

STUHR
is this OK

CP&L

Carolina Power & Light Company

FEB 18 1982

*Response reviewed by
Bill Cline - considered
satisfactory. [Signature]*

*Attention:
Candle Julian*

Mr. James P. O'Reilly
United States Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, GA 30303

*from
Jim McQueen*

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

Dear Mr. O'Reilly:

In response to your letter of January 11, 1982, IE Inspection Report Nos. 50-324/81-25 and 50-325/81-26, Carolina Power & Light Company (CP&L) submits the attached information concerning emergency preparedness for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2.

To aid the Staff in their review, the attached responses compare number by number to the items identified in Appendices A and B of your January 11, 1982 letter. The deficiencies of the BSEP Radiological Emergency Plan (Revision 2), which are noted in Appendix C of your January 11, 1982 letter, are currently under review. Changes to correct these deficiencies will be provided in accordance with LOCFR50.54(q), and will be completed by May 11, 1982, as required in your letter.

CP&L believes that the actions described in this letter are responsive to the comments contained in your January 11, 1982 letter and, upon completion, should form a basis for concluding that Brunswick can respond to any emergency situation without undue risk to the health and safety of the public.

REGIONAL DIRECTOR
DEPUTY DIRECTOR
ASSISTANT TO DIRECTOR
DIRECTOR, RRPI
DIRECTOR, EPOS
DIRECTOR, ENF/INV
DIRECTOR, ETI
PUBLIC AFFAIRS OFFICER

Yours very truly,

[Signature]

B. J. Furr
Vice President
Nuclear Operations

RGB/WRM/ly (7802)
Enclosures

B. J. Furr, having been first duly sworn, did depose and say that the information contained herein is true and correct to his own personal knowledge, or based upon information and belief.

Rebecca L. Isaacs
Notary (Seal)

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PDR ADDCK 05000324
G PDR

My commission expires: My Commission Expires 8-8-88

C. Julian

ENCLOSURE 2

BRUNSWICK STEAM ELECTRIC PLANT
EMERGENCY PREPAREDNESS APPRAISAL
APPENDIX B

1. The Corporate Emergency Plan is currently being revised to incorporate changes made to the augmented emergency response organization as described in Revision 2 of the BSEP Emergency Plan. This revision will be completed by April 15, 1982.
2. The ENS telephone extension in the TSC is operational.
3. Carolina Power & Light (CP&L) presently believes that personnel can travel from the TSC to the Control Room in a timely manner and that no additional procedures are required.
4. An evaluation will be completed by April 1, 1982 to determine the need for any modifications to the TSC.
5. The Emergency Plan and implementing procedures will be revised to show which rooms in the Service Building will be used for OSC purposes. This revision will be completed by April 1, 1982.
6. A backup OSC will be established by April 1, 1982.
7. The ENS telephone extension in the EOF is operational.
8. Appropriate radiological equipment, decontamination supplies, and emergency protective supplies will be stored in the EOF.
9. An evaluation of EOF-conditions will be completed by April 1, 1982.
10. Modifications will be made during the 1982 refueling outages to ensure that personnel working near sample hood lines are exposed to radiation doses which are as low as reasonably achievable.
11. Modifications which will enable personnel to take containment air samples under a full range of accident conditions will be made during the 1982 refueling outages. These modifications will ensure that radiation doses received by the personnel taking the samples are as low as reasonably achievable.
12. A mechanism will be established to permit post-accident collection of particulate filters and charcoal/silver zeolite cartridges from the stack and Turbine Building vents prior to accumulation of high activity levels. This will be accomplished prior to April 1, 1982.
13. A review to determine the need for any improvements in the liquid radwaste/effluent sampling capability is currently underway and will be completed by June 1, 1982.

