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Senior Vice President -
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May 1, 1981

Mr. Darrel G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docket Nos.: STN 50-546
STN 50-547
Construction Permit Nos.:
CPPR 170
CPPR 171

SUBJECT: Marble Hill Nuclear Generating Station
Units 1 and 2

Dear Mr. Eisenhut:

This is in response to your letter of February 18, 1981 requesting confirmation of the implementation dates for meeting certain requirements.

Marble Hill Nuclear Generating Station is scheduled for fuel load of Unit 1 in June of 1986. Therefore, submittal of emergency response facility (ERF) conceptual design information is to be in connection with the OL review process. Since Public Service Company of Indiana, Inc. (PSI) does not expect to receive an operating license for Marble Hill until after October 1, 1982, the upgraded facilities will not be required to be operational prior to that date, but the upgraded facilities are to be operational prior to receiving a permanent operating license.

Marble Hill Nuclear Generating Station is a replicate of the Byron plant which is under construction by Commonwealth Edison Company of Illinois. Therefore certain emergency response facilities which are not site specific - control room, Technical Support Center (TSC) and Operational Support Center (OSC) - may be determined by the parent plant design. Submittal of such designs by Commonwealth Edison Company as part of its OL review process for the Byron plant will precede submittals by PSI for Marble Hill.

Transmitted as enclosures to your letter were further clarification of NRC positions on minimum staffing requirements for nuclear power plant emergencies and on emergency operations facility (EOF) siting and design. In response to the issuance of these requirements, PSI has the following comments:

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1. Concerning requirements on the capability for additional personnel to report to their assigned emergency response locations, we do not feel that the times stated therein are realistic. When applied, such requirements would mean that each individual within certain emergency response function classifications would need to relocate to a very short distance from the plant. While we do feel that certain emergency response functions will require additional staff to report to their assigned locations as quickly as possible and that adequate staffing may be accomplished within time intervals approaching the 30 minute/60 minute time frames, we feel that the requirements as constituted place severe restrictions on where these people must reside and where they would have to remain while on call.

   Experience indicates that reactor accidents develop more slowly than so rapid a response force staffing capability would assume. Practically speaking, an EOF would be staffed in stages, over a period of several hours, allowing sufficient time for obtaining the proper people to report. Therefore we suggest that the requirements for additions to the staff be ammended.

   We feel that the result of placing undue restrictions upon the establishment of the emergency response force might result in manning the emergency response facilities with alternates whose qualifications might not equal that of the primary.

   We believe that a little more time should be allowed in setting up an EOF and that allowing sufficient time to obtain the most appropriate response force personnel to man the EOF would serve the health and safety of the public. Therefore we recommend that requirements no more severe than 90 minute/3 hour limitations be imposed.

2. Concerning the requirements for emergency operations facility (EOF) siting and design specifics stated in the revised Table III.A.1.2-1 (Table B-1 to NUREG 0654, Revision 1) we feel that requirements for providing a backup EOF and for designing the primary EOF to meet certain protection factors should be site specific.

   Due to the variation in site specific meteorology and topography as well as the accessibility of the EOF to the plant site and to other locations of importance, EOF locations either less than 10 miles or beyond 20 miles from the plant site could prove to be equally as acceptable as EOF sites between 10 and 20 miles.

PSI is currently evaluating the acceptability of certain EOF sites with respect to projected doses using methodologies which are acceptable to the NRC. One of these EOF sites which is less than 10 miles from the plant site may prove to be the optimum location, and acceptable with respect to projected doses so as not to require a backup. When these studies are complete and it is determined that an exception to the stated requirements should be requested in accord with NUREG 0696, PSI will request NRC review and concurrence before proceeding.

If you have any questions please advise.

Sincerely,

S. W. Shields

MRK/gb