

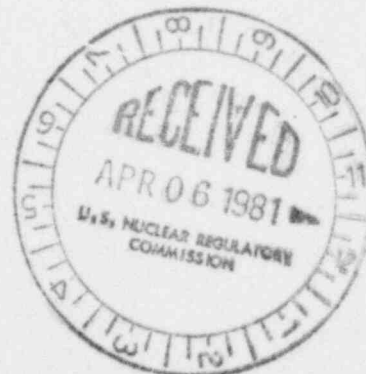
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 1, 1981

Docket No. 50-298



Mr. Jay M. Pilant
Director of Licensing and
Quality Assurance
P. O. Box 499
Columbus, Nebraska 68601

Dear Mr. Pilant:

We have completed our review of your emergency plan submittal dated January 2, 1981, for the Cooper Nuclear Station. Your plan was reviewed against the criteria stated in NUREG-0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Plans and Preparedness in Support of Nuclear Power Plants." This document addresses the standards in the revised 10 CFR 50 which became effective November 3, 1980.

Our review has concluded that your onsite emergency preparedness program as submitted does not meet the criteria in NUREG-0654. Enclosed are our comments which identify the additional information and commitments that are required to satisfy these criteria. Your emergency plan should be revised to address these comments in accordance with the provisions of the revised 10 CFR 50.

Within the next few weeks you will be contacted by the staff to arrange a meeting to discuss the incorporation of our comments into your emergency plan and implementation dates.

Sincerely,

A handwritten signature in cursive script, appearing to read "T. A. Ippolito".

Thomas A. Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

Enclosure:
Comments on Cooper
Emergency Plan

cc: w/enclosures
See next page

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F

Mr. J. M. Pilant
Nebraska Public Power District

- 2 -

April 1, 1981

cc:

Mr. G. D. Watson, General Counsel
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USNRC
Resident Inspector
P. O. Box 446
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COOPER NUCLEAR STATION EMERGENCY PLAN (JANUARY 2, 1981)

GENERAL OVERVIEW COMMENTS

A. General Comments

- 0 In general the Cooper Emergency Plan (hereafter called either "the Cooper Plan" or "the Plan") addresses what will be done at the Cooper Station during a radiological emergency. Unfortunately the Plan is lacking in the specific details of how the actions will be done, by whom they will be done, and the complexity of the interfaces involved. The Plan is written to inform persons, (who in general may have little or no detailed familiarity with the Cooper plant, its equipment, or procedures, and who may have no specific training in engineering or health physic practices) of the complex response mechanisms which are being developed to handle a radiological emergency at the Cooper Station. The Plan should thus be written to give sufficient detail for those individuals.
- 0 A number of NUREG-0654, Rev. 1 criteria are not specifically addressed in the Cooper Plan itself but are instead addressed in the Plan Implementation Procedure number 5.7 (e.g. criteria E.3, E.4, I.3, I.4, etc.). This is not acceptable. The Plan shall be a stand alone document, containing sufficient detail on which the NRC can base its safety findings. While other emergency plans, procedures, provisions, and other appropriate documents can and should be referenced to provide the reader with additional information and insight, the Plan itself must also contain a summary of the referenced documents. Such summaries should be short but must contain sufficient detail to base the safety findings.
- 0 NPPD should maintain a current list of all "Controlled Copies" of its Cooper Station Emergency Plan. That list should contain the names, addresses and phone numbers of all persons and/or organizations which are sent a copy of the Plan and who could be expected to respond to an emergency at the Cooper Station. This will serve as a mechanism to record the sending of changes to the necessary holders of your Plan and allow you to periodically audit those "Controlled Copies" to ensure that they are up to date and correct.

B. Report Mechanics

- 0 All pages should be dated to facilitate awareness of changes which have been made to the Plan per your stipulation on page 1-5.
- 0 In-Test References shall be as specific as possible, e.g. the reference should be to a specific page, not to an entire section. While this policy must be tempered to reduce the overall amount of work necessary to make simple changes and corrections to the Plan, the policy must be given due consideration so as to aid the reader in moving from one part of the Plan to another.
- 0 In the "Emergency Plan Implementation Procedures" (EPIP's) all in Test References shall be as specific as possible. During an emergency it is the EPIP's which will be used and the reader will not have the time to hunt for a general reference.
- 0 Each page requiring approval prior to implementation should be dated and signed by the approving official. This has not been done for your Emergency Procedures although space has been provided for that function. Further, such blocks as "Prepared By/Date" and "Reviewed By/Date" have been left blank.

