POWER AUTHORITY OF THE STATE OF NEW YORK
INDIAN POINT NO. 3 NUCLEAR POWER PLANT
P. O. BOX 215 BUCHANAN, N. Y. 10511
TELEPHONE: 914-739-8200

December 22, 1981
IP-LML-15850

Ronald C. Haynes, Director
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUBJECT: Indian Point No. 3 Nuclear Power Plant
Document No. 50-286
Emergency Preparedness Appraisal 50-286/81-05

Dear Mr. Haynes:

This letter responds to your Emergency Preparedness Appraisal 50-286/81-05 dated November 19, 1981.

Appendix A to this letter describes our planned actions for items identified in Appendix A of your letter, and Appendix B to this letter addresses the results of our consideration of items in Appendix B of your letter.

Very truly yours,

John C. Brons
Resident Manager

JCB:pw

8201250068 820106
PDR ADOCK 05000286
Q PDR

APPENDIX A

POWER AUTHORITY OF THE STATE OF NEW YORK
Indian Point No. 3
Nuclear Power Plant

EMERGENCY PREPAREDNESS APPRAISAL 50-286/81-05
RESPONSES

APPENDIX A, Item # 1
(286/81-05-4)

Development and implementation of an emergency response training program for qualifying individuals and groups who are selected for assignment to each of the various functional areas of activity, including:

a. medical first-aid, onsite and offsite fire response organizations, post-accident sampling, the recovery organization, other augmentation personnel, and the news media;

b. provisions for training affected individuals in major plan, procedure, facility, equipment or organizational changes; and

c. the means to verify attendee performance against training objectives.

RESPONSE

The development and implementation of an emergency response training program for the Indian Point No. 3 site has been accomplished and is outlined in Implementation Procedure IP-1085 Rev. 0. Specifically (a) medical first-aid and onsite and offsite fire response organization training is addressed; (b) Section 2.6 of IP-1085 address the provisions for retraining when major plan, procedure, facility, equipment or organizational changes occur; and (c) During the 1981 training year written tests were given. This means to verify attendee performance against training objectives will continue, and is addressed in section 2.8 of IP-1085.

Recovery personnel training is provided by EIP-18 (Emergency Plan Maintenance) and was last accomplished during the week of August 24th, 1981. News media training sessions are accomplished by PASNY Public Relations and include pre-drill briefings to familiarize the news media with our plant & procedures. Training was accomplished in March for Health Physics and Chemistry personnel in post-accident sampling.

The Power Authority considers this item completed.

APPENDIX A, Item #2
(286/81-05-07)

Provisions for sufficient space in the Emergency Operations Facility (EOF) and Alternate EOF to enable effective direction, coordination and evaluation of all licensee activities during emergency conditions.

RESPONSE

At the present time the Power Authority is working with Consolidated Edison Company to provide sufficient space in the EOF and AEOF to enable effective direction, coordination and evaluation of licensee activities during emergency conditions.

By the end of December 1981 we shall be established in the "new" EOF located in the Buchanan Service Center building of Consolidated Edison. Expanded communications and space have been provided. Sufficient space has been allocated to County, State and Nuclear Regulatory Commission officials. Region I Emergency Preparedness members were consulted on expected numbers of NRC personnel and the tasks NRC personnel would be responsible for in the EOF. Adequate numbers of the Power Authority personnel will be available to interface with the NRC during an emergency.

The AEOF is being relocated from its present location to the Consolidated Edison Company's Eastview Service Center. Space and communications are being provided for licensee, recovery, NRC, State and local personnel. It was originally expected that this move would be complete by December 1981. Priority attention was given to the "new" EOF however and the AEOF will not be operable until the end of January 1982.

APPENDIX A, Item #3
(286/81-05-11)

Development of plans/schemes and procedures for handling, storing, transfering, analyzing and discharging post-accident liquid wastes.

RESPONSE

Our liquid waste storage capacity has been expanded to approximately 152,500 gallons. This expanded capacity is considered adequate for handling and storing post accident liquid waste.

The Power Authority will continue to maintain Memorandum of Understanding (MOU.) No. 15 with Con Edison which governs the tranfer of liquid rad waste to Indian Point No. 1. This MOU provides for the maintenance of an emergency surge volume to receive waste. In the event of an accident which generated excessive amounts of liquid waste or wastes containing activity levels above those which can be routinely processed, special arrangements would be required to meet the specific need.

