

December 30, 1980

FILE: NG-3514(B)

SERIAL NO: NO-80-1935

Dr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 & 2  
DOCKET NOS 50-325 AND 50-324  
LICENSE NOS. DPR-71 AND DPR-62  
EMERGENCY PLANNING

Dear Dr. Denton:

In our letter of June 27, 1980, to Mr. Ippolito of your staff, Carolina Power & Light Company (CP&L) indicated our intention to submit a revised Radiological Emergency Plan. Forwarded with this letter, pursuant to 10CFR50.54(u), are ten copies of a revision to the Brunswick Steam Electric Plant Radiological Emergency Plan. Three copies of the plan are being sent to the Atlanta IE Regional Office. This revision will replace the existing Volume 13 of the Brunswick Operating Manual effective April 1, 1981.

The revised Plan has been written to meet the requirements of 10CFR Part 50. The details of the Plan have been written to the requirements of NUREG-0654 with a few exceptions. These exceptions represent Carolina Power & Light Company's best judgment as to planning improvements which take into account local geography and demography or which are consistent with objectives and plans of the local and State agencies responsible for implementation of actions that interface with Carolina Power & Light Company's Plan. It should be noted that references to State and local plans refer to drafts which are still being developed. We are working closely with State and local agencies to ensure compatibility between their plans and ours. North Carolina informed FEMA Region IV by letter dated December 9, 1980, of their intent to file state and local plans on February 16, 1981. We anticipate providing you the required copies of the revised N. C. State and local plans shortly thereafter.

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Since ten copies of the South Carolina Radiological Emergency Plans are being submitted to the NRC under the H. B. Robinson Steam Electric Plant, Unit No. 2 Docket, only two additional copies of the South Carolina Plan are being submitted to you with this letter. One additional copy of the South Carolina Plan is being submitted to the Atlanta IE Regional Office.

Attached to this letter is a table which provides a cross-reference between the Brunswick Plan and the Evaluation Criteria of NUREG-0654. As you know, there has been extensive industry comment on the specific criteria in NUREG-0654 and NUREG-0696 related to Emergency Response Facilities, as a result of which the criteria used by the NRC Staff are continuing to evolve. We have attempted to be sensitive to those areas and believe that your staff will find that the Brunswick Plan provides a reasonable and effective basis for responding to a radiological emergency. We will continue to work with your staff to accomplish acceptable arrangements which consider our good faith efforts with respect to emergency response facilities. During our October, 1980, meeting with your staff, we discussed our ongoing projects and future plans regarding emergency response facilities. We would like to have an on-site meeting with your staff in early 1981 to further review this matter.

Carolina Power & Light Company is evaluating evacuation times for the area surrounding the Brunswick Plant. Our preliminary estimates have been forwarded to you under separate cover. The final report will be provided to you upon completion. The data developed from this study will be provided to state planners for their use in developing the North Carolina Emergency Plan.

We are prepared to work closely with the NRC Staff in order to respond to questions that may arise.

Sincerely,

  
E. E. Utley  
Executive Vice President  
Power Supply and  
Engineering & Construction

JHE/bwb  
Attachments

cc: Mr. T. A. Ippolito w/o attachment 3  
Mr. James P. O'Reilly (NRC) (3 copies of Attachment 2; 1 copy of Attachment 3)  
County Commission (Brunswick and New Hanover) w/o attachment 3  
County C. D. Coordinator w/o attachment 3  
State Emergency Preparedness Division w/o attachment 3

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CROSS-REFERENCE BETWEEN NUREG-0654 EVALUATION  
CRITERIA AND BRUNSWICK RADIOLICAL EMERGENCY RESPONSE PLAN

NUREG-0654 Criterion	Brunswick Section(s)	NUREG-0654 Criterion	Brunswick Section(s)
A.1.a	3.3.2, 3.3.3, 3.4	B.10	3.3.3, Appendix B, Appendix E
A.1.b	1.3.2, 3.0, 3.1, 3.2, 3.3, 3.4, 3.5	C.1.a	3.4.4.1, Appendix B
A.1.c	Figures 3.1-1, 3.2-1 3.5-1 thru 3.5-4, Table A-1	C.1.b	3.4.4.1, Appendix B
A.1.d	3.0, 3.2.1	C.1.c	3.4.4.1, Appendix B
A.1.e	3.4, 3.5	C.2	3.2.3
A.2.a	Onsite: 3.2; Offsite: 3.3, 3.4; Appendix C	C.3	5.6.4
A.2.b	NA	C.4	3.3, 3.4, Appendix B, Appendix C
A.3	Appendix B	D.1	Chapter 2
A.4	3.2.1, 3.2.2.3, 3.3.1.3	D.2	Chapter 2
B.1	3.0, 3.1, 3.2	D.3	NA
B.2	3.0, 3.2.1	E.1	3.5, 4.1, 4.4.1, Procedures
B.3	3.2.1	E.2	3.2, 3.3, 3.4, 3.5, Procedures
B.4	3.2.1	E.3	Table 3.5-2
B.5	3.0, 3.2, 6.1.1	E.4.a-n	Table 3.5-3
B.6	3.2, 3.3, 3.4, 3.5, 5.0, 5.2, 5.3, 5.5, (see also A.1.c above)	E.5	NA
B.7	7.0	E.6	3.5
B.8.a	3.3.1, 7.2.6	E.7	3.5
B.8.b	Chapter 7	F.1.a	3.5, Procedures
B.8.c	3.3.1	F.1.b	3.5, Appendix A
B.8.d	3.2.11, 3.3.1.4, 3.3.1.5	F.1.c	3.5, Appendix A
B.9	3.3.2	F.1.d	3.5, Appendix A
		F.1.e	3.2, 3.3, 3.5, Procedures
		F.1.f	3.5, Appendix A, Procedures

