



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

APR 24 1981

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Docket No. 50-358

The Cincinnati Gas & Electric Company
ATTN: Mr. Earl A. Borgmann
Vice President, Engineering
P. O. Box 960
Cincinnati, Ohio 45201

Dear Mr. Borgmann

We have completed our review of your Emergency Plan submittal dated January, 1981 for the Zimmer Nuclear Plant. Your plan was reviewed against the criteria stated in NUREG-0654, "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 that became effective November 3, 1980.

Our review has indicated that additional information and commitments are required before we can conclude that your onsite emergency preparedness program meets these criteria.

Enclosed are our comments for which resolution is necessary. Your emergency plan should be revised to address these comments in accordance with the provisions of the revised 10 CFR 50.

Sincerely,

Robert L. Tedesco, Assistant Director
for Licensing
Division of Licensing

Enclosure:
Comments on Zimmer
Emergency Plan

cc: See next page

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Washington, D. C. 20515

REVIEW OF THE ZIMMER EMERGENCY PLAN

A. Assignment of Responsibility (Organization Control)

- Written Letters of Agreement (LOA) with various support agencies are out of date. The LOA's that need updating are:

The State of Ohio

Clermont County

The State of Kentucky

Campbell County

- LOA's are needed with:

Nuclear Steam Supply System (NSSS)

Sargent & Lundy

The helicopter company

- In addition, all letters of agreement should be revised to provide concepts of operation, specific support commitments, authorities, responsibilities and limits on actions of contractors, private organizations and local service support groups.

B. Onsite Emergency Organization

- Specify how minimum staffing requirements, as per Table B-1 of the criteria, will be established. Specifically, only seven qualified individuals are available on a 24 hour/day basis, as per Table 5-2 of the Plan. A total augmentation plan should be established showing how Table B-1 staffing requirements will be met, including the 30 and 60 minute augmentation schedule. The total plan augmentation specifies only 14 people. Augmentation plans should also address provisions for augmentation during inclement weather.

C. Emergency Response and Resources

- Submit provisions for incorporating the Federal response capability into Emergency operations (i.e., Department of Energy). The Plan should specify the Federal resources expected for accident categories in Appendix 1 of the criteria, including expected times of arrival at the site. Specific licensee resources as needed to support the Federal response should be listed in the Plan, e.g., command posts, telephone lines, radio frequencies and telecommunications centers.
- Identify available radiological laboratories and their capabilities and the response times that can be expected in an emergency (i.e., vendors, universities, private laboratories, etc.).

E. Notification Methods and Procedures

- Commit that a prompt Alerting and Notification System meeting the design objectives of NUREG-0654, Rev. 1, Appendix 3 will be developed, and in place. The Plan should address the administrative and physical means, and the time required to promptly notify the public of an emergency. The Plan should commit to the establishment of such a system and indicate when the system will be operational.
- Provide for written messages intended for the public consistent with the licensee's classification scheme. Messages to the public giving instructions regarding specific protective actions to be taken by occupants of affected areas should be included in the Plan. In addition, the Plan should contain a description of the message authentication scheme and verification procedures.

F. Emergency Communications

- The provision for communications as described in the Plan is insufficient to meet the objectives of the criteria. The Plan should include information to describe:
 - 1) Alternates for both ends of the communications link.
 - 2) How State, local and other support groups will be notified 24 hours per day (e.g., town sheriff, volunteer fire fighters, local EOC volunteers).
 - 3) The communications link between the facility and mobile medical support.

G. Public Education and Information

- The Public Information Program indicated in the Plan does not clearly define what sector of the public will receive periodic information regarding how they will be notified, what their actions should be in an emergency, the agreed upon means of evacuation verification, the location of relocation centers and the use of radioprotective drugs. Further, the Program does not make provisions for the special needs of the handicapped. In addition, provide the following information.
- Submit samples of the public education and information material intended for the public.
- Clearly indicate that space will be made available for the news media at the nearsite EOF.
- Define the methods to be used for rumor control.
- Specify where the utilities information offices will be located.

