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MAY 6 1976

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Mr. William Graw, Director  
City of Elyria  
Ohio Civil Defense  
320 Cornell Avenue  
Elyria, OH 44035

Dear Mr. Graw:

Your letter of April 4 to President Gerald Ford and your letter of April 2 to Ms. Bette B. Welch, Administrative Assistant to Congressman Charles A. Mosher of Ohio, have been referred to the Nuclear Regulatory Commission for reply.

Your letter of April 4 to President Ford forwarded a copy of a newspaper article from the Cleveland Plain Dealer entitled "1,488 Defects Found at Nuclear Plant." The article along with a copy of your letter to Ms. Welch refers to the Davis-Besse Nuclear Power Station owned by the Toledo Edison Company. With respect to this article, we offer the following summary comments.

The NRC has a philosophy of "defense-in-depth" for the design and operation of nuclear power plants. This philosophy calls for minimizing the likelihood of operating failures by the use of redundant systems, equipment, and design. In addition, the NRC has certain requirements for quality assurance that all applicants or licensees must meet before they are issued construction permits or operating licenses. These requirements help to assure that the plant will be built and operated in a safe manner.

The Davis-Besse facility, which is nearing completion east of Toledo, is under frequent scrutiny by the NRC Office of Inspection and Enforcement. Inspections, now averaging more than two per month, last several days and are made by teams of two or more inspectors.

An example of the thoroughness required by the NRC's regulatory program is found in the report of 1,488 "defects" being found in the electrical work at Davis-Besse. These "defects," ranging from the almost trivial to the significant, were found by Toledo Edison in a special reinspection of the safety-related electrical work. After a NRC inspection in May 1975 found quality assurance and installation problems with the safety-related electrical work, Toledo Edison agreed to make a complete reinspection of the electrical work and take any corrective action needed.

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Toledo Edison's reinspection program is still underway. When it is completed, the NRC will then conduct another independent inspection of the safety-related electrical work to evaluate the effectiveness of the utility's recheck and repairs. The NRC inspection staff has conducted similar inspection of other areas of plant construction, too, and these inspections will intensify as the plant nears completion and preparations are begun for plant operations.

Before an operating license is granted to Toledo Edison for the Davis-Besse plant, the NRC staff must satisfy itself that the facility has been built as designed and that it meets the applicable standards and specifications. The NRC's regulatory program (licensing and inspection) is aimed at assuring that the plants are designed and built to be operated safely. If there is any reasonable doubt about the safety of the plants they will not be permitted to operate.

Your letter of April 2 to Ms. Welch concerns a variety of matters dealing with the safety of nuclear power plants, emergency planning assistance and the Reactor Safety Study (WASH 1400). With respect to these matters, we want to assure you that the NRC and other Federal agencies have been actively involved in all of these areas for some time. Rather than attempt to address each sentence in your letter individually, it would probably be best if we outlined the scope of our efforts in the general areas of your concern.

First, comments concerning the safety of nuclear power plants have been outlined above.

Second, in the matter of emergency planning assistance; for some time, the NRC, as "lead agency" and other Federal agencies have been actively involved in a cooperative interagency program to assist States and their local governments in developing and improving radiological emergency response plans in support of fixed nuclear facilities like the Davis-Besse Nuclear Power Station. This program is outlined in a Federal Register Notice, a copy of which is enclosed as Enclosure 1. Each Federal agency listed in this notice has been assigned specific responsibilities for assisting the States and local governments in radiological emergency response planning.

These agencies are also responsible for providing training programs for State and local governments in this area and a fully-funded "Federal Inter-agency Course in Radiological Emergency Response Planning in Support of Fixed Nuclear Facilities" has been developed and has been offered to State and local government personnel since March of 1975. On March 8-12, 1976 four emergency planning personnel from Ohio attended this course. We are surprised that you apparently have not heard of the course. Enclosure 2

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is a copy of the Course Schedule (curriculum). Of further interest to you may be a "Federal Interagency Field Training (Assistance) Cadre," comprised of representatives of the involved Federal agencies. This "Cadre" is available to assist State and local government personnel in the development or improvement of their radiological emergency response plans. It is also available to assist in the observation and critique of drills or exercises testing these plans.

