SP906-L

DUKE POWER COMPANY

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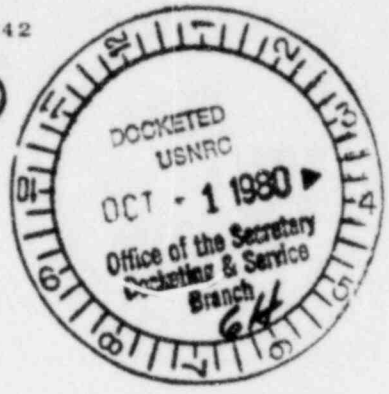

September 25, 1980

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

Attention: Docketing and Services Branch

Subject: NUREG-0654
Comments
Duke File: A-12.16.1

Dear Sir:

Attached are Duke's comments on NUREG-0654, entitled " Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

Very truly yours,

L. C. Dail, Vice-President
Design Engineering Department

EKM/pam

Attachment

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COMMENTS ON NUREG - 0654
ENTITLED " CRITERIA FOR PREPARATION AND
EVALUATION OF RADIOLOGICAL EMERGENCY
RESPONSE PLANS AND PREPAREDNESS IN SUPPORT OF
NUCLEAR POWER PLANTS "

SECTION	PAGE	COMMENT
Table B-1	31-32	At least one hour is required to supplement shift staffing, based upon notification and travel time. Several hours (1-4) may be required for corporate personnel to reach the station. The requirement for maintenance personnel on-shift cannot be justified from a cost benefit standpoint; support within one hour is adequate.
G.3.b	43	News media personnel must be prevented from interfering with personnel in the emergency response organization in the Emergency Operations Facility. Co-location should be permissible only if barriers are available to achieve some separation.
H.2	44	There is no apparent basis for having Emergency Operations Facility within one mile of the reactor.
H.6	45	We presume this paragraph is intended to apply only to portable monitoring equipment.
H.9	46	Paragraph H.1 specifies an onsite operational support center in accordance with NRC letter dated 10/30/79; criteria in this paragraph conflict with that letter.
I.5	48	See comments for Appendix 2.
J.10.c	52	It is impossible to notify all segments of transient and resident population.
J.10.h	54	Jurisidictional boundaries may not be conducive to relocation centers 5-10 miles beyond the plume exposure pathway EPZ.
N.1.a	61	Exercise frequency should not require participation by any organization more often than once per year. This would apply to state and local governments, licensees and individual nuclear stations.
N.2.e	63	Health physics drill frequency should be annual to be consistent with other drills.

SECTION	PAGE	COMMENT
App.2 1.c.(1)	2-1	The acceptance criteria go well beyond installed equipment capabilities at operational stations. Parameters needed should be related to predication methods used.
1.c.(4)	2-2	There is no justification for redundant power sources if capability to obtain meterological data via backup system/procedures exists.
2.c.(1)	2-3	The most likely situation requiring a backup system would be as a result of natural phenomena (tornado, etc.), which would most likely incapacitate all onsite meteorological capacity. Thus a remote backup is preferable, but the information may not be representative of site environs.
2.c.(5)	2-3	Application of quality assurance requirements to meteorological systems serves only to limit available technology/vendors and extend the schedule. This proposed requirement could not be backfit to existing systems.
2.c.(6)	2-3	If two methods to obtain meteorological data exist, redundant power sources cannot be justified.
3.c.(1)	2-4	"Real-time" should be changed to "periodically using the latest available information."
4.c.(1)	2-5	Meteorological information is characteristically slow in rate of change, and should be validated prior to off-site transmission to preclude decisions/ recommendations based upon erroneous information. Since "real-time" information cannot be justified, the most accurate means of data transmission is telephone/telecopier.
App.3	3-1	The design objective of notifying the affected population within a 10 mile radius within 15 minutes cannot be justified. The only accidents that could result in releases within 30 minutes per WASH 1400 are those denoted as PWR 8 and PWR 9. Releases from such accidents are low level, short duration and extremely low probability. Based upon the above and plume dispersion characteristics, it is more reasonable to begin notification of population out to a 2-3 mile radius in a short time-frame. Beyond 2-3 miles, significantly more time should be allowed.