As an interim method of analysis, Chemistry Procedure RE-CS-042, "Sampling Various Plant Systems During Accident Conditions," will be modified to allow for preparation and analysis of highly radioactive liquid after its collection. This procedure will be changed by January 15, 1982.

Collection of post-accident liquid waste requires a long-range solution. An engineering study is being initiated to develop a system capable of sampling each of our liquid waste storage tanks for high level rad waste. The sampling and analysis method for these tanks will be similar to that currently in use for the Reactor Coolant System. The engineering design is expected to be completed by September 1982 and the sampling system installed by July 1983. Associated operating procedures will be developed at that time.

APPENDIX A, Item #4
(286/81-05-12)

Provisions for communication and other equipment needed to operate the News Center consistent with its designated functions during an emergency as well as for security at the News Center.

RESPONSE

Arrangements for the Special News Center located in the Fire Hall at Verplanck, N.Y. are being completed jointly with Con Edison.

The telephone system is in the final stages of installation, and should be completed by December 1981. There will be telephones available in the media area and additional telephone lines will be available for federal, state and local government use, as well as for utility use. Telephone Lines with (212) and (914) area codes and plant exchanges will offer flexibility and reliability.

Telecopy equipment will also be available to government entities and the utilities as an added communications link. Copying machines, typewriters and work materials will be provided. Information materials have been prepared for distribution and use at the Special News Center.

It is expected that television stations would have self-contained electrical supplies for their cameras.

A full complement of recording and playback equipment including radio and television has been acquired and will be available at the Center.

APPENDIX A, Item #5
(286/81-05-19)

Development of unambigous Emergency Action Levels based on Control Room and plant instrumentation and conditions, including appropriate references between the Emergency Operating Procedures and the appropriate emergency classification in the Emergency Plan.

RESPONSE

Table 4-1 (Initiating Conditions and Emergency Action Levels) of the Emergency Plan has been re-arranged and expanded to include a concise method of determining an emergency classification. Each initiating condition category is listed in degrading order with appropriate Emergency Action Levels. In addition, a flow chart has been developed which duplicates Table 4-1 in a simplified form. Plant licensed personnel have reviewed the revised Table and the Flow Chart and find them both acceptable. Final issue of the revised table and chart is expected by January 15, 1982.

APPENDIX A, Item #6
(286/81-05-20)

Provisions for making protective action decisions based on current and projected plant status and conditions, i.e., for accident situations in which minimal radiological releases have occurred, but plant status, as evidenced from instrumentation, is deteriorating.

RESPONSE

Procedures are being revised to provide recommendations to State and Local Governments concerning protective actions when there is evidence from instrumentation that plant status is deteriorating. This procedural change should be in place by January 15, 1982, in parallel with Item #5.

APPENDIX A, Item #7
(286/81-05-23)

Provisions for communicating protective action recommendations based upon plant system parameters and/or radiological dose projections directly to the local offsite authorities responsible for implementing protective measures within the plume EPZ.

RESPONSE

Provisions for communicating protective action recommendations based upon plant system parameters and/or radiological dose projections directly to the offsite authorities responsible for implementing protective measures within the plume exposure EPZ have been accomplished by installing direct line telephones comprising the, "County-State Hot Line," in appropriate locations. Backup means for communication have also been accomplished and addressed procedurally. We have also instituted a consistent means to notify the local and state governments with the use of prepared forms and a procedural sequence of calls.

The Power Authority considers this item completed.

APPENDIX A, Item #8
(286/81-05-26)

Revision of Procedure RE-HPP-3.4 to include: pre-task supervisory briefings concerning precautions and prerequisites to be observed based upon unusual plant/radiological conditions expected and mission direction; provisions for communication (with designation of backup means) of data, including transmittal of original data sheets to the organizational element responsible for assessment; provision of data sheets to assure recording of pertinent data relevant to the surveys; and provisions for labeling collected samples for future identification and analyses, and for a central collection point for such samples.

