



Docket No. 50-346

License No. NPF-3

Serial No. 600

March 27, 1980

RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Mr. Darrell G. Eisenhut, Acting Director
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

The U.S. Nuclear Regulatory Commission and the Federal Emergency Management Administration have conducted an on-site review of the emergency planning related to the Davis-Besse Nuclear Power Station. The on-site review was conducted February 19, 20 and 21, 1980. The items identified by the review team, for which some action was requested, are shown in the attached. Also shown is the Toledo Edison Company's response to those items. Comments from Toledo Edison's March 21, 1980 review with the inspection team leader are included.

Toledo Edison will use the upgraded emergency plan (with the changes indicated in the attached) to develop implementing procedures and conduct training. The intention remains to implement the upgraded emergency plan in the late spring or early summer 1980.

Should you have questions or if you wish to discuss any of these items, please do not hesitate to contact me or my staff.

Very truly yours,

TC 31

cc: Mr. Bill Axelson, w/a
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Mr. Jerry Martin, w/a
Battelle Northwestern Laboratories
P. O. Box 999
Richland, Washington 99352

THE TOLEDO EDISON COMPANY EDISON PLAZA 300 MADISON AVENUE

8004010
TOLEDO, OHIO 43652

A043
3/10
ENCL TO:
FILES
NRC POR
LPOR
IAE (2)
EPB-DOR
STATE PROGRAM
B GRIMES

F

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

Toledo Edison Response
To NRC/FEMA On Site Review
Items (Page by Page)

NRC Item

Pg. 4-1 - Insert in the plan Toledo Edison responsibility to assess the 50 mile pathway and make recommendations to the cognizant agencies - insert in section six of the plan.

Toledo Edison Response

Paragraph 6.4.4 of the plan includes the requested recommendation.

NRC Item

Pg. 4-3 - Unusual event classification does not address (1) failure of a safety or relief valve to close or (2) loss of containment integrity requiring plant shutdown.

Toledo Edison Response

Page 4-3 has been modified to include both the items noted.

NRC Item

Pgs. 4-10 and 4-11 - Change classification to meet NUREG-0610 (and to be compatible with the State of Ohio).

Toledo Edison Response

The classification system currently employed by the State of Ohio does not conform to NUREG-0610. The State Plan will be revised by April 28, 1980. When the revision is complete, the Davis-Besse Plan will be revised to be compatible.

NRC Item

Pg. 4-11 - For a Class B accident, or its NUREG-0610 equivalent, seeking shelter, as a minimum, should be recommended.

Toledo Edison Response

This recommendation has been added to page 4-11.

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

-2-

NRC Item

Pgs. 4-15 thru 4-22 - Insert reliable (safety grade) instrument reading to assess and classify the accident (refers to specific emergency action level readings).

Toledo Edison Response

Each emergency action level has been reviewed and definitive information provided. Whenever feasible, direct instrument readings are given. In the absence of instrument readings other definitive information is provided.

NRC Item

Pg. 4-23 - Item No. 11 should be changed to an unusual event.

Toledo Edison Response

The change has been made.

NRC Item

Pg. 4-24 - Item No. 25 should be changed to an alert.

Toledo Edison Response

The change has been made.

NRC Item

Pg. 4-25 - Keep table 4-3.

Toledo Edison Response

Table 4-3 has been retained.

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

-3-

NRC Item

Pg. 5-7 - Clarify who assigns communicators.

Toledo Edison Response

Page 5-7 now reflects the method of communicator assignment.

NRC Item

Pgs. 5-9, 5-31 - Typographical errors (Coordinator was used instead of communicator).

Toledo Edison Response

The correction has been made.

NRC Item

Pgs. 5-10 - Indicate when the offsite emergency organization will be activated.

Toledo Edison Response

The information requested has been added to page 5-9.

NRC Item

Pgs. 5-20 - The NRC direct line telephone shall be manned within one hour when required.

