

AMERICAN ELECTRIC POWER *Service Corporation*



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November 30, 1979
AEP:NRC:00303

Donald C. Cook Nuclear Plant Units 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-72
Commentary

Mr. Samuel J. Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing and Service Branch

Dear Mr. Chilk:

The attachment to this letter is in response to Mr. D. G. Eisenhut's letter of October 10, 1979 which requested comments on the document entitled "Basis for Emergency Action Levels for Nuclear Power Facilities".

Very truly yours,

A handwritten signature in dark ink, appearing to read "R. W. Jurgensen".
R. W. Jurgensen
Chief Nuclear Engineer

RWJ/cys

cc: R. S. Hunter
John E. Dolan
D. V. Shaller - Bridgman

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U.S. Nuclear Regulatory Commission
Samuel J. Chilk

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In addition, General Electric notes that "Turbine Failure" is identified as an example of an initiating condition (Item 14e, page 5). We believe that within the context of the document "Turbine Failure" is intended to mean the occurrence of an event that might lead to the ejection of external missiles so as to impair the safety of the reactor plant (see Reference 3). The use of the term "Turbine Failure" without a qualifying definition could be misconstrued to mean all turbine "forced outages". Since the vast majority of turbine forced outages are not related in any way to the safety of the plant, this would be an unwarranted reporting of irrelevant events. General Electric therefore suggests that "Turbine Failure" on page 5 is inappropriate and should be deleted.

We appreciate the opportunity to provide these comments and would be pleased to respond to any questions you may have.

R. H. Buchholz

R.H. Buchholz, Manager
BWR Systems Licensing

/mac

cc: G.G. Sherwood
J.E. Ward
L.F. Gifford

Mr. Samuel J. Chilk, Secretary

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bc: S. J. Milioti J. I. Castresana/G. M. Gurican
Members of the NSDRC Subcommittee on Emergency and Security Plans
J. Warnock
XX-N-6219
AEP:NCR:00303

ATTACHMENT

TO

AEP:NRC 00303

COMMENTS ON "BASIS FOR EMERGENCY ACTION
"LEVELS FOR NUCLEAR POWER FACILITIES"

1. The basis contains no appropriate justification for the establishment of the "Notification of Unusual Event" class and therefore this level should be eliminated from licensee Emergency Plans for the following reasons:
 - a) Minor events having no effect on the health and safety of the public because no radiological hazard or potential hazard exist do not warrant the consideration by public officials or agencies.
 - b) An event which comes into the realm of being classified as an emergency "Alert" shall require due notification and action to mitigate any serious consequences associated with the event, hence the public is properly protected against being exposed to a radiological hazard.
 - c) The examples listed for this class of emergency do not realistically coincide with the "Expected Frequency" shown on the table for these events.
 - d) Newly established NRC acceptance criteria for emergency plans require prompt notification (within 15 minutes) of off-site agencies following the occurrence of an emergency having potential or projected radiological consequences, and the "Release Potential" for this class states that "No releases of radiological material requiring off-site response or monitoring are expected..." and
 - e) Since minor events are truly not emergencies, but rather are the expected contingencies which may arise in day to day operations, more confusion may result from the use of this classification of unusual events for plant operations, off-site agency operations, and communications between public officials and the public, especially in situations where no real danger exists.
2. The use of example situations or events associated with the other "Emergency Action Level" classes does not create an increase in protection of the public and therefore should not serve as a basis in the establishment of a specific emergency class for the following reasons:

- a) The public would be better protected if EAL classes could be defined by limits of dose exposure similar to 10 CFR 100 criteria or EPA's Protective Action Guidelines.
 - b) Dose estimates should serve as the basis for any projected radiological release consequence and by the establishment of estimate levels associated with an emergency event or classification, the appropriate off-site actions can be taken to protect the public.
 - c) In addition, examples alone can create a reliance on the part of the operator to only consider those possibilities listed rather than being prepared for some totally unexpected event when making his determination as to an emergency level classification and hence this would lessen the protection of the public's safety.
3. Under "Licensee Actions" for each Class the close out actions required include written summary reports within certain time frames as indicated. This action does not serve to protect the health and safety of the public above and beyond what is already required under Technical Specification reporting requirements which reference Regulatory Guide 1.16, and therefore should be removed from future editions of this document.
 4. Finally, the "Class Description" and "Purpose" sections of each table do not serve as a basis, in and of themselves, for the establishment of the particular emergency class. Rather, there appears to be a definition of certain goals which may well be considered as actions in the "Purpose" sections and therefore these purposes would be better placed in the actions to be taken listings for each class; and the general descriptions for each class of emergency are too vague and could be more appropriately described if related directly to project or actual dose estimates expected to be received by the public during a given event.