<u>NUREG-0654 Criterion</u>	<u>Brunswick Section(s)</u>	<u>NUREG-0654 Criterion</u>	<u>Brunswick Section(s)</u>
F.2	Appendix A	H.12	4.2.3, 5.0, 5.2, Table 5.0-1
G.1	4.4.2.2, 6.1.4	I.1	Chapter 2, Procedures
G.2	4.4.2.2, 6.1.4	I.2	4.2.1.3, 5.6.2, 5.6.4
G.3.a	3.2.11, 3.3.1.4, 3.3.1.5, 5.4, 5.5.2	I.3.a	4.2.1, Appendix D
G.3.b	5.4	I.3.b	4.2.1, 5.6.2, Appendix D
G.4.a	3.2.11, 3.3.1.4, 3.3.1.5	I.4	4.2.2, Appendix D
G.4.b	3.2.11, 3.3.1.4, 3.3.1.5, 3.4, Appendix A	I.5	5.6.1, Appendix D
G.5	6.1.1.13	I.6	Appendix D-2
H.1	5.2.5.3	I.7	4.2.4
H.2	5.0	I.8	3.2.5.1, 4.2.3, 4.2.4, 5.6.2
H.3	NA	I.9	4.2, 6.1.1, Appendix D Procedures
H.4	3.0, 3.2, 3.3, 3.5, Procedures	I.10	4.2, Appendix D, Procedures
H.5	5.6	J.1.a	4.4.2, 5.1.1, Appendix A, Procedures
H.5.a	5.6.1	J.1.b	4.4.2, 6.1.1, Appendix A, Procedures
H.5.b	5.6.2	J.1.c	4.4.2, 6.1.1, Appendix A, Procedures
H.5.c	5.6.3	J.1.d	4.4.2
H.5.d	5.6.5	J.2	4.4.2, 4.4.4.1, Procedures
H.6.a	5.6.1	J.3	3.2.5.3, 4.4.4.1
H.6.b	5.6.2	J.4	3.2.5.3, 4.4.2.2
H.6.c	5.6.4	J.5	3.2.7, 4.4.2
H.7	5.6.1, 5.6.2	J.6.a	4.4.3, 5.7
H.8	5.6.1	J.6.b	4.4.3, 5.7
H.9	5.3, Table 5.7-1	J.6.c	4.4.3, 4.4.5
H.10	6.3.1		
H.11	5.7, Table 5.7-1, Procedures		

<u>NUREG-0654 Criterion</u>	<u>Brunswick Section(s)</u>	<u>NUREG-0654 Criterion</u>	<u>Brunswick Section(s)</u>
J.7	4.2.4, 4.4.1, 4.4.2.2, Appendix D-3	K.6.c	4.4.4, Procedures
J.8	Not addressed	K.7	4.4.4, 4.4.5, Appendix E
J.9	NA	K.8	NA
J.10.a	5.8, Appendix E	L.1	3.2.5.3, 3.3.3, 4.4.5, 5.8 Appendix B, Appendix E
J.10.b	Figures 1.1-6, 1.1-7	L.2	3.2.5.3, 3.3.3, 4.4.5, 5.8, 6.1.1, Appendix B, Appendix E
J.10.c	3.5	L.3	NA
J.10.d	NA	L.4	3.2.5.3, 3.3.3, 4.4.5, Appendix B, Appendix E
J.10.e	NA	M.1	3.2.1, Chapter 7, Procedures
J.10.f	NA	M.2	7.2
J.10.g	NA	M.3	7.2, Appendix A, Procedures
J.10.h	NA	M.4	4.2.3, Appendix D
J.10.i	NA	N.1.a	6.1.2.2
J.10.j	NA	N.1.b	6.1.2.2
J.10.k	NA	N.2.a	6.1.2.1
J.10.l	NA	N.2.b	6.1.2.1
J.10.m	see item J.7	N.2.c	6.1.2.1
J.11	NA	N.2.d	6.1.2.1
K.1.a-g	4.4.3	N.2.e	6.1.2.1
K.2	4.4.3	N.3.a-f	6.1.2
K.3.a	3.2.5.4, 5.7	N.4	6.1.2.2
K.3.b	3.2.5.4	N.5	6.1.2.2
K.4	NA	O.1	6.1.1
K.5.a	4.4.4, Procedures	O.1.a	6.1.1.13
K.5.b	3.2.5.3, 5.7	O.1.b	NA
K.6.a	3.2.5.4, 4.4.4		
K.6.b	Procedures		

<u>NUREG-0654 Criterion</u>	<u>Brunswick Section(s)</u>
0.2	6.1.2.1
0.3	6.1.1.12
0.4.a	6.1.1.1, 6.1.1.3
0.4.b	6.1.1.1, 6.1.1.4, 6.1.1.5, 6.1.1.11, 6.1.1.12
0.4.c	6.1.1.11, 6.1.1.12
0.4.d	6.1.1.6, 6.1.1.13
0.4.e	6.1.1.7
0.4.f	6.1.1.12, 6.1.1.13
0.4.g	6.1.1.13
0.4.h	6.1.1.13
0.4.i	6.1.1.3
0.5	6.1.1
P.1	6.1.1.1, 6.1.3
P.2	6.1.3
P.3	6.1.3
P.4	6.2.2
P.5	6.2.2
P.6	1.2
P.7	Not Addressed
P.8	Table of Contents
P.9	6.2.1