

DEC 05 1977

Docket No. 50-368, 50-313

Arkansas Power and Light Company
ATTN: Mr. William Cavanaugh, III
Executive Director, Generation
and Construction
P. O. Box 551
Little Rock, Arkansas 72203

Gentlemen:

SUBJECT: ARKANSAS NUCLEAR ONE PLANT EMERGENCY PLAN
(ARKANSAS NUCLEAR ONE-UNIT 2)

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In our review of the Arkansas Nuclear One plant Emergency Plan, which is applicable to both ANO-1 and ANO-2, we considered that the provisions for emergency drills and exercises provided a sufficient framework with respect to the scope of such drills and exercises and the coordination with supporting state and local agencies. Our finding, as set forth in our Safety Evaluation Report for ANO-2, was based on the fact that your commitment, although somewhat general, was sufficient to meet the requirements of Appendix E to 10 CFR Part 50.

We noted in our Safety Evaluation Report that the details and procedures to implement the Emergency Plan would require inspection and evaluation by our Office of Inspection and Enforcement prior to issuance of an operating license. Subsequent to the formulation of our finding as reported in our SER, it has been brought to our attention, through the inspection process, that the implementation of the emergency planning program appears to be seriously deficient in the areas of the scope of drills and exercises and the coordination of these with the offsite support agencies.

In view of these inspection findings it is apparent that Arkansas Power and Light Company has not met what we considered to be the intent of the plans with respect to implementing certain aspects dealing with the scope of drills and exercises and their coordination with offsite support agencies. Our inspection findings were initially set forth in Section C.3.c Inspection and Enforcement Report No. 77-08 on Docket No. 50-313 (ANO-1).

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An Emergency Plan should provide reasonable assurance that appropriate measures can and will be taken to protect health and safety and prevent damage to property in the event of an emergency. We will require that sufficient advance planning be executed by AP&LCo, including the preparation of procedures to implement the planning objectives and periodic testing by drills and exercises, to ensure (1) that a high order of preparedness exists, (2) an orderly and timely decision making process at times of stress and (3) the availability of necessary equipment, supplies and services.

In this regard we consider the response provided in Section II of the letter of Mr. D. A. Rueter to Mr. G. L. Madsen dated June 22, 1977 to be completely inadequate in meeting our requirements as identified above.

It is, therefore, our position that Arkansas Power and Light Company amend the Emergency Plan and the associated implementing procedures relating to drills and exercises to provide for participation of offsite emergency support personnel, including those of state and local agencies on an annual basis (i.e., at least once each calendar year). Each such annual drill will be required to address, as a minimum, the communication links and notification procedures with those agencies to demonstrate that capability for early warning of the public is maintained. The plan will also be required to contain provisions for quarterly (i.e., once each calendar quarter) drills for fire brigade members, annual fire drills including active participation by an offsite fire department, and annual drills of repair and damage control teams.

The amendments to the Emergency Plan and its associated implementing procedures indicated to be necessary by this letter are not directed toward imposing any additional requirements beyond those already required by 10 CFR Part 50, Appendix E. Rather these changes are required to ensure that an adequate framework of drills and exercises will be implemented to provide for an acceptable state of emergency preparedness.

We request that the indicated amendments to the Emergency Plan and its procedures be submitted at the earliest practical time to allow for resolution of this matter prior to the issuance of an operating license for ANO-2. We request that you provide a schedule for submittal of those amendments within thirty days of receipt of this letter.

Sincerely,

Sincerely,

Original Signed by
John F. Stolz

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Division of Operating Reactors

John F. Stolz, Chief
Light Water Reactors Branch No. 1
Division of Project Management

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