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October 15, 1982
JPN-82-80

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Mr. Ronald C. Haynes, Regional Administrator
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U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
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Attention: Mr. H.W. Crocker, Director
Division of Emergency Preparedness
and Operational Support

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Emergency Preparedness Appraisal 50-333/82-03

- References: 1. G.H. Smith (USNRC) to J.P. Bayne (PASNY)
dated April 20, 1982; same subject.
2. G.H. Smith (USNRC) to C.A. McNeill, Jr. (PASNY)
dated April 2, 1982; same subject.

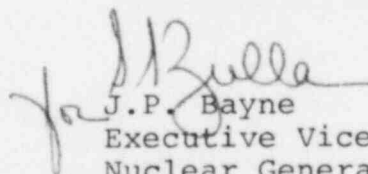
Dear Sir:

Attached is the Authority's response to those items identified in Appendix C to Emergency Preparedness Appraisal 50-333/82-03. However, changes to the FitzPatrick Emergency Plant have not been included in the attachment.

We request a 60-day extension of the deadline for the submittal of these plan changes. This additional time is necessary because the changes require that the entire 300 page Emergency Plan be rewritten. While the major portion of the rewrite has been completed, internal review, typing and printing remain. The revised plan will reflect the changes described in the attachment and the findings of your Emergency Exercise Appraisal.

If you have any questions, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours


J.P. Bayne

Executive Vice President
Nuclear Generation

cc: Mr. Ron Barton
United Engineers & Constructors, Inc.
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Mr. J. Linville
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POWER AUTHORITY OF THE STATE OF NEW YORK
JAMES A. FITZPATRICK NUCLEAR POWER PLANT

RESPONSE TO SECTION C
OF USNRC EMERGENCY PREPAREDNESS
APPRAISAL 50-333/82-03

- A.1 Existing agreements have been reviewed and updated to specifically identify assistance that may be required. Existing agreements will be reviewed annually and updated as necessary.
- B.1 The plan will be revised to indicate that the Emergency Director will be the individual with the authority and responsibility for overall direction and control during an emergency situation.
- B.2 The Power Authority has adopted a 60 minute call-out period supplement the on-shift complement. The plan will be revised to include the completed emergency organization required by the criteria in Table B-1 of NUREG-0654.
- B.3 The JAFNPP Recovery Manager, or designee, will be responsible for interfacing with government authorities when the focus shifts from response to recovery. The plan will be revised to delineate this responsibility.
- B.4 Only those private sector companies that would be called upon to assist the plant in a "response" situation have been contacted to provide written agreements. This is a total of two private organizations. Agreements have been requested in accordance with criteria B.9 of NUREG-0654. Agreements have not been requested for private organizations who may be contracted during the "recovery" phase.
- C.1 The Plan will be revised to include information on security access, office facility, and meals for support of the Federal response. Specific resources will not be listed because of the variable nature of these resources.
- C.2 The Emergency Plan and Organization will be changed to provide a licensee representative at the Oswego County Emergency Operations Center (EOC)

- D.1 Emergency Action Levels (EALs) have been established for each initiating condition. The new system was demonstrated at the JAFNPP August 11, 1982 Emergency Exercise. Revised EALs have been submitted to you in the form of Procedure IAP-2. The Emergency Plan will reference EALs.
- E.1 A description of the Oswego County Prompt Notification System will be incorporated in the Emergency Plan. The description includes information on the siren system, residential tone alert radios, industrial tone alert radios, and the Oswego County Emergency Broadcast System. The descriptions provide salient information on the system activation and operation.
- E.2 The Power Authority considers messages of this type outside the prerogative of the licensee, but within the realm of a state or county agency. Emergency Broadcast Messages have been prepared for the JAFNPP by Oswego County and New York State. These messages have been submitted to FEMA for review and are in the form of a controlled document entitled the Oswego County Emergency Broadcast System.
- F.1 The individuals who would man the communications links have been designated Communicators. These individuals would be involved in initiating emergency response actions.
- F.2 Communications with the U.S. Coast Guard will be conducted over normal telephone links. A message has been included in Procedure EAP 1.1 for this purpose.
- G.1 A sample copy of the revised emergency preparedness information that was distributed to the public in the 10 mile EPZ was provided to USNRC Appraisal team members at the August 11, 1982 JAFNPP Emergency Exercise.
- G.2 A special card has been included in the public information brochure sent to the residents in the 10 mile EPZ. This card entitled "Project Special Care", when returned by a resident, is intended to identify those handicapped individuals in the community that require special care in an emergency situation. This program is not referenced in the JAFNPP Emergency Plan. This program is under the auspices of Oswego County.
- G.3 No provision for briefing the news media has been made at the EOF. The design and location of the EOF precludes its use as a news media briefing area.