C. Graphics

- 0 Graphic matter should be placed in or near the text in which it is referenced.
- 0 All graphic matter should be given proper titles and should be large enough to read (see page 2-5 of your Plan).
- 0 Many of the graphs, maps, and tables in the Plan are either illegible or not understandable due to poor copy quality, cluttered original, poor layout, or reduced size. Consideration should be given to making maps on double size pages (e.g. foldouts) and to providing flow arrows for diagrams. An indication of priority of flow should also be provided for simultaneous flow of information (e.g. during notification of offsite personnel, etc.).

D. Errors

- 0 NUREG-0654, Rev. 1, criteria A.3 is referenced to EP-13.0 when in fact it should be referenced to EP-14.0 (which does not contain the required letters of agreement).
- 0 NUREG-0654, Rev. 1 criteria A.4 is referenced to EP-2.0 when in fact it should be referenced to EP-12.0.
- 0 NUREG-0654, Rev. 1, criteria I.11 is not addressed in your Cross Reference Table (see page 7).
- 0 The term "Site Emergency" for the third class of emergency has been changed to "Site Area Emergency" in Revision 1 to NUREG-0654. Your Plan should be corrected throughout to incorporate this change.
- 0 The U.S. Department of Energy has changed both the name and call-up mechanisms for its old "R.A.P. & I.R.A.P." teams. Your Plan must be corrected to incorporate the updated information.

Specific Comments for the CNS Emergency Plan (1/2/81)

SECTION A - ASSIGNMENT OF RESPONSIBILITY

NUREG - 0654, REV. 1

CRITERIA

COMMENT

- | | | |
|---------|---|---|
| A.1 a&b | 0 | The Plan does not properly address the use of private organizations as part of the overall response organization even though such organizations are identified in the Plan. Nor are the concepts of operations of these organizations and their interfaces specified. |
| | 0 | The Plan depends heavily upon the provisions for assistance contained in other emergency plans (such as the State of Nebraska Plan, etc.). The Plan shall be a stand alone document. While it is acceptable to incorporate, by reference, other emergency plans, the specific nature of the services and assistance expected from other organizations must be presented to a degree which enables the reader to determine the functions to be performed by support organizations. |
| A.1.c | 0 | Due to omissions as indicated above, the block diagrams (see figure on page 1-3) illustrating the interrelationships of the response organizations are not complete and must be corrected. |
| A.1.d | 0 | The Plan indicates that "the Emergency Director (Station Superintendent or his designated representative)" shall be in charge of the emergency response. However, the said designee(s) is not identified by title (see last line of page 2-1). The Plan shall identify, by titles, all those individuals who may be designated to serve as the "Emergency Director", including specific line of succession. (See Criteria 8.3). |
| A.1.e | 0 | The Plan stipulates on page 2-1 that "the Duty Shift Supervisor is automatically the Emergency Director until relieved, thus providing 24-hour emergency response and communication capabilities." This simple statement <u>does not</u> demonstrate the 24 hour per day manning of communications links, especially for offsite notification. The Plan shall describe in detail the capability for manning communication links on a 24-hour-per-day basis. |

COMMENT

A.3

- 0 The entire area of "Letters of Agreement" with off-site support agencies is extremely deficient in the Cooper Plan. Not only are the letters from Section 14.0 omitted from the Plan but the listing of the letters of agreement is also deficient. Groups excluded from the list include: 1) local fire and rescue organizations, 2) private organizations such as GE, INPO, private labs, etc. and 3) appropriate Federal organizations. It is also required (see criteria D.9) that these letters be reviewed at least every 12 months.

A.4

- 0 The Plan does not adequately demonstrate that the capability exists to assure continuity of resources for a protracted period. While Section 12.0 indicates that some capability exists for communication equipment and material (including food and lodging), no provision is made to interface the station needs with the corporate office capabilities. The Plan shall identify the specific individual who will be responsible for seeing that sufficient technical and administrative personnel will be available during a protracted period.

