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

Docket No: 50-466

OCT 23 1979

Mr. E. A. Turner, Vice President
Power Plant Construction and
Technical Services
Houston Lighting & Power Company
P. O. Box 1700
Houston, Texas 77001

Dear Mr. Turner:

SUBJECT: EMERGENCY PREPAREDNESS REQUIREMENTS - ALLENS CREEK NUCLEAR GENERATING STATION, UNIT 1

In a recent letter dated October 10, 1979 on the "Followup Actions Resulting from the NRC Staff Reviews Regarding the Three Mile Island Unit 2 Accident", we outlined the staff's requirements resulting from its Emergency Preparedness Studies. In that letter we stated that the Commission was considering what changes to current regulations and policy would be appropriate as a result of the Siting Policy Task Force Report (NUREG-0625), and it was likely that they would endorse the 10- and 50-mile emergency planning zones recommended by the EPA/NRC study.

On October 18, 1979, the Commission concurred in and endorsed the guidance on emergency planning zones recommended in the NRC/EPA report. In a policy statement on that date (Enclosure 1), the Commission directed the NRC staff to incorporate the planning basis guidance into existing documents used in the evaluation of State and local emergency preparedness plans to the extent practicable.

Thus, in addition to the requirements now set forth explicitly in Appendix E to 10 CFR Part 50, and the requirements of Enclosure 7 of our October 10, 1979 letter, it is the staff position that for near term CPs, preliminary plans for coping with the potential consequences of emergencies beyond the site boundary must include provisions for a plume exposure pathway Emergency Planning Zone (EPZ) and an ingestion pathway Emergency Planning Zone. The EPZ for the plume exposure pathway must encompass an area of about 10 miles in radius, and the EPZ for the ingestion pathway an area of about 50 miles in radius.

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The following information must be provided and evaluated in order to implement this staff position.

1. Contacts and agreements with local, State and Federal governmental agencies with responsibility for coping with emergencies for development of final plans must be documented for the areas within the plume exposure Emergency Planning Zone. This shall include agreement in principle between these agencies on a framework for emergency notification and protective action criteria acceptable to the NRC. For a description of the draft Emergency Action Level Guidelines see Enclosure 2. The principal government office or agency in each local political jurisdiction (county and municipality) within the plume exposure pathway EPZ, which would have the responsibility for prompt implementation of protective action warnings and instructions to the public, must be clearly identified.

2. A preliminary analysis which describes the means to be employed in the notification of State and local governments, Federal agencies and the public in the event of an emergency must be submitted for the plume exposure EPZ and for notification of the agricultural agencies and other governmental bodies having jurisdiction within the ingestion pathway EPZ. A commitment must be made to provide prompt notification to offsite authorities and to assure that offsite authorities have the resources to provide a general early warning and clear instructions to the public, acceptable to the NRC, in the plume exposure EPZ within 15 minutes following notification from the facility.

3. Preliminary planning must reflect the need to include facilities, systems, and methods for identifying the degree of seriousness and potential scope of radiological consequences of emergency situations within and outside the site boundary, including capabilities for dose projection using real-time meteorological information and for dispatch of radiological monitoring teams within the EPZ's. The anticipated role and capabilities of offsite agencies in radiological monitoring and dose assessment in the environs must be described for both plume and ingestion exposure pathways. Preliminary planning must reflect the role of the on-site technical support center and of the near-site emergency operations center in assessing information, recommending protective action and disseminating information to the public.

4. Preliminary planning must reflect provisions for initiating protective actions for all exposure pathways, onsite and offsite, including:

   (a) Direct radiation exposure from a confined source in-plant, an airborne plume, and ground deposition,

   (b) Inhalation exposure from an airborne plume, and

   (c) Ingestion exposure from contaminated water, milk, and other agricultural products.

A preliminary analysis which describes various available protective action options must be submitted for the areas within the Emergency Planning Zones. This must include estimates of evacuation times for various sectors and distances within the plume exposure EPZ. Preliminary plans for protective action recommendations within the plume exposure EPZ must include evacuation, sheltering, and area access control. Preliminary plans for protective action recommendations within the ingestion exposure EPZ must include taking cows off pasture when required and controlling the use of milk, drinking water, and agricultural products whose source is within the ingestion EPZ.