RESPONSE

A revision to RE-HPP-3.4 will be issued to incorporate the following items:

- Prerequisites for pre-task supervisory briefings concerning the precautions to be observed based upon unusual plant/radiological conditions expected and mission direction.
- Apparatus section: means of communication are radios, soundpower and in-house phones.
- Procedure section: data is to be transmitted to the Health Physics Team Leader in the OSC or the Emergency Director until the OSC is manned.
- Standard Radiological Survey Log Sheet incorporated as an attachment, is to be used to record all the pertinent information for radiological surveys (date/time/location/readings/instrument number/technician name) also describes the means to transfer original data to the OSC for evaluation.
- Sample identification requirements - date/time/location/sampletype/ instrument number/sample results/technician's name, also specific sample storage location.

This revision will be in place by January 15, 1982 with the exception of the radio communications which will be in place by June 1, 1982.

APPENDIX A, Item #9
(286/81-05-34)

Development of procedures for maintenance of security during emergency conditions

RESPONSE

Immediate steps have been taken to review the existing Emergency Plan for those areas identifying security responsibilities, including the security aspects of the Special News Center. Security responsibilities will be identified by procedure prior to January 15, 1982. Security has been and will continue to be trained to respond appropriately during Emergency Conditions.

APPENDIX A, Item #10
(286/81-05-38)

Development and implementation of a program for dissemination of information to the public and the news media regarding the actions to be taken by individuals within the plume EPZ during an emergency.

RESPONSE

The Power Authority of the State of New York's Vice President Public Relations or his designee will serve as the company spokesperson. He will direct the activation and operation of the Special News Center.

A public information and education program is underway to inform the public of the Emergency Plan. Meetings have been held and are continuing with local government, school, police, fire and other officials and representatives inside and outside the 10 mile EPZ to inform them of their roles in the event the Plan would ever require actual activation.

The public information booklet has been prepared and a prototype has been forwarded to the NRC. Distribution of the booklet is planned following the completion of the public notification system's installation and prior to the site's emergency exercise. The public information booklet covers the requirements of NUREG-0654 for providing residents of the EPZ with information regarding action to be taken during an emergency. Additional information materials, based on the booklet, will be prepared. They include posters for public places (i.e. parks, shopping locations, public buildings, etc.)

A media information program, consisting of briefings and plant tours, is being conducted. News media kits have been prepared and include general and technical information.

APPENDIX B

POWER AUTHORITY OF THE STATE OF NEW YORK

Indian Point No. 3

Nuclear Power Plant

EMERGENCY PREPAREDNESS APPRAISAL 50-286/81-05

RESPONSES

APPENDIX B, Item #1
(286/81-05-01)

Clarification of the interface between the corporate and site emergency organizations as they pertain to the Plant Operations Manager.

RESPONSE

The site Plant Operation Manager is responsible to the Emergency Director. Figure 5-3 on page 22 of the Indian Point No. 3 Emergency Plan was misprinted. In the next revision to the Emergency Plan this figure will correctly reflect that the Plant Operation Manager reports directly to the Emergency Director and has no direct responsibility to the Recovery Manager.

APPENDIX B, Item #2
(286/81-05-02)

Provisions for an on-call TSC Manager at all times.

RESPONSE

Procedurally there exists a hierarchy for the Technical Support Center Supervisor staffing. When individuals are called into staff the Technical Support Center, the most senior member of the hierarchy will assume responsibility as the Technical Support Center Supervisor. There are at present two call-in rosters which cover Technical Support Center personnel. One roster is solely for Technical Support Center personnel in the event the Technical Support Center is the only support center being manned. The other roster is a listing of those individuals "on-call" who would report to the EOF, TSC and OSC. Members of the Technical Support Center Supervisor hierarchy are present on both rosters.

The Power Authority considers this item completed.

APPENDIX B, Item #3
(286/81-05-03)

Provisions of written agreements with contractors for health physics staff support for emergency conditions extending beyond 24 hours.

RESPONSE

An emergency response written commitment from the Institute for Resource Mangement (IRM), our Health Physics support contractor, is being pursued. The letter of commitment will describe actions to be taken to supply Health Physics personnel during emergency conditions. Our existing contract with IRM is currently being modified to reflect that commitment. In addition, all future Health Physics support personnel contracts will contain provisions for emergency response. We expect completion of this item by January 15, 1982.

APPENDIX B, Item #4
(286/81-05-04)

Designation of emergency preparedness instructor selection and qualification criteria.

RESPONSE

The designation of emergency preparedness instructor qualification criteria is addressed in Implementation Procedure IP-1085, section 2.4.

The Power Authority considers this item completed.

