



NUCLEAR REGULATORY COMMISSION

ORIGINAL

In the Matter of: PRELIMINARY DISCUSSION OF EMERGENCY  
PREPAREDNESS REVIEW PROCESS AND DEVELOPMENT  
OF SCHEDULE OF MAJOR EMERGENCY PREPAREDNESS  
REVIEW MILESTONES

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1 UNITED STATES OF AMERICA  
2 NUCLEAR REGULATORY COMMISSION

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4 PRELIMINARY DISCUSSION OF EMERGENCY  
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6 OF SCHEDULE OF MAJOR EMERGENCY PREPAREDNESS  
7 REVIEW MILESTONES

8 - - -

9 Room P-114  
10 Phillips Building  
11 Bethesda, Maryland  
12 Thursday, April 29, 1982

13 The meeting convened, pursuant to notice, at

14 10:15 a.m.

15 NRC STAFF:

16 LOUIS WHEELER  
17 TOM McKENNA  
18 NEMEN MICHEL TERC

19 SEABROOK (YANKEE ATOMIC ELECTRIC COMPANY):

20 JOHN ROBINSON  
21 ROCCO MARCELLO  
22 JIM MACDONALD

23 PUBLIC SERVICE COMMISSION OF NEW HAMPSHIRE:

24 STEPHEN DODGE  
25 PETER STRICKLAND

1 P R O C E E D I N G S

2 MR. WHEELER: Let's get started.

3 MR. McKENNA: I think the first major  
4 milestone - and this is Duke's - is that we have to get  
5 an SER out and knowing, typically, in emergency  
6 preparedness these SERs stay open right up to the last  
7 minute.

8 We close them out sometimes just a week or two  
9 before we go down to the Commission and go for a license  
10 because of things like FEMA's findings and  
11 determinations which we generally do not get until after  
12 they had the exercise, etc., or possibly closing out  
13 certain issues on the appraisal may wait until the last  
14 minute - delivery of certain pieces of equipment and  
15 this sort of thing. The I&E goes out, the region goes  
16 out, we we close out the issue, we are done.

17 But the idea is to close as many issues as we  
18 can on this coming SER, try to get as much of it done as  
19 possible.

20 In the case of plans, realizing that is what  
21 the SER addresses, I think we ought to be able to  
22 accomplish a lot of it. So, the ideal is that come SER  
23 time, that we get as much of this stuff done as possible.

24 Now, it looks like I am supposed to have a  
25 draft on May 31, and Duke is going to try to publish it

1 on September 7. I do not think we will be able to do  
2 too much by May 31.

3 MR. WHEELER: The May 31 date is the date that  
4 I plan to have the draft of the SER put together. It is  
5 going to be pretty much an in-house document. The date  
6 that I will need your input, Tom, originally was May 7.

7 MR. McKENNA: Right.

8 MR. WHEELER: That is only a draft SER for the  
9 purpose of highlighting open issues and it is primarily,  
10 as I say, going to be an in-house document for our use.

11 MR. McKENNA: I guess what we need to decide  
12 then, Duke - they have a lot of plan revisions to make.  
13 I get the feeling from discussions with them that they  
14 have enough information in-house to answer a lot of this  
15 stuff.

16 When can you get the revision to us, the plan  
17 revision?

18 MR. MACDONALD: Well, do you need answers to  
19 the RAI submitted to you and the plan revision, or just  
20 answers to the RAIs? The answers to the RAI are sooner  
21 than the plan revision.

22 MR. McKENNA: But ultimately we need a plan  
23 revision.

24 MR. MACDONALD: Yes. Before you make your  
25 conclusions on the SER?



1 MR. McKENNA: Yes, I need a plan revision.

2 Now, what we have done in other cases - and I  
3 do not want to do it here, to be honest with you - is,  
4 we have put in SERs that say that the licensee is  
5 committed to do the following things, and the only  
6 deficiency remaining is that these be incorporated in  
7 the plan.

8 But we still have that final step, I still  
9 have to do the review. I will go that route, but I  
10 would just as soon not.

11 MR. ROBINSON: How extensive are these plan  
12 revisions?

13 MR. MACDONALD: They are all over the plant.

14 MR. WHEELER: The formal Safety Evaluation  
15 Report is scheduled for publication in September. So,  
16 we have from now until then to get the plan brought up  
17 to speed. If in the interim you wish to provide us with  
18 specific answers to questions and explain your  
19 intentions to revise the plan, that would be helpful to  
20 us in our preparing our formal Safety Evaluation Report.  
21 But by the time we go to press with the Safety  
22 Evaluation Report it must be based on the plan itself.

23 MR. ROBINSON: Jim, are there any hang-ups  
24 with the changes that have to be made?

25 MR. MACDONALD: Just the physical process,

1 pouring through the plan; deciding on what we are  
2 committing to, change-wise and make that change with  
3 UENCF and have 300 copies, or whatever.

4 MR. ROBINSON: There is nothing that  
5 represents a major problem.

6 MR. MACDONALD: When we go through the RAIs  
7 and we will see some major problems. But once it is  
8 decided to revise the plan that is pretty  
9 straight-forward. I do not know what the time frame for  
10 cranking in UENCF, for that kind of activity, is. But  
11 it is not that bad.

12 Certainly, by the time the SER actually is  
13 officially published we will have a plan revision.

14 MR. McKENNA: Let me tell you what we did with  
15 Paolo Verde and see if that might be a course of action.

16 We generated a list of questions just like  
17 this. The licensee said, "Ok, we will come up with our  
18 course of action on each one, and then let's sit down  
19 and talk about it before we go through the process of  
20 revising the plan. Let's go down and say what we are  
21 going to do on every single one of them. Hopefully,  
22 that will cut out a lot of trouble with the plan.

