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ATOMIC POWER COMPANY

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September 30, 1980  
SDE-80-09

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Attn: Docketing and Service Branch

Subject: Comments of NUREG-0696 (Draft)

Dear Sir:



Maine Yankee Atomic Power Company is pleased to offer specific comments on the draft report NUREG-0696, Functional Criteria for Emergency Response Facilities. Notification of request for comments on this report appeared in the Federal Register on August 15, 1980 (45 FR 54708).

One general comment we have on NUREG-0696 is that the report lacks a sense of balance in the proposed guidance criteria; on the one hand the staff has been overly prescriptive in setting forth certain requirements (e.g., system unavailability requirements, seismic design criteria), yet in other areas the criteria are extremely vague or yet to be developed. Hopefully, this weakness will be addressed and comments on NUREG-0696 will form the basis for resolving this deficiency.

We are also concerned with the ambitious unrealistic implementation schedule proposed for NUREG-0696. It is easy to establish a schedule for implementing vague or undefined guidance criteria -- the difficult task is to establish a realistic schedule that reflects the continual changes in the requirements. We trust that the Commission will carefully consider the responses from utilities on the implementation schedule, so as not to jeopardize the continued development of emergency preparedness.

Maine Yankee Atomic Power Company is a member of the KMC Coordinating Group on Emergency Preparedness Implementation, and utilizes nuclear engineering expertise of Yankee Atomic Electric Company, Westborough, Massachusetts. Both of these groups have submitted comments on the NUREG, and we strongly endorse those comments.

As knowledge of case...

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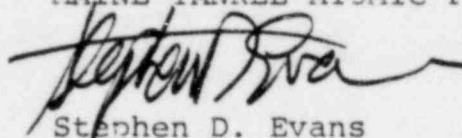
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We assume that since this information is being published as guidance, in a NUREG, it r presents one acceptable alternative way of meeting the NRC's regulatory requirements.

Our specific comments on NUREG-0696 are enclosed.

Sincerely,

MAINE YANKEE ATOMIC POWER COMPANY

A handwritten signature in black ink, appearing to read "Stephen D. Evans", written over the typed name.

Stephen D. Evans

SDE/bjp

Enclosure

## Specific Comments - NUREG 0696

### Safety Parameter Display System

The SPDS total system design to achieve an unavailability goal of .001 (page 8) is unrealistically high even with redundant computers. Our present computer upgrade, which has been under development for several months, will simply not achieve the availability goal of greater than 99.9% of the time. Realistically, 98% is a more accurate figure. The prescribed unavailability goal is totally unnecessary for a backup monitoring system, and therefore should be deleted.

Also, the seismic qualifications for the SPDS have not been adequately justified in the NUREG.

### Emergency Operations Facility

The concept of the alternate EOF, which first appeared in NUREG-0654, should be reinstated in NUREG-0696 and the draft habitability requirements for the EOF be deleted from the criteria.

The primary purpose of the EOF is in the evaluation of an incident and to provide recommendations to State officials on possible protective actions. This is most effectively accomplished with a primary EOF located just outside the site boundary, and a more distant alternate EOF that could be activated should evacuation be required, rather than a single structure located some 5 to 10 miles from the plant that would not have to be evacuated. We believe that our present operating concept for the EOF will enhance our response in all emergency situations.

In the unlikely event our primary EOF became uninhabitable, Maine Yankee's alternate EOF, located approximately 4 miles away in a federally approved fallout shelter, would be activated.

Duplicate communications at both EOF's and other redundant communications links described in the upgraded emergency plan give adequate assurance that information transfer will be preserved in the event primary EOF had to be evacuated. It is important to remember that all evacuation activities are directed by State officials from the State EOC, not from the licensee EOF.

Page 18: The requirement for permanent radiation monitoring systems in the EOF is overly prescriptive and should be deleted. The functional criteria will be preserved by modifying the first two sentences on page 18 to read: "To insure adequate radiological protection of EOF personnel, radiation monitoring systems shall continuously indicate radiation dose rates and airborne radioactivity concentrations inside the EOF while in use".

