



*Wisconsin Electric* POWER COMPANY

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February 18, 1981

Mr. Samuel J. Chilk  
Secretary of the Commission  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Dear Mr. Chilk:

EMERGENCY OPERATIONS FACILITY

We recently orally responded to an NRC Staff questionnaire regarding the Emergency Operations Facility (EOF) to be established at each nuclear power plant as part of the required overall upgrading of emergency preparedness. We also are aware that the Commissioners have been considering the final requirements for the EOF. We have commented several times on EOF requirements, both in writing and in oral presentations to the NRC Staff at various public meetings. We believe it may be helpful to summarize our comments in a form which may be useful to the Commission in its consideration of final EOF requirements.

Based on guidance provided in late 1979, we began planning what we believe to be an appropriate set of facilities to serve as the EOF. At our Point Beach Nuclear Plant (PBNP), there is an Energy Information Center (EIC), an all-brick structure about 1/8 mile from the plant, and a Site Boundary Control Center (SBCC), a small wooden building located about one mile southwest of the plant at the site boundary. The SBCC houses basic emergency equipment, such as environmental sampling equipment, traffic control gear, decontamination supplies, and protective materials. We believe that the ideal EOF for PBNP would include both the EIC and an enlarged and improved SBCC. The EIC would serve as the primary meeting point for Federal, state, local, and Corporate officials. The upgraded SBCC would serve as a health physics and security control point at the normal site entrance, and would house emergency materials and a basic health physics laboratory for the screening of environmental samples. In the event of temporary habitability problems, the SBCC would serve as back-up to the EIC. In the extreme, the Two Creeks Town Hall could serve as an alternate to the SBCC. We believe these facilities afford a natural and effective means for handling any emergency that could arise at PBNP.

To put these facilities in complete perspective with overall emergency capabilities at PBNP, it should be noted that our Technical Support Center (TSC), which is currently under construction, will have approximately 18,000 feet of floor space. About half of this is below grade and will remain habitable at any time after an accident; the remaining half, above grade, is habitable for all except the first few hours of the accident when direct radiation would limit time of stay. The TSC also will house a laboratory for reactor coolant and health physics sample analysis. Recovery management will best be effected from the TSC. Since our TSC affords ample accommodation for both plant and government personnel in the event of an accident, the need for data transmission to the EOF is eliminated for all except voice communications. All personnel with a legitimate need for immediate access to raw data can be accommodated at the TSC.

When the NRC began to promulgate requirements for upgraded emergency facilities, we began, in good faith, to develop what we considered, and still believe to be, the most appropriate arrangement to accommodate the suggested functions. Priority was given, correctly we believe, to the construction of a complete and spacious TSC. Auxiliary facilities (the EOF in the form of our EIC and SBCC) were planned to cope with site access control, environmental monitoring, and the coordination of offsite activities.

We have been distressed with the "moving target" presented by the ever-changing criteria for the EOF. The first change was the suggestion that filtration be provided. Then, shielding and filtration were required to afford habitability comparable to the control room. A data link was added to the requirements for the EOF. Finally, a location 5-15 miles distant was proposed.

As a result of these changes, we have suspended implementation of our plans for the EOF, particularly with respect to the construction of a new SBCC. Plans for the TSC, of course, cannot be changed since that facility is well under construction. It was our original intent to build a new SBCC during calendar year 1981. That is no longer possible. If habitability requirements are imposed, the facility could not be provided until 1983. If a distance of 5-15 miles is required for the EOF, further delay would result.

We submit the following for your consideration in finalizing criteria for the EOF:

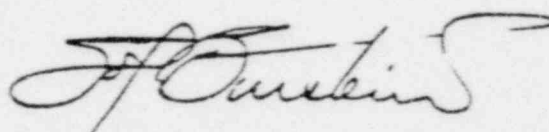
1. Habitability requirements comparable to the control room and TSC are inappropriate for the EOF.
2. The EOF should be located at the site to allow effectively the performance of site access control and health physics functions.

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3. A data link to the EOF should not be required for those licensees who provide a TSC both large enough and complete enough to accommodate all persons with a legitimate need for immediate data access.

Resolution of this issue is needed before we can proceed further with the establishment of the final EOF at our Point Beach Nuclear Plant. We believe many other licensees similarly require such resolution to proceed with implementation of their emergency facilities.

Very truly yours,



Executive Vice President

Sol Burstein

Copies to Chairman J. F. Ahearne  
Commissioner J. M. Hendrie  
Commissioner V. Gilinski  
Commissioner P. A. Bradford  
Mr. W. J. Dircks  
Mr. H. R. Denton