23 MR. MACDONALD: That was my intention. There  
24 are quite a few of them already. I do not know how we  
25 can do that.

1 MR. McKENNA: I just found out about it.

2 MR. MACDONALD: We are prepared verbally to  
3 answer a lot of those.

4 MR. McKENNA: Why don't we plan on doing that  
5 up there, then? That is one of the things that would be  
6 on that agenda. I think that would be very helpful to  
7 me.

8 MR. ROBINSON: How soon could we set this  
9 meeting up?

10 MR. WHEELER: How does May 20 sound? It is a  
11 Thursday, the third week in May. That is the time we  
12 are looking at as a possible date for the site  
13 familiarization.

14 MR. McKENNA: I think we are going to need an  
15 additional day for the meeting.

16 MR. WHEELER: An additional day?

17 MR. McKENNA: I think one day for the site  
18 visit. But I think we ought to give ourselves a whole  
19 day for it, just in case.

20 MR. WHEELER: All right.

21 MR. McKENNA: So, the site familiarization on  
22 the 20th and the meeting the 21st?

23 MR. WHEELER: Thursday and Friday.

24 MR. McKENNA: Yes. I mean, that is up to  
25 you. What do you think? It is your schedule, I am

1 available.

2 MR. WHEELER: I am available. From your  
3 contacts with FEMA, do you know whether or not they  
4 would be available?

5 MR. McKENNA: They said the 20th is all right  
6 for them. We are going to invite them for the site  
7 visit so they will start getting in on the process.

8 The 21st, the last time I heard, anything  
9 after something like the 17th is good for them. I will  
10 call and confirm, and if there is any problem, Duke and  
11 I will have to work it out with you folks.

12 MR. MACDONALD: We are going to have a public  
13 meeting on the emergency plan exercise some time the  
14 week of May 17.

15 MR. McKENNA: I do not want to get into apples  
16 and oranges.

17 MR. MACDONALD: I mention that because FEMA has  
18 a scheduling problem because of that.

19 MR. McKENNA: They said any time after the  
20 17th was good for them. That was the last thing they  
21 worried about.

22 MR. MACDONALD: Well, who goes to the Seabrook  
23 meeting from a FEMA standpoint?

24 MR. McKENNA: I invited Ed Thomas, and I think  
25 he was going to invite somebody from the counsel's

1 office. All I told them was, "It is just a site  
2 familiarization. It is a good time for you to see the  
3 site and start working with us. I think we are going to  
4 have to work very closely from now on on this thing."

5 I told him that he could bring a couple of  
6 people. He said, "Well, I want to bring so-and-so, and  
7 so-and-so, and so-and-so," and I said, "Wait a minute,  
8 let's keep it small."

9 So, I think that was the only restriction. I  
10 said, "Let us know and we will get a hold of the  
11 licensee."

12 MR. MACDONALD: Well, Thomas certainly will be  
13 involved in the Vermont Yankee public meeting.

14 MR. McKENNA: I already talked to him. His  
15 schedule said any time after the 17th he could make it.  
16 I have already asked him about the 20th and he said that  
17 is good for him. I have not asked im about the 21st.

18 MR. ROBINSON: It seems to me probably the  
19 21st would be all right.

20 MR. WHEELER: Perhaps we can have the all-day  
21 meeting on Thursday, the 20th, and site familiarization  
22 Friday morning.

23 MR. McKENNA: That sounds good.

24 MR. WHEELER: Do we see the site  
25 familiarization taking all day?

1 MR. McKENNA: Typically, two or three hours.

2 MR. WHEELER: All right. Let's work towards  
3 scheduling that. Rocky, if you can see about whether or  
4 not there is a meeting place where we can all get  
5 together there at the site, I would say basically all  
6 day on Thursday, May 20. And Tom, if you can get FEMA  
7 cranked into this and see whether or not they can go by  
8 that schedule.

9 MR. McKENNA: I would ask Nemen to check up  
10 there and see if they have any problems. I am sure the  
11 region is going to want to participate, too. So, if you  
12 could check with our boy, George or somebody, to see  
13 whether they have any problems with that date.

14 MR. WHEELER: All right. The regional  
15 representation, of course, there is always a resident  
16 who can sit in for them if the region themselves are not  
17 readily available.

18 MR. McKENNA: All right.

19 What I would like to do is ask Duke here - we  
20 have a September 7 date - when do you need my input into  
21 the final, in reality, technical input due to project  
22 managers?

23 MR. WHEELER: By the schedule you have in  
24 front of you it is basically a month ahead of time. I  
25 don't recall the date.

1 MR. McKENNA: So, August 7. I will need the  
2 plan revisions two weeks in advance. So, I will need  
3 them by --

4 MR. MACDONALD: Mid-July?

5 MR. McKENNA: The third week in July.

6 Now, realizing - I know you cannot close  
7 everything out because there will be a lot of open  
8 issues, the interface is all set officially with this  
9 kind of thing, the agreement letters, the centers met.  
10 Things like that may just be hanging.

11 MR. MACDONALD: Procedures and equipment.

12 MR. McKENNA: Procedures and equipment all is  
13 just going to be open. What would be very helpful, I  
14 think, in this process, if we started in the submittal  
15 somehow or other trying to keep track of what you think  
16 you have closed out and what you think you have not  
17 closed out. I do not know what you think about that,  
18 there are a hundred and one issues. I can keep track of  
19 them.