If you have any questions concerning this matter, please contact the NRC Project Manager for your facility.

Sincerely,

D. B. Vassallo, Acting Director
Division of Project Management
Office of Nuclear Reactor Regulation

Enclosures:
1. Commission Policy Statement
2. NRR Staff Draft Guidelines

cc w/enclosures:
See next page

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PLANNING BASIS FOR EMERGENCY RESPONSES TO NUCLEAR POWER REACTOR ACCIDENTS

AGENCY: Nuclear Regulatory Commission

ACTION: NRC Policy Statement

Purpose

This is a statement of policy with regard to an Environmental Protection Agency (EPA) and Nuclear Regulatory Commission (NRC) task force report on guidance for use in state and local radiological emergency response plans at nuclear power plants.

Background

The NRC received a request from the Conference of Radiation Control Program Directors, an organization of State officials, to "make a determination of the most severe accident basis for which radiological emergency response plans should be developed by offsite agencies." In response, an EPA and NRC task force was established which prepared a report entitled "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," NUREG-0396, EPA 520/1-78-016, dated December 1978. Single copies of the report can be obtained by writing to the Director, Division of Technical Information and Document Control, Nuclear Regulatory Commission, Washington, D.C. 20555. The task force report was published for public comment in the Federal Register on December 15, 1978 and the comment period was extended to May 15, 1979 to allow additional comments resulting from the accident at Three Mile Island. A synopsis of the comments received and the task force consideration of these comments is available from the Assistant Director for Emergency Preparedness, Office of State Programs, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555.

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NRC Policy

NRC concurs in and endorses for use the guidance contained in the task force report. In endorsing this guidance, the Commission recognizes that it is appropriate and prudent for emergency planning guidance to take into consideration the principal characteristics (such as nuclides released and distances likely to be involved) of a spectrum of design basis and core melt accidents. While the Commission recognizes that the guidance may have significant response impacts for many local jurisdictions, it believes that implementation of the guidance is nevertheless needed to improve emergency response planning and preparedness around nuclear power reactors.

The Commission is directing its staff to incorporate the planning basis guidance into existing documents used in the evaluation of state and local emergency response plans to the extent practicable. The NRC has recently published an Advance Notice of Proposed Rulemaking concerning additional regulations on emergency plans, 44 FR 41484. Tuesday, July 17, 1979. Additional guidance will be provided following this rulemaking. This additional guidance can be expected to consider how local conditions such as demography, land use, and meteorology can influence the size and shape of the EPZs and to address other issues, such as evacuation planning.

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Planning Basis

The major recommendation of the report is that two Emergency Planning Zones (EPZs should be established around light water nuclear power plants. The EPZ for airborne exposure has a radius of about 10 miles; the EPZ for contaminated food has a radius of about 50 miles. Predetermined protective action plans are needed for the EPZs. The exact size and shape of each EPZ will be decided by emergency planning officials after they consider the specific conditions at each site. These distances are considered large enough to provide a response base which would support activity outside the planning zone should this ever be needed.

The report also provides planning basis guidance in the form of a range of time values in which emergency response officials should be prepared to implement protective action. The report indicates that, depending on such factors as the specific sequence of events during an accident which results in the release of radioactivity to the atmosphere and the prevailing meteorological conditions, protective action may be required from perhaps one-half hour to one day after the initiation of the accident. Development and periodic testing of procedures for rapid notification of emergency response officials is encouraged, since the time available for action is strongly affected by the time consumed in notification.

The chemical and physical characteristics of those radionuclides which contribute most significantly to human exposure are presented.

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Specific implementation dates for full implementation of the task force recommendations and any others that are developed will be established as part of the ongoing rulemaking effort. The Commission also expects the staff to assist state and local governments in improving their emergency response capabilities at existing sites in the immediate future.

Dated at Washington, D.C. this 16th day of October 1979.

FOR THE NUCLEAR REGULATORY COMMISSION

Samuel J. Chilk

Secretary of the Commission