SECTION B - ONSITE EMERGENCY ORGANIZATION

NUREG - 0654, REV. 1
CRITERIA

COMMENT

- | | | |
|---------------|---|--|
| B.1 | 0 | The Plan does not adequately describe the onsite emergency organization of plant staff personnel for all shifts and its relationship to the responsibilities and duties of the normal staff complement". For <u>each</u> shift, specify the types and number of personnel on duty, what their regular duties are, and how their duties would change during an emergency. |
| B.2 | 0 | The Plan does not specify that the Emergency Director has "the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures." |
| B.3 | 0 | The Plan does not contain a clear line of succession for the Emergency Director position nor does it specify the conditions for higher level utility officials assuming this function. |
| B.4 | 0 | The Plan does not clearly establish specific functional responsibilities assigned to the Emergency Director nor does the plan clearly specify which responsibilities may not be delegated to other personnel within the onsite emergency organization. Note that among the responsibilities which may not be delegated shall be the decision to notify and recommend protective actions to authorities responsible for offsite emergency measures. |
| B.5 | 0 | The Plan does not fulfill either the scope or the intent of this criteria. No table, similar to Table B-1 of NUREG-0654, Rev. 1, is incorporated into the Plan, nor is any other method apparent which supplies the required information regarding shift manning and augmentation. |
| B.6 | 0 | See comments on Criteria A.1.a, b, & c. |
| B.7.b, c, & d | 0 | See comments on Criteria A.4 & B.5. |

NUREG - 0654, REV. 1
CRITERIA

COMMENT

- | | | |
|-----|---|--|
| 8.8 | 0 | The Plan identifies only GE, INPO and the Ft. Calhoun Station as "contractor and private organizations who may be requested to provide technical assistance to and augmentation of the emergency organizations". Care must be taken to ensure that <u>all</u> such potential organizations are identified. |
| 8.9 | 0 | The section of the Plan references for this criterion (section 9.0) does not address the use of local police or fire-fighting organizations. Also only one Rescue Squad is identified (Auburn). Letters of agreement which delineate the authorities, responsibilities, and limits on the actions of such organizations shall be included in the Plan. |

SECTION C - EMERGENCY RESPONSE SUPPORT AND RESOURCES

NUREG - 0654, REV. 1

<u>CRITERIA</u>		<u>COMMENT</u>
C.1.a	0	The Plan does not clearly identify specific persons, by title, who are authorized to request Federal assistance from the DOE-RMAP or from other Federal organizations.
C.1.b	0	The Plan does not describe either the specific Federal resources expected from the DOE-RMAP and other Federal organizations, or the expected times of arrival of such assistance.
C.1.c	0	As the Plan does not adequately identify the types or scope of Federal assistance which may be requested during an emergency at the Cooper Station (see comment on C.1.b) the Plan also fails to adequately address the NPPD resources available to support such assistance. Section R.12.3 shall be updated in light of new information gathered pursuant to fulfilling criteria C.1.b.
C.2.b	0	While the Plan, on page 12 8, does indicate that "a site representative may be sent to the affected local or state emergency operations facility", (singular) provisions shall be made to ensure that a sufficient number of persons are trained and available to maintain a 24 hour per day coverage during a protracted period.
C.3	0	The Plan identifies only the Radiochemistry Lab at the site as a possible alternate facility for radiological analysis services during an emergency. Although the services of INPO and GE are mentioned, no information is given as to the detailed services and capabilities which could be supplied by these, or other support organizations. The Plan shall include the expected time of arrival or availability of such assistance.
C.4	0	The Plan does not adequately identify nuclear and other facilities, organizations, or individuals which could be relied upon in an emergency to provide assistance.

