



# Nebraska Public Power District

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NSD930605  
May 27, 1993

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

Subject: Emergency Plan Revision  
Cooper Nuclear Station  
NRC Docket No. 50-298, DPR-46

- References:
- (1) Letter dated May 20, 1987, Julius W. Becton, Jr., Director FEMA to Honorable Kay A. Orr, Governor of Nebraska, FEMA Rule 44 CFR 350 approval.
  - (2) Letter dated May 20, 1987, Julius W. Becton, Jr., Director FEMA to Honorable John Ashcroft, Governor of Missouri, FEMA 44 CFR 350 approval.

Pursuant to the requirements in 10 CFR 50.54(q), the Nebraska Public Power District is submitting the attached draft revision to the subject plan for your review and approval. The District believes that the proposed changes to the plan will continue to meet the standards of 10 CFR 50.47(b) and 10 CFR 50 Appendix E. The District also believes the proposed changes will not reduce the effectiveness of the plan but, as the proposed revision would remove a feature presently discussed in the plan, the District requests NRC review and approval of the attached draft revision to the CNS Emergency Plan.

The draft revision proposes to remove the backup mobile sirens as part of the Nebraska Public Power District's Emergency Plan for Cooper Nuclear Station. The backup mobile sirens described in the existing Emergency Plan are not considered an element of the CNS Alert and Notification System (ANS) as approved by FEMA in references (1) and (2). The District desires to remove the mobile sirens from the Emergency Plan to eliminate the maintenance, testing, and component replacement requirements for a system that is not a part of the ANS. Removal of the mobile sirens will not change the alert and notification system approved for use at Cooper Nuclear Station.

As a result of rule changes following the Three Mile Island Accident in 1981, a public alert and notification system was installed for Cooper Nuclear Station. The original system consisted of a combination of fixed sirens and mobile sirens. To provide a more effective means of notifying the public, the mobile sirens were

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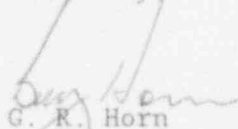
Document Control Desk  
May 27, 1993  
Page 2

replaced by tone alert radios in 1982. In accordance with FEMA-REP-10, "Standard Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants", the District submitted the Alert and Notification System Design Report in March, 1985. This system design was based upon the use of fixed sirens and tone alert radios for notifications. As noted in the enclosed ANS Design Report, pages 1 and 12, the use of mobile siren vehicles as described in FEMA-REP-10, Section E.6.2.2 was not employed as an element of the alert and notification system. The system described in the ANS Design Report was approved by references (1) and (2) with full 44 CFR 350 approval being granted to the states of Nebraska and Missouri on May 20, 1987 (see Appendix A of the enclosed ANS Design Report).

Removal of the mobile sirens will not reduce the effectiveness of the alert and notification system as designed and therefore, will not reduce the effectiveness of the Emergency Plan for Cooper Nuclear Station. The District believes that the Plan will continue to meet the standards of 10 CFR 50.47(b) and 10 CFR 50 Appendix E.

If you have any questions concerning this revision, please contact my office.

Sincerely,



G. R. Horn  
Nuclear Power Group Manager

/rg  
Attachment (Proposed Plan Revision)  
Enclosure (Alert & Notification Design Report)

cc: U.S. Nuclear Regulatory Commission (2)  
Regional Administrator - Region IV

NRC Senior Resident Inspector  
Cooper Nuclear Station

Operations will assume supervision of all NRC personnel at the site, will represent the NRC in interactions with other agencies, and will decide what response actions must be taken, consistent with the delegated authority.

#### 5.4.5 Notification

When an emergency classification is declared, CNS will initiate predetermined notifications as defined in EPIP 5.7.6. Notification to state and/or local agencies will be completed within 15 minutes of the declaration of an emergency. The procedures to be followed and the contents of initial and follow-up notifications are set forth in EPIP 5.7.6. Specific details of the alert notification system are outlined in EPIP 5.7.27, Early Warning System.

Within the 10-mile Emergency Planning Zone (EPZ), an Early Warning System has been developed. This system was established to meet the prompt notification requirements established by the NRC and was designed for response to any disaster where prompt notification of the public is desirable.

The Early Warning System consists of fixed sirens and tone-activated Emergency Broadcast System radios. Tone-activated radios are made available to residences located within the rural EPZ areas but outside the hearing range of the fixed sirens. The radios are pretuned to the Primary Emergency Broadcast Stations and are automatically activated when the EBS radio station initiates the Emergency Broadcast System tones.

The design basis and rationales for the early warning system is in the Alert and Notification Design Report. Details pertaining to physical and administrative controls of this system are found in this document.

~~In addition to the primary means of notification with fixed sirens and tone-activated radios, a backup system consisting of~~

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~~vehicle mounted mobile siren units is available. This mobile siren system is comprised of mobile units which will follow predesignated routes. Mobile sirens have been provided to volunteer fire departments within the areas to be covered.~~

CNS EPIP 5.7.27 describes how the system will be activated in the event of an emergency. EPIP 5.7.27.1 describes how a malfunctioning tone-activated radio will be repaired or replaced.

