

Omaha Public Power District

January 11, 1982 LIC-82-014

1623 HARNEY & OMAHA, NEBRASKA 68102 # TELEPHONE 536-4000 AREA CODE 402

Mr. Robert A. Clark, Chief U. S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Division of Licensing Operating Reactors Branch No. 3 Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Clark:

RECEIVED JAN 1 5 1982

The Commission's letter to the Omaha Public Power District, dated November 23, 1981, detailed the results of the staff's evaluation of the Fort Calhoun Station Emergency Response Facilities (ERF). The staff used the draft NUREG-0814, "Methodology for Evaluation of Emergency Response Facilities." As one of the twenty-seven (27) utility members of the "Coordinating Group on Emergency Preparedness" (CGEP), the District has previously expressed its concerns regarding the draft NUREG-0814. as addressed in the CGEP letter dated November 9, 1981 from Mr. D. F. Knuth of KMC to Mr. Samuel J. Chilk. The staff's use of the draft NUREG-0814 for evaluating the Fort Calhoun Station ERF has heightened the District's concerns. The draft NUREG-0814 adds numerous new requirements beyond that provided by previous Commission guidance in NUREG-0696, which provided the basis for the Fort Calhoun Station ERF design. Additionally, much of what is included in the draft NUREG-0814 is very prescriptive (e.g., the ERF display device hardware has very specific details such as a requirement that any CRT screens must have a minimum capacity of "80 characters by 24 lines").

The District has, as have many other utilities, commenced construction or issued contracts for the ERF. To issue new guidance, adding numerous new requirements, penalizes those utilities who are making a good faith effort to upgrade their ERF's. Accordingly, the District recommends that the staff's use of the draft NUREG-0814 be reevaluated.

Sincerely,

W. C. Jones Division Manager Production Operations

WCJ/KJM/TLP/RWS:jmm

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cc: LeBoeuf, Lamb, Leiby & MacRae