20 MR. MACDONALD: Well, a simple way of doing  
21 that is for us to provide an answer either way on each  
22 of those RAIs.

23 MR. McKENNA: With reference to the plan, that  
24 would be great. That would be great for me. It also  
25 would be helpful if it does get transferred to the



1 region, that would keep a nice paper flow for them.

2 But we an work that out. In any case, I think  
3 the important thing is, the third week in July what  
4 changes you can make. Try to get as much as you can  
5 done so we get that review. And hopefully, at this  
6 meeting up there we can identify soft spots.

7 I think we can discuss here today - I hope we  
8 can discuss - scheduling issues. In other words, the  
9 centers. I mean, there are some technical issues that  
10 are going to take long-time planning and I would like to  
11 be able to at least talk about that a little bit. Maybe  
12 you could run through the ones you are particularly  
13 worried about, scheduling-wise.

14 I can tell you where I think we are going and  
15 what I think you need to do, and when you should have it  
16 done to be able to get the process.

17 MR. WHEELER: That is well within the scope of  
18 this meeting to identify those issues, that we must come  
19 up with a schedule for resolving.

20 MR. McKENNA: Now, that is SER. Realizing we  
21 have to close out all the open issues before the  
22 licensing process is done. Here again, emergency  
23 preparedness, sometimes it goes right to the end, I  
24 realize that.

25 MR. MACDONALD: In other words, the SER may

1 carry a number of open issues.

2 MR. McKENNA: Yes. There will probably be  
3 several supplements on this thing and in emergency  
4 preparedness these supplements may go right up to the  
5 last minute.

6 Part of it is a conclusion of a typical  
7 operating license SER, written early on in the game and  
8 it identifies six items that typically are open. That  
9 will probably be open in this one. I will give it to  
10 you. Let me read them down:

11 One are the corrections of all the  
12 deficiencies. So, that is still an open issue because  
13 the SER will identify anything that you have not closed  
14 out. That September SER is an open issue.

15 Submission of the state and local response  
16 plans in accordance with 50.33.

17 MR. MACDONALD: Submission to NRC, or  
18 submission by the states to FEMA?

19 MR. McKENNA: Submission of final plans to NRC  
20 under 50.33 which says that you will submit so many  
21 copies, and they have to be final.

22 So, that may be one that comes right up at the  
23 last minute. Or if they are not finals, there has to be  
24 a plan accompanied with some sort of letter agreement  
25 that says, "Yes, we will implement this plan as it

1 stands at this point in time."

2 MR. MACDONALD: You have the Massachusetts and  
3 New Hampshire plans right now.

4 MR. McKENNA: All right.

5 All right, submission and satisfactory  
6 evaluation of the emergency plan implementing procedures.

7 Now, the evaluation takes place primarily  
8 during the appraisal. But still, you have to submit the  
9 procedures in accordance with the rule - I will give you  
10 this, by the way - and we will have to look at it.

11 Now, the way we are going to look at it is  
12 during the appraisal. So, whatever findings come out of  
13 the appraisal you will have to fix.

14 Next, there will have to be acceptable review  
15 by FEMA of FEMA's findings and determinations. So, FEMA  
16 has to complete their offsite review, give us the  
17 findings and determinations, and then we have to review  
18 those; that all has to be cleared up. So, anything as  
19 far as offsite has to be done.

20 I think that may be - I am not sure - but that  
21 may be one of our biggest scheduling constraints is  
22 going to be the offsite review because FEMA is going to  
23 have to complete that and the offsite plans have to be  
24 done in time for them to do that, for them to finish  
25 their process which involves regional and headquarters

1 reviews.

2 MR. MACDONALD: right.

3 MR. McKENNA: I do not know if you have seen  
4 their rule, what is it, 44.350? They have a lot of  
5 steps. There are a lot of steps. There are several  
6 places where more than one Federal agency gets involved  
7 and they all have to have some comments and have to send  
8 them back.

9 MR. MACDONALD: It is a formal RAC Committee  
10 review process, an exercise evaluation, public hearing,  
11 what would be the finalization in the region, and then  
12 submission to Washington with a recommendation.

13 MR. McKENNA: Right. And when it comes to  
14 Washington there is this Federal - whatever it is -  
15 review committee that all gets a crack at it, and that  
16 takes another month or two.

17 I am sure we can streamline that.

18 MR. MACDONALD: Let's talk about that a  
19 minute. How much of that has to be done before the NPC  
20 awards a fuel load low-power physics test?

21 MR. McKENNA: That is a different story. That  
22 is a different story entirely. The policy on that - it  
23 is my knowledge - the policy on that is not, I think,  
24 cast in concrete. But my impression is, what we have  
25 been doing, we get interim findings and determinations

1 from FEMA and go on those. We have those much earlier  
2 in the game.

3           The amount of planning that is required on  
4 emergency preparedness planning, at least we used to  
5 say, had to conform to old 101, something at that level  
6 - not new 101 but old 101.

7           MR. MACDONALD: That is the licensee plan. I  
8 am talking about offsite.

9           MR. McKENNA: Like I said, interim findings  
10 and determinations. Oh, boy, San Onofre, I wish John  
11 had stayed, John could answer his questions. Maybe I  
12 will see if I can get him over here because he just went  
13 through, exactly through that with the folks out in  
14 California.