Carolina Power & Light Company

November 29, 1979

1. HAROLD DENTON
2. James

Serial No: CD-79-3079

FILE: W-3514(K)
FILE: NC-3514(K)
FILE: W-1740(B)
FILE: NC-1740(B)

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Operating and Service Branch

COMMENTS ON NUREC-0610

Dear Sir:

As solicited in Mr. Harold R. Denton's September 19, 1979 letter, Carolina Power & Light Company is submitting the following comments on NUREC-0610, "Draft Emergency Action Level Guidelines for Nuclear Power Plants." Our comments are directed to each of the four categories: Unusual Event, Alert, Site Emergency and General Emergency.

Notification of Unusual Event

This would require notification of State/local authorities for a short-term event with a duration of only a few minutes. There is no need to exercise off-site authorities for a minor event of known cause which has ended.

Item 4 under Licensee Actions requires a written summary within 24 hours. This should be relaxed to a time frame of 5-10 days for such an event. The 24-hour requirement would distract some attention from proper operation; for weekend events, there would probably be no one available at the state or local authorities to receive the report.

Augmenting on-shift resources is almost certain to be unnecessary for an unusual event (Licensee Actions, Item 2). Too frequent use will impair the sense of urgency needed for a significant problem.

The list of initiating conditions for unusual events needs clarification. Examples are:

- a. Item 1 would require State/local authorities to stand by for SCOD periodic tests.
- b. Item 2 would require State/local authorities to be notified when a quarterly technical specification reporting limit had been exceeded that would be the result of a gradual, cumulative release history instead of a single "unusual event."

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- c. Item 11 would require notification on loss of plant computer; depending on plant design, this could be important or trivial. Plant design should be factored into this requirement. Item 11 would also require notification on loss of meteorological instrumentation. This should not be required in the absence of any other event.
- d. For Item 14, more specific definitions (and/or examples) are needed for the terms "near aircraft activity," "near (site)... explosion," "near (site)... gas release," and "turbine failure."
- e. Item 15 is the "catch-all" clause which leaves the auditability aspect open-ended. If there are other examples, they should be specified, but this open-ended category should be eliminated, or enforcement and auditing requirements would be too ambiguous.

Notification of Alert Event

Item 5 under Licensee Actions requires periodic updates to off-site authorities every fifteen minutes; this is too frequent and should be no more frequent than once per hour or when significant new information becomes available.

Item 7 under Licensee Actions (written summary within 8 hours) is not practical: The assumption in this item is that the event has already ended; it should then be verbally closed out by a summary to off-site authorities. It could be followed by a written brief in 24-48 hours and a written summary in 3-4 days.

The list of initiating conditions for alert events needs clarification. Examples are:

- a. Item 18.d.: Toxic and flammable gases routinely enter the plant site under controlled conditions. This NUREG would require this to be an Alert Event.
- b. Item 19 is the "catch-all" clause which again leaves the auditability aspect open-ended. This should be eliminated.

Notification of Site Emergency

Item 9 under Licensee Actions requires a written summary within 8 hours. This requirement is not practical and should be relaxed.

Item 16 under initiating conditions is another "catch-all" clause which should be eliminated.

Notification of General Emergency


Item 9 under Licensee Actions requires a written summary within 8 hours. This requirement is not practical and should be relaxed.

March 1, 1968

The inclusion of Item 100-1000000 is inappropriate for the maximum potential of the public health and safety since "knows and responds" is listed on the list. This should be listed as Item No. 1, perhaps as "action and initiative programs," in order to properly emphasize the action that must precede the public.

Please contact our staff if you have any questions concerning these items.

Yours very truly,


M. K. Wiley
Executive Vice President
Power Supply & Customer Services

L. B. [unclear]