

PHILADELPHIA ELECTRIC COMPANY

NUCLEAR GROUP HEADQUARTERS

955-65 CHESTERBROOK BLVD.

WAYNE, PA 19087-5691

(215) 640-6000

November 21, 1989

Docket Nos. 50-277
50-278
50-352
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License Nos. DPR-44
DPR-56
NPF-39
NPF-85

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Peach Bottom Atomic Power Station, Units 2 and 3
Response to Request for Additional Information
Concerning Proposed Combined Emergency Operations
Facility

Dear Sir:

Attached is Philadelphia Electric Company's (PECo's) response to an NRC letter dated October 6, 1989, requesting additional information concerning the proposed combined Emergency Operations Facility (EOF) for Limerick Generating Station (LGS) and Peach Bottom Atomic Power Station (PBAPS).

On September 30, 1988, we submitted a letter requesting NRC approval of a combined EOF for both LGS and PBAPS. This new facility would be located adjacent to an existing PECo service center and would be greater than 20 miles from the PBAPS site. In response to our September 30, 1989 request, the NRC transmitted a letter dated December 6, 1988, requesting additional information concerning this proposed combined EOF.

On August 10, 1989, we submitted a response to the NRC request, dated December 6, 1988, for additional information regarding this proposed combined EOF. Based on the NRC's review of the information we provided in our August 10, 1989 submittal, the NRC determined that additional information was still necessary regarding the acceptability of the proposed EOF. Accordingly, the NRC requested additional information by letter dated October 6, 1989. Specifically, the NRC requested that we provide additional information pertinent to EOF staffing and communication capabilities with offsite teams.

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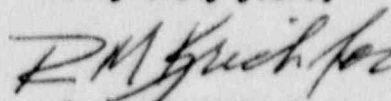
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The attached response restates each question specified in the NRC October 6, 1989 letter along with our response. The information necessary to adequately address each of the NRC's questions is provided in the following attachments.

- Attachment 1 - Response to October 6, 1989 Request for Additional Information
- Attachment 2 - Proposed EOF Staffing Plan
- Attachment 3 - Proposed EOF Staffing and Corresponding Company Organizational Positions and Work Locations
- Attachment 4 - Proposed EOF Staffing Travel Times

If you have any questions, please do not hesitate to contact us.

Very truly yours,



G. A. Hunger, Jr.
Director
Licensing Section
Nuclear Services Department

Attachments

cc: W. T. Russell, Administrator, Region I, USNRC
T. J. Kenny, USNRC Senior Resident Inspector, LGS
T. P. Johnson, USNRC Senior Resident Inspector, PBAPS

ATTACHMENT 1

RESPONSE TO OCTOBER 6, 1989
NRC REQUEST FOR
ADDITIONAL INFORMATION

ATTACHMENT 1

PHILADELPHIA ELECTRIC COMPANY RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING THE PROPOSED COMMON EMERGENCY OPERATIONS FACILITY FOR THE LIMERICK GENERATING STATION AND PEACH BOTTOM ATOMIC POWER STATION

Background

On August 10, 1989, Philadelphia Electric Company (PECo) submitted a response to an NRC letter dated December 6, 1988, requesting additional information concerning the proposed combined Emergency Operations Facility (EOF) for the Limerick Generating Station (LGS) and Peach Bottom Atomic Power Station (PBAPS) to be located in Coatesville, Pennsylvania. In reviewing the information provided in our August 10, 1989 response, the NRC concluded that additional information was still necessary to determine the acceptability of the proposed Coatesville EOF. Therefore, the NRC letter dated October 6, 1989 requested additional information pertinent to the proposed EOF's staffing and communication capabilities with offsite teams.

The following section, "Response to Request for Additional Information Issues," provides the information requested by the October 6, 1989 NRC letter.

Response to Request for Additional Information Issues

NRC Item

1. Provide the proposed staffing plan for the new EOF. List the proposed staff by title, indicating where they work (corporate office or at one of the plants) and where they live in relationship to the proposed EOF (miles and travel time).

Response

The proposed staffing plan for the Coatesville EOF would involve combining the personnel and capabilities of the existing LGS and PBAPS EOFs, and the Headquarters Emergency Support Center located in Philadelphia. The proposed EOF could be adequately staffed by the key emergency response organization personnel within 60 minutes in accordance with the direction of NUREG-0696, "Functional Criteria for Emergency Response Facilities." This staffing plan also utilizes the support staff call-out ability to meet additional staffing commitments. Attachments are provided detailing specific information regarding the EOF staffing plan. The attachments identified below provide the necessary information regarding EOF staffing, travel times, company organizational positions, and work location relationships.

