



**R&W Fuel Company**

An American Company With  
Worldwide Resources

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October 25, 1989

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Mr. Eldon Testa  
United States Nuclear Regulatory Commission  
Region II  
101 Marietta Street, N. W.  
Atlanta, GA 30323

Dear Mr. Testa:

This letter is in response to our telephone conversation on October 24, 1989. You requested information relating to certain capabilities and measures the CNFP would take in the event of adverse weather.

QUESTION 1: What is the maximum wind speed that can be measured by meteorological equipment maintained at the CNFP?

RESPONSE: The CNFP does not inventory any type of meteorological equipment.

If necessary, meteorological data can be obtained from the Naval Nuclear Fuel Division or the U. S. Weather Bureau Office, located in nearby Lynchburg, Virginia.

QUESTION 2: What is our emergency action level for flooding conditions?

RESPONSE: Please reference Section 8.2.1.3 of the enclosed pages of our RCP.

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Mr. Eldon Testa, USNRC Region II

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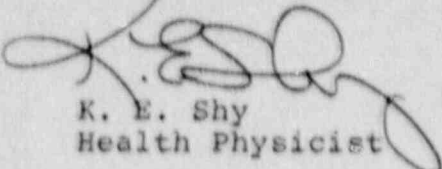
QUESTION 3: What is our action plan in the event of adverse weather conditions?

RESPONSE: Please reference Section 11.0 of the enclosed pages of our Emergency Procedure.

If you have any further questions, please contact me.

Sincerely,

B&W FUEL COMPANY  
COMMERCIAL NUCLEAR FUEL PLANT

  
K. E. Shy  
Health Physicist

KES:cmr

Attachments

LETT/51-TX.KES

8.0 FACILITY DESCRIPTION

8.2.1.2 Alarm Systems and Release Prevention

LIQUID EFFLUENT RELEASE PREVENTION

Potentially contaminated liquid effluent is evaporated and processed through our air effluent system as described in Chapter 5. The air effluent release prevention features are as previously described. The retention tank backup system (also described in Chapter 5) utilizes liquid level alarms which sound in the Health-Safety Office. Flow can be switched to the empty tank while the full tank is evaluated for compliance with 10 CFR 20 Appendix B limits prior to release. The two tanks are joined by an overflow line so that in case of alarm failure, the excess waste will flow into the other tank. In addition, the tanks are protected by a 2,000 gallon concrete sump. A diagram of the retention tank system is shown in Figure 8.3.

8.2.1.3 Support Systems

EARTHQUAKE

The CNFP is located in an area classified as Zone 2 on the Seismic Risk Map of the United States and corresponds to an intensity of VII on the Modified Mercalli Scale. This intensity has an acceleration range of 0.06 and 0.14 g and implies variable damage to building. It is assumed there would be no loss of integrity of the metal frame, sheet-metal-covered CNFP facility, due to the metal's ductility.

8.0 FACILITY DESCRIPTION

8.2.1.3 Support Systems

TORNADO

The CNFP is not designed to withstand the direct impact of a tornado. However, the CNFP is located in a relatively low probability area for tornadoes. The probability of a tornado actually striking the site in any given year is estimated to be  $3.0 \times 10^{-4}$ , with a recurrence interval of 3,333 years.

FLOODS

The possible effects of flooding at the CNFP are considered to be zero since the estimated 500 year flood would have a stage of 497 feet, while the floor of the CNFP is at 547 feet. The Standard Project Flood projected by the Corps of Engineers would reach 502 feet, still 45 feet below the CNFP floor. Elevations are above sea level.

Accidents At Neighboring Activities

Babcock & Wilcox operates the NNFD and NNFD-RL facilities on the site adjacent to the CNFP. A criticality accident at those facilities would probably activate the CNFP criticality monitoring system which would sound the evacuation alarms.



- 10.21 Call CNFP Guard and give information.
- CNFP Guard 10.22 Make an announcement over the public address system to evacuate the plant immediately.
- Employee 10.23 Evacuate the plant and proceed to your designated muster area.
- Senior Employee Present 10.24 Muster employees and report results to CNFP Guard.
- CNFP Guard 10.25 Contact the NNFD Security Control Room and request assistance.
- 10.26 Control vehicle traffic.
- 10.27 Call the following CNFP Emergency Response Organization members:
  - 10.27.1 Plant Manager
  - 10.27.2 Emergency Officer
  - 10.27.3 Security Officer
- CNFP Emergency Response Members 10.28 Upon arrival at the CNFP, assume normal business hours responsibilities.

11.0 ADVERSE WEATHER/SEISMIC CONDITIONS - EMERGENCY CLASSIFICATION - NOTICE OF UNUSUAL EVENT

- 11.1 For the purpose of this procedure, severe weather conditions shall be defined as:
  - 11.1.1 Tornado Warning
  - 11.1.2 Hurricane Warning
  - 11.1.3 Flooding conditions (causing a direct threat to the CNFP)
  - 11.1.4 Earthquake

Responsibility

Action

NORMAL BUSINESS HOURS

- Emergency Officer 11.2 Consult with the Plant Manager to determine the most appropriate plan of action. The following shall be considered:
  - 11.2.1 Termination of plant operations.

- 11.2.2 Securing plant utilities.
- 11.2.3 Site evacuation.
- Plant Manager 11.3 Insure required offsite agency notifications are made when: (Call List - Exhibit J - Form J-7) (Page 66)
- 11.3.1 Emergency is declared.
- 11.3.2 Existing emergency classification must be escalated.
- 11.3.3 Emergency is terminated.

OTHER THAN NORMAL BUSINESS HOURS

- CNFP Guard 11.4 Notify the following:
- 11.4.1 Plant Manager
- 11.4.2 Emergency Officer
- 11.4.3 Security Officer
- Plant Manager/  
Emergency Officer 11.5 If plant operations are in progress, evaluate the need to:
- 11.5.1 Terminate operations.
- 11.5.2 Secure plant utilities.
- 11.5.3 Evacuate the site.
- 11.6 Insure required offsite agency notifications are made as noted in Section 11.3.

12.0 MAJOR FIRE/EXPLOSION: EMERGENCY CLASSIFICATION - ALERT

Responsibility

Action

NORMAL BUSINESS HOURS

- Area Supervisor 12.1 Activate fire alarm.
- Employees 12.2 Evacuate the plant, proceed to your respective muster area (Exhibit B) (Page 29).

NOTE: Emergency Team members report to their respective muster officer and then