SECTION D - EMERGENCY CLASSIFICATION SYSTEM

NUREG - 0654, REV. 1

CRITERIA

COMMENT

D.1 & D.2

- 0 The Plan uses the term "Site Emergency" as the third classification of emergencies. This is incorrect and shall be changed to "Site Area Emergency" pursuant to 10 CFR Part 50, Appendix E, (IV), (C).
- 0 The Plan does not address all of the applicable examples of initiating conditions as specified in Appendix 1 to NUREG-0654, Rev. 1, nor are specific instrument, parameter or equipment status indications given for the emergency action levels (initiation conditions).
- 0 A specific and detailed evaluation of your entire emergency classification system and the associated emergency action level schemes is now underway at the NRC and will be forwarded to you upon completion.

SECTION E - NOTIFICATION METHODS AND PROCEDURES

NUREG - 0654, REV. 1

<u>CRITERIA</u>		<u>COMMENT</u>
E.1 & E.2	0	The Plan does not give any indications that its proposed notification scheme has been mutually agreed upon by all of the potentially affected jurisdictions. Further, the entire treatment of the issue of notification in the Plan is vague, and much more specific detail is needed in order for the NRC to make a favorable finding on this issue.
E.3	0	The Plan does not adequately develop the content of initial emergency messages to be sent from the station. The proposed messages and other important information located in Attachments B and H to Procedure Number 5.7 of the Cooper Nuclear Station Operations Manual/CNS Emergency Plan Implementation shall be included in the Plan.
E.4	0	The Nuclear Accident Report Form, page 14 of Attachment B to Procedure Number 5.7 does not contain the information required by criteria E.4.a, d-e, f, h-k, m-n, NUREG-0654, Rev. 1.
E.6	0	The Plan does not adequately provide detailed information regarding the administrative and physical means, and the time required, for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ. NPPD shall also provide sufficient information to demonstrate that all requirements of Appendix 3 to NUREG-0654, Rev. 1 are met.
E.7	0	The Plan does not address the preparation of messages intended for the public and to inform them of such aspects as appropriate aspects of sheltering, ad hoc respiratory protection, evacuation routes, and other important issues during an emergency. NPPD shall coordinate the preparation of such messages with the state and local authorities.

SECTION F - EMERGENCY COMMUNICATIONS

NUREG - 0654, REV. 1
CRITERIA

COMMENT

- | | | |
|---------|---|--|
| F.1.a-f | 0 | See Comment on Criterion A.1.e. Further, the Plan does not identify organizational titles and alternates for both ends of the communications links. |
| F.2 | 0 | The Plan does not demonstrate that there exists a common coordinated communication link with <u>all</u> the fixed and mobile medical support facilities and equipment. |
| F.3 | 0 | The Plan does not indicate that maximum allowable time between tests of both the NAWAS equipment and the mobile radio units. |

SECTION G - PUBLIC EDUCATION AND INFORMATION

NUREG - 0654, REV. 1
CRITERIA

COMMENT

- | | | |
|------------|---|--|
| G.1 & G.2 | 0 | The Plan does not address a public education and information program to provide and disseminate on an annual basis, necessary information to the public as specified by these two criteria. The program shall address both the permanent and transient adult population within the plume exposure EPX. |
| G.3.a | 0 | The Plan does not clearly describe the physical locations for use by news media during an emergency. |
| G.3.b | 0 | The Plan does not specify the number of new media personnel for which space is provided at the nearsite and alternate ECC. To avoid confusion during an emergency, the NPPD should consider this factor and arrive at a method to determine the maximum allowable number of news media, news equipment, etc. in the ECC and identify a method to "rotate" the news media. |
| G.4. a & b | 0 | The Plan does not clearly identify a single spokesperson who shall have access to all necessary information. The duty now seems to be split between the Public Affairs Director and the Station Superintendent. NPPD shall designate a singular individual who shall have overall authority and responsibility for the release of information to the public and news media and a line of succession for this function as required. |
| G.5 | 0 | The Plan makes no provision to coordinate with the local and state, authorities and present, at least annually, a program to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information in case of an emergency at the site. |