- o Attachment 2 - Proposed EOF Staffing Plan
- o Attachment 3 - Proposed EOF Staffing and Corresponding Company Organizational Positions and Work Locations
- o Attachment 4 - Proposed EOF Staffing Travel Times

The information provided in these attachments may be subject to change since revisions to the LGS or PBAPS Emergency Plans or Emergency Plan

Implementing Procedures may necessitate the need to revise the information provided in these attachments.

NRC Item

2. Provide a description of the communications system proposed to communicate between the proposed EOF and the offsite teams.

Response

The existing methods for communicating between each site's EOF and emergency response field radiation survey and environmental sampling teams is by radio. This method can also serve as a backup communication link between the EOFs and the respective stations during emergencies in the event that normal communications are disrupted. This form of communication will continue to be used at the proposed Coatesville EOF for communicating with field radiation survey and environmental sampling teams, and backup communications with the stations.

The radio link between the offsite teams and the proposed combined Coatesville EOF will be modeled after the system that currently exists at LGS to communicate between offsite teams located in regions of the LGS Emergency Planning Zone (EPZ) and the existing LGS EOF. This radio communications system utilizes mobile radios in offsite team vehicles and handheld portable radios to communicate information through a central repeater located at the station. PBAPS also has a central repeater located at the station for emergency communication use. Both the LGS and PBAPS central radio repeaters are 200 watt transmitter/receivers. These repeaters provide the necessary radio coverage for communicating with offsite teams in the EPZs around each plant site. The central radio repeaters will be hardwired to on-site radio consoles located at each station's Control Room, Operations Support Center, and Technical Support Center. In addition, these central radio repeaters will be connected to off site radio consoles located at the proposed Coatesville EOF via PECO's existing microwave communications system.

The power supply for the central radio repeaters located at each station will be capable of being supplied by emergency power from a station emergency diesel generator with automatic transfer to batteries as an alternate power source. To ensure that constant radio communication is maintained between the offsite teams and the proposed Coatesville EOF, a new radio repeater will be installed at the proposed EOF to serve as a radio backup link to the central radio repeater at each station should the normal microwave communication link become inoperable. Therefore, the radio consoles located at the proposed EOF could then be manually switched to the EOF repeater in order to maintain communications.

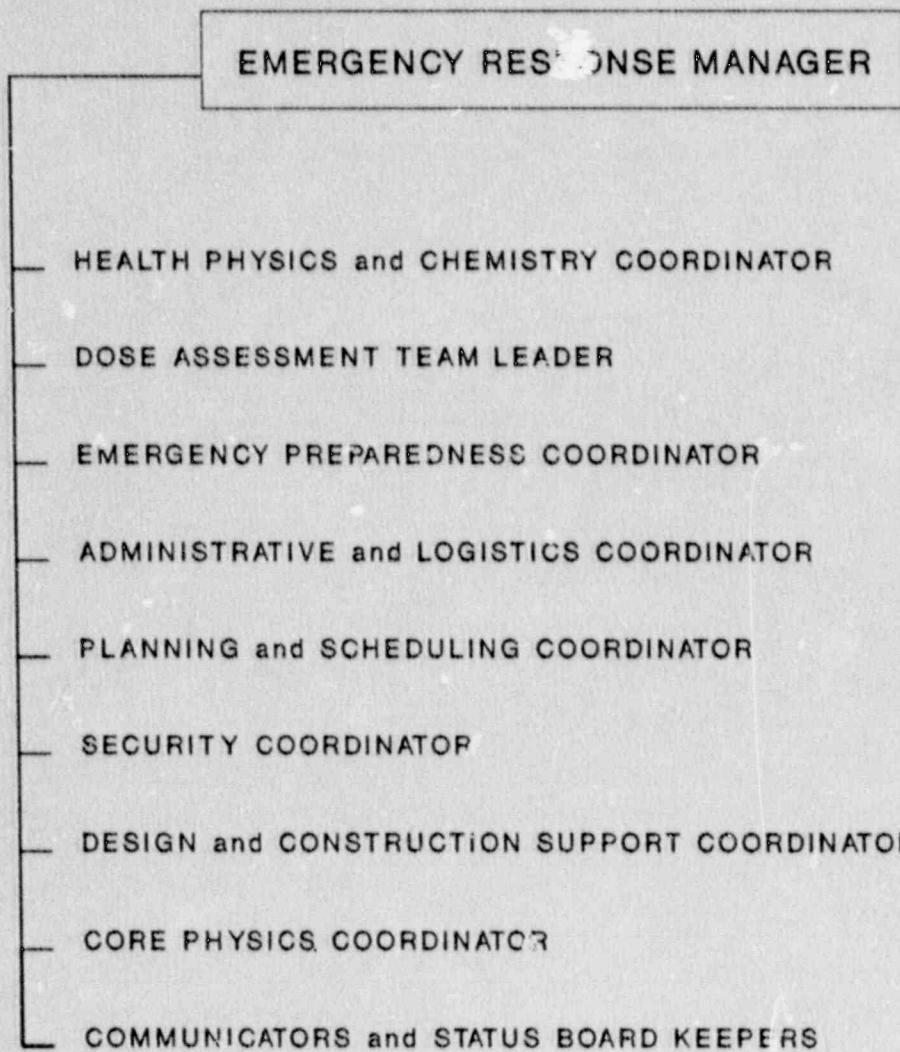
This radio communication system will ensure reliable communications between offsite field radiation survey and environmental sampling teams, located in any region of either the LGS or PBAPS EPZs, and personnel at the proposed Coatesville EOF.