H. Emergency Facilities and Equipment

- State how "as built" diagrams of the facility will be available for the personnel in the EOF, TSC, and OSC.
- Specify the types of equipment available in the TSC and EOF, identified in NUREG-0696, including the types and locations of communications equipment. This information should be detailed on a scaled drawing.
- Specify the road distance and travel time between the control room and nearsite EOF.
- Specify how personnel onsite during the emergency will have adequate protective equipment available to them, i.e., protective respiratory devices.
- Provide a description of the meteorological instrumentation and procedures as identified in Appendix 2 of NUREG-0654, Rev. 1 and the provisions to obtain representative real-time meteorological information from other sources.
- Identify the provisions for inspection, inventory, quarterly operational checks and calibration of both fixed and portable instruments and equipment (protective equipment, communication equipment, radiological monitoring equipment and emergency supplies).

H. (Continued)

- Identify laboratory facilities, their capabilities, and the expected backup response they may provide during an emergency.

I. Accident Assessment

- Include a plot or graph indicating the relationship between the containment radiation monitor(s) reading(s) and radioactive material available for release from containment.
- Clearly establish methods and techniques used to determine the magnitude of a release of radioactive materials based on plant effluent monitors. In addition, establish the relationship between effluent monitor readings and onsite and offsite exposures and contamination for various meteorological conditions.
- Describe the methodology to be used for determining release rates and projected doses if the instrumentation used for assessment were to go offscale or become inoperable.
- Describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone. Methods, equipment, and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through the liquid or gaseous pathways should be described. The description should address activation criteria, means of notification, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.

I. (Continued)

- Describe the means for relating measured field contamination levels to dose rates for key isotopes and gross radioactivity measurements. Also describe the provisions for estimating an integrated dose for comparison with Protective Action Guides.
- Describe the provisions for individual respiratory protection, protective clothing and the use of radioprotective drugs by onsite emergency workers.

J. Protective Response

- Explain the basis for the adverse weather evacuation time estimates, the selection of alternative routes and the methods of evacuation that will be used during inclement weather. In addition, evacuation time estimates should be modified to include institutions, such as hospitals and nursing homes.
- Describe the provisions for evacuation of non-essential onsite personnel, including evacuation routes, transportation and decontamination capabilities.
- Describe the "Controls that have been established" outside controlled area boundaries.
- Describe the use of radioprotective drugs by onsite personnel. Specify who decides when they are used, by whom, and what the dosage is. Specify the amount available onsite.
- Describe the recommendations for protective measures that may be given to the public based on measured or calculated dose rates. Recommendations should be keyed to the emergency classifications and Action Levels described in Appendix 1 of the criteria.

L. Medical and Public Health Support

- The Plan states that there is a corporate Medical Director. Where will the Medical Director be located during an emergency, and how quickly can he arrive onsite?
- The Plan only describes the capabilities of Cincinnati General Hospital in a Letter of Agreement. Describe the capability of a local hospital, other than the Cincinnati General Hospital, used to provide assistance. Include the hospital's capabilities for evaluating radiation exposure and uptake and describe the training for hospital personnel.
- Describe how an injured individual will be transported during inclement weather.

M. Recovery and Reentry Planning and Postaccident Operations

- Describe the means by which decisions are reached to relax both onsite and offsite protective measures during the recovery period following an emergency.
- Describe the means for informing members of the response organizations that a recovery operation is to be initiated, and identify changes in the organizational structure that are planned.

0. Radiological Emergency Response Training

- Additional information is required concerning the training program for personnel who will implement the radiological emergency response plan. The description should include the specialized training and periodic retraining programs (include scope, nature and frequency) for each of the nine categories of personnel listed in Section II.0.4. of NUREG-0654, Rev. 1.
- Identify where the formal training program includes training to determine individual qualification, and specify the minimum level of competence established for the positions assigned emergency response roles. Training and retraining programs, qualifications testing and competence to include State and local officials should also be specified.
- The Plan should be modified to specify that first aid personnel will be retrained and tested annually and personnel holding multi media certification should be recertified every two years.

N. Exercises and Drills

- Revise the communication and fire drill frequency from annually to quarterly to conform to the criteria in NUREG-0654, Rev. 1.
- Although communication drills with hospitals are acceptable on a quarterly basis, the plan should be revised to include a full medical disaster plan exercise annually.
- Provide a commitment that scenarios will include:
 - 1) Arrangements for official observers
 - 2) The basic objective of the drill
 - 3) The date, time, place and participating organization
 - 4) Simulated events
 - 5) The time schedule of real and simulated events
 - 6) A narrative summary description

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

- The Plan should be modified to specify that independent audits will be conducted annually. In addition, audited items should include the interfaces with State and local governments.