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United States Nuclear Regulatory Commission
Emergency Preparedness Program Office
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Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Comments on NUREG-0696

Gentlemen:

We have reviewed the functional criteria for emergency response facilities as discussed in the July, 1980 draft of NUREG 0696.

The NUREG formalizes requirements for Emergency Response facilities which were initially identified as being both desirable and necessary shortly after the TMI event. We endorse both the desirability and need for these facilities. We immediately undertook the design of these facilities and presently have erected the structural steel for an emergency complex that includes an EOF, a TSC and analytical facilities for radioactive samples.

These functions will be carried out in completely isolated portions of this complex. Spaces for conferences and press briefings have been incorporated into the design. Adequate communication equipment, emergency power supplies and sufficient shielding are provided to assure that all necessary functions can continue to be performed under conditions which are more severe than the Design Basis Accidents which are included in the Final Safety Analysis Report.

We have presently committed a large amount of engineering effort as well as a significant sum of money to this project in order to have these facilities available as rapidly as possible.

We are concerned that the increasing number of new requirements and newly defined details will result in major redesigns, schedule slippage, and unreasonably large additional expenditures prior to completing this project unless some flexibility is provided in the NUREG to accommodate the site specific conditions which exist at all facilities.

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These site specific conditions include such things as the space available in existing plant structures, the size and shape of the existing plant protected area and the size, shape and topography of the site.

Our specific comments on the draft of the NUREG are as follows:

Paragraph I D

The independent verification requirements of all aspects of these facilities (most of which are not Quality Assurance Category I) introduce unnecessary delays at each step of the process. If this requirement is imposed, it will not be possible to complete these facilities for at least five years. The meaning of the term validation is not clear in this context. These types of requirements should only apply to the SPDS and the balance of the facilities should be subjected to a design review and functional testing program subsequent to the completion of the facilities. Changes to the facilities will be agreed upon on a case-by-case basis and should only be required to achieve the capability necessary to perform the intended function. The availability goal should be adjusted by at least an order of magnitude to be consistent with the reliability of commercial equipment performing similar functions. Unrealistic availability goals will probably not be achieved during the lifetime of existing plants and will probably be counterproductive by increasing equipment down time for maintenance and modifications and extend the delivery time of replacement parts. The imposition of new requirements such as seismic capability may require totally new design and application concepts which could result in realizing extremely poor availability until these new concepts mature.

Paragraph II F

The SPDS design criteria availability goal should be adjusted consistent with the previous discussion. The SPDS should be considered a diagnostic tool and an aid in achieving a rapid assessment of the status of the plant. In no cases should this device be considered as the prime indication of plant conditions. The same redundant, safety grade, qualified instruments presently installed and utilized to operate the plant must continue to serve as the ultimate source of reference for plant conditions and operator action. With this in mind, the imposition of seismic design requirements is unnecessarily restrictive and limits the capacity to procure and install the systems in a timely manner.

Paragraph III A

Additional staffing will serve no useful purpose in the event that the TSC is unavailable. This requirement should be deleted.

Paragraph III B

The Technical Support Center location should be selected to assure that it is easily accessible to the emergency staff including employees of the NSS vendor, A/E and NRC representatives who might not be totally familiar with the site. Ongoing activities in the TSC or the Control Room should not be interrupted to provide guide services for late arrivals. The two-minute walking time between the TSC and the Control Room is unnecessarily restrictive. A slightly longer travel time would reduce unnecessary trips between the two locations, which was one of the original goals of the TSC concept. In addition, when such a visit is made, even if only to provide a management presence, the individuals involved will probably spend at least fifteen minutes in the Control Room. No single individual is indispensable to the functioning of the TSC since a multidisciplined group is expected to be in place at this location. These facts make the rigid defining of the travel time between these locations unnecessary. The method of travel should not be restricted to walking since individuals may prefer to drive, particularly in inclement weather.

The two minute walking time requirement should be modified to state that "the technical support center shall be located sufficiently close to the Control Room that the distance can be traveled in a few minutes under all weather conditions."

The location and distances between the Control Room, the TSC and the EOF should not be defined so precisely that site specific variations can not be accommodated. The only important requirement is that each activity be physically isolated from the other to avoid unnecessary interference and yet be within reasonably short travel distance to expedite face-to-face interaction when necessary. The best logistical location for each facility must be selected considering the unique characteristics of each site.

Paragraph III F

The Technical Support Center habitability should be defined in accordance with GDC 19 since the amount of shielding required is dependent upon its location with respect to the reactor containment building. As presently written, the requirement could be misinterpreted to require exactly the same protection factor as the Control Room with no regard for the calculated radiological conditions which could exist at the location of the TSC.

Paragraph III H

The requirement for the TSC data display should be revised to state one "TSC data display shall be of sufficient accuracy to permit assessment of the operating condition of plant systems." Detailed technical analysis, when required, should be performed utilizing direct readings from installed station instruments thereby eliminating a source of potential additional inaccuracies.

The previous comments on revising the unavailability goal also apply here.

A final general comment on the NUREG relates to the incorporation of the requirements of Regulatory Guide 1.97 prior to the finalization of this guide. We are particularly concerned about the imposition of valve position indication requirements. We believe that manual valves which are maintained closed and locked or sealed during normal operation should be exempted from monitoring. This requirement is especially unnecessary with the subatmospheric containment design which is employed at our facility.

Very truly yours,

C. N. Dunn
Vice President, Operations

cc: U.S. Nuclear Regulatory Commission
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