Additionally, we recently reissued the document originally published in December of 1974 by the Atomic Energy Commission Regulatory Office entitled "Guide and Checklist for Development and Evaluation of State and Local Government Radiological Emergency Response Plans in Support of Fixed Nuclear Facilities (NUREG 75/111)." A copy of this guidance document is enclosed as Enclosure 3. This publication addresses the concerns you have expressed in your letter including:

1. Notification methods and procedures in the event of an emergency;
2. Responsibility of nuclear facility operators for notification, initial accident assessment and recommendations concerning protective actions; (also reflected in NRC Emergency Planning Regulations 10 CFR 50, Appendix E, Enclosure 4)
3. Specific guidance in many areas for developing emergency plans.

The U.S. Environmental Protection Agency and the Defense Civil Preparedness Agency have published companion emergency planning guidance in their publications "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA-520/1-75-001)" and Change #1 (June 1974) to "Disaster Operations - A Handbook for Local Governments (CPG 1-6)." Copies of these are included as Enclosures 5 and 6. The Energy Research and Development Administration's (ERDA) "Radiological Assistance Plan (RAP)" and the Federal "Interagency Radiological Assistance Plan (IRAP)" are described in ERDA publications numbers 10 and 60, Enclosures 7 and 8. They are important documents outlining the Federal radiological emergency response capability.

Third, in the matter of NRC safety studies; the NRC has released the "Reactor Safety Study" (WASH 1400). Enclosure 9 is an Executive Summary of that study. The complete study is quite voluminous and is available from the National Technical Information Service, Springfield, VA for \$62.00 printed copy and \$2.25 for each volume in microfiche form.

We trust that the enclosed information will help bring you up-to-date in the areas of your concern. If you believe that you may have a need to attend the one-week emergency planning course, you should contact the Director of the Ohio Disaster Services Agency, Major General James C. Clem, and advise him of your concerns. If he believes that you should attend one of the courses we have scheduled for June or September of this year,

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we will make the necessary arrangements for invitational travel orders to the course with transportation, lodging and per diem expenses being paid by the aforementioned Federal interagency group.

Please be assured that the NRC and the other involved Federal agencies are exerting substantial effort to assist the States and local governments in improving their radiological emergency response plans in support of fixed nuclear facilities like Davis-Besse. The nuclear power plants located in Ohio are some distances from your City of Elyria, approximately 50 miles in the case of Davis-Besse, 60 miles in the case of the Perry Nuclear Station and 200 miles in the case of the Zimmer Nuclear Station. It is highly unlikely that any foreseeable accident occurring at any of these nuclear power plants would affect your city. Nevertheless, we seek your assistance and help in promulgating the guidance and information that has already been provided by the Federal government. We suggest that you ascertain any role your organization may have in the State emergency plans supporting these particular Ohio nuclear facilities from the Director of the Ohio Disaster Services Agency.

We look forward to your early reply concerning our invitation to participate in our training program.

Sincerely,

(Signed) William J. Dircks

William J. Dircks  
Assistant Executive Director  
for Operations

cc w/o encl: Mr. Roland L. Ellis, Director of Correspondence, The White House  
Ms. Bette B. Welch, Admin Asst to Congressman Charles A. Mosher, Ohio  
Major General James C. Clem, Adjutant General & Director, Ohio Disaster Services Agency  
Mr. James C. Wynd, Engr-in-Charge, Radiological Health Unit, Ohio  
Mr. John W. McConnell, DCPA-HQ  
Mr. Carl R. Siebentritt, DCPA(D&CM) HQ

bcc w/o encl: FRZintz, ERDA-OS  
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RGross, FDA-BRH-HQ  
JNocita, FPA-HQ  
DCarbone, BDAA-HQ  
AGrella, DOT-HQ  
RWHouston, NRP  
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