15           MR. MACDONALD: For San Onofre?

16           MR. McKENNA: And basically on offsite they  
17 were looking for a point of contact, somebody that you  
18 would contact if something did happen, and this person  
19 had the authority and sponsibility to go ahead and start  
20 taking actions. Basically, the warning system would be  
21 door-to-door. But somebody you could get a hold of  
22 quickly who could do it, and some kind of assurance that  
23 he would start acting on it.

24           Now, that is my recollection. What I would  
25 like to do on that when we get a chance, let me call

1 John and see if I can get him over here and he can go  
2 through that for you.

3 MR. MACDONALD: As I understand it, there are  
4 different licensing milestones associated with fuel load  
5 versus a full-power operating license.

6 MR. McKENNA: Right.

7 MR. MACDONALD: I mean other regards too, but  
8 certainly in this emergency plan to determine offsite  
9 preparedness, conclusion by FEMA.

10 MR. McKENNA: You are right, and I have not  
11 been through one. So, everything I have is hearsay.

12 MR. MACDONALD: As a matter of fact, it is a  
13 little unclear as to whether an exercise is required  
14 before the fuel load license.

15 MR. McKENNA: Exactly, I think you are right.  
16 As I said, I do not think there is a piece of paper that  
17 says exactly what is required. Let me take two seconds  
18 and call John to see if I can get him over here because  
19 John has been through one.

20 MR. WHEELER: All right. You want to take  
21 about three or four minutes to make a phone call?

22 MR. McKENNA: Yes.

23 MR. WHEELER: All right, fine.

24 (Discussion off the record.)

25 MR. WHEELER: Back on the record.



1           MR. McKENNA: John said that we do not need  
2 him, he can give me the story.

3           There is not a set policy because you have to  
4 apply for low power. When you apply for a low power,  
5 there has to be a hearing on that low power just  
6 addressing that issue. So, contentions will be raised  
7 concerning the low power license.

8           So, one thing that has to be addressed are  
9 those contentions. Now, the major point of it is that  
10 it is the staff's position that for a low power because  
11 of the low fission product inventory in the core at that  
12 time, that you have a lot of time to do things.

13          So, all those emergency preparedness things  
14 that are designed for prompt action do not necessarily  
15 have to be addressed at that stage because we have  
16 studies that indicate that you have 10, 15 hours before  
17 there will be a release from the time you lost coolant,  
18 a major release.

19          So, that is the way we have been looking at  
20 it. So, for California, for instance, John said that  
21 the staff was not requiring sirens, they were not  
22 requiring an exercise. In one case they did not have  
23 findings and determinations from FEMA but they were  
24 criticized by the Commission in that case.

25          MR. MACDONALD: Another case you mean, not San



1 Onofre?

2 MR. McKENNA: Yes, that was another case. At  
3 San Onofre they did have interim requirements and  
4 determinations from FEMA, mainly just addressing those  
5 issues that, again, do not require prompt action.

6 When you think about it, primarily governments  
7 are already set up to deal with these kinds of things  
8 now. So, that is not a major issue. However - and this  
9 may be the toughest part - the staff has felt it  
10 appropriate to have an appraisal, onsite appraisal, to  
11 actually see what you have on site to be able to handle  
12 onsite problems.

13 So, we would have an appraisal that would take  
14 you up through to look at those items that would be  
15 required for a low power license. Now, I do not know  
16 how to define that for you at this point, but that would  
17 be the process.

18 So, you apply. There will be contentions. We  
19 will have to address the contentions at the hearing.  
20 So, that is one unknown.

21 MR. WHEELER: With regard to contentions, the  
22 prehearing conference on May 6 and 7 is for two  
23 purposes. Number one is determining the petitions'  
24 standing, and to determine what contentions will be  
25 admitted into the proceedings.

1           So, I expect at the end of that prehearing  
2   confer      to have a pretty good idea of what the  
3   emerger     redness contentions will be; that is this  
4   May 6

5           . MACDONALD: Duke, have potential  
6   interve     rs filed potential contentions?

7           MR. WHEELER: Yes. And emergency preparedness  
8   issues do appear in several of the petitions.

9           MR. MACDONALD: Rocky, I trust we have a copy  
10   of that.

11          MR. WHEELER: Tom, where in the sequencing of  
12   things should the onsite appraisal appear, between what  
13   and what?

14          MR. McKENNA: It sounds to me like if they  
15   want a low power that the appraisal will have to take  
16   place before that. But I am looking at Nemen since the  
17   appraisals are a regional responsibility. My guess is  
18   that when you start getting close --

19          MR. TERC: What dates are we talking about?

20          MR. McKENNA: I don't know.

21          MR. WHEELER: October '83, I believe, is the  
22   date scheduled for the licensing Board initial decision.

23          MR. McKENNA: Then you work back. You don't  
24   want to have a Salem. We had the appraisal about a week  
25   or two before they wanted the license - I don't know

1 what it was - and then they hired 60 guys who put up a  
2 tent and started working on revising the emergency plan  
3 to correct that.

4 So, give yourself time to get things fixed..

5 MR. MACDONALD: That's right, that is what we  
6 are trying to do.

7 MR. McKENNA: Right. So, I think what it is,  
8 as soon as you are ready, what you do is, you tell us  
9 when you want the appraisal.

10 MR. MACDONALD: All right.

11 MR. McKENNA: Now, realizing that you might  
12 want a low power, so you might want to do it as early as  
13 you can. But if you go too arly and find a lot of  
14 stuff, you know, you are going to have to balance it.

15 MR. TERC: In the next meeting, whenever we go  
16 with this issue, if you will like to hear some hint as  
17 to how to go about doing it right from the beginning, if  
18 you have not done it maybe we can talk about it.

