



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 17, 1980

Docket No. 50-346

Mr. Richard P. Crouse
Vice President, Nuclear
Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Dear Mr. Crouse:

We have completed a review of your revised emergency plan which you submitted to us for information by letter dated August 15, 1980. Our review was based upon the criteria specified in the document "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (NUREG-0654), which contains the standards stated in our new regulation (10 CFR 50.47(b)) which became effective on November 3, 1980. The results of our review are contained in the enclosure. Our determination that your emergency plan meets the new rule will also be based upon the criteria of NUREG-0654. Therefore, you are requested to resolve the comments in your submittal pursuant to the rule which is due January 2, 1981.

In addition to requesting resolution of the comments in the enclosure, you are reminded that your commitment to provide for the meteorological instrumentation and associated procedures that satisfy Appendix Z of NUREG-0654 is expected in your response to the document "Clarification of TMI Action Plan Requirements" (NUREG-0737).

Sincerely,

Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Licensing

Enclosure:
Comments on Emergency Plan
Submittal

cc w/enclosure:
See next page

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DAVIS-BESSE EMERGENCY PLAN SUBMITTAL

DATED AUGUST 15, 1980

The following staff comments follow the format of NUREG-0654.

B. Onsite Emergency Organization

- o This Plan does not provide for the "Minimum Shift Staffing for Plant Emergencies" as per Table B-1 of the criteria. The Plan should specify the position or title and major tasks to be met by persons to be assigned to the functional areas of emergency activity. For all emergency classifications, specific assignments should be made for all shifts and for plant staff members, both onsite and away from the site. These assignments should cover the emergency functions stated in Table B-1. The minimum capabilities and staffing on-shift and available within 30 minutes and 60 minutes following the declaration of an emergency should be as indicated in Table B-1. The implementation schedule for licensed operators, auxiliary operators, and the shift technical advisor (on shift) should be as specified in the July 31, 1980 letter to all power reactor licensees.
- o The Plan does not indicate which functions the EDO may not delegate. Among these should be the decision to notify and make recommendations to authorities responsible for offsite emergency measures.

C. Emergency Response Support and Resources

- o The Plan does not identify contractor or vendor radiological laboratories and their expected response times which can be used in an emergency.

- o The Plan does not indicate specific persons authorized to request RAP assistance (i.e., State, local or licensee).

E. Notification Methods and Procedures

- o The Plan does not describe administrative and physical means, and the time required for prompt alerting and providing of instructions to the public within the plume exposure pathway EPZ (see App.3).
- o The Plan does not describe the content of written messages to be provided to the public, consistent with the Plan's classification system. Such messages should include the appropriate aspects of sheltering, thyroid blocking (if approved by the State) or evacuation.

G. Public Information

- o The Plan does not include a sample of the information (newsletter) to be sent to the public.

H. Emergency Facilities and Equipment

- o The Plan does not make provision for backup radiological laboratories in case the onsite laboratory becomes inoperable.

- o The Plan does not describe the emergency provisions or equipment in the onsite Operation Support Center. Specifically, general category of supplies including respiratory protection, protective clothing, and potassium iodide doses should be indicated.

I. Accident Assessment

- o When long-term lessons learned equipment (i.e., high range effluent monitors and containment high range monitors) are installed, EALs for each class of emergency must be calculated and factored into Section 4.0 of the Plan.

J. Protective Response

- o The Plan does not describe a listing or location of respiratory protection or protective clothing that would be made available to onsite emergency workers.
- o The Plan does not provide maps showing evacuation routes and relocation centers for licensee personnel including construction personnel located at the site.
- o The Plan does not indicate how long it will take to warn onsite individuals and what means are available.
- o The Plan does not describe the decontamination capability at the offsite EOF.

K. Radiological Exposure Control

- o The Plan does not provide for maintaining emergency worker dose records.
- o The Plan does not specify action levels for determining the need for decontamination of personnel and equipment.
- o The Plan does not provide onsite contamination control measures including area access control, and drinking water and food supplies.
- o The Plan does not provide for the capability for decontaminating and relocating onsite personnel, including provision for extra clothing.

N. Exercises and Drills

- o The Plan does not make provisions to start an exercise between 6:00 PM and midnight, and another between midnight and 6:00 AM once every six years.
- o The Plan does not indicate that Health Physics drills will be conducted semi-annually which involve analysis of implant samples with actual elevated radiation levels (i.e. post-accident sampling systems).

O. Radiological Emergency Response Training

- o The Plan does not indicate that the training program will provide for on-the-spot correction of erroneous performance made during the drills.

P. Responsibility for the Planning Effort

- o The Plan does not indicate that Emergency Plan and Implementing Procedures will be reviewed and updated annually.