



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

JAN 31 1992

MEMORANDUM FOR: William H. Rankin, Chief
Emergency Preparedness Section

FROM: Anne. T. Boland, Radiation Specialist
Emergency Preparedness Section

SUBJECT: TURKEY POINT EMERGENCY PLAN CHANGE; REVISION 21

I. BACKGROUND

Florida Power and Light Company submitted Revision 21 to the Turkey Radiological Emergency Plan, dated May 21, 1991. The revision included text as well as Emergency Action Level (EAL) changes. To facilitate the review, the EALs were transmitted to Headquarters; Emergency Preparedness Branch for evaluation. The Headquarters evaluation did not identify any EAL changes which decreased the effectiveness of the Plan. A summary of the EAL comments is provided as an attachment to this memorandum.

The text changes were primarily administrative in nature including correction of typographical errors and grammatical changes. Global changes to the Plan included: (1) FPL Offsite Organization to FPL Corporate Organization; (2) Interim Emergency Teams to Onshift Emergency Teams; (3) Nuclear Emergency Planning Manager (Corporate) to Manager, Nuclear Emergency Preparedness; and (4) Emergency Planning Coordinator (Site) to Emergency Planning Supervisor. These changes which reflected no impact on the Emergency Plan will not be discussed further. A summary of the other changes to the Plan are discussed following.

II. CHANGES AND COMMENTS

A. Section 2, Organization, Facilities, and Support Services

1. Page 2-1, Item 2.1.1, Florida Power and Light Company

The Plan was revised to clarify that Florida Power and Light Company has primary responsibility for owner controlled area recovery and re-entry. Previously, the Plan only stated onsite recovery.

Comment: This Plan clarification was not a change in intent; therefore, there is no overall effect on Emergency Plan implementation.



2. Page 2-2, Figure 2-1, FPL Emergency Response Organization

The response organization was modified as follows:

- a. The Nuclear Watch Engineer was deleted as an alternate on-shift Team Leader for the radiation protection function. In addition, the TSC HP Supervisor replaced the Health Physics Supervisor as the primary Radiation Protection Team Leader, and the alternate was deleted.

Comment: These changes were discussed with John Kirkpatrick of the licensee's organization on January 22, 1991. The licensee stated that the title change of Health Physics Supervisor to TSC HP Supervisor did not reflect changes in the primary and alternate personnel filling the role. The new title was implemented to accurately reflect the functional position in the emergency organization. In addition, the deletion of the Nuclear Watch Engineer as an alternate on-shift Team Leader is appropriate. The licensee stated that adequate health physics coverage is maintained on each shift to cover this position until arrival of the primary TSC HP Supervisor. From these discussions, the inspector concluded that the changes made in the emergency organization chart were administrative and do not decrease the effectiveness of the Emergency Plan.

- b. The title of the First Aid/Decontamination Team was changed to the First Aid Team, and the primary and alternates for the function were changed. Previously, the interim personnel were First Aid trained employees or radiochemists, and the primary personnel were the Project Site Safety Supervisor or the EMT on shift. The new revision states interim and primary team members are Chemistry Technicians or HP Radiation Protection Men.

Comment: This area was discussed in detail with the licensee. The change in title of the Team was determined to be administrative in nature in that the overall function remains unchanged. The First Aid Team continues to provide minor first aid

treatment and decontamination of injured personnel. Upon initial review, the staffing and technical capability of the team appeared to be decreased by the change. Specifically, the EMT capability was deleted from the First Aid Team, and the licensee's training procedures did not require first aid training for Radiation Protection Men. Licensee representatives stated that the EMT capability continues to be available onsite on a 24-hour basis. However, because this is a contracted service no credit is taken in the Emergency Plan. In addition, the licensee informed the reviewer, that Chemistry Technicians (primary onshift First Aid Team members) are trained in Red Cross Multi-media first aid methods, and chemistry technicians are required to be onshift at all times per Technical Specifications. Further, Radiation Protection Men serve on the team only to provide decontamination and health physics support and are not expected to perform first aid treatment; therefore specialized first aid training is not required. These clarifications by the licensee resolved the reviewers concerns, therefore, these changes neither increase nor decrease the effectiveness of the Plan.

- c. The Security Shift Specialist replaced the Protected Area Guard as the alternate, interim Security Team Leader. In addition, the TSC Security Supervisor replaced the Plant Security Supervisor and the Assistant Plant Security Supervisor as the primary Security Team Leader.

Comment: These changes are changes in title only and do not reflect any change in the actual primary and alternates filling these roles during and emergency.

