

# TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II

July 21, 1980

Mr. Harold R. Denton, Director  
Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Denton:

In the Matter of the Application of ) Docket Nos. 50-327  
Tennessee Valley Authority ) 50-328

In my letter to you dated May 1, 1980, TVA provided five copies of the Radiological Emergency Plan (REP) for Sequoyah Nuclear Plant. As stated in the referenced letter, this REP was developed to meet the criteria of NUREG-0654. In my letter of June 19, 1980, a revised version of the REP was provided, as well as cross references and the Tennessee Radiological Emergency Response Plan for Sequoyah Nuclear Plant. This revised REP contained changes resulting from a meeting between TVA and the NRC on May 30, 1980. Since the June 19, 1980, submittal, TVA has received additional informal comments from the NRC, and the REP has been revised to address these comments.

Enclosed are 41 copies of the REP as it has been revised through the date of this letter. Also enclosed are 41 copies of the Tennessee Radiological Emergency Response Plan which has been designated as Appendix F to the REP, 41 copies of the revised cross reference between NUREG-0654 and the REP, and TVA responses to the latest NRC comments.

Five copies of this information and five copies of the implementing procedures document were hand-carried and delivered to F. Pagano of the NRC on July 18, 1980.

As stated previously, the REP was written in accordance with NUREG-0654. However, there are three areas where the REP does not meet the exact recommendations as specified in NUREG-0654. These areas include the near-site Emergency Operations Facility (EOF), prompt notification of the public, and minimum shift manning.

NUREG-0654 recommends that a near-site EOF be established in close proximity to the nuclear plant site and a backup EOF be provided in the event that evacuation becomes necessary. To meet the intent of this recommendation, TVA has established a near-site press center where the press can assemble during an emergency, which is located within one mile

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of the plant. To provide for central coordination of the emergency centers which are established in any alert, site, or general emergency, TVA has established the Chattanooga Central Emergency Control Center (CECC) about sixteen and one-half miles from the site. Since this is outside of the plume exposure emergency planning zone, no backup facility for the CECC is required.

In inspection report 50-327/80-23 dated July 14, 1980, it was stated that during the June 16, 1980, Sequoyah emergency exercise, the NRC-OIE observers reviewed the activities to determine if those activities could have been better performed with centers being located nearer the plant site. The review concluded that there appeared to be no activities which would have been substantially improved by relocating the centralized EOF nearer the site.

NUREG-0654 also recommends that a system be used for notifying the public within 10 miles of Sequoyah Nuclear Plant of a radiological emergency. A prompt notification system is planned for the area around Sequoyah Nuclear Plant as described below. The estimated date for a fully operational system is July 1 to December 1, 1981.

The system utilized to promptly notify the public within the plume exposure pathway will consist of an automated siren alarm system within the five-mile emergency planning zone (EPZ) and a vehicular notification system outside the five-mile EPZ. The siren system will consist of 24 sirens strategically located within the five-mile EPZ. The range of the sirens is such that essentially all of the population within the five-mile EPZ will be instantaneously notified of the emergency situation. This siren system will have the capability of being activated from the State Emergency Operations Center or the local emergency operations center. State emergency employees and vehicles utilizing sirens and public address systems will notify the population outside the five-mile EPZ. Upon notification by one of these methods, specific instructions and information to the public will be provided through the use of TV, radio, and the NOAA weather radio network. The public within the 10-mile EPZ has received and will be provided annually with updated information regarding notification, TV, radio, and other emergency broadcast messages, and preliminary evacuation information.

The estimated notification time with this system in place will be 15 minutes in the five-mile EPZ for 90 percent of the population and 15 to 45 minutes for the remainder. The population within the 5 to 10-mile EPZ will receive notification within one hour.

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TVA cannot commit to Table B-1 of NUREG-0654 without further clarification of the requirement by NRC. Table B-1 defines "Minimum Staffing Requirements for NRC Licensees." Some of the functions specified are in addition to the minimum shift manning at Sequoyah Nuclear Plant as previously agreed to by the NRC and as specified in the Sequoyah Nuclear Plant Technical Specifications. TVA believes that these additional staffing requirements should not be specified in the same manner as technical specification 6.2. The intent of these additional manning requirements should be specified in plant administrative practices.

It is TVA's position that the REP as submitted by this letter meets the current NRC criteria for Radiological Emergency Plans and provides for adequate protection of TVA employees and the health and safety of the public. It is TVA's intent to implement the REP as submitted upon receipt of a full-power license for Sequoyah Nuclear Plant.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

L. M. Mills, Manager  
Nuclear Regulation and Safety

Enclosures

Sworn to and subscribed before  
me this \_\_\_\_\_ day of \_\_\_\_\_ 1980

\_\_\_\_\_  
Notary Public

My Commission Expires \_\_\_\_\_



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MEMORANDUM FOR: TERA CORPORATION  
FROM: US NRC/TIDC/DOCUMENT MANAGEMENT BRANCH  
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