SECTION H - EMERGENCY FACILITIES AND EQUIPMENT

NUREG - 0654, REV. 1

CRITERIA

COMMENT

H.1 & H.2

- 0 The functional criteria for emergency response facilities (TSC, EOF, etc.) has been updated and issued as NUREG-0696, Final Report. NPPD shall review the capabilities and characteristics of the proposed emergency response facilities associated with the site to assure that all criteria are met.
- 0 The Plan uses a concept of five separate Operation Support Centers (assembly areas). While this concept is not in direct violation of the guidance criteria established in NUREG-0654, Rev. 1, extreme care must be taken to assure that the necessary level of coordination and control is established by the Emergency Director over the actions and movements of personnel assigned to these centers or that a single OSC is established. The Plan does not now provide sufficient detail as to the operations of these centers to enable the NRC to make a finding on this issue.
- 0 The Plan should include maps or graphic diagrams depicting the locations (both principal and alternate) of:
 - o Nearsite EOF and EOCs (both state and local).
 - o Offsite Technical Support Center
 - o Control Room (no alternate)
 - o Onsite Operational Support Center
- 0 The Plan shall describe monitoring, either portable or permanent, for both direct radiation and airborne radioactive contamination at the TSC. (NRC letter 10/30/79).

COMMENT

- | | | |
|-----------|---|--|
| H.4 | 0 | The Plan does not provide adequate information regarding the projected time required to fully activate and staff the emergency response facilities (including the time required to move from the Primary EOF to the alternate EOF). Nor is there an adequate description of the methods and procedures which will be used to assure that functional continuity will be maintained during these times. |
| H.5 | 0 | The Plan does not provide sufficient detail on the characteristics of its process monitors and other onsite monitoring equipment (i.e. the type of monitors, their detection capabilities and applicable ranges). Also NPPD shall provide this information for the High Range Noble Gas Monitors and Insite Primary Containment Radiation monitors. |
| H.6 & H.7 | 0 | The Plan does not provide an adequately detailed description of its system of offsite monitoring and analysis. Nor is there adequate information as to the methods and procedures of obtaining offsite direct readings or for the collection, transportation, and analysis of samples. The Plan indicates that offsite (and onsite) samples will be collected and returned onsite to the radiochemistry lab for analysis. The Plan shall describe provisions to use offsite facilities with radiochemical analysis capabilities during an emergency when facilities onsite are unavailable. NPPD shall also make provision for the storage of necessary supplies and equipment to carry out its offsite monitoring capabilities at an offsite location. NPPD shall ensure that all requirements of the NRC RAB Branch Technical Position for the Environmental Radiological Monitoring Program, Rev.1 (Nov. 79) are met. |
| H.8 | 0 | A complete and detailed evaluation of the Cooper Station meteorological system and instrumentation is now underway at the NRC. The results of that evaluation will be supplied to you as soon as it is completed. NPPD should also review the requirements of Appendix 2 to NUREG-0654, Rev. 1 and shall assure that all requirements are met to the best of your understanding until the full NRC evaluation provides you more detailed guidance. |

NUREG - 0654, REV. 1
CRITERIA

COMMENT

- | | | |
|------|---|---|
| H.9 | 0 | The Plan does not provide adequate information regarding the size, capacity, equipment, supplies, or staffing of the five proposed operations support centers. |
| H.10 | 0 | The Plan does not provide for the physical inspection, inventory, and operational checking of emergency equipment, supplies, and instruments at least once each calendar quarter and after each use. The proposed plan of using seals on the doors of equipment lockers is not adequate as it would indicate only the integrity of the inventory but not the functional capability or accuracy of the equipment or instrumentation. |
| | 0 | The Plan also fails to provide sufficient information regarding the calibration of equipment. |
| H.11 | 0 | The Plan does not contain an appendix which includes the identification of emergency kits and their contents by general category. The information contained in the EPIP shall be provided as an appendix to the Plan. |
| H.12 | 0 | The Cooper Plan fails to meet this criterion (see comments on Criteria H.6 & H.7). |