- G.4 Rumor control was effectively demonstrated during the JAFNPP Emergency Exercise August 11, 1982. Rumor control is presently accomplished with the use of a recording device that can answer 12 phone calls simultaneously. A description of the system's operation will be included in the Emergency Plan.
- G.5 An annual program is conducted for the news media which provides information about nuclear power plant operations, emergency plans, radiological releases and points of contact for information release. This program is conducted by plant personnel and college instructors when available. A description of this program will be included in the Emergency Plan.
- H.1 Additional information will be provided on the location, size and equipment within TSC, OSC, EOF, AOSC, and AEOF in the Emergency Plan. The Authority is currently reevaluating the EOF/AEOF structures against criteria set forth in NUREG-0696. We anticipate that this evaluation will be complete not later than December 30, 1982.
- H.2 The Authority considers that functional staffing of the TSC and EOF one hour after notification is adequate. The Emergency Staff will be notified through normal telephone links. A designated on-shift individual will be responsible for these notifications. Procedures EAP 1.2 and EAP 1.3 list the method used to notify Emergency Staff Members.
- H.3 Seismic information is available to the site. This information is not , however, directly translatable into an EAL. The same is true of the hydrologic information. A description of the instrumentation and data evaluation methods will be included in the Emergency Plan.
- H.4 The radiological and process monitors that would be used in conjunction with the Emergency Action Level Procedure is included in that procedure (IAP-2). Reference to this procedure will be included in the emergency plan.

- H.5 The fire and combustion products detectors which may be used for initiating emergency measures are identified in JAFNPP Emergency Procedure IAP-2 Emergency Action Levels. A reference to this will be included in the plan.
- H.6 Offsite information regarding hydrologic and seismic data are obtainable from three local sources. This information is not contained in any procedure and will be addressed in the Emergency Plan.
- H.7 Information outlining the parameters for the dosimeters associated with the Environmental Radiological Monitor Program will be included in the plan.
- H.8 Meteorological instrumentation has been undergoing extensive modifications at JAFNPP to meet the criteria set forth in NUREG-0654. These changes will be reflected in the Emergency Plan revisions.
- H.9 The location of the Operational Support Center and equipment contained in that facility will be included in the Emergency Plan.
- H.10 Reference to the frequency of instrument calibration is included presently in JAFNPP Emergency Plan Procedure IAP-2.
- H.11 Emergency Kits are referenced by category and location in IAP-2. However, an appendix showing these locations will be included in the Emergency Plan.
- I.1 The meteorological system has initial effluent values for the scenarios listed in the JAFNPP FSAR. The values for each of the initiating conditions as described in NUREG-0654 have not been included in the JAFNPP Emergency Plan.
- I.2 The Authority will be providing design details of the post-accident sampling system to the NRC's Office of Nuclear Reactor Regulation, Division of Licensing in response to a July 27, 1982 request. A schedule for the submittal of this information is currently in preparation.

Descriptions of the post accident sampling capability and radiation monitors will be included in the Emergency Plan. The procedural use of this instrumentation is included in the JAFNPP Emergency Plan Procedures and referenced JAFNPP Radiation Protection and Operations Procedures.