19 MR. WHEELER: All right.

20 MR. TERC: Where the emphasis should be.

21 MR. McKENNA: You mean on preparing for the  
22 appraisal?

23 MR. TERC: On preparing for the appraisal.

24 MR. McKENNA: Right.

25 MR. WHEELER: I will make a note of that as

1 one item to be covered at a future meeting.

2 MR. TERC: That's right.

3 MR. MACDONALD: Why is that? That is not  
4 allowed here?

5 MR. WHEELER: We don't want to get into the  
6 details of the onsite appraisal, what it is going to  
7 involve, what is required, and this sort of thing.  
8 Right now, for this discussion, I would just like to get  
9 into determining when, at least a time frame for having  
10 the onsite appraisal.

11 If there are some things that you want to  
12 discuss regarding the onsite appraisal, at least tell us  
13 now what those things are and we will make sure they get  
14 put into the agenda for the next meeting.

15 MR. MACDONALD: Well, the only item we had in  
16 regard to NRC appraisals was what the plan was for  
17 conducting an appraisal at Seabrook. Was there indeed  
18 going to be an appraisal before either a full power  
19 operating license or a low power testing license.

20 MR. McKENNA: I would say the answer is yes to  
21 both - although, talking to John you probably, if you go  
22 for a low power, you probably will end up getting two  
23 appraisals. You will probably get the original  
24 appraisal for the low power and then it sounds like  
25 maybe later on we will come back and fill in the gaps

1 that were left on that appraisal. You might get two.

2 I am just guessing, I do not know.

3 MR. ROBINSON: This would mean, then, we have  
4 this low power appraisal prior to October '83?

5 MR. WHEELER: Yes.

6 MR. McKENNA: My guess is, just thinking about  
7 it, the region always goes back to check deficiencies.

8 MR. TERC: I don't see why they need two  
9 appraisals.

10 MR. McKENNA: You get one appraisal, and then  
11 in another visit to check the things for close-out.

12 MR. TERC: The follow-up, yes.

13 MR. McKENNA: And the question that will be  
14 raised by the first appraisal is, are the deficiencies  
15 identified sufficient enough to prevent a low power  
16 license. If the answer is yes, then it will prevent a  
17 low power license. If it is not, then those can be  
18 fixed when the region goes back to check. That is  
19 probably the way.

20 MR. WHEELER: Tom, would two months before the  
21 Licensing Board initial decision, would that give us  
22 adequate time for the onsite appraisal?

23 MR. TERC: In order for them to get the report  
24 and to work on the items, I don't know how much time  
25 they want to give it. But you should think of times of

1 at last six weeks, four to six weeks, from the time we  
2 have an appraisal onsite and we issue the report.

3 MR. MACDONALD: That sounds rather optimistic.

4 MR. TERC: That's correct.

5 MR. WHEELER: Then I would say, to allow for  
6 scheduling uncertainties, he says four to six weeks.

7 Let's tentatively schedule eight weeks, let's say about  
8 two months prior to the Licensing Board initial decision.

9 MR. TERC: That would be best, yes.

10 MR. MACDONALD: That is just to get the report  
11 to us.

12 MR. McKENNA: Then you have to fix the stuff.

13 MR. TERC: They have to work on it.

14 MR. MACDONALD: And reply to you.

15 MR. TERC: The findings on the appraisal would  
16 depend on the amount of work, of course, that you do  
17 before the appraisal. That is what we want to talk  
18 about in another meeting in order for you to go in the  
19 right direction. I am sure that is what you want, the  
20 minimum number of findings.

21 MR. MACDONALD: Right.

22 MR. WHEELER: When does the region recommend  
23 that we actually conduct the onsite appraisal?

24 MR. TERC: I cannot answer for the region  
25 because I don't know. The appraisals that I have been



1 involved with have not been in the process of licensing.

2 MR. McKENNA: If it helps you at all - and  
3 this is totally off the cuff - this is what Region 3  
4 did. Zimmer tried to get an early appraisal, they  
5 wanted to get started. It was almost as if they wanted  
6 us to do an audit on them so they knew what they did to  
7 do. They did not want to do too much.

8 The region said, "No, we are going to come out  
9 there about a month before you think you are ready for a  
10 day and just look around. But if we don't think you are  
11 ready we are not coming. We are not going to waste our  
12 time."

13 So, I suspect that I would not be surprised if  
14 Region 1 might want to do the same thing.

15 MR. TERC: Yes.

16 MR. McKENNA: They are not going to want to  
17 come out there and waste their time with all that  
18 manpower and effort until they think you are fairly  
19 ready.

20 MR. MACDONALD: I can appreciate that. I  
21 wonder how they are going to get the feeling on whether  
22 we are ready or not.

23 MR. TERC: You tell us when you are ready.

24 MR. MACDONALD: They have a resident.

25 MR. ROBINSON: It looks like we are talking,



1 probably, four months prior to the initial decision to  
2 make sure we have time to correct any deficiencies.

3 MR. WHEELER: All right, four months before  
4 the initial decision would be June of '83. Perhaps we  
5 could schedule the 1st of June for a preliminary visit  
6 to determine the status of preparations.

7 MR. McKENNA: I don't think we want to talk  
8 for the region.

9 MR. WHEELER: No, I am just proposing.

10 MR. TERC: I would say sometime in July, but  
11 it would be subject to scheduling from the people who do  
12 the scheduling.

