REACTOR FACILITY

8 January 1990

50-288

Mr. Theodore Michaels Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, DC 20555

Re: License R-112, Docket 50-288

Dear Mr. Michaels:

Enclosed is a draft of a revised version of our Emergency Plan, for which your approval is requested. The need for a revised version was identified by internal audits conducted by our Reactor Review Committee. The Committee has now approved the new version. We believe that each of the changes will have the effect of strengthening the Plan, in many cases by eliminating inconsistencies with other documents and by simplifying decision making. The changes considered by the Director to be most significant are summarized below:

- 2.0 OPERATIONS BOUNDARY definition is simplified so that the boundary remains fixed under all conditions (see new Figure 3).
- 2.0 SITE BOUNDARY definition is made consistent with the Technical Specifications, and is simplified so that the site boundary is now a circle rather than an irregular perimeter.
- 3.1 To facilitate updates, written agreements with fire, police, ambulance, and hospital agencies are no longer attached to the Emergency Plan, but are maintained as before, and audited by the Reactor Review Committee. These agreements are currently out for renewal.
- 3.1.1 The 5 persons on the Emergency Notification Call List need no longer all be licensed operators, but they must include the Director, Reactor Supervisor, and the Health Physicist. Compliance with the present requirement during the summer, often places an operator on the ENCL who is temporarily living hundreds of miles from the reactor.
- 3.1.3 Responsibility for the Emergency Plan and for emergency drills has been assigned to the Director rather than to the Reactor Supervisor.
- 4.0 To facilite updates, the Emergency Implementation Procedures are no longer attached to the Emergency Plan, but are maintained as before, and audited by the Reactor Review Committee.
- 4.2 Kem 4. An event which requires evacuation of any part of the Chemistry Building is no longer classified as an "Unusual Event," although an

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event which requires evacuation of the entire Building is still so classified. This change recognizes that the rather common occurrence of noxious fumes or other incidents which require the evacuation of but one lab in the Chemistry Building, is not a threat to the safety of the reactor.

10.1 Good Samaritan hospital personnel and private ambulance personnel are no longer required to be trained on an annual basis in Reed Reactor Facility emergency procedures. Currently, the hospital personnel train on an annual basis with the Trojan nuclear plant, and the RRF sends observers to this exercise. The RRF staff is now routinely trained in first aid, and RRF emergency drills continue to emphasize proper treatment and transportation of an accident victim to is contaminated with radioactive material.

To assist in your comparison, we are enclosing a copy of the existing Plan along with its appendixes.

Sincerely,

Lawrence Ruby

Professor

Reactor Director

cc: D. Bennett, wo enc.

NRC Region V, w enc.

State of Oregon, w. enc