ATTACHMENT 2

PROPOSED EOF
STAFFING PLAN

ATTACHMENT 2

PROPOSED COMBINED
EMERGENCY OPERATIONS FACILITY (EOF)
STAFFING PLAN



ATTACHMENT 3

PROPOSED EOF STAFFING AND
CORRESPONDING COMPANY ORGANIZATIONAL
POSITIONS AND WORK LOCATIONS

ATTACHMENT 3

PROPOSED COMBINED EMERGENCY OPERATIONS FACILITY (EOF) STAFFING AND CORRESPONDING COMPANY ORGANIZATIONAL POSITIONS AND WORK LOCATIONS

| EOF POSITION | AVAILABLE DESIGNATED RESPONDERS | INDIVIDUALS REQUIRED | NAME | WORK LOCATION | CURRENT COMPANY ORGANIZATIONAL POSITION |
|--|---------------------------------|----------------------|---|----------------------------|--|
| EMERGENCY RESPONSE MANAGER | 4 (***) | 1 (***) | G. LEITCH D. SMITH S. KOWALSKI D. HELWIG | LGS PBAPS CB CB | VP, LGS VP, PBAPS VP, NUCLEAR ENGINEERING VP, NUCLEAR SUPPORT |
| DOSE ASSESSMENT TEAM LEADER | 3 (***) | 1 (***) | K. HOLSOPPLE J. McFADDEN D. ROMBOLD | CB CB CB | DIR., RADIATION PROTECTION SUPERISOR, DOSIMETRY PHYSICIST |
| DOSE ASSESSMENT TEAM MEMBERS | 5 (***) | 1 (***) | S. LEVINE A. ALLOWAY H. CUKIER K. BORTON M. ALPER | CB CB CB CB CB | PHYSICIST PHYSICIST ENGINEER ENGINEER PHYSICIST |
| FIELD SURVEY GROUP LEADERS | 5 (***) | 1 (***) | ASSIGNED FROM RESPECTIVE SITES | | PBAPS AND LGS HEALTH PHYSICS SUPERVISORS |
| HEALTH PHYSICS AND CHEMISTRY COORDINATOR | 3 (-) | 1 (-) | J. McFADDEN K. PRZEWORSKI J. WILEY | CB CB CB | SUPERVISOR, DOSIMETRY PHYSICIST CHEMISTRY CONSULTANT |

ATTACHMENT 3 (CONTINUED)