13 MR. WHEELER: OK, we are here to identify the  
14 best times.

15 MR. TERC: Yes, July would be a good time.

16 MR. WHEELER: Subject to approval by the  
17 region for their involvement.

18 MR. TERC: Yes, right.

19 MR. McKENNA: It would be good if we could get  
20 this, get it out to everybody and have everybody look at  
21 it.

22 MR. WHEELER: All right, we will just say  
23 mid-June for a preliminary visit, mid-July for the  
24 full-blown appraisal.

25 MR. McKENNA: Are you getting all this?

1 MR. TERC: What is a preliminary visit, what  
2 does it consist of? I have no idea.

3 MR. McKENNA: I guess what Nemen is saying, I  
4 don't think the region thinks they need that. They will  
5 just check with the resident and if they think they need  
6 to go out and look, they will go out and look.

7 MR. WHEELER: After we publish this schedule  
8 they can give us their feedback.

9 MR. McKENNA: I would just say July for the  
10 first, that is good enough.

11 MR. DODGE: How far in advance are the  
12 procedures needed, prior to the appraisal?

13 MR. TERC: Prior to the appraisal? I would  
14 say you should have your procedures in our office within  
15 three weeks before.

16 MR. DODGE: Three weeks?

17 MR. WHEELER: Call that the last week in June.

18 MR. TERC: The last week of June?

19 MR. WHEELER: Yes, we are talking about 1983.

20 MR. McKENNA: Realizing, too, that things like  
21 training will have to be completed also, for the  
22 appraisal.

23 MR. MACDONALD: Training would have to be  
24 completed at the time of the appraisal, is that what you  
25 just said?

1 MR. McKENNA: Yes, because we walk through  
2 people. At least some of it will have to be completed,  
3 correct.

4 MR. TERC: Well, the appraisal includes  
5 walk-throughs, provision of training records, as you  
6 know. You have an instruction for that.

7 MR. WHEELER: Does the governing regulation  
8 rule on this appraisal, specify what must be done in the  
9 way of training prior to the appraisal?

10 MR. TERC: I believe that if you look at the  
11 technical Instruction 25.1555 - I think it is - that  
12 outlines all the different areas that you should have,  
13 the questions that will be asked.

14 MR. MACDONALD: Well, this is a different  
15 animal, an appraisal of a new operating plant with a new  
16 set of procedures and a new training program, etc. I am  
17 just wondering what kind of guidance exists within the  
18 NRC for conducting the appraisal for an animal like that.

19 MR. TERC: You are right, that is a different  
20 animal. I cannot talk in terms of operating plants.

21 MR. MACDONALD: An appraisal plan would be  
22 provided on it. We know what the appraisal consists of  
23 there.

24 MR. McKENNA: I know on other sites we have  
25 been using essentially the same document, there has not

1 been any change there. But I think the question that  
2 might be raised here is because with a plant that is  
3 going to be coming up you are going to be doing training  
4 right up to the last minute.

5           How are those types of things going to be  
6 accomodated by the appraisal team? That sounds like an  
7 issue for, maybe, the next meeting because Nemen can get  
8 back to his management and find out. That is a good  
9 question.

10           That is right, you will be doing stuff right  
11 up to the last minute.

12           MR. TERC: What did you say, you would need  
13 July, August, September to do the training?

14           MR. McKENNA: Well, see, they will be training  
15 right up to the last minute, hopefully, so that at the  
16 point they start operation everything will be complete  
17 and they will be ready to go.

18           I think the issue is, it is not very  
19 appropriate to have them have all their training  
20 completed four months in advance, five months in advance.

21           MR. MACDONALD: Really, the training is  
22 dictated by the timing required for an exercise to be  
23 conducted.

24           MR. McKENNA: That will be another issue,  
25 right.

1 MR. MACDONALD: So, if indeed we are required  
2 to have an exercise prior to fuel load, then the  
3 training program is going to be scheduled to support  
4 that.

5 MR. TERC: Yes.

6 MR. MACDONALD: We will be holding off an an  
7 exercise to the time frame between fuel load and full  
8 power operating license which might be what, six months?

9 MR. McKENNA: John told me - Sears - that they  
10 did not require an exercise at the California plant  
11 before low power. So, right.

12 But still, there will be a certain amount of  
13 training we will have to check. There is no question  
14 about that.

15 MR. ROBINSON: Maybes a subject for this next  
16 discussion is identification of the issues that the area  
17 region will be looking at for this low power license.  
18 It might be that the training of the HP Department and  
19 the operators might not include all the offsite dose  
20 assessment and the rest of it. We can identify the  
21 specific issues.

22 MR. TERC: How long will you have that low  
23 power license? Do they go into a high power license  
24 afterwards in a few months?

25 MR. WHEELER: Yes. Now, a low power license

1 is just based on the Licensing Board's initial  
2 decision. The full power license requires, of course,  
3 Commission approval. Our record to date with low power  
4 licenses has been that it says generally some small  
5 number of months between the two. It will be driven in  
6 large part by the applicant's schedule.

7           The issuance of licenses will be timed, among  
8 other things, to ensure that there is no delay in  
9 loading the fuel and ultimately going commercial which,  
10 I think, is now scheduled for February '84.

11           MR. ROBINSON: It is my understanding that the  
12 low power is going to be tied to five percent, exceeding  
13 five percent power?

14           MR. WHEELER: The low power licenses to date  
15 have limited operations, core power, to less than five  
16 percent. The purpose of the low power license is to at  
17 least allow the loading of the fuel and some testing  
18 that can be done at less than five percent power.