SECTION I - ACCIDENT ASSESSMENT

NUREG - 0654, REV. 1 CRITERIA

COMMENT

- | | | |
|---------------|---|---|
| I.1 | 0 | See Comments of Criteria D.1, D.2, H.5, & H.6. |
| I.2 | 0 | The Plan does not fulfill this criterion. Most of the required items are listed in the Plan as "to be added later". NPPD shall review the requirements of NUREG-0737 to assure that all requirements are met. |
| I.3 & I.4 | 0 | The Plan does not fulfill these criteria. The required information contained in attachments to EPIP's shall be included, in sufficient detail, to enable a person not trained in engineering or health physics to follow and understand the general nature of the calculations. |
| I.5 | 0 | The Plan does not fulfill this criterion. The Plan indicates that this information will be "added later." NPPD shall commit to a firm schedule consistent with the requirements of Appendix 2 to NUREG-0654, Rev. 1. |
| I.6 thru I.10 | 0 | See Comments on Criteria I.3, I.4, D.1, D.2, H.5, and H.6. |
| | 0 | The Plan does not address these criteria. Some information is contained in Attachment "I" to the EPIP's, however, the information is lacking in detail. NPPD shall correct the Plan to incorporate such information and shall increase the depth and detail of the descriptions used to demonstrate compliance with these criteria. |

SECTION J - PROTECTIVE RESPONSE

NUREG - 0654, REV 1
CRITERIA

COMMENT

- | | | |
|-----------|---|--|
| J.1 | 0 | The Plan does not provide the established times required to warn or advise onsite individuals who may be in areas controlled by the operator. Further, the notification of other persons who may be in the public access areas, passing through the site or within the owner controlled areas is not addressed in the Plan. |
| J.2 | 0 | The Plan does not fulfill this criterion. The appropriate information and maps, now contained in Attachment "B" to EPIP's, including the projected numbers of evacuees, the time required to evacuate the site and gather the evacuees at a remote assembly areas, provisions for alternate routes, and the handling and control of traffic flow, shall be included in the Plan. |
| J.3 & J.4 | 0 | The Plan fails to provide detailed descriptions of the manpower, equipment and methods to be used to provide the capability to monitor and decontaminate the people and equipment evacuated from the site during an emergency. |
| J.5 | 0 | The Plan does not provide for either the accountability of all onsite individuals within 30 minutes of the start of an emergency, or for the continuous accountability of all onsite individuals (emergency workers) thereafter, including the personnel assigned to the five OSC's. |
| J.6 | 0 | The Plan does not address this criterion. NPPD shall correct the Plan to provide information regarding minimum inventories of these items, projected numbers of emergency workers who may need these items, provisions to acquire additional supplies, and methods to distribute and periodically check that these items are being properly used during an emergency. |
| J.7 | 0 | The Plan does not adequately address this criterion. NPPD shall correct the Plan to incorporate the information contained in Attachment "B" to the EPIP's and shall assure that the recommendations set forth in Tables 2.1 & 2.2 of EPA-520/1-75-001 are addressed. |

NUREG - 0654, REV. 1
CRITERIA

COMMENT

- | | | |
|----------|---|--|
| J.8 | 0 | The Plan does not address this criterion. NPPD shall correct the Plan to fulfill the criteria as developed in Appendix 4 to NUREG-0654, Rev. 1. |
| J.10 a-c | 0 | The Plan does not fulfill these criteria. NPPD shall correct the Plan to incorporate the necessary maps and the means of notifying all segments of the transient and resident population. All graphics shall be of sufficient size and clarity to enable the NRC to make its finding on this criteria. |
| J.10 m | 0 | See Comment on Criterion J.7. |

SECTION K - RADIOLOGICAL EXPOSURE CONTROL

NUREG - 0654, REV. 1

<u>CRITERIA</u>		<u>COMMENT</u>
K.1	0	The Plan does not clearly establish specific radiation exposure guidelines consistent with the EPA Emergency Worker and Lifesaving Activity Protective Action Guides (EPA 520/1-75-001) for <u>each</u> of the types of actions required by this criteria.
K.2	0	See Comment on Criterion K.1. Further, the Plan does not <u>clearly</u> identify the specific persons, by <u>position</u> or title, who have the authority to authorize emergency workers to receive doses in excess of 10 CFR Part 20 limits.
K.3 a&b	0	The Plan does not clearly describe the provisions made to ensure that a capability exists to determine and record doses received by emergency workers on a 24-hour-per-day basis, nor the methods to ensure that dosimeters are read at appropriate frequencies.
K.5	0	The Plan does not specify action levels of determining the need for decontamination nor does it establish the means (equipment, manpower, supplies and procedures) for such required decontamination with subsequent remonitoring.
K.6	0	The Plan does not establish a definitive program to govern the control of contamination during an emergency nor the criteria for permitting returned areas and items to normal use.
K.7	0	The Plan does not include a detailed description of the means of providing the capability for decontamination of onsite personnel and equipment which may be required to be relocated offsite during an emergency, including the provision of extra clothing, decontaminants, and capabilities to detect and remove radioiodine contamination of the skin.