APPENDIX B, Item #5
(286/81-05-06)

Provisions for dedicated communication links from the TSC to State and local government response agencies.

RESPONSE

The Power Authority considers the sole purpose of the Technical Support Center to be a source of information and recommendations directly to Power Authority personnel. Dedicated phones to the EOF, CR, TSC, NRC and to the Power Authority Corporate Offices are in place in the TSC for this purpose. Communications to State and Local Response agencies on technical matters will take place from the EOF or Special News Center in accordance with the Emergency Plan.

The Power Authority considers this item completed.

APPENDIX B, Item #6
(286/81-05-08)

Re-evaluation of the primary coolant sampling and analytical facilities for adequacy assuming a 10 Ci/g primary coolant source term.

RESPONSE

The design, fabrication and installation of our Post Accident Reactor Coolant Sampling System was based on guidance from a Regulatory Guide 1.4 source term diluted with Emergency Core Coolant System water volume. Even if the entire Regulatory Guide 1.4 source term was diluted with only Reactor Coolant System water, a maximum activity attainable has been calculated to be 2.75 Ci/g.

At this time there are no plans to modify our sampling system. However we will perform an additional evaluation based on a 10 Ci/g primary coolant source term, followed by considerations to modify associated procedures based on that evaluation. The evaluation is expected to be completed by July 1, 1982.

APPENDIX B, Item #7
(286/81-05-09)

Provisions of appropriate shielding for transporting collected containment air samples to the radioanalytical laboratory and provisions for the storage/maintaining of the samples obtained.

RESPONSE

To provide for appropriate methods to shield air samples from containment during transportation to the radioanalytical laboratory, shield assemblies for use in transport of high radiation level iodine and particulate samples were purchased. Delivery is expected by February 1982.

Post accident samples will be stored in a source vault onsite until it is determined these samples are no longer required for further analysis. Storage will be in accordance with procedure RE-CS-042.

APPENDIX B, Item #8
(286/81-05-10)

Determination of the representativeness of post-accident airborne effluent particulate sampling.

RESPONSE

To determine the representativeness of post-accident airborne effluent particulate sampling we have initiated an evaluation of the plant vent accident sampling system. Based on the evaluations, appropriate action will be taken to compensate for or eliminate the losses, by June 1983.

APPENDIX B, Item #9
(286/81-05-13)

Performance of an engineering study of the existing ARM system to upgrade post-accident radiation level mapping capability and to extend the upper limit of detection.

RESPONSE

An engineering study is being initiated to investigate the feasibility of expanding the range of detection of the existing ARM system. This study will be expanded to include post-accident radiation level mapping capabilities. Present plans include the installation of additional radiation detectors, with a useable range of detection, at strategic locations. Considerations will be applied to include the recommended upper limit of detection, provided such an instrument exists which satisfies the desired range of detection.

A complete engineering study is scheduled for completion by November, 1982.

APPENDIX B, Item #10
(286/81-05-14)

Justification of the positioning of meteorological instruments mounted on the primary tower or relocation of these instruments to conform to Regulatory Guide 1.23.

RESPONSE

To provide compliance with Reg Guide 1.23, on October 22, 1981 adjustments were made to the wind sensor monitoring arms at all exposure levels of the 122 meter meteorological tower on the Indian Point site. The wind sensor crossarms have been rotated to a position perpendicular to the instrument booms and the booms have been extended to a distance such that the centerline of the crossarms are 83 inches from the nearest outside diameter tower leg.

Proposed Revision 1 to Nuclear Regulatory Guide 1.23 (9/1980) states that: "Instrumentation should be located on booms oriented in the prevailing wind at a maximum distance of two tower widths from the tower...." Since the outside diameter width of any face of the 122m meteorological tower is 39 inches (x2 = 78 inches), the extended distance of the instrument booms and the reorientation of the wind sensor mounting arms with respect to the booms assures compliance with the above proposed guideline and this item with respect to positioning.

The Power Authority considers this item completed.

APPENDIX B, Item #11
(286/81-05-15)

Determination of whether 15-minute averaged data from the backup meteorological tower reasonably represent information from the primary system (i.e., the site meteorology) and if not representative, appropriate modifications to assure representativeness of the backup tower data.