- d. The Offsite Assembly Area Supervisor replaced the Health Physics Supervisor as the designed primary for this position.

Comment: This change reflects a change in normal job title to emergency position title. This change neither increases nor decreases the effectiveness of the Plan.

- e. The revised chart now specifies that the OSC Emergency Response Teams will perform re-entry tasks.

Comment: This change reflects current licensee practice and appears appropriate.

3. Page 2-10, Item 2.2.4, Federal Response Actions

The discussion regarding the ENS was revised to delete the statement that the ENS is a dedicated line from the Control Room to the Operations Center.

Comment: This change was appropriate in that the ENS system is located at various plant and offsite locations, not just the Control Room.

4. Page 2-12, Figure 2-3, Turkey Point Plant Normal Operating Organization

The normal organization chart was significantly revised.

Comment: These changes in the normal organization do not appear to adversely affect the overall implementation of the Emergency Plan.

5. Page 2-13, Item 2.2.1, Normal Operating Organization

Emergency Preparedness was added as a supervisory responsibility of the Operations Superintendent - Nuclear.

Comment: Appropriate management oversight of the Emergency Preparedness program should not be affected by this change. The overall effect on the Emergency Preparedness Program due to management restructuring will be evaluated during future routine inspections.

6. Page 2-15, Item 2.2.1, Normal Operating Organization

This revision deleted the statement that the Quality Control Supervisor reports directly to the Plant Manager - Nuclear. The new organization chart shows this position as reporting to the Site Project Manager.

Comment: This change does not affect the emergency organization or the implementation of the Emergency Plan.

7. Page 2-17, Item 2.2.2.1, Immediate Response Phase

The licensee clarified the role of the On-shift Emergency Teams. Previously, the Plan stated that the teams should take actions regardless of the fact that primary emergency team members may be present. The revision states that the On-shift teams should take action until the emergency condition is mitigated or relieved by primary emergency team personnel.

Comment: This change neither increases nor decreases the effectiveness of the Plan.

8. Page 2-19, Figure 2-4, Immediate Response Organization

This organization chart was revised to reflect the title changes discussed in item B.2. above.

Comment: This change was administrative in nature and neither increases nor decreases the effectiveness of the Plan.

9. Page 2-34, Item 2.4.6, Emergency News Center

This paragraph was revised to allow the activation of the near-site Information Center at the Homestead National Guard Armory to be optional based on the discretion of the Emergency Information Manager. The licensee continues to commit to staffing and activation of the Emergency News Center at the General Office Building.

Comment: This change neither increases nor decreases the effectiveness of the Plan. The Emergency News Center at the General Office remains the primary with the Homestead National Guard Armory facility only to be activated as necessary to support an emergency situation.

10. Page 2-36, Figure 2-6, Turkey Point Plant
Emergency Facilities Location Map

This diagram was significantly upgraded to provide a clearer description of the Turkey Point site layout and the location of the emergency response facilities.

Comment: This change neither increases nor decreases the effectiveness of the Plan.

11. Page 2-38, Item 2.5.1, Plant First Aid Facility

The statements regarding the use of offsite support groups for the treatment of injuries involving radiation or radioactive material was clarified. The revised statement indicates that offsite support will be used for those situations "that cannot be adequately handled onsite."

Comment: This change is appropriate in that the site does maintain a limited first aid capability for handling minor injuries involving contamination.

12. Page 2-39, Item 2.5.5, South Florida Emergency
Physicians, P.A.

The licensee added to the Plan that cellular telephones are available to provide alternate communications between the hospital and ambulance and/or helicopter during the transport of an injured person. In addition, the Plan was modified to specify that the hospital will be notified of the arrival of an injured person by the "plant" rather than the "Control Room."

Comment: These changes neither increase nor decrease the effectiveness of the Plan.

B. Section 4, Notification and Communication

1. Page 4-1, Item 4.1, FPL Emergency Response
Organization

This section was revised to clarify that both the Emergency Coordinator and the Recovery Manager have responsibility for the completion of the



necessary notifications and determining the content of the notifications. Specifically, the Recovery Manger has this responsibility once the EOF is declared operational.

Comment: This change is appropriate and is consistent with the current FPL Implementing Procedures.

2. Page 4-10, Item 4.6, Communications Equipment

The title of the Public Address System was changed to the Plant Page System. The capabilities, power supply, and independence of the system remained unchanged.

Comment: This change neither increases nor decreases the effectiveness of the Plan.

