

# GENERAL ELECTRIC

NUCLEAR FUEL  
AND SERVICES  
DIVISION

GENERAL ELECTRIC COMPANY, 175 CURTNER AVE., SAN JOSE, CALIFORNIA 95125  
Mail Code 861

SPENT FUEL SERVICES OPERATIO

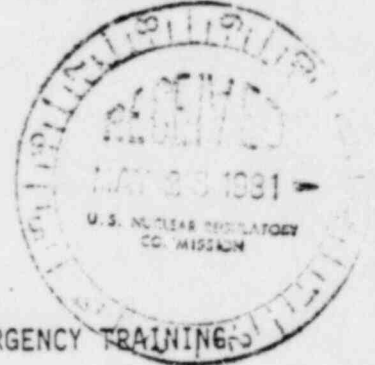


DMD-547

Docket No. 72-1  
Docket No. 70-1308  
License No. SNM-1265

May 15, 1981

Office of Nuclear Material Safety & Safeguards  
Attn: R.E. Cunningham, Director  
Division of Fuel Cycle & Material Safety  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



SUBJECT: RESPONSE TO NRC REQUEST FOR INFORMATION re EMERGENCY TRAINING

Gentlemen:

On May 8, 1981, Dr. Tom Clark of your staff called to request that we provide a discussion of emergency training plans and activities carried on at Morris Operation as reflected in the *Radiological Emergency Plan for Morris Operation*, NEDO-21894, in relation to the content of 10CFR50, Appendix E, Section IV-F, "Training." The following discussion is in response to his request:

Emergency Consequences and Response Required

In general, Appendix E is concerned with an emergency at a reactor requiring the involvement of many segments of an emergency structure, including public agencies at Federal, State and local level who might be involved in evacuation or other action within the Emergency Protection Zone (EPZ). This concern is in stark contrast to the emergency spectrum at Morris Operation (REP 4.2) where there is no off-site impact for any credible accident or other emergency. Although emergencies at Morris Operation would not require the complex response nor the large emergency force contemplated by Appendix E, each element of "Contents of Emergency Plan" of Appendix E is addressed in General Electric's license application as required by 10CFR72.19.

\* References to emergency plan sections are noted "REP X.X.X".

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There are two elements that constitute the principal basis for implementing radiological emergency training at Morris Operation. These elements are the limited nature of consequences from credible emergencies (REP 4.2 through 4.2.8) and the small staff required to safely and efficiently operate an ISFSI (REP 5.2, 5.2.3 and 5.2.4). The nature of the consequences from credible accidents or other emergencies at Morris Operation limits the scope of specialized emergency training required for operating and management personnel as well as for off-site support personnel. The small staff requirements of Morris Operation precludes the use of specialized emergency teams, as listed in Appendix E, and the limited consequences make such specialization unnecessary.

Specialized Training Activity and Categories of Emergency Personnel

All essential functions of the categories of emergency personnel contained in Appendix E, IV-F are performed at Morris Operation.\*

The Emergency Brigade (REP 5.2.3) performs the functions of radiological monitoring (c.), fire fighting (d), damage control and repair (e.), first aid and rescue teams (f). Emergency Brigade training is an integral part of operator training as described in Attachment F to the applicant's amended application for license renewal under 10CFR72 dated January 12, 1981. This training is on-going and includes drills and exercises as well as classroom work.

Personnel responsible for emergency assessment (b.) include shift supervisors (REP 6.2) and the Emergency Task Force (REP Chapter 2 and §5.2.4). Shift supervisors are provided with special instructions regarding emergencies. These instructions, located in the Control Room, include lists of telephone numbers, copies of emergency plans, copies of Morris Operating Instructions, etc. Shift supervisors are fully qualified as operators and are the most experienced of operations personnel. They are well qualified to undertake the Emergency Coordinator responsibilities in an emergency (a.).

The Emergency Coordinator and Emergency Brigade are supported by the Emergency Task Force. Members of the task force are specialists or managers of specific activities and their emergency duties parallel their normal duties. For example, the Senior Engineer - Licensing & Radiological Safety (REP 5.2.4.6) provides radiological expertise and analyses

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\* In the following discussion each category of emergency personnel contained in IV-F are identified by letter reference to IV-F, notated (a.), (b.), etc.

during an emergency.

