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F. L. CLAYTON, JR. Senior Vice President



October 28, 1980

Docket No. 50-348 Docket No. 50-364

Mr. Albert Schwencer Director of Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Schwencer:

Submitted herewith are ten (10) copies of the Joseph M. Farley Nuclear Plant Emergency Plan, revision 4, to meet the requirements of NUREG-0654, FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants and the requirements of the emergency planning final rule, published in Federal Register, August 19, 1980 in support of the issuance of a full power operating license for Unit 2 of the subject plant.

This submittal also meets the requirements of section 50.54, paragraph (s)(l) for Unit 1 of the subject plant.

In order to meet the requirements of section 50.54, paragraph (q), a control number has been assigned to each copy of the Emergency Plan submitted and a transmittal form requesting receipt verification is provided. Changes to the plan will be developed in accordance with section 50.54, paragraph (q) and distributed to holders of controlled copies (including NRR and I&E) as they are approved.

Other areas related to Emergency preparedness, specifically development of the Technical Support Center and the on site (within approximately 1/2 mile of the plant) Emergency Operations Facility are being prisued in accordance with draft NUREG-0696, Functional Criteria for Emergency Response Facilities.

In addition, the requirements of paragraph III.A.l.l. of NUREG-0694, TMI-Related Requirements for New Operating Lijenses

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are addressed in attachments 1 through 3 of this letter. Emergency Implementing Procedures (EIP's) required by paragraph V of Appendix E will be forwarded by November 6, 1980.

The State of Alabama's revised plan is rot printed; however, it should be available by October 31, 1980 and will be submitted at that time by separate correspondence.

The Alabama Power Company Emergency Plan for the Joseph M. Farley Nuclear Plant, Units 1 and 2 has been reviewed by the Plant Operations Review Committee (PORC) and the Nuclear Operations Review Board (NORB) in accordance with section 50.54, paragraph (q) to verify that revision 4 of the subject plan does not reduce the effectiveness of the plan.

Very truly yours,

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FLC/JRC:nac

Attachments

cc: Director I&E, Region II (3-w/Attachments and Plan)

### ATTACHMENT 1

## PROMPT NOTIFICATION SYSTEM

The concept currently envisioned employs a combination of sirens and NOAA transmitter/receivers. We presently have a contractor conducting a detailed survey and studies to determine the most efficient and effective system.

Alabama Power Company will make every reasonable effort to provide a useful notification system within the required time frame in accordance with the following tentative schedule:

January 1, 1981	Receive final survey report
March 1, 1981	Order equipment
June 1, 1981	Receive equipment
July 1, 1981	System operational

## ATTACHMENT 2

# METEOROLOGICAL CRITERIA FOR EMERGENCY PREPAREDNESS AT OPERATING NUCLEAR POWER PLANTS

#### A. PRESENT COMPLIANCE (INTERIM FOUR ELEMENT COMPLIANCE)

#### 1. Element 1 Requirement:

"A primary meteorological measurements program with redundant power sources for the primary system".

#### Commitment:

The following instrumentation is presently operational on site:

Wind speed - 150 ft. above grade Wind direction - 150 ft. above grade  $\Delta T_1$  - between 10 meters and 200 ft.

The instrumentation is powered from normal station service power supplies. A backup power supply is provided locally at the meteorological tower by an emergency generator. Readout is provided locally and in the control room.

## 2. Element 2 Requirement:

"A backup meteorological measurements system with redundant power sources".

#### Conmitment:

The following instrumentation is presently operational on site:

Wind speed - 35 ft. above grade Wind direction - 35 ft. above grade  $\Delta T_{2}$  (Redundant) - between 10 meters and 200 ft.

The instrumentation is powered from normal station service power supplies. A backup power supply is provided locally at the meteorological tower by an emergency generator. Readout is provided locally and in the control room.

#### 3. Element 3 Requirement:

"A system for making real-time predictions of the atmospheric effluent transport and diffusion".

#### Commitment:

A dose calculational method (DCM) is available in the control room which uses source term inputs from either radiation monitoring readings and/or sampling results and wind speed and direction inputs from either the primary or backup meteorological monitoring system. A conservative stability class is assumed to determine projected dose rates and projected integrated dose for various distances out to 10 miles from the plant.

## 4. Element 4 Requirement:

"A capability for remote interrogation, on-demand, of the atmospheric measurements and predictions systems by the licensee, emergency response organizations, and the NRC staff with primary and backup communications systems".

## Commitment:

Interrogation on demand by appropriate outside authorities can be accomplished by verbal transmission of requested data via the Emergency Nctification Network and the NRC Ring Down communications line as a primary method. Commercial land lines provide a backup communications capability.

### 5. Compensatory Measures Requirement:

"(ii) The DCM portion relating to the transport and diffusion of gaseous effluents should be consistent with the characteristics of the Class A model outlined in element 3 to Appendix 2 to NUREG-0654".

### Compensatory Measure:

The dose calculational method uses a sitespecific modification of the methodology described in Reg. Guide 1.111, "Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents in Routine Releases from Light-Water Cooled Reactors" and a conservative assumed atmospheric stability classification. This methodology is consistent with the characteristics of the Class A Model outlined in element 3 of Appendix 2 to NUREG-0654. "(iii) Maintain telephone access to the individual responsible for making offsite dose projections [Appendix E to 10 CFR Part 50 (IV)(A)(4)]. Provide number and contact individuals by March 1, 1981"

## Compensatory Measures:

The Shift Supervisor/Emergency Director is responsible for dose projections. This function may be assigned to a member of the staff when the TSC is activated. In any event the individual can be contacted via the NRC Ring Down communications line or via a commercial land line at (205) 899-5156, (205) 899-5157, or (205) 794-0800.