- I.3 The information will be included in the Emergency Plan. However, this information is generic in nature and not site specific to JAFNPP.
- I.4 Meteorological data will include wind speed, wind direction, temperature, and Δ temperature. This information will be made available to the off-site NRC center and State and County agencies.
- I.5 The method for relating measured field contamination levels to dose rates applicable isotopes is detailed in JAFNPP Emergency Plan Procedure EAP-7.2 - Downwind Survey Dose Estimates.
- J.1 Included in the Emergency Plan is a description of use of the JAFNPP paging system. This system is used to warn or advise contractor/construction personnel as it is audible inside the owner controlled area. Reference to its use for this purpose will be included.
- J.2 Privately owned automobiles will be used to transport employees to off-site assembly locations. Backup bus transportation is available from Oswego County. A discussion of routes is already included in the JAFNPP Site Evacuation Procedure and the Protective Action Procedure. This information will be included in the JAFNPP Emergency Plan.
- J.3 Evacuated personnel will be decontaminated at the remote assembly area as required. This is included in the JAFNPP Site Evacuation Procedure, EAP 11.
- J.4 This area is being addressed anew. It is one of the major findings of the JAFNPP Emergency Exercise. A response will be forthcoming by January 30, 1983.
- J.5 The Authority's medical consultant has recommended the use of radio protective drugs for on-site emergency personnel. The recommendation is under review and a position will be established by January 30, 1983.

- J.6 These maps are provided in the JAFNPP Procedure EAP-18 - Protective Actions. Population maps are maintained only by Oswego County.
- J.7 Descriptions of the siren, tone alert and EBS system will be included in the Emergency Plan. Operational procedure and system activation procedures will be referenced therein.
- J.8 This is included in JAFNPP Emergency Plan Procedure EAP-18, "Protective Action - Recommendations".
- K.1 EAP-15, "Emergency Radiation Exposure Criteria and Control Procedure" will be referenced in the JAFNPP Emergency Plan.
- K.2 A description of the JAFNPP dosimetry computer and records system will be included for this purpose. This information will include some operational information.
- K.3 Included in the Emergency Plan will be a reference to EAP-2, "Personnel Injury" and RPOP-2, "Personnel Decontamination" which includes the method for decontamination of emergency personnel wounds, supplies, instruments and equipment.
- K.4 The Authority believes that this information should not be contained in the site Emergency Plan, but instead in the State and County plans, as is the case.
- K.5 This information is contained in referenced Procedure RPOP-2, "Personnel Decontamination."
- N.1 The annual exercise shall include off-site radiological releases of sufficient magnitude to declare a General Emergency. Accordingly, the annual exercise will be conducted in varying weather conditions and on the back shifts every six years. The plan will be changed to reflect these changes.
- N.2 Communications drills will be conducted quarterly with federal and state organizations, and monthly with the NRC.
- N.3 The JAFNPP Emergency Plan includes a simulated in-plant liquid sample analysis with the Health Physics Drills.
- N.4 A discussion of the exercise method will be included in the Emergency Plan.

- O.1 A complete description of the new centralized Emergency Plan Training Program will be included in the JAFNPP Emergency Plan. A new employee has been hired to develop and administer this program and includes detailed descriptions of job functions and their related training requirements.
- P.1 The Emergency Planning Coordinator at JAFNPP has the overall authority for radiological emergency response planning.
- P.2 As previously stated, agreement letters will be re-certified on an annual basis.
- P.3 A synopsis of the JAFNPP administrative procedure for control of Emergency Plans will be included in the plan.
- P.4 A list of the supporting plans and their source will be included. These include:
- The Oswego County Radiological Response Plan and Procedures
 - The Oswego County Emergency Broadcast System Procedures
 - The New York State Radiological Plan and Procedures
 - The PASNY Headquarters Emergency Response/Recovery Plan and Procedures
 - The Oswego Hospital Emergency Plan
 - The Nine Mile Point Nuclear Station Emergency Plan
- P.5 Appendix A does not include a cross reference that identifies each section of the plan implemented by procedures. Procedure IAP-2 provides a similar synopsis of the JAFNPP Emergency Plan.
- P.6 A cross reference between the plan and the NUREG-0654 evaluation criteria will be included by January 30, 1983.
- P.7 An independent review of the emergency preparedness program shall be conducted annually.
- P.8 SAP-3, the Communications Testing Procedure, provides that telephone numbers will be updated quarterly.