The Manager - Morris Operation may act as Emergency Coordinator (REP 5.2.1) or delegate these duties to another. In either case, he is advised by the Emergency Task Force and directs overall operation of the facility during an emergency. He participates in emergency drills and exercises at Morris Operation. He is actively involved in on-going coordination with the local Emergency Services and Disaster Agency, local law enforcement agencies and other aspects of emergency planning, as well as having attended classes in radiation safety and other emergency-oriented training.

Medical support personnel and security personnel have received specialized radiological training and other training as described in our response to questions dated March 18, 1981; see response to question 6. Support personnel from the Division's headquarters in San Jose would be working within their speciality and do not require special training or instruction other than a situation briefing upon arrival at the site.

In summary, the initial training required for emergency response at Morris Operation is covered by existing training programs and is integrated in the training and certification program required by 10CFR72, including periodic retraining requirements.

#### Training Available to Local Service Personnel

Training is offered and provided to local service and law enforcement personnel as noted in our response to questions dated March 18, 1981; see response to question 6. Local news media personnel have frequently visited the site and such visits are encouraged.

#### Exercise and Drills

The "full scale" exercises discussed in Appendix E, IV-F, 1, 2 and 3 are applicable to nuclear power plants. We know of no reason to apply these full scale exercise requirements to an ISFSI. The very limited consequences and the small controlled area EPZ make it unnecessary to do so. However, liaison is maintained among local and State emergency agencies.

Adequate emergency exercises and drills are conducted as discussed in REP 8.1. Communication links are tested daily.

Maintaining Emergency Preparedness and Recovery

The plan for maintaining emergency preparedness is described in REP-Chapter 8. A recovery plan is in effect (REP-Appendix 3).

Distances to Specific Support Services

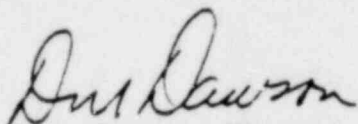
Approximate mileage between Morris Operation and off-site support services are as follows:\*

Glenwood Medical Group	... 20 miles
St. Joseph's Hospital	... 20 miles
University of Chicago Hospital	... 55 miles
Coal City (fire and rescue)	... 8 miles
Murray & Trettel	... 60 miles

Please call H. Rogers (408\*925-6496) or C. Herrington (408\*925-6385) of this office if there are questions regarding this response or other aspects of emergency planning at Morris Operation.

Respectfully,

GENERAL ELECTRIC COMPANY



D.M. Dawson, Manager  
Licensing & Transportation

DMD:HAR:bn

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\* Per phone conversation between Dr. K.J. Eger (GE) and Dr. A.T. Clark (NRC) May 12, 1981.

MAYER, BROWN & PLATT

RELATED CORRESPONDENCE

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May 18, 1981

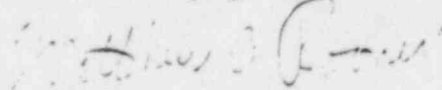
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277 PARK AVENUE  
NEW YORK, NEW YORK 10172  
212 924 7100  
188 QUEEN VICTORIA STREET  
LONDON EC4V 4BS, ENGLAND  
01 248 1485

TO: ATTACHED SERVICE LIST IN NRC PROCEEDING  
DOCKET NO. 70-1308 LICENSE SNM 1265

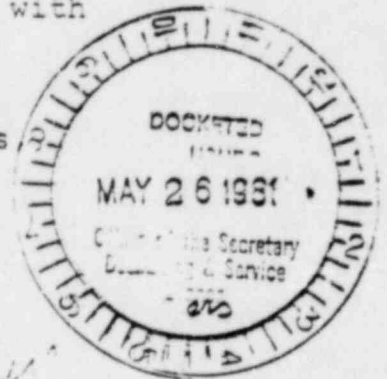
Enclosed please find a copy of the following document, which General Electric recently filed with the Nuclear Regulatory Commission:

Letter of May 15, 1981 to Office of Nuclear Material Safety & Safeguards Attention R.E. Cunningham, Director from D.M. Dawson.

Sincerely yours,



Matthew A. Rooney



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Enclosure