Compensatory measures shall not be exercised past April 1, 1982.

### B. UPGRADE COMMITMENTS

The following commitment dates are subject to change based on final guidance from the NRC and upon equipment availability.

1. BY July 1, 1981

A functional description of upgraded primary and backup meteorological instrumentation, dose calculation methodology, and remote interrogation capability will be provided for review. A tentative schedule for installation and full operational capability is provided below.

2. BY January 1, .982

The following will be provided:

- Installation date for emergency response facility (TSC, EOF, OSC) hardware and software.
- b. Primary and backup meteorological equipment, Class A DCM and remote interrogation capability of Appendix 2 to NUREG-0654.
- 3. BY April 1, 1982

The following will be provided:

 Full operational capability of commitment B.2.b.

- b. Data distribution as required for the Control Room, TSC, EOF, and NRC as required by 4.c. of Appendix 2 to NUREG-0654.
- c. DCM available for review.
- d. Comparison of any DCM in use to the fully operational Class A model.
- 4. BY September 1, 1982

The following will be provided:

- a. A description of the Class B model.
- b. Documentation of the technical bases and justification for the type of Class B model to be used with a discussion of the site-specific attributes of the model.

5. BY June 1, 1983

A fully operational Class B model will be in effect.

### ATTACHMENT 3

## MINIMUM STAFFING REQUIREMENTS

The minimum staffing requirements of Table B-1 of NUREG-0654 will be met with the exceptions listed in the attached table by September 1, 1981, and full compliance is expected by April 1, 1982 with one clarification as noted below:

These commitments are dependent on the immediate availability of personnel, time of day, weather conditions or radiological conditions.

## CLARIFICATION

 The EOF will be manned by a senior manager and staff from the off-site corporate office as indicated in the Emergency Plan.

# MINIMUM STAFFING FOR EMERGENCIES

Major Functional Area	Major Tasks	Position Title or Expertise	On Shift*	Capability 30 min.	for Additions 60 min.
Plant Operations and		Shift Supervisor (SRO)	1		
Assessment of		Shift Foreman (SRO)	1		
Operational Aspects		Control Room Operators	2#		
		Auxiliary Operators			
Emergency Direction		Shift Supervisor or	1**		
and Control (Emergency		Emergency Director			
Director)***					
Notification/	Notify licensee, State,		1		2
Communication****	local and Federal				
	personnel & maintain				
	communication				
Recovery	Emergency Operations	Sentor Manager <sup>1</sup>			
	Facility Director	beniter manufer			
Radiological Accident					
Assessment and Support					1
of Operational Accident	Offsite Dose	Senior Health Physics			
Assessment	Assessment	(HP) Expertise		1	
	Offsite Surveys		2**		2
	Onsite (out-of-plant)		1**		1
	In-plant surveys	HP Technicians	2		1
	chemistry/Radio-	Rad/Chem Technicians	2		1
	HP Support	Counting Room Technician	1		
		Radiation Detection Man	1		
		Nuclear Operative	1		
Plant System	Technical Support	Shift Technical Advisor	1		
Engineering, Repair		Core/Thermal Hydraulics	1**		1
and Corrective Actions		Electrical			1
		Mechanical			1
	Repair and Corrective	Mechanical Maintenance/	1**		1
	Actions	Rad Waste Operator			1
		Electrical Maintenance/	]**	1	1
		Instrument and Control			
		(1&C) Technician			1

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#### MINIMUM STAFFING FOR EMERGENCIES (continued)

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Major Functional Area	Major Tasks	Position Title or Expertise	On Shift*	Capability for 30 min.	Additions 60 min.
Protective Actions (In-Plant)	Radiation Protection:	HP Technicians	2**		2
	<ul> <li>a. Access Control</li> <li>b. HP Coverage for repair, corrective actions, search and rescue first- aid &amp; firefighting</li> <li>c. Personnel monitoring</li> <li>d. Dosimetry</li> </ul>				
Firefighting			Fire Brigade per Technical Specifications	Local Suppor	t
Rescue Operations and First-Aid		Mar and Add Soft on Mar	2**	Local Suppor	t
Site Access Control and Personnel Accountability	Security, firegighting communications, personnel accountability	Security Personnel	All per Security Plan		
		TOTAL	15	2	17
NOTES: * For each unaffected and one auxiliary op are covered.	nuclear unit in operation, mainta erator except that units sharing	in at least one shi a control room may	ft foreman, one share a shift fo	control room o oreman if all f	perator unctions

\*\* May be provided by shift personnel assigned other functions.

\*\*\* Overall direction of facility response to be assumed by EOF director when all centers are fully manned. Director of minute-to-minute facility operations remains with senior manager in technical support center or control room.

\*\*\*\* May be performed by engineering aide to shift supervisor.

1 A senior manager from the Corporate Office will proceed to the EOF as indicated in the plan.

\*\*\*\*\* Staffing capability in 60 minutes is dependent upon immediate availability of personnel, time of day, weather conditions, or radiological conditions.

# For Modes 5 and 6, one control room operator and one auxiliary operator shall be onshift.

Staffing may be less than the minimum requirements for a period of time not to exceed 2 hours provided that immediate action is taken to restore staffing to the minimum requirements.