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1881 - 1981

SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

March 31, 1981

Re: Docket Nos. 50-277
50-278

Mr. Darrell G. Eisenhut, Director
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: NUREG 0737, Item III.A.2
Improving Licensee Emergency Preparedness

Dear Mr. Eisenhut:

NUREG 0737, "Clarification of TMI Action Plan Requirements," item III.A.2 requires the implementation of radiological emergency response plans by April 1, 1981. These plans address the primary and backup meteorological measurements, and the dose calculational methodology relating to the transport and diffusion of gaseous effluents. The NUREG 0737 requirement references the guidances presented in NUREG 0654, Appendix 2, "Meteorological Criteria for Emergency Preparedness of Operating Nuclear Power Plants." Our plans and schedule for implementing the NRC requirements identified in NUREG 0737 are as follows.

1. NRC REQUIREMENT: Provide a description of the radiological emergency response plans that includes elements of NUREG 0654, Appendix 2.

Response

Philadelphia Electric Company's plans for addressing Appendix 2 are described in the responses provided to the NRC requirements 2, 3, and 4 below.

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2. NRC REQUIREMENT: Submit implementing procedures describing methods, systems, and equipment to assess and monitor actual or potential offsite consequences of a radiological emergency condition.

Response

The method, systems, and equipment to assess and monitor actual or potential offsite consequences of a radiological emergency are described in procedure EP 316, and transmitted to the NRC with my letter dated February 28, 1981. EP 316 as well as the other implementing procedures for the Emergency Plan currently in review by the NRC will be continuously reviewed and revised as necessary during the transition period from the old plan to the complete implementation of the new plan. Revised procedures will be submitted to the NRC for review. Meteorological inputs for this procedure consist of the following:

1. Wind speed and direction from a 320 ft. Aerovane on the Peach Bottom primary tower. (representative of a stack release)

2. Wind speed and direction from a 75 ft. Aerovane on the Peach Bottom primary tower (representative of a vent release)

3. Wind speed and direction from a 92 ft. Aerovane on the Peach Bottom backup meteorological tower.

4. Turbulence class (Gustiness) determined from the fluctuations of the wind direction trace.

3. NRC REQUIREMENT: Implement the radiological emergency response plan by April 1, 1981 with the exception of the Class B model described in NUREG 0654, Appendix 2.

Response

The alternative for meteorological measurements described in NUREG 0737, item III.A.2 is presently in effect. The existing meteorological monitoring system consists of:

1. A primary tower with Aerovanes at the 75 ft. and 320 ft. level and thermohms at 76 ft., 146., and 316 ft. levels;

2. A backup tower with aerovanes at 30 ft. and 92 ft. and thermohms at 33 ft. and 89 ft.

Instrument output is displayed on charts in the control room. Dose calculations are performed in accordance with procedure EP 316 that has been written in response to the requirement to meet

the ch[illegible]teristics of the Class A model in Appendix 2 of NUREG 0654. [illegible]cedures have been established for phone access by the NRC in [illegible]ne event of a radiological emergency.

4. NRC REQUIREMENT: By July 1, 1981, a functional description of the upgraded programs (offsite dose computer) and schedule for installation and full operational capacity shall be provided.

Response

We are evaluating various suppliers of digital meteorological equipment, and developing a computer dose model consistent with the characteristics of the Class A model outlined in the assessment capability of Appendix 2 to NUREG 0654. We expect to provide a description and schedule of the upgraded capabilities by July 1, 1981 as requested.

We believe this description of our current and long term capabilities for real time dose predictions will meet the NRC criteria presented in NUREG 0737, item III.A.2. Should you have any questions regarding this submittal, please do not hesitate to contact us.

Very truly yours,