Toledo Edison Response

Paragraph 5.4.9 includes this requirement.

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

-4-

NRC Item

Pg. 5-24 - The function of the PUCO in relation to the emergency plan should be clarified.

Toledo Edison Response

Reference to the PUCO has been deleted (it will also be deleted from the state plan).

NRC Item

Pgs. 5-31 and 5-32 - Better position descriptions for key onsite and offsite personnel (i.e., onsite Operations Director, Emergency Operations Manager, Station Operations Manager, Emergency Duty Officer; offsite Chairman and Chief Executive Officer, Emergency Director, Public Relations, Recovery Director).

Toledo Edison Response

These position descriptions have been upgraded and are presented in Table 5-2. Paragraph 6.1.2 defines the role of the Emergency Duty Officer.

NRC Item

Pg. 6-13 - Indicate in Section 7 the offsite ability to measure radio iodine (i.e., SAM-2 and silver zeolite).

Toledo Edison Response

Table 7-2 has been added and reflects the SAM-2 and silver zeolite assets.

NRC Item

Pg. 6-16 - Change classification to NUREG-0610.

Toledo Edison Response

See comments for pages 4-10 and 4-11 above.

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

-5-

NRC Item

Pg. 8-11 - Letters of Agreement must be updated every two years.

Toledo Edison Response

The requirement was changed from every year to every two years.

TC 31/3-7

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

General Items

NRC Item

- 1) Additional rings of TLD's as per Branch Technical Position (BTP) for RG 4.8 should be addressed.

Toledo Edison Response

The additional rings of TLD's required in the BTP for RG 4-8 have been added. This is addressed in Toledo Edison's response to the TMI short term lessons learned.

NRC Item

- 2) Containment radiation plots us. Core damage for 100% gap activity, 1% and 10% fuel inventory should be provided.

Toledo Edison Response

Bechtel Corporation is providing the required plots. One plot has been provided. Remaining plots will be provided by the end of April 1980. When the plots are received they will be added to the plan.

NRC Item

- 3) Potassium Iodide (KI) distribution procedure should be approved by an M.D. Site emergency workers must be screened to insure there will be no complications with KI. Also, additional KI should be stored in the ECC.

Toledo Edison Response

An implementing procedure is being developed to incorporate the necessary screening and administration of KI. This procedure will be approved by the Company's Medical Advisors who are MD's. This action will be completed by 5/30/80.

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

-2-

NRC Item

- 4) Appendix A (List of Implementing Procedures) should include the post accident procedures from TMI short term lessons learned (as per NRC 10/30/79 letter).

Toledo Edison Response

These procedures are listed as supporting procedures in Appendix A.

NRC Item

- 5) Research offsite meteorological data for backup of Davis-Besse meteorological station.

Toledo Edison Response

Paragraph 7.6.5 has been modified to reflect availability of backup meteorological data from both Cleveland and Toledo Airports. Additionally, wind direction and velocity are available from the U.S. Coast Guard at Marblehead.

NRC Item

- 6) Ensure the followup message requirements of NUREG-0654 are addressed (item E-4).

Toledo Edison Response

Followup message data required by NUREG-0654, E-4 will be addressed in Davis-Besse procedure AD 1850.06. This procedure is a support procedure for the emergency plan.

NRC Item

- 7) Evacuation times required by NUREG-0654 (J-8) must be included in the plan.

Toledo Edison Response

Evacuation times are included in Appendix D on the Emergency Plan.

Docket No. 50-346
License No. NPF-3
Serial No. 600
March 27, 1980

-3-

NRC Item

- 8) Include the requirement for total population dose exposure in the dose projection procedures.

Toledo Edison Response

This requirement was added to the plan (page 9-2).

NRC Item

- 9) Provided updated long range plan for TSC, ECC and press center.

Toledo Edison Response

An updated response is being prepared for submission to the short term lessons learned task force. This will be completed by the end of March.

TC 31/8-10