



Omaha Public Power District

1623 HARNEY OMAHA, NEBRASKA 68102 TELEPHONE 536-4000 AREA CODE 402

April 2, 1981

Mr. Darrell G. Eisenhut, Director
U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Eisenhut:

In response to the Commission's letter dated February 18, 1981, Omaha Public Power District's schedule for implementation of the post-TMI requirements for upgrading emergency response facilities and staffing levels for emergencies is attached.

Sincerely,

W. C. Jones
Division Manager
Production Operations

WCJ/KJM/TLP:jmm

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036



A045
5
1/1

810 4070 424

F

Commission's Requirement

For operating reactors, the upgraded emergency response facilities conceptual design shall be submitted by June 1, 1981. For operating license applications, such design information should be provided in connection with the OL review process. The upgraded facilities shall be operational by October 1, 1982, for all facilities licensed for operation prior to that date. For OL expected to be issued after October 1, 1982, the upgraded facilities shall be operational prior to receiving an operating license.

District's Response

The conceptual design for the Fort Calhoun Station's upgraded emergency response facilities will be submitted to the Commission by June 1, 1981. However, it is anticipated that the facilities will not be fully operational until June, 1983.

The onsite Technical Support Center (TSC) building is presently near completion. The Emergency Operations Facility (EOF) building should be completed by October 1, 1982. Hardware for data display and acquisition should be onsite by October 1, 1982. However, integration of the emergency response data instrumentation with the existing plant process and safety circuitry will require the plant to be at cold shutdown for at least two months. Therefore, the District intends to complete installation of the data display systems for the emergency response facilities coincident with the refueling outage scheduled to start November, 1982, and finish February, 1983.

Another four months should be allowed to debug the data systems prior to imposing Technical Specification limits on availability and operability. Therefore, the earliest date the emergency response facilities can be expected to be fully operational is June, 1983.

It should be noted that the time estimates provided above are based upon the assumption that Fort Calhoun's existing instrumentation is adequate and that a commercial grade computer system will meet the data acquisition and display requirements of NUREG-0696. If existing instrumentation must be fully upgraded to Regulatory Guide 1.97 criteria, the schedule may be delayed.

Commission's Requirement

Table III.A.1.2-1 (Table B-1 to NUREG-0654, Revision 1) establishes staffing levels for emergency situations. The revision of NUREG-0654 establishes staging of staffing for 30 to 60 minutes rather than requiring capability for required augmentation at 30 minutes. The implementation schedule for licensed operators and STA on shift shall be as specified in Task Action Item I.A.1.3. Any deficiencies in the other staffing requirements of the table must be capable of augmentation within 30 minutes by September 1, 1981, and such deficiencies must be fully removed by July 1, 1982.

District's Response

The District has evaluated the staffing requirements detailed in Table B-1 of NUREG-0654, Rev. 1, against the numbers and qualifications of people presently employed at the District. As a result of this evaluation, the District is unable to commit to the Commission's schedule for full implementation of the Table B-1 staffing requirements.

The District presently has eight employees on shift full time, excluding security personnel. The District is presently investigating required training and staffing needs to meet the requirement for ten people to be on shift full time by July 1, 1982. The District will advise the Commission of any problems in meeting this schedule.

The requirement to ensure an additional 11 men can be on site within 30 minutes and another 15 on site within the next 30 minutes is presently beyond the District's capabilities. In total numbers, there are qualified people available to augment the plant staff in all of the functional areas identified. However, to meet the minimum staffing capability required within 30 minutes with 100% certainty, the District would be required to take some measures that are highly impractical, if not impossible. The number of personnel qualified to perform the functions required by Table B-1 and also living within 30 minutes of the plant is minimal. For example, Table B-1 requires a total of five Health Physics/Rad. Chem. Technicians be on site within 30 minutes. There are presently only four qualified technicians living within 30 minutes of the plant. To ensure availability of these four technicians, they would have to be on call at all times. The other option would be to require other technicians to move closer to the plant. Either option is highly undesirable, if not infeasible, given the constraints existing with the current labor contracts. A third option evaluated was to train additional people, but for several functions (e.g., Health Physics/Rad. Chem. Technicians) a high level of expertise is required and training of inexperienced people would dilute the expertise required and, although the letter of the law could be met, the intent would be defeated. Therefore, the District is unable to commit to the augmentation requirements imposed by Table B-1 and recommends the Commission re-evaluate their criteria to establish more realistic requirements. Given the location of most plants relative to population centers, and especially the staffing available at a single unit plant, the District finds the Commission's present staffing requirements untenable. Allowing 60 minutes for augmentation would be much more realistic, although the District's evaluation has identified some concerns in the ability to achieve a 60 minute on site augmentation for all functions.