

October 6, 1981



File: NG-3514(B)

Serial No.: NO-81-1653

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 AND 50-324
LICENSE NOS. DPR-71 AND DPR-62
EMERGENCY PLAN - REVISION 2

Dear Mr. Denton:

In accordance with 10CFR50.54(q), Carolina Power & Light Company (CP&L) hereby transmits ten (10) copies of Revision 2 to the Brunswick Steam Electric Plant (BSEP) Emergency Plan. This revision is submitted to incorporate new or revised information requested by Mr. Thomas A. Ippolito's letter dated August 4, 1981. Instructions for entering the revised pages in the BSEP Emergency Plan are included in this revision. New or revised information is indicated by vertical bars in the margin of appropriate pages.

To aid the staff in their review of this revision, the following response compares number by number to the questions or comments contained in Mr. Ippolito's August 4, 1981 letter;

1. Provisions have been added throughout the Plan to incorporate NUREG-0654 requirements of a near-site Emergency Operations Facility and associated staff.
2. Several written agreements with agencies and support organizations have been updated and are included in Appendix B. Additionally, the remaining written agreements contained in Appendix B are currently being revised to be consistent with the Plan. The need for written agreements with other agencies not contained in the Plan is being evaluated.
- 3.1 An Auxiliary Operator from the unaffected unit will serve as the interim Emergency Communicator as illustrated on Figure 3.1-1 of the Plan.
- 3.2 Carolina Power & Light's (CP&L) position concerning augmentation to meet minimum staffing requirements of NUREG-0654 is contained in CP&L's letter of June 9, 1981.

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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: ~~0110150401~~ DOC. DATE: 81/10/06 NOTARIZED: NO DOCKET #
 FACIL: 50-324 Brunswick Steam Electric Plant, Unit 2, Carolina Powe 05000324
 50-325 Brunswick Steam Electric Plant, Unit 1, Carolina Powe 05000325
 AUTH. NAME: AUTHOR AFFILIATION
 UTLEY, E. E. Carolina Power & Light Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 DENTON, H. R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards Central Files version of Revision 2 to radiological emergency plan. Revision incorporates new or revised info requested in VRC 810804 ltr including NUREG-0654 requirements for near-site emergency operations facility.

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 TITLE: Emerg Plan (CF Avail)

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Carolina Power & Light Company

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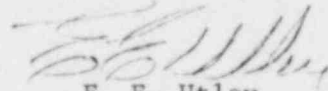
4. Appendix B of the Plan contains current letters of agreement with Boiling Spring Fire Department and Yaupon Beach Fire Department. A letter of agreement with the Southport Fire Department is currently being negotiated and will be included in the Plan when signed.
5. Section 3.4.4.1 of the Plan has been revised to specify, by title, persons authorized to request assistance, as well as to identify facilities available to support Federal assistance.
6. Sections 2.2, 2.3, 2.4, and 2.5 address the emergency classification and emergency action level (EAL) scheme followed at Brunswick. Specific EALs (including specific instruments, parameter values, and equipment status for which they are based) are contained in the plant's Technical Specifications and the Emergency Procedures.
7. The administrative and physical means and the time required for notifying and providing prompt instructions to the public is contained in Section 4.4.6, and in Figures 1.1-2, 1.1-6, and 4.4-1 of the Plan.
8. The public education and information program is described in Section 4.4.7.1 of the revised plan.
9. The Technical Support Center is discussed throughout the Plan. Additional modifications and/or relocation of that facility are presently being evaluated and will be included in the Plan if adopted.
10. The Emergency Operations Facility is discussed throughout the Plan. Additional modifications and/or relocation of that facility are presently being evaluated and will be included in the Plan if adopted.
11. Meteorological instrumentation and procedures are described in Section 4.2.3 of the Plan.
12. CP&L capability for acquiring and evaluating meteorological information is described in Section 5.7.2 of the Plan.
13. The Plan has been revised in Section 3.2.5.1 so that the estimated deployment times of the Environmental Monitoring Teams are included.
14. The means for relating the various measured parameters to dose rates for key isotopes and gross radioactivity measurements are described in Section 4.2.2 and 5.7 of the Plan.

15. The means and time required to warn individuals onsite and in areas controlled by the licensee are described in Section 4.4.2.1 of the Plan.
16. Provisions for evacuation routes and transportation for individuals onsite are described in Section 4.4.2.2 of the Plan.
17. Time estimates for evacuation within the plume exposure EPZ are given in Section 4.4.7.3 and in Figure 4.4-1 of the Plan.
18. Protection afforded by residential units and other shelters is described in Sections 4.4.7.4 and 4.4.7.5 of the Plan.
19. CP&L capability for around the clock dose determination is described in Sections 4.2 and 5.7 of the Plan.
20. Specific action levels for determining the need for decontamination are described in Sections 4.4.4 and 7.4 of the Plan.
21. Criteria for returning areas and items to normal use are described in Sections 4 and 7 of the Plan.
22. General plans and procedures for reentry are described in Sections 3.2.1 and 4.4.3, and plans for recovery are described in Section 7 of the Plan. The Company is following industry and governmental developments in the area of recovery planning. More detailed recovery plans will be developed in the future upon receipt of substantive guidance and reference materials.
23. The means for informing response organizations that recovery operations are initiated and of changes in the recovery organization are described in Section 7 of the Plan.
24. Section 6.1.2.1 of the Plan has been revised to include monthly communication checks with State and Local Governments within the plume EPZ, and quarterly checks with Federal Emergency Response Organizations within the ingestion pathway. The Radiological Monitoring Drills have been changed to include collection and analysis of water, vegetation, soil and air sample media.
25. The assistant to the Plant General Manager is responsible for maintaining Emergency Preparedness as outlined in Sections 6.0 and 6.1.3 of the Plan.
26. The Plant Emergency Procedures which implement the Emergency Plan are contained in the BSEP Plant Operating Manual, Volume 13, Book 2.

27. Section 6.2.1 has been revised to require emergency phone listings to be updated at least quarterly.

CP&L believes that the information contained in the revised Plan is responsive to the staff comments contained in Mr. Ippolito's letter of August 4, 1981, and should form a basis for the staff to conclude that BSEP can respond to any emergency situation without undue risk to the health and safety of the public.

Yours very truly,



E. E. Utley
Executive Vice President
Power Supply and
Engineering & Construction

RGB/JHE/lr (573 209)

Attachment

cc: Mr. J. P. O'Reilly (3)