

October 12, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
LONG ISLAND LIGHTING COMPANY)	Docket No. 50-322 (OL)
)	(Emergency Planning
(Shoreham Nuclear Power Station,)	Proceeding)
Unit 1))	

RESOLUTION OF SUFFOLK COUNTY
CONTENTION EP 9 -- RADIOLOGICAL EXPOSURE

THIS AGREEMENT by and among Long Island Lighting Company ("LILCO"), the Nuclear Regulatory Commission Staff ("Staff"), Suffolk County ("the County" or "SC"), the Shoreham Opponents Coalition ("SOC"), and the North Shore Committee ("NSC") (hereinafter collectively the "Parties") resolves Suffolk County Contention EP 9 in accordance with the terms stated below, subject to the approval of the Atomic Safety and Licensing Board ("Licensing Board").

Suffolk County Contention EP 9 concerns the control of radiological exposure to emergency workers during a radiological emergency at the Shoreham Nuclear Power Station. Suffolk County contends that the Shoreham Emergency Plan ("Plan") does not adequately provide for the protection of emergency response

personnel, in that it (A) inadequately describes provisions for monitoring individuals evacuated from the site, (B) does not describe action levels for determining the need for decontamination of emergency response personnel, and (C) does not delineate guidelines for emergency workers to follow to ensure that any exposures received by workers are not excessive.

The LILCO Plan currently states the following at pages 6-9 to 6-13:

Protective action within the plant site will be initiated by actual or imminent radiological conditions or other habitability hazards such as toxic gas or fire. Upon assessment by the Emergency Director that a situation exists that requires evacuation of areas of the plant, an evacuation signal will be activated simultaneously with an announcement of the emergency condition over the party page system indicating the areas to be evacuated. Evacuated personnel will report to designated assembly areas consistent with implementing procedures.

When personnel have assembled, personnel accountability will then proceed following the guidance of the personnel accountability procedures. Accountability for onsite personnel will be accomplished within 60 minutes.

In the event of a site evacuation, Figure 6-1 details the onsite assembly areas with primary and secondary evacuation routes leading to the LILCO main access road. Transportation for onsite personnel shall be by personal vehicle as well as car pooling where conditions warrant.

The extent and nature of personnel and vehicle monitoring will depend on the amount and physical nature of the radioactive material released. If personnel exit the site via the portal monitors in the guardhouse, monitoring can be considered complete. If background

levels preclude use of the portal monitors, monitoring should be performed at the offsite assembly area. If vehicle monitoring is performed, it should be performed along the LILCO main access road at the 69KV substation. Vehicles found to be contaminated should be directed into the substation for decontamination.

By this Resolution agreement, LILCO agrees to address the County's Contention EP 9(A) by replacing the third and fourth paragraphs quoted above with the following language:

In the event of a site evacuation, an evacuation signal will be activated simultaneously with an announcement of the emergency condition over the page-party system. The announcement will indicate the means by which evacuation is to occur and to what offsite assembly area people are to gather for subsequent monitoring, decontamination, and accountability. Transportation for onsite personnel shall be by personal vehicle as well as car pooling where conditions warrant. Station security personnel will direct traffic onsite and at the intersection of both access roads and North Country Road (See Figure 6-1). More detail is contained in EPIP's.

The extent and nature of personnel and vehicle monitoring will depend on the amount and physical nature of the radioactive material released. If personnel exit the site through portal monitors located in the guardhouse, monitoring can be considered complete. If high radiation levels preclude the use of portal monitors, personnel monitoring will be performed at the offsite assembly area by health physics personnel. If vehicle monitoring indicates levels in excess of 100 cpm above background Beta-Gamma radiation, decontamination of vehicles shall be performed by health physics personnel at the 69KV substation.

At the remote assembly area, accountability of personnel will be performed by the Administrative Supervisor with the assistance of Security. Any unaccounted for personnel will be paged and, if still missing, search and rescue efforts will commence.

The LILCO Plan currently states at pages 6-14 to 6-15:

To the extent possible, the normal station contamination limits shall be adhered to. The personnel contamination limits are 100 cpm above background as measured by an RM-14/HP-210 or equivalent. Equipment contamination limits are less than 200 dps/100 cm² removable Beta-Gamma.