Local and/or state governments are responsible for implementation of notification/warning actions in the 10 mile EPZ. Normally, government and public warning information will be disseminated as directed by the Governor or his Authorized Representative. However, the notification system provides for local government decision and initiation of notification/warning actions for those in the 10 mile EPZ, especially in the event of a major nuclear power plant incident. Local governments may make decisions based on the recommendations of NPPD management or state representatives.

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exceed predetermined values, or when other situations threaten personnel safety.

Onsite actions to protect station personnel and visitors are the responsibility of the Emergency Director. Measures for the protection of the general public are detailed in the Nebraska, Missouri, Kansas, and Iowa State Emergency Plans.

Protective actions for onsite personnel will be taken whenever a radiological emergency has occurred, or may occur, which might result in concentrations of airborne activity or radiation levels in excess of normal limits. In addition, protective actions will be taken for onsite personnel in other emergency situations such as fires, floods, and tornados where personnel safety is threatened. Onsite personnel will be notified by actuation of the station emergency alarm system, telephone calls, or public address system announcements, as applicable. Notification will be accomplished as soon as assessment actions permit a proper evaluation of conditions. Personnel will be notified of appropriate protective actions to be taken.

The Emergency Director will recommend appropriate protective actions to offsite authorities. Protective actions for offsite areas are initiated by state and local government emergency response organizations. These actions may include in-house shelter or evacuation. The action which affords the lower radiation exposure when projected or measured offsite doses are expected to require implementation of Environmental Protection Agency (EPA) Protective Action Guides will generally be preferred. Other factors such as release duration, mobilization time, or adverse weather will be important considerations affecting protective action recommendations.

Approximate initiation times for protective actions are shown in Table 6.4-1. Means of public notification include fixed sirens, ~~mobile sirens~~ and tone-activated Emergency Broadcast System receivers. Special use or remote area notification is discussed

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NPPD personnel are available to describe the special conditions and constraints involved in dealing with station emergency radiological release situations.

NPPD offers training annually for members of the Nemaha County Hospital and Falls City Community Hospital.

This training includes notification procedures, basic radiation protection, and the identity, by position and title, of the individual in the onsite emergency organization who will control the organizations' support activities.

~~CNS offers annual training for members of the Volunteer Fire Departments of Brownville, Nemaha, Peru, Shubert, Watson, and Rockport.~~

~~This training covers activation and use of the backup mobile siren system.~~

Radiological orientation training is offered annually to local emergency service or Civil Defense personnel, local law enforcement agencies, and local news media personnel.

#### 8.1.4 Public Education

NPPD has prepared an educational booklet for distribution to the public within the plume exposure Emergency Planning Zone (EPZ). The booklet has been mailed to residents within a 10-mile radius of the station and is available for review at NPPD headquarters, CNS, the Nebraska State Civil Defense Agency, the Nebraska Department of Health - Division of Radiological Health, and the Missouri State Emergency Management Agency. The booklet outlines the station's operational concept, sets forth the various classifications of emergencies, summarizes the emergency plan and procedures developed to safeguard the general

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Recovery operations will include measures taken during and immediately following the emergency, as well as, the longer term post-emergency efforts. These operations will be performed by station and other NPPD personnel, and, if required, by contract technical and labor support. Manpower and equipment resources supporting the individual functional segments of the Recovery Organization will vary according to the severity of damage and specific situational needs.

## 5.7.26 LONG-TERM ENVIRONMENTAL MONITORING

Methods to be used for evaluating long-term environmental consequences and analyses of trends involving key isotopes of radioactive material released from the Elevated Release Point at CNS are described in this procedure. Immediate collection and analysis of samples from impacted areas following an elevated release shall be conducted in accordance with EPIP 5.7.18, Off-Site And Site Boundary Monitoring. Long-term environmental monitoring and trend analyses shall be conducted in accordance with this procedure. Appropriate protective measures are also discussed. (Also see Section 7.5.5 of the Emergency Plan.)

## 5.7.27 & EARLY WARNING SYSTEM 5.7.27.1

The purpose of this procedure is to describe the Early Warning System within the Emergency Planning Zone (EPZ) of Cooper Nuclear Station. This system was set up to meet prompt notification requirements for Cooper Nuclear Station. It was also designed for response to any disaster, fire, flood, tornado, etc., where prompt notification of the public is desirable.

As indicated in Section 5.4.5 of the Emergency Plan, the CNS Early Warning System consists of fixed sirens covering areas of high population density and tone activated Emergency Broadcast System (EBS) radios in the low population density rural areas.

The fixed siren system is composed of 21 pole mounted sirens.

The EBS tone activated radios are in residences located within the rural EPZ areas outside the hearing range of the fixed sirens. These radios are pretuned to the Primary Emergency Broadcast Stations (KFAB-1110 kHz Omaha, within the Nebraska EPZ and KFEQ-680 kHz St. Joseph, within the Missouri EPZ) and are automatically activated when the EBS station sounds the EBS tones.

~~In addition to the primary means of notification, fixed sirens and tone activated radios, a backup system consisting of vehicle mounted mobile siren units is available. This Mobile Siren System is comprised of mobile units following designated routes. Mobile sirens have been provided to each volunteer fire department within these areas to cover a specified number of routes.~~