RESPONSE

To assure ourselves of the representativeness of the backup meteorological tower at the Indian Point site, efforts are under way to re-package an additional tower and use it as our backup tower. The new tower should not yield the effects of building influences as were the considerations to the existing tower.

Instrumentation and conduit are now on order and a completion date is scheduled for February, 1982, assuming no delays in delivery of materials.

APPENDIX B, Item #12
(286/81-05-16)

Provisions for additional respiratory protection equipment for use during emergencies.

RESPONSE

In addition to the SCBA's listed in section 4.2.2.1 of the 50-286/81-05 Appraisal, there are four one-hour SCBA's at the Control Point with four spare bottles available for personnel entering the Primary Auxiliary Building. In addition, there are twenty 30-minute SCBA's available for the fire brigade with 24 backup cylinders. The Power Authority considers these provisions sufficient in the event of an emergency.

The Power Authority considers this item completed.

APPENDIX B, Item #13
(286/81-05-17)

Provision of direct means of communication other than land-line telephone (e.g., a radio system) from the EOF to offsite authorities to ensure capability of communicating protective action recommendations in the event that telephone systems are unusable.

RESPONSE

Provisions are being made to install a radio network between the IP-3 site and State and County authorities to insure communication paths do not rely solely on land-based telephones.

Working with Consolidated Edison Company, the Power Authority has under-taken the following activities. Radio equipment is being purchased, frequency permits being issued and operating frequencies assigned. The New York State Office of Disaster Preparedness frequency will be used. We are working closely with the State to complete this extensive effort by the end of May 1982. This date must remain flexible, as it is contingent on the receipt of operating permits and procurement of equipment.

APPENDIX B, Item #14
(286/81-05-18)

Revision of emergency procedures to incorporate the use of the New York State Police radio located in the control room.

RESPONSE

In Appendix B of the Emergency Plan Implementation Procedures a backup means of communication (radio) to the State Police is addressed. Because of the limited use of this radio and the efforts underway to install a complete radio network to County and State authorities (286/81-05-17), at this time the Power Authority does not feel justified in revising procedures to include the use of this radio. However, we will continue referencing it in Appendix B of the Implementing Procedures Document.

The Power Authority considers this item completed.

APPENDIX B, Item #15
(286/81-05-21)

Provision of prepared messages for informing response groups including State and local officials, during the initial notification sequence, of the emergency classification and any protective action recommendations based on current and projected plant status and conditions, as well as radiological dose projections.

RESPONSE

In a September 1981 revision to Implementation Procedure IP-1030 a form was included, which will be used to transmit messages to State and Local officials. This form has been adopted by all the nuclear utilities in New York State. The Power Authority distributed these forms to the County officials in September with instructions for use.

The Power Authority considers this item completed.

APPENDIX B, Item #16
(286/81-05-22)

Provisions for including pertinent railroad lines in the notification scheme.

RESPONSE

In a September 1981 revision to Implementation Procedure IP-1030, provisions for notifying Consolidated Rail Corporation (local railroads) in the event of a Radiological Emergency were made. A Letter of Agreement was obtained from Consolidated Rail Corporation and will be included in the Emergency Plan in its next revision.

The Power Authority considers this item completed.

APPENDIX B, Item #17
(286/81-05-24)

Data sheets which include provisions for recording the date and time of each survey, the names of the technicians, the duration of the meter readings, the instruments used by type and serial number, as well as air sample count times.

RESPONSE

The pertinent survey information is recorded on a Monitoring Team Field Survey Form and will be incorporated as an attachment to IP-1010. This form will include the technician name(s), instruments used, serial numbers, and date and time of the surveys. This will be completed by January 15, 1982.

APPENDIX B, Item #18

(286/81-05-25)

Specification in Procedure IP-1005 and IP-1010 of the organizational element to whom collected data and the data sheets are to be provided for emergency assessment.

RESPONSE

Implementation Procedures 1005, 1010 and 1011 will be revised to specify the organizational element to whom collected data and the data sheets are to be provided for emergency assessment. These revisions should be complete by the end of December, 1981, and contingent on technical and administrative review, should be incorporated into the Emergency Implementation Procedures by the end of January 1982.

APPENDIX B, Item #19
(286/81-05-27)

Provision of data sheets for post-accident primary coolant sampling in Procedure RE-CS-042, Revision 2.