#### Nuclear Data Link

The second paragraph under this section on page 3, presents a description of what NRC would generally do in an emergency situation. We submit that this information is not functional criteria for emergency response facilities and should be deleted from 0696. As a point of clarification however, in Maine, the responsibility for informing offsite officials and the public lies with State government.

The same comment applies to statements made in the first full paragraph on page 4. It would appear that NRC is attempting to justify the NDL by stating that "...the NRC is responsible for keeping Federal, State and local officials and the general public informed about all aspects of the incident and subsequent emergency response facilities". These responsibilities fall within the province of State of Maine and local officials. In fact, this is correctly stated on page 15 of NUREG-0696: "The State and local agencies shall provide official updates to the affected public".

While 0696 discusses the function of the NDL, the necessity for "the same data as the variables listed in R.G. 1.97" is yet to be adequately defined. Detailed procedures on what will be done with the data once received in Bethesda must be provided considering that, (1) for its initial response, NRC Region I plans to dispatch twelve personnel to Maine Yankee in the event of an incident, (2) dedicated phone lines from the plant to Bethesda exist for providing information, (3) depending on the severity of the incident, the Emergency Management Team may or may not be activated and, (4) State of Maine and local community officials are responsible for informing officials and the general public on all aspects of a radiological incident and any necessary emergency response activities required.

We are extremely concerned that a great temptation would exist for NRC to attempt to take an active role in plant operations especially during an emergency situation with the availability of the variables listed in R.G. 1.97. It is suggested that to alleviate this entire problem area, detailed procedures and description of the applications of the variables requested in R.G. 1.97 be presented for discussion before the utility be required to shoot at a moving target.

#### Processor Computers

The need for independent processors of input signals for the SPDS, TSC, EOF, and NDL is unnecessary. A computing system for the inquiry and response functions which is independent from the system serving the control room would eliminate processor contention, however, to say that the two systems need to be totally independent back to, but not including, the sensor itself is not adequately justified, and at Maine Yankee, because of limitations in available space and signal cable routings, will be very difficult indeed to accomplish. A more feasible approach would be to maintain a shadow image of the control room data based on the computing system which will service the emergency facilities.

This method becomes even more logical when one considers the fact that "supplementary information from the process computer may be used as part of the TSC data display". If some information from the process computer is needed for TSC and EOF, why not include the parameters scheduled for dedicated input to the emergency response computer system as an additional group of parameters taken from or shared with the process computer.

This method has several distinct advantages over the method outlined in NUREG 0696. (1) As interaction between personnel in the TSC, EOF, and control room develops, one is assured that everyone is dealing with the same data, not data from a common source with unequal flow paths, but the same data. (2) It would seem that eventually the TSC would have the desire to inquire into more and more parameters as an incident progresses. If the TSC were utilizing a shadow image of the control room data base that additional information would be available to them. (3) The quality of the inquiry software for the TSC would be increased because inquiry routines would be the same as those used in the control room. Trending functions would be the same, output format would be standardized. This would promote a very smooth transition for personnel who might move physically from the control room to the TSC and then to the EOF. (4) This method of data transfer will promote more accurate communication between the control room and the various emergency centers and should help minimize any personal disorientation which occurs as a person moves from one area to another.

A statement is included which says that, "It may be desirable to provide interactive terminal and display capability between the plant emergency facilities and NRC headquarters to aid emergency management". If it is the responsibility of the licensee to provide such capability in addition to the NDL, either the NDL is not adequate as envisioned or such additional capability is not really necessary or desirable. Furthermore, adequate technical justification for this capability to the NDL is not contained in NUREG 0696.

Implementation Schedule

The implementation schedule for all aspects of NUREG 0696 seems very restrictive considering the magnitude of such a project. In order for all parts to be adequately planned, specified, equipment purchased, installed, and software generated with proper documentation and quality assurance testing would add at least another year to the present implementation schedule. The implementation schedule is unrealistic and should be thoroughly reworked to prevent jeopardizing the end result of emergency preparedness.

Maine Yankee will have very great difficulties meeting this schedule, especially since even now it is unclear exactly what is required.