SECTION L - MEDICAL AND PUBLIC HEALTH SUPPORT

NUREG - 0654, REV. 1

CRITERIA

COMMENT

L.1

0

The Plan does not contain sufficient information regarding the capabilities and equipment available to local and backup hospital and medical services to demonstrate that they have the capability for evaluation of radiation exposure and uptake.

SECTION M - RECOVERY AND REENTRY PLANNING AND
POSTACCIDENT OPERATIONS

NUREG - 0654, REV. 1
CRITERIA

COMMENT

M.1 - M.4

- 0 The Plan does not address Recovery Planning and Postaccident Operations. The information contained in the Plan is vague and unsupported and mainly deals with reentry of the facility for medical emergencies or search and rescue missions for personnel accountability. NPPD should review the recommendation of the Atomic Industrial Forum's "Nuclear Power Plant Emergency Response Plan" dated October 11, 1979.

SECTION N - EXERCISES AND DRILLS

NUREG - 0654, REV. 1

CRITERIA

COMMENT

N.1 thru N.5

- 0 The Plan does not adequately address the issue of "exercises" and "drills". The Plan shall include a detailed description of what an exercise or drill will include, when they will take place, how the exercise or drill scenario will be developed and variety, and what will be done with the results from such an exercise or drill (including provisions for the required critiques after the exercise), etc. NPPD shall further review the requirements of 10 CFR Part 50, Appendix E, IV, F. and shall ensure that all requirements of the Rule and the guidance contained in NUREG-0654, Rev. 1, are met.

SECTION 0 - RADIOLOGICAL EMERGENCY RESPONSE TRAINING

NUREG - 0654, REV. 1

CRITERIA

COMMENT

0.1.a - 0.5

- 0 The treatment of the entire issue of training (and periodic retraining) of emergency response personnel is completely inadequate in the Plan. The information in the Plan (see Section 11.2) is vague and unsupported. The NPPD shall develop a detailed and comprehensive program to train, test, and periodically retrain the emergency response personnel, including both offsite and onsite response personnel. The Plan shall describe the training program, including an indication of the depth and detail of such training as well as the methods used to verify that personnel have received and understand the information presented during the training and that they can effectively carry out the actions required of them during an emergency, (e.g. demonstrated capability to perform their assigned tasks).

SECTION P - RESPONSIBILITY FOR THE PLANNING EFFORT;
DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION
OF EMERGENCY PLANS

<u>NUREG - 0654, REV. 1</u> <u>CRITERIA</u>		<u>COMMENT</u>
P.1	0	See Comment on Criteria 0.1.
P.2	0	The Plan does not clearly identify the overall authority and responsibility of the Station Superintendent for radiological emergency response planning.
P.3	0	The Plan does not clearly identify an Emergency Planning Coordinator who has the responsibility for the development and updating of emergency plans and the coordination of these plans with other response organizations.
P.4	0	The Plan does not provide for an annual review of the plans <u>to certify</u> that they are current, including changes required based upon identified deficiencies as a result of drills and exercises.
P.6	0	The Plan does not contain a detailed listing of supporting plans and their source.
P.7	0	The Plan does not contain, as an appendix, a listing by title of the procedures required to implement each section of the Plan.
P.9	0	The Plan does not provide sufficient detail for the NRC to make a finding in this area. The NPPD shall correct the Plan to incorporate additional detail of its proposed audit program including what items will be audited, whether offsite copies of the Plan will be audited, whether offsite copies of the Plan will be audited, how the audits will be performed and what will be done with the results of the audit.
P.10	0	The Plan does not provide for the quarterly updating of both offsite and onsite telephone numbers contained in the Emergency Procedures.