RESPONSE

The post accident sampling procedure (RE-CS-042) has been revised to include data sheets. These data sheets and the normal chemistry log sheets will contain all required reactor coolant chemistry results.

The Power Authority considers this item completed.

APPENDIX B, Item #20
(286/81-05-28)

Revision of Procedure RE-CS-042, Rev. 2, to include: provisions/ precautions for contamination control during post-accident sampling and analyses; provisions for analysis of above samples if primary analytical area has elevated radiation levels; provision of data sheets; and provisions for transmitting the data, as well as, the original data sheets to the organizational element responsible for assessment.

RESPONSE

The post accident sampling procedure RE-CS-042, Revision 2 requires disposal of low cost items and isolation of more expensive items to prevent spread of contamination. This procedure revision also includes data sheets when appropriate.

The background radiation levels in the present primary counting area will not preclude radioiosotopic determination of post accident samples. This background radiation will be further reduced when new facilities become available in 1982. The present gamma spectroscopy system will correct for increases in background and this capability will compensate for the expected changes resulting from this type of reactor accident.

Appropriate Emergency Plan Implementation Procedures will be revised to incorporate the organizational element responsible for receiving and maintaining data sheets, prior to the end of January 1982.

APPENDIX B, Item #21
(286/81-05-29)

Revision of the post-accident sampling and analytical procedures to include provisions for: valving diagrams and schematics; checklists for assuring task completion; labeling, transporting, handling and storage of high activity samples.

RESPONSE

The post accident sampling procedure (RE-CS-042) has been modified to include all necessary diagrams and schematics, and check lists for task completion. This revision also clarifies requirements for the labeling, transporting, handling and storage of high activity samples.

The Power Authority considers this item completed.

APPENDIX B, Item #22
(286/81-05-30)

Revision of post-accident sample analytical procedures to include provisions for analyzing high activity particulate and iodine samples.

RESPONSE

The gamma spectroscopy operating procedure, RE-CA-300, Rev. 1, currently provides the necessary instructions to determine the isotopic concentration in high-activity samples. This method will be further refined in 1982 after a collimator beam shield assembly is received.

APPENDIX B, Item #23
(286/81-05-31)

Revision of Procedure IP-1018 and other relevant procedures to detail the method by which the Emergency Director is to orchestrate the REMP sample collection and analyses, and to provide, as far as pratical, for preplanned sample collection frequencies for various magnitudes and modes of activity releases following an accident.

RESPONSE

Consolidated Edison Company provides personnel and procedures for radiological and environmental monitoring for the Indian Point vicinity per MOU #30. Con Edison and the Power Authority are working together in reviewing the requirements for the Radiological Environmental Monitoring program. Procedure revisions should be issued by the end of March, 1982.

APPENDIX B, Item #24
(286/81-05-32)

Modification of Procedure IP-1060 to include provisions: to ensure that all personnel leaving restricted areas or other areas suspected to be contaminated and individuals in assembly and reassembly areas are monitored for contamination; for maintaining records of all individuals checked for contamination; for special considerations for skin contamination with radioiodine; and for ensuring that collected data are provided to the organizational element responsible for radiation protection during emergencies.

RESPONSE

A revision to Implementation Procedure 1060 will incorporate changes to include the following:

- Provisions to ensure that all personnel leaving restricted areas or other areas suspected of being contaminated and individuals in assembly and re-assembly areas are monitored for contamination.
- A description of the procedure for the transfer of collected data to ensure the Health Physics Team Leader in the OSC receives data for evaluation and retention.
- A description of the special consideration for radioiodine skin contamination.
- A revision of attachment A-36, which will be included as an attachment to IP-1060 to establish a record those individuals surveyed for contamination.

The revision will be completed by January 15, 1982 with the exception of the considerations of radioiodine skin contamination which should be completed by May 1, 1982.

APPENDIX B, Item #25
(286/81-05-33)

Provision of specific instructions, guidance and criteria in IP-1020, IP-1021, IP-1022 and IP-1054 to ensure the proper instruments and techniques are used.

RESPONSE

Our qualified Health Physics technicians are trained in decontamination procedures and in the use of various survey instruments. They are trained to bring the proper instrumentation to the scene of an accident. Since there are different survey requirements for various types of conditions it is not appropriate to require a specific instrument to be brought to an accident scene.