PROPOSED COMBINED EMERGENCY OPERATIONS FACILITY (EOF)
STAFFING AND CORRESPONDING COMPANY ORGANIZATIONAL
POSITIONS AND WORK LOCATIONS (CONTINUED)

| EOF POSITION | AVAILABLE DESIGNATED RESPONDERS | INDIVIDUALS REQUIRED | NAME | WORK LOCATION | CURRENT COMPANY ORGANIZATIONAL POSITION |
|-------------------------------------|---------------------------------|----------------------|---------------|---------------|---|
| PLANNING AND SCHEDULING COORDINATOR | 6 (-) | 1 (-) | G. MADSEN | LGS | WORK COORD. ENGINEER |
| | | | D. POLIERO | LGS | OUTAGE SCHED. SUPERVISOR |
| | | | F. ZASTOWT | LGS | ENGINEER |
| | | | (3) | PBAPS | TO BE ASSIGNED |
| SECURITY COORDINATOR | 5 (-) | 1 (-) | J. McGOLDRICK | CORPORATE | MGR., CLAIMS SECURITY |
| | | | R. DENEEN | CORPORATE | DIR., SECURITY ADMIN. |
| | | | J. RULLO | CORPORATE | DIR., SECURITY OPERATIONS |
| | | | T. O'DONNELL | CORPORATE | SENIOR AGENT |
| | | | N. CARTER | CORPORATE | INVESTIGATOR |
| EMERGENCY PREPAREDNESS COORDINATOR | 4 (-) | 1 (-) | A. DAUGHERTY | CB | ENGINEER |
| | | | J. GERHART | CB | PHYSICIST |
| | | | K. SCHLECKER | CB | PHYSICIST |
| | | | M. MEZIAS | CB | ANALYST, SUPERVISORY |
| | | | | | |
| COMMUNICATORS | 9 (***) | 1 (***) | G. FOUST | CB | ENGINEER |
| | | | M. HARMON | CB | ENGINEER |
| | | | M. KRAY | CB | ENGINEER |
| | | | C. LAPISH | CB | TECHNICAL ASSISTANT |
| | | | F. LEAR | CB | ENGINEER |
| | | | K. LEE | CB | TECHNICAL ASSISTANT |
| | | | L. MIDDLETON | CB | ANALYST |
| | | | M. RESTANIO | CB | ENGINEER |
| | | | G. SIEFERT | CB | ENGINEER |

ATTACHMENT 3 (CONTINUED)

PROPOSED COMBINED EMERGENCY OPERATIONS FACILITY (EOF)
STAFFING AND CORRESPONDING COMPANY ORGANIZATIONAL
POSITIONS AND WORK LOCATIONS (CONTINUED)

| EOF POSITION | AVAILABLE DESIGNATED RESPONDERS | INDIVIDUALS REQUIRED | NAME | WORK LOCATION | CURRENT COMPANY ORGANIZATIONAL POSITION |
|----------------------|---------------------------------|----------------------|-------------|---------------|---|
| STATUS BOARD KEEPERS | 6 (***) | 1 (***) | C. LAULETTA | CB | TRAINING SUPERVISOR |
| | | | J. JOSEPH | CB | INSTRUCTOR |
| | | | L. ANDRES | CB | TECHNICAL ASSISTANT |
| | | | J. BUCKLEY | CB | ENGINEER |
| | | | R. GROPP | CB | TECHNICAL ASSISTANT |
| | | | H. RYAN | CB | TECHNICAL ASSISTANT |

NOTES:

LGS - LIMERICK GENERATING STATION
 PBAPS - PEACH BOTTOM ATOMIC POWER STATION
 CORPORATE - CORPORATE HEADQUARTERS, PHILADELPHIA
 CB - CHESTERBROOK, NUCLEAR GROUP HEADQUARTERS
 MGR. - MANAGER
 SUP'T - SUPERINTENDENT
 DIR. - DIRECTOR
 (***) - 60 MINUTE RESPONSE COMMITMENT
 (**) - 90 MINUTE RESPONSE COMMITMENT
 (*) - 120 MINUTE RESPONSE COMMITMENT