19           This involves a fair amount of time, we  
20 recognize that. It allows this to take place while we  
21 are in the process of closing out those final issues  
22 that need to be closed out prior to the full power  
23 license.

24           MR. McKENNA: And from an emergency planning  
25 standpoint, I guess the most important thing to realize



1 is, Nemen, that we looked at it and it takes about 15  
2 hours at those power levels. It takes about 15 hours  
3 before you get into a core-melt type situation and you  
4 lose your systems. So, there is a big difference  
5 between that and a fully operating plant.

6           So, whatever has to be done real quickly might  
7 not have to be looked at.

8           MR. TERC: I do not know how willing the NRC  
9 is to go back within six months and do another appraisal  
10 of the same plant. We will have to compromise somewhere.

11           MR. McKENNA: Let's take a look. I will bring  
12 it up with my guys and you can bring it up with your  
13 guys and then they can get on the phone. That sounds  
14 great. I think we are making some progress.

15           Where am I? OK, I am going to continue  
16 through my little list here.

17           Acceptable findings of an onsite appraisal to  
18 establish that the applicant plant is capable of being  
19 implemented.

20           MR. WHEELER: We set July to actually conduct  
21 the onsite appraisal.

22           MR. McKENNA: Tentatively.

23           MR. WHEELER: Of course.

24           MR. McKENNA: Right.

25           MR. WHEELER: Let's say, August to September



1 for findings. Did you not say it would take about four  
2 to six weeks to produce the documents?

3 Publication of findings, September '83.

4 MR. McKENNA: And that would have to be filed  
5 by the region to ensure that the fixes have been made.  
6 I do not know typically when you do that either.

7 MR. TERC: I'm sorry.

8 MR. McKENNA: That the findings to the  
9 licensee will be followed by a visit by you folks to  
10 ensure that it has been fixed. I do not know when that  
11 is done.

12 MR. TERC: Well, the follow-ups are based on  
13 the 120 days.

14 MR. McKENNA: In this case that does not apply.

15 MR. MACDONALD: This is different.

16 MR. McKENNA: This will have to be fixed  
17 before.

18 MR. TERC: So, what I am saying is, that is  
19 usually the case in an operating plant. However, when  
20 the plant is in the process of refueling or maybe in  
21 your case of fueling, it will be before or prior to  
22 start-up - which is another way of meeting the  
23 requirements before you start up.

24 MR. MACDONALD: Well, time-frame wise we are  
25 potentially talking about the document we need for

1 permission to load fuel coming out of the NRC in October  
2 of '83.

3 MR. McKENNA: When you are talking October '83  
4 you are not talking full power license?

5 MR. MACDONALD: Loading fuel.

6 MR. McKENNA: Loading fuel. So, when do you  
7 expect to go to the Commission for full power?

8 MR. WHEELER: We tentatively have scheduled a  
9 Commission decision in November of '83.

10 MR. McKENNA: That may not be full power.

11 MR. MACDONALD: Well, is someone here familiar  
12 with what we are applying for right now? We have filed  
13 the FSAR as an application for a full power operating  
14 license.

15 MR. WHEELER: Right. You have ultimately  
16 applied for a full power license. In our licensing  
17 review we will make a determination on the full power  
18 license. The matter of a low power license is just an  
19 interim step. It is an option which we have found to  
20 make much more efficient use of our time and to  
21 substantially reduce delays at the end of the licensing  
22 process, delays attributable to regulatory  
23 considerations.

24 After the Licensing Board issues their initial  
25 decision we do go ahead before the Commission gives a

1 decision. We do go ahead and give at least a low power  
2 license. It allows you to take the fuel off the  
3 railroad car and put it into the vessel.

4 MR. MACDONALD: Yes, but you do not award that  
5 automatically.

6 MR. WHEELER: No.

7 MR. MACDONALD: Are you saying we have to  
8 apply for that?

9 MR. WHEELER: No. You come in and ask for a  
10 low power license -- correction, you come in and ask for  
11 a full power license.

12 MR. MACDONALD: Which we have done.

13 MR. WHEELER: Which you have done.

14 MR. MACDONALD: And your licensing review is  
15 proceeding on that basis.

16 MR. WHEELER: Is proceeding on that basis. If  
17 it appears that you will get a full power license based  
18 on the Licensing Board's initial decision, then at the  
19 time of the initial decision we issue a low power  
20 license to allow you to proceed with loading the fuel  
21 and doing some initial testing until such time as we  
22 complete the final hearing processes and the Commission  
23 authorizes a full power license.

24 MR. ROBINSON: You know, it almost looks like  
25 we should be looking at the October date as the full

1 power license for the purpose of getting our end of the  
2 emergency planning out of the way.

3 MR. TERC: Yes.

4 MR. ROBINSON: I hate to see us reach October  
5 and find out we have a full power license and then have  
6 to hold back because we have not completed the emergency  
7 plan.

8 MR. WHEELER: Well, I certainly don't  
9 anticipate a full power license in October. Our  
10 Commission decision is not scheduled until November.  
11 That Commission decision is required for the full power  
12 license.

13 MR. L. LANA: There might be issues that might  
14 be hanging and you might get stuck.

15 MR. WHEELER: All right, go for November as  
16 the full power license date, fine.

17 MR. McKENNA: So, these dates that are good,  
18 try to do as much as you can.

19 MR. MACDONALD: Oh, yes.

20 MR. McKENNA: I guess throughout the low power  
21 discussion, that is just confusing.

22 MR. MACDONALD: That confused us, yes. That  
23 means exercise scheduling, and plans, and FEMA review,  
24 and findings, etc., should be geared to a November '83  
25 full power operating license.