C. Section 5, Response to Accident Conditions

1. Page 5-11, Item 5.1, Field Monitoring - Plant

The procedure reference regarding the operation and activation of the field monitoring teams was changed from HP-92 to EPIP-20129. The description of these teams and response resources remains unchanged in the Plan.

Comment: This change neither increases nor decreases the effectiveness of the Plan.

2. Page 5-16, Table 5-3, Typical Population within the Owner Controlled Area

The data related to the number of contractors potentially onsite during a single unit outage was changed from 1357 to 1750. This brings the typical site population to 3488.

Comment: This change reflects a Plan update and neither increases nor decreases the effectiveness of the Plan.

3. Page 5-22, Item 5.2.8, Alert and Notification System

The number of sirens in the 10-mile EPZ was upgraded from 33 to 41.

Comment: This change should be considered a Plan improvement.



4. Page 5-22, Item 5.3.1, Onsite Radiation Protection Program

The procedure reference for emergency exposure guidelines was changed from HP-91 to EIPs 20111 and 20130. In addition, the licensee modified the Plan to allow emergency exposures received for personnel rescue missions to be exempt from explicit Emergency Coordinator approval. All other exposures in excess of 10 CFR 20 limits must be approved by the Emergency Coordinator in advance.

Comment: The deletion of the requirement for authorization of emergency exposures in excess of 10 CFR 20 limits appears contradictory to NRC guidance. NUREG-0654, Item II.K.2, states that the licensee shall establish procedures in advance for permitting onsite volunteers to receive radiation exposures in the course of carrying out lifesaving and other emergency activities. These procedures are to include expeditious decision making and a reasonable consideration of relative risks.

Discussions with John Kirkpatrick of the licensee's organization on January 22, 1992, revealed that the licensee did not intend allow emergency exposures without management approval. Instead, the intent was to allow such approvals to be performed verbally by the Emergency Coordinator without having the workers sign and complete the scope of work paperwork. The reviewer noted that the licensee's procedures did allow for a such a verbal approval. However, because the revised Plan text appears to be contrary to regulatory guidance, the licensee agreed to modify the wording to explicitly indicate that Emergency Coordinator approval is required for all exposures of this nature; however, the approval can be verbal to expedite rescue operations. The inspector agreed with the licensee's proposal which is to be incorporated into the next revision of the Emergency Plan.

5. Page 5-26, Item 5.4.1, Onsite Recovery and Re-entry

The Recovery Manager was deleted from the Plan as an authority for determining when re-entry will take place. Currently, only the Emergency Coordinator has this authority. In addition, the



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Plan was modified to require that the TSC Health Physics Supervisor be responsible for providing HP coverage for Emergency Teams if the event is within the RCA.

Comment: These changes neither increase nor decrease the effectiveness of the Plan.

D. Section 6, Public Information

Pages 6-5 through 6-11, Sample FPL News Statements

New sample news releases were added to the Plan. The press releases are for the following categories: Unusual Event, Alert, Site Area Emergency, General Emergency, Medical Emergency, Emergency News Center Activation, and Loss of Power/Core Damage/Radiation Plume. The new sample releases provide a uniform format for press releases, fill in the blanks, and various textual options based on actual plant conditions.

Comment: This change neither increases nor increases the effectiveness of the Plan. The new releases do appear, however, to provide a more consistent structure for the release of emergency information.

E. Section 7, Maintaining Emergency Preparedness

Page 7-5, Item 7.1.4.1, Exercise (Integrated Drills)

The requirement for off-hours exercises was changed from "At least one exercise between 6:00 p.m. and midnight and at least one exercise between midnight and 6:00 a.m. every six years" to "At least one exercise between 6:00 p.m. and 4:00 a.m. every five years."

Comment: This change neither increases nor decreases the effectiveness of the Plan. The revised frequency for off-hour emergency exercises is consistent with FEMA guidance and the NRC inspection criteria contained in Inspection Procedure 83202.

III. SUMMARY AND CONCLUSION

Based on the review of Revision 21 to the Turkey Point Emergency Plan, the reviewer determined that, with the exception noted in Item II.C.4 above, the changes were consistent with the requirements of 10 CFR 50.47(b), 10 CFR 50, Appendix E, and 10 CFR 50.54(q) as well as the planning guidance provided in NUREG-0654. The licensee corrective actions regarding authorization of emergency exposures in

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excess of 10 CFR 20 limits will be incorporated into the next revision of the Emergency Plan. The letter to the licensee should reflect these facts.

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Attachment: HQ EAL Review
cc w/Attachment: C. Banks