
R. Erickson, NRR/PEPB

bcc w/o enclosure:
M. Smith

REGION V
AMcQueen
4/8/91
AOM

GGood *GHE*
4/8/91

JReese *JR*
4/9/91

REQUEST COPY YES / NO	REQUEST COPY YES / NO	REQUEST COPY YES / NO
SEND TO PDR YES / NO		



Comments on Washington Nuclear Project (WNP-2)
Emergency Preparedness Plan Changes (Revision 10)

<u>Page(s)</u>	<u>Section</u>	<u>Comment</u>
6-1 through 6-22		<p>Review of this section found it not fully consistent with methodology and guidance pertaining to EALS in NUREG-0654. Extensive discussions of this change and the elements of the tables were conducted by a Region V (RV) inspector with licensee emergency preparedness representatives on January 16 and 17, 1991, during a routine emergency preparedness inspection at the site (Inspection Report 50-397/91-02). NRC concerns were indicated on an item by item basis. Solutions to address the concerns were reviewed and tentatively agreed to between the NRC inspector and licensee personnel. It was indicated that Revision 12 to the Emergency Preparedness Implementing Procedure (EPIP) 13.1.1 would incorporate appropriate changes to address NRC concerns. This is being tracked by RV as an open inspection item (91-02-02). The emergency plan should therefore reflect the EALS agreed to. The change may be acceptable after revision to conform to EPIP 13.1.1, Revision 12. (Open Item 50-397/EP-10-01)</p>
11-7	11.6.1	<p>This appears to be a degradation of former plan commitments. The plan formerly read:</p> <p>"Deployment time to have monitoring teams in the field during normal working hours is less than thirty minutes and less than one and one-half hours for team members responding from home during offshift hours."</p> <p>The plan is changed to read:</p> <p>Field team personnel are required to be at their duty station within 60 minutes from the time an Alert or greater emergency active level is declared. Deployment time for field team personnel after they have arrived at their duty stations is anticipated to be 30 minutes or less. This is based on the time necessary to brief the team, load equipment, and depart the staging</p>

area. This deployment time could be shorter during normal work hours when field team personnel are more available and could respond sooner than the 60 minute required response time.

The plan formerly, therefore, made a commitment that field teams composed of personnel present at the site could be deployed to the field within thirty minutes, with the remaining deployment within one hour and thirty minutes. The newly submitted version appears to have effectively deleted the thirty minute deployment capability commitment altogether. This new version appears to effectively commit to the one and one half hour deployment for all field teams with the pressure to meet the thirty minute deployment time gone. In discussing this item with the licensee, on March 15, 1991, it was indicated that this item will be rewritten to assure there is no effective degradation of the former plan commitment. The change will be reviewed for acceptability upon receipt by RV. (Open Item 50-397/EP-10-02).