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14. Copies of decontamination procedures for the decontamination kits in the TSC and Visitor's Center will be provided by March 1, 1982.
15. A review to determine the necessary number of Emergency Environmental Monitoring Teams is currently underway and will be completed by June 1, 1982.
16. Respiratory protection and protective clothing will be provided for each Emergency Environmental Monitoring Team by June 1, 1982.
17. Copies of emergency kit inventories will be maintained in each kit. These will be included by March 1, 1982.
18. Provisions have been made to obtain and utilize a back-up source of representative meteorological information and for routine checks of communication. These provisions have been incorporated into the Brunswick Plant Emergency Procedures (PEPs). These revisions to the PEPs were approved by the Plant Nuclear Safety Committee on November 20, 1981.
19. Severe weather information is available in the Control Room 24 hours per day through the load dispatcher, who receives updates via NOAA.
20. Dose assessment procedures are currently being reviewed and upgraded. Any changes that are appropriate will be completed by April 1, 1982.
21. PEP-3.5.1 will be revised to address the use of silver zeolite cartridges in taking air samples and to identify the specific instrumentation to be used and the storage locations. This revision will be completed by April 1, 1982.
22. The RC&T procedures to be used for in-plant surveys will be referenced in PEP-3.3.1 and PEP-3.3.2 by April 1, 1982.
23. The relationship between PEP-3.3.3 and RC&T-1500 will be identified in each procedure by April 1, 1982.
24. Precautionary notes and other appropriate conditions will be added to Procedure RC&T-1500 relative to sample preparation and handling for chloride and boron analysis. This will be accomplished by April 1, 1982.
25. Procedure RC&T-0150 will be revised by April 1, 1982 to recognize that post-accident particulate and iodine samples from containment may contain significant quantities of radioactivity.
26. Review for greater sample-to-detector distances for counting high level charcoal/silver zeolite cartridges and particulate filters is currently being performed. This review will be completed by April 1, 1982.
27. Review is in process to establish a procedure for post-accident collection of particulate filters and charcoal/silver zeolite cartridges from the stack. This review will be completed by May 1, 1982.

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28. Procedures will be revised to inform personnel of recommended evacuation routes from plant areas in emergency conditions. This will be accomplished by April 1, 1982.
29. PEP-3.8.1 will be revised by March 1, 1982 to specify the assembly areas for a site evacuation.
30. Provisions are being made to obtain an agreement for a second general practitioner for medical assistance. This will be accomplished by June 1, 1982.
31. Corporate Communications Implementation Procedures 4.6 and 5.2 address information liaisons with State and Federal organizations.
32. Corporate Communications Implementation Procedure 4.2 defines the methods taken to handle rumor control.
33. RC&T-0600 and its appendices are currently being reviewed to assure clear expression of the limits in Sections 2.1 and 8.6 and that the information is current. This review will be completed by March 1, 1982.
34. Preselecting personnel for Re-entry Teams prior to an emergency does not seem practical. Only personnel qualified to be team members would be asked to volunteer. Preselecting team members would be difficult due to shift rotation.
35. PEP-4.3 has been approved by the Plant Nuclear Safety Committee to implement CP&L's commitment for drills and exercises.
36. PEP-4.3 will be revised by April 1, 1982 to require documentation for corrective actions resulting from drills and exercises.
37. PEP-4.5 has been revised to incorporate annual dissemination of updated public information.
38. Corporate Communications will provide for familiarization of the news media through an annual briefing.

Post accident sampling OK?

C. Julian

ENCLOSURE 1

BRUNSWICK STEAM ELECTRIC PLANT
EMERGENCY PREPAREDNESS APPRAISAL
APPENDIX A

1. The Emergency Plan Training/Retraining Program was defined and approved by the Plant Nuclear Safety Committee on December 18, 1981. This program will be fully implemented by April 1, 1982.
2. The procedure for performing initial offsite dose projection/assessment was upgraded and approved by the Plant Nuclear Safety Committee on November 6, 1981. Retraining on this procedure for appropriate personnel was completed, including walk-throughs, on January 6, 1982.

ATTACHMENT