

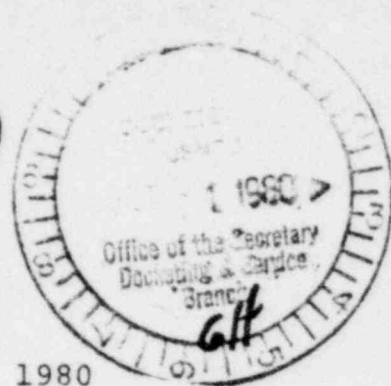
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POWER REGULATORY
PROPOSED ROLL

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(45 FR 54719)

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September 26, 1980

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

Attention: Docketing and Service Branch

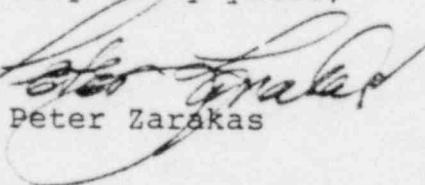
Dear Sir:

The Federal Register of August 15, 1980 (45 FR 54708) request-
ed comments on the Nuclear Regulatory Commission's document
NUREG-0696, "Functional Criteria for Emergency Facilities"
and the proposed implementation schedule on page 54709.

Consolidated Edison Company of New York, Inc. (Con Edison),
as holder of Operating License DPR-26 for Indian Point Unit
No. 2, wishes to provide the following comments on the
above noted documents.

Detailed comments on NUREG-0696 and its accompanying implemen-
tation schedule have been sent to you by the Atomic Industrial
Forums' (AIF) Safety Parameter Integration Subcommittee on
Nuclear Regulation. Con Edison fully endorses the AIF comments.
Additional comments are provided in the attachment to this
letter.

Very truly yours,



Peter Zarakas

Attachment

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CONSOLIDATED EDISON
COMMENTS ON THE IMPLEMENTATION
SCHEDULE FOR NUREG 0696 "FUNCTIONAL
CRITERIA FOR EMERGENCY FACILITIES"

The schedule for completion of the emergency response facilities, as published in the Federal Register (45 FR 54709), is completely unrealistic and imposes an unwarranted burden on the licensees. Some examples which show the unreasonableness of the schedule are:

1. The Commission has required that construction of the Technical Support Center (TSC) to have been started at least 3 months before the criteria for this facility is fully defined and a minimum of 6 months before the designs have been reviewed and approved by the NRC staff.

While industry has known about the TSC since the issuance of NUREG 0578, all of the four emergency facilities must be treated as an integrated system and therefore, a change in the criteria for one of the components can have a drastic effect on the other components. NUREG 0696 requires that a portion of the Safety Parameter Display System (SPDS) be designed to withstand an Operating Base Earthquake (OBE). Based on the requirements of NUREG 0578 many owners including Con Edison had gone ahead on the basis of having the data acquisition system located in the Technical Support Center (TSC). If the data acquisition system must meet an OBE, it follows that the TSC which houses it, must now also be designed to withstand an OBE. This indirect imposition of seismic criteria on the TSC and data acquisition system is a significant increase in scope which could easily invalidate all prior designs and/or require extensive re-design for this facility.

2. The criteria for the SPDS is such that a computer must be used as part of the data acquisition system and that the computer and display system will have to withstand an OBE. The schedule requires that this system be procured within 1 year and be operational within 15 months after the Commission has finalized the criteria. To impose this short a time frame for a complicated computer system is unreasonable in normal situations and almost impossible for one with such seismic qualifications.
3. The decision whether to utilize a separate computer or part of a process computer for the SPDS should be left to the licensee, as long as the appropriate availability factors and security requirements contained in NUREG-0696 are met.

4. The long standing requirements for the TSC was that it be sized for at least 25 persons. However, at the workshop on NUREG 0696 held at King of Prussia on August 12, 1980, a representative from an NRC-I&E regional office made the statement that they want space for an additional 15 people. If all or part of this request is incorporated into the final version of the NUREG, the increased space requirement could easily require major re-design.
5. We strongly recommend that the concept of an alternate EOF be retained in NUREG-0696. The primary EOF should be located as close as practicable to the facility with hardening appropriate to its proximity to the reactor and function. The alternate should be located outside an approximate ten mile radius in the unlikely event the primary EOF must be evacuated. In order to avoid a time period during an emergency when neither facility is operational, a minimum level of staffing could be dispatched to the alternate at the time the primary EOF is activated.

Such an arrangement could be extremely functional and cost effective, especially if the alternate EOF is a state or local government facility planned to be used for emergency response activities.

The flexibility of such a concept allows for future determination of now uncertain design criteria (such as assumed accident scenarios) without requiring abandonment of new facilities that several utilities have constructed.

6. NUREG-0696 mentions the acceptability of adjacent structures to comprise the EOF. This is a good concept that should be retained and expanded upon, as it permits the maximization of usage of existing structures. Different structures could be assigned appropriate functions and the modifications made to match the functions (i.e. an emergency control center in one structure would be hardened to the maximum practical extent while a long term recovery center would not be hardened to the same order).
7. The above two comments are provided to allow designs at specific facilities such as ours to proceed with the maximum flexibility and still satisfy the Commission's concerns. We have proceeded in good faith with construction and equipment installation based upon evolving criteria from the Regulatory Staff. NUREG-0696 should be a design criteria document, not a detailed design specification.

In summary, the Commission is asking the industry to make tremendous expenditures of human resources and monies to design, procure and establish facilities to meet an unrealistic schedule even before all of the requirements are known.