In accordance with station policy, a record is kept of the levels of contamination on the areas of the body of each patient. This record and the Health Physics technician accompany the patient if it is determined that hospital decontamination and/or extensive medical attention is necessary. Marking the patient becomes unnecessary because of Health Physics accompaniment. As patient decontamination progresses,the levels of contamination will decrease and a permanent written record of all the levels will be maintained from start to finish.

IP-1021 has been changed and training accomplished to emphasize that medical attention takes precedence over decontamination.

The Power Authority considers this item completed.

APPENDIX B, Item #26
(286/81-05-35)

Procedural provisions for: development and review of ad hoc procedures for repair and corrective actions during emergencies; team practice of corrective actions to be performed prior to entry into high radiation areas; clarification as to how REA's are to be executed during accident conditions; and use of a survey instrument for the team with a range sufficient to measure radiation fields of 1000 R/hr or more.

RESPONSE

IP-1025, Repair and Corrective Action Teams, will be revised to reflect AP-4, Section III which addresses ad hoc emergency procedures. IP-1025 will also be revised to specifically address the ALARA concept for emergency conditions.

Existing procedure RE-HPP-3.4 reflects the requirement for survey instruments with sufficient range to measure radiation fields of 1000 R/hr or more.

A description shall be included in the procedures which describe the use of REA's during accident conditions.

This will be completed by January 15, 1982.

APPENDIX B, Item #27

(286/81-05-36)

Specification of specific criteria upon which the emergency classes will be downgraded and for entering the recovery mode.

RESPONSE

An evaluation of the Emergency Action Levels that are available to declare an emergency classification will be initiated to determine if it is reasonably feasible to delineate specific criteria upon which the emergency classification will be downgraded and the recovery mode will commence.

This evaluation will be completed prior tc March 1, 1982. If considered appropriate, procedures will be developed by January 1, 1983.

APPENDIX B, Item #28
(286/81-05-37)

Provisions for notification of Federal, State and local officials and response organizations prior to entering a downgraded or recovery mode.

RESPONSE

Notification procedures for response organizations and offsite agencies will be revised to include this notification prior to entering a downgraded or recovery mode.

These procedures will be revised by March 1, 1982.

APPENDIX B, Item #29
(286/81-05-39)

Verification and documentation that inventories of emergency equipment designated for common use for emergencies at Indian Point Unit 2 and Indian Point 3 are correct and that routine equipment operability checks are performed.

RESPONSE

The Power Authority has made arrangements with Consolidated Edison to receive and review the monthly inventories and communication check sheets which apply to common use equipment designated for emergency preparedness.

The Power Authority considers this item completed.

APPENDIX B, Item #30
(286/81-05-40)

Provisions for dating "call-in rosters" to ensure that the current revisions are properly distributed and in use.

RESPONSE

"Call-in" rosters are now dated to ensure that current revisions are properly distributed and in use.

The Power Authority considers this item completed.

APPENDIX B, Item #31
(286/81-05-41)

Coordination of the interface between the licensee and NRC Region I through the Region I Emergency Preparedness Coordinator concerning the work space and communication needs of the NRC emergency response organization.

RESPONSE

Co-ordination efforts have been undertaken with the NRC Region I Emergency Preparedness Co-ordinator's office to address problems concerning work space and communication needs of the NRC emergency response organization. Designation of NRC personnel and the locations to which they would report and from which they would operate during an emergency at IP-3 was discussed with the Region I staff.

The EOF spacing and communication requirements were reviewed. Telephones and space will be provided on the 2nd floor of the EOF for NRC personnel. The space and majority of telephones should be available by the end of December 1981 and the remainder of telephones will be installed shortly thereafter.

The TSC is at present a temporary facility. Provisions for additional outside lines are underway and should be complete by the end of December 1981. The permanent TSC, scheduled for completion in October 1982, will include sufficient communication equipment for the NRC staff.

The Power Authority considers this item completed.

APPENDIX B, Item #32
(286/81-05-42)

Provision of a written agreement with Consolidated Edison concerning transfer of post-accident liquid effluents, if such transfers are considered as an option.

RESPONSE

A written agreement is in place with Consolidated Edison (MOU 15) governing the transfer of liquid wastes. This agreement is not limited to non-accident conditions. Post-accident wastes which may be processed within the physical limitations of the Con Ed facilities may be transferred under the provisions of the existing agreeement.

The Power Authority considers this item completed.