Decontamination of emergency personnel wounds, supplies, instruments and equipment shall normally be conducted in the Personnel Decontamination Facility adjacent to the Health Physics office on the 15' elevation of the Turbine Building. This facility contains showers with controlled drains and the necessary materials for personnel decontamination. The Personnel Decontamination Facility contains a stainless steel sink and decon area which shall be used for contaminated minor wounds, equipment and instruments.

If the release has resulted in extensive offsite contamination such that evacuation of the general public is being implemented, monitoring and decontamination prior to exit from the assembly areas would be superfluous in light of the potential for recontamination. Under these circumstances, personnel will be monitored for contamination as provided in the emergency plans of the affected jurisdictions.

In the event that personnel are evacuated to offsite assembly areas, monitoring and decontamination will be performed along the site access road near the LILCO 69KV Substation.

Personnel found to be contaminated will be issued protective clothing and directed to the EOF decontamination facility for further monitoring and decontamination. The same material and equipment utilized in onsite decontamination will be utilized at the EOF. Provisions will be available for radionuclide analysis of the personnel contamination in order to determine the amount of radioiodine present. Personnel contamination that cannot be removed by normal Health Physics Procedures will be referred to a medical specialist in personnel radiation accidents.

By this Resolution agreement, LILCO agrees to address the County's Contention EP 9(B) by replacing the first paragraph quoted above with the following language:

During emergency conditions, normal station contamination limits shall be adhered to as much as possible. Normal personnel contamination limits are 50 cpm above background as measured by an RM-14/HP-210 or equivalent. Normal equipment contamination limits are less than 100 dpm/100 cm² removal Beta-Gamma activity. Under accident conditions, the Radiation Protection Manager will determine if a change in contamination levels is warranted. Actions taken by health physics personnel will include access control for unrestricted areas where excessive contamination levels exist, personnel monitoring at alternate areas, and vehicle monitoring at offsite assembly areas.

Personnel performing emergency actions such as search and rescue, first aid, corrective actions, assessment actions, personnel decontamination, and offsite assistance shall be subject to normal contamination limits unless the Radiation Protection Manager has increased these limits. Personnel from offsite agencies (such as firefighters, police or ambulance personnel) who have not fulfilled the requirements for unescorted access in accordance with the appropriate security procedures governing access control shall be granted only Escorted Access.

The LILCO Plan currently states in Section 6.5.1:

All reasonable measures shall be taken to maintain the radiation dose to emergency personnel as low as reasonably achievable and within 10 CFR Part 20 limits. Personnel performing emergency activities involving exposures which may or will exceed 10 CFR 20 limits shall be volunteers and shall be briefed on potential exposure consequences prior to receiving such dose. Authorization to exceed 10 CFR 20 limits shall be made only

by the Emergency Director and/or the Radiation Protection Manager. Since this authorization is made only during declared emergencies, this capability is readily available on a 24-hour a day basis (see Section 5.1). Emergency Exposure Criteria, detailed in the Emergency Plan Implementing Procedures, are consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides (EPA 520/1-75-001). Table 6-4 depicts Emergency Exposure Criteria for various activities.

By this Resolution agreement, LILCO agrees to address the County's Contention EP 9(C) by replacing this paragraph with the following language:

Radiation doses to emergency personnel shall be maintained within 10 CFR 20 limits and be kept as low as reasonably achievable (ALARA). Maintenance of exposure records shall be performed in accordance with normal station procedures. Personnel performing emergency activities involving exposures which may or will exceed 10 CFR 20 limits shall be volunteers and shall be briefed on potential exposure consequences prior to receiving such dose. Health physics personnel in the field will have the authority to take all necessary actions to maintain exposure to emergency personnel below 10 CFR 20 limits (see SP 61.001.01). Authorization to exceed 10 CFR 20 limits shall be made only by the Emergency Director and/or the Radiation Protection Manager. The means to accomplish this is contained in SP 69.050.01. Since this authorization is made only during declared emergencies, this capability is available on a 24-hour/day basis (see Section 5.1). Emergency exposure criteria (Table 6-4) depicts exposure guidelines for various emergency activities and are consistent with EPA Emergency Workers and Lifesaving Activity Protective Action Guides (EPA 520/1-75-001).

Accordingly, based upon LILCO's agreement to add this language to the Plan, SC finds that SC Contention EP 9 is

resolved. As a result, the Parties jointly urge the Licensing Board to accept this Resolution to terminate litigation of SC Contention EP 9.

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