ATTACHMENT 4

PROPOSED EOF
STAFFING TRAVEL TIMES

ATTACHMENT 4

PROPOSED COMBINED
EMERGENCY OPERATIONS FACILITY (EOF)
STAFF RESPONSE TIMES

PERSONNEL RESPONSE TIMES FROM RESIDENCE
TO PROPOSED EOF

| EOF POSITION | AVAILABLE DESIGNATED RESPONDERS | APPROXIMATE MILEAGE (MILES) | APPROXIMATE TIME TRAVELLED (MINUTES) |
|--|---------------------------------------|-----------------------------------|--|
| EMERGENCY RESPONSE MANAGER | 4 (***) | 40 | 50 |
| | | 45 | 50 |
| | | 58 | 75 |
| | | 40 | 50 |
| DOSE ASSESSMENT TEAM LEADER | 3 (***) | 39 | 60 |
| | | 105 (A) | 120 (A) |
| | | 15 | 25 |
| DOSE ASSESSMENT TEAM MEMBERS | 5 (***) | 78 (A) | 120 (A) |
| | | 50 | 60 |
| | | 15 | 20 |
| | | 29 | 45 |
| | | 30 | 45 |
| FIELD SURVEY GROUP LEADER (B) | 5 (***) | 36 | 50 |
| | | 15 | 25 |
| | | 71 (A) | 85 (A) |
| | | 39 | 45 |
| | | 28 | 45 |
| HEALTH PHYSICS and CHEMISTRY COORDINATOR | 3 (*) | 31 | 45 |
| | | 32 | 45 |
| | | 32 | 43 |
| ADMINISTRATIVE and LOGISTICS COORDINATOR | 3 (*) | 44 | 60 |
| | | 27 | 40 |
| | | 30 | 45 |
| DESIGN and CONSTRUCTION SUPPORT COORDINATOR | 3 (*) | 65 | 90 |
| | | 30 | 45 |
| | | 10 | 20 |

ATTACHMENT 4 (CONTINUED)

PROPOSED COMBINED
EMERGENCY OPERATIONS FACILITY (EOF)
STAFF RESPONSE TIMES

PERSONNEL RESPONSE TIMES FROM RESIDENCE
TO PROPOSED EOF (CONTINUED)

| EOF POSITION | AVAILABLE DESIGNATED RESPONDERS | APPROXIMATE MILEAGE (MILES) | APPROXIMATE TIME TRAVELLED (MINUTES) |
|-------------------------------------|---------------------------------|-----------------------------|--------------------------------------|
| CORE PHYSICS COORDINATOR | 5 (**) | 4 | 10 |
| | | 15 | 25 |
| | | 31 | 45 |
| | | 23 | 30 |
| | | 23 | 30 |
| CORE PHYSICS COORDINATOR STAFF | 9 (**) | 4 | 10 |
| | | 15 | 25 |
| | | 26 | 40 |
| | | 31 | 45 |
| | | 26 | 40 |
| | | 28 | 40 |
| | | 23 | 30 |
| 23 | 30 | | |
| 1 | 5 | | |
| PLANNING and SCHEDULING COORDINATOR | 6 (*) | 15 | 30 |
| | | 26 | 45 |
| | | 85 | 90 |
| | | 36 | 50 |
| | | 60 | 75 |
| 45 | 50 | | |
| SECURITY COORDINATOR | 5 (*) | 10 | 15 |
| | | 24 | 40 |
| | | 30 | 45 |
| | | 15 | 35 |
| | | 60 | 75 |
| EMERGENCY PREPAREDNESS COORDINATOR | 4 (*) | 15 | 30 |
| | | 68 | 90 |
| | | 18 | 35 |
| | | 50 | 75 |

ATTACHMENT 4 (CONTINUED)

PROPOSED COMBINED
EMERGENCY OPERATIONS FACILITY (EOF)
STAFF RESPONSE TIMES

PERSONNEL RESPONSE TIMES FROM RESIDENCE
TO PROPOSED EOF (CONTINUED)

| EOF POSITION | AVAILABLE DESIGNATED RESPONDERS | APPROXIMATE MILEAGE (MILES) | APPROXIMATE TIME TRAVELLED (MINUTES) |
|-------------------------|---------------------------------------|-----------------------------------|--|
| STATUS BOARD KEEPERS | 6 (***) | 30 | 45 |
| | | 25 | 40 |
| | | 42 | 60 |
| | | 30 | 45 |
| | | 30 | 45 |
| | | 15 | 30 |
| COMMUNICATORS | 9 (***) | 29 | 45 |
| | | 20 | 25 |
| | | 44 | 60 |
| | | 30 | 45 |
| | | 30 | 45 |
| | | 30 | 45 |
| | | 45 | 60 |
| | | 36 | 50 |
| | 28 | 45 | |

NOTES:

- (***) - 60 MINUTE RESPONSE TIME COMMITMENT
- (**) - 90 MINUTE RESPONSE TIME COMMITMENT
- (*) - 120 MINUTE RESPONSE TIME COMMITMENT
- (A) - DESIGNATED SECOND SHIFT RESPONDER
- (B) - FIELD SURVEY GROUP MEMBERS WILL BE
DISPATCHED FROM THEIR RESPECTIVE SITES