



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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Docket

September 5, 1980

Docket No. 50-155

Mr. R. B. DeWitt
Vice President
Consumers Power Company
1945 Parnell Road
Jackson, Michigan 49201

Dear Mr. DeWitt:

The staff has completed its review of your emergency plan submittals dated October 29, 1979, March 11, 1980, June 9, 1980, and June 12, 1980 (Appendix M only) which relate to prompt improvement of emergency preparedness. Your emergency plan was reviewed against the criteria stated in NUREG 0654, "Criteria for Preparation and Evaluation of Radiological Emergency Plans and Preparedness in Support of Nuclear Power Plants."

Our review has indicated that additional information and commitments are required before the staff can conclude that your onsite emergency preparedness program meets the afore-mentioned criteria. Enclosed is a list of comments. Your emergency plan should be revised to address these comments and a revision to the plan should be provided to us within 60 days of receipt of this letter.

In our view, your emergency plan dated June 9, 1980 reflects improvement over your existing plan and gives a greater margin for public health and safety. Since the revised plan does not downgrade the effectiveness of your emergency preparedness, you should begin to implement this revision.

We would be pleased to discuss or clarify any of the information requested, if you so desire.

Sincerely,

for *Thomas V. Wambach*
Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
As stated

cc: See next page

8010020 169 F

cc w/enclosure:

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ENCLOSURE

Comments on Big Rock Point Emergency Plan

The following deficiencies are categorized in NUREG-0654 format.

A. Assignment of Responsibility (Organization Control)

Written Letters of Agreement (LOA) with various offsite support agencies are out of date. The following LOA's from Appendix A of the Site Emergency Plan need to be updated.

Charlevoix Fire Department
Charlevoix City Hospital
Little Traverse City Hospital
Emmet County Sheriff's Office
United States Coast Guard - Charlevoix
Charlevoix, MI

B. Onsite Emergency Organization

The plan does not indicate that the minimum shift staffing requirements as per Table B-1 of the criteria will be established. Specifically, only six qualified individuals are available on a 24 hour/day basis. They include: one Shift Supervisor; two Control Room Operators; two Auxiliary Operators; and one Shift Technical Advisor.

The following four additional shift positions must be manned on a 24 hour/day basis: one Health Physics Technician; one Rad/Chem Technician; one dedicated person for notification and communications; and one Shift Foreman or equivalent Senior Reactor Operator.

C. Emergency Response Support and Resources

The plan identifies radiological laboratories which could be used in

an emergency. However, the expected response times of these capabilities are not indicated in the plan.

D. Emergency Classification System

No deficiencies were noted in this section. However, when long-term, Lessons Learned commitments are implemented, certain Emergency Action Levels (specific instruments, parameters, or equipment status) may cause changes to Appendix M of the Site Emergency Plan. These will be reviewed at a later date.

E. Notification Methods and Procedures

The plan does not provide the administrative and physical means, or the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone. (EPZ). A commitment to ensure that such a means exists is the responsibility of the licensee and should be included in the plan.

F. Emergency Communications

No deficiencies were noted in this section. However, as noted during the June 24, 1980, exercise at Big Rock Point, a dedicated communication line between the licensee and the State On-Scene Emergency Operating Center is necessary. It is recommended that such a system exist to ensure that the licensee's communication scheme is compatible with the State and local scheme.

G. Public Information

Section 9.6.5.2.d of the plan indicates that a public information program will be available to the residents within the primary EPZ.

The plan states this information will be found in the local telephone directory and will be made available at the County Emergency Services Office and Sheriff's Department. The public information program should be incorporated in the Emergency Plan for our review.

The plan does not designate the principal points of contact and physical locations of the news media center. Further, the plan does not indicate where these news briefings will be accomplished.

The plan does not provide an annual training program to acquaint news media personnel with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

H. Emergency Facilities and Equipment

No deficiencies were noted in this section at this time. However, when long-term Lessons Learned commitments are fully implemented, certain changes to the Site Emergency Plan will be necessary, (e.g., permanent TSC, meteorological tower, etc.).

I. Accident Assessment

No deficiencies were noted in this section at this time. However, when a new meteorological tower is installed, meeting the criteria stated in Appendix 2 of NUREG-0654, the plan will have to be revised to reflect this change. Further, access to the meteorological data must be made available to the Control Room, TSC, near-site EOF, and offsite NRC center.

J. Protective Response

The plan does not indicate that fishermen or other near-site beach users will be warned or advised of an emergency at the site. Clear emergency instructions which would require them to take protective measures should be posted on the beach.

L. Medical and Public Health Support

No deficiencies were identified in this section.

M. Recovery, Reentry and Postaccident Operations

Section 9.9 (Recovery) of the Site Emergency Plan is very weak. A recovery plan should contain the position/title, authority, and responsibilities of individuals who will fill key positions in the facility recovery organization. This organization shall include technical personnel with responsibilities to develop, evaluate, and direct recovery and reentry operations. The recovery organization recommended by the Atomic Industrial Forum is an acceptable framework. Please provide your Recovery Plan.

N. Exercises and Drills

Section 9.8.1.2 of the Site Emergency Plan is insufficient to meet the criteria. Specifically, additional commitments in the plan to conduct exercises and drills in the following areas should be provided in the plan:

1. An exercise shall be conducted once every six years on the back-shifts, i.e., between 6:00 p.m. and midnight, and between midnight and 6:00 A.M.

2. Communication drills with State and local governments within the plume exposure EPZ shall be tested monthly. Communication drills within the ingestion pathway EPZ shall be tested annually
3. Medical drills involving a simulated contaminated individual which contains provisions for participation by the local ambulance and offsite medical facility shall be conducted annually.
4. Health Physics drills shall be conducted semiannually which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment. Further, tests of the post-accident sampling system of in-plant liquid samples shall be conducted semiannually.

plan does not indicate that scenarios will be used in exercises and drills. These scenarios should include (as a minimum): (1) the basic objective of the drill; (2) the date, time, place, and participating organizations; (3) the simulated events; (4) the time schedule of real and simulated events; (5) a narrative summary describing the exercise or drill; and (6) arrangements for qualified observers.

0. Radiological Emergency Response Training

The plan does not indicate that a training program for instructing and qualifying personnel shall be established for (1) radiological monitoring teams, (2) repair and damage control teams, (3) first aid and rescue personnel, and (4) licensee's headquarters support personnel.

P. Responsibility for the Planning Effort: Development, Periodic Review,
and Distribution of Emergency Plans

No deficiencies were noted in this section except that the Site
Emergency Plan should contain an index.