1           MR. WHEELER: Yes. That would be the  
2 conservative approach.

3           MR. TERC: In practice, also I have found that  
4 it is harder to fix emergency plans and procedures that  
5 started in the wrong direction, than to get them right  
6 from the beginning. So, I think you should aim because  
7 it is really a hassle to try to fix emergency procedures  
8 because they are all interacting with each other, after  
9 you have done them the first time.

10           So, it is better to shoot for a good set of  
11 procedures, plans and equipment and so forth.

12           MR. MACDONALD: Do it right the first time.

13           MR. TERC: Yes, do it right the first time.

14           MR. McKENNA: I think maybe we can work out  
15 some kind of way we can get a dialog going between them  
16 and the region, on-going, on this thing because you are  
17 sort of pushing two things. You are pushing the plan  
18 which is sort of us, right now; and then you are pushing  
19 the appraisal which is the region. So, I think you  
20 should keep both of us informed of what is going on.

21           I do not know quite how to do that because it  
22 has not been done in the past. But mainly, we have not  
23 been in this kind of situation before in the past,  
24 either.

25           MR. WHEELER: I see no reason why they cannot

1 prepare correspondence to the region administrator with  
2 myself as copy addressee; or for that matter, why you  
3 can't have two principal addressees, address it to the  
4 region and address it to myself.

5 MR. McKENNA: I think in this case that is  
6 appropriate - on everything, plans, anything. I think  
7 both people should get it because what the roles of  
8 people are is not clear.

9 MR. WHEELER: All right, let's do that, then.  
10 Any of your correspondence that comes to the NRC,  
11 related to emergency preparedness, address it both to  
12 the headquarters here and to the regional administrator.

13 MR. McKENNA: I am just trying to think. All  
14 right, then the last step is going to be the exercise  
15 and in fixing any deficiencies identified.

16 Now, a long time ago I sat down and thought  
17 about exercises, and FEMA's findings and input, and all  
18 that sort of thing, and came up with a little bit of a  
19 schedule.

20 I hate to speak for FEMA at this meeting. I  
21 was hoping somebody from FEMA might be here but they did  
22 not show. But as a working, talking document, let's  
23 draw up some dates, let's put them down and send them  
24 off to FEMA as part of this whole package and hopefully  
25 we can get FEMA, maybe, to discuss it at that meeting up



1 there. We will try to make them a participant in that  
2 meeting.

3 MR. WHEELER: On this you are talking about  
4 the evacuation drill?

5 MR. McKENNA: Yes, the exercise - say  
6 "exercise."

7 MR. WHEELER: Yes, I understand.

8 MR. McKENNA: Please.

9 (Laughter.)

10 MR. McKENNA: Please, say "exercise."

11 All right, let me throw out some dates that  
12 deal with offsite planning. These, I have to stress,  
13 are my dates, they are not FEMA's dates; they are not  
14 anybody else's dates. They are in there just for  
15 discussion purposes and we should transmit them to FEMA,  
16 probably, as a point for starting discussions, something  
17 like that.

18 It looks to me like the exercise has to happen  
19 in August of '83. The reason being, it will give them  
20 one month to get their findings to us. So, that gets  
21 them to us by September. That gives us a couple of  
22 months before we go down to the Commission.

23 So, I would say, FEMA's findings to us by  
24 9-83; exercise complete by 8-83. Backing off from that  
25 with the hearing scheduled for March I am sure that

1 formal testimony will have to be filed, probably, in  
2 February. With formal testimony filed in February, FEMA  
3 will need - depending on what contentions are admitted -  
4 they are going to need a certain amount of draft plans  
5 so that they can address those contentions.

6           So, my guess is, somewhere around September,  
7 the fall of this year, they are going to start needing  
8 certain planning documents from state and local  
9 governments.

10           Now, I do not want to say that they are going  
11 to need a complete set of plans, but depending on what  
12 the contentions are, some time this fall they are going  
13 to have to start getting stuff to be able to start  
14 preparing because it is going to take them a while to  
15 review it.

16           That is just the big picture the way I look at  
17 it right now. Now, it is my understanding that in  
18 discussions with FEMA -- maybe it was with you, Jim -  
19 that maybe local plans are supposed to be done about  
20 this fall.

21           MR. MACDONALD: That is true.

22           MR. McKENNA: All right, so, quick picture.

23           I also understand that we are not too sure  
24 what is going on with state planning and I am going to  
25 pursue that. I think that would be a good topic for

1 discussion up there at the meeting. We will invite FEMA  
2 and see if we can discuss scheduling of the state and  
3 local planning efforts, and these milestones I just  
4 discussed.

5 I think what we should probably do is write so  
6 that FEMA is not caught unaware, that we write them a  
7 little memo explaining what we would like at that  
8 meeting and see if they are willing to participate. I  
9 am sure they are willing but will they be ready to  
10 discuss that. If not, we might have to schedule a  
11 separate meeting. That is another topic, is this  
12 schedule I just propoed.

13 That's it. I do not know what else to say.

14 MR. WHEELER: To review the last point, then,  
15 we are saying fall, and I just arbitrarily wrote down  
16 October. The two local plans completed and submitted to  
17 NRC - or we will say local plans completed and made  
18 available to FEMA.

19 MR. MACDONALD: Yes.

20 MR. McKENNA: Made available to FEMA.

21 MR. MACDONALD: FEMA needs them.

22 MR. McKENNA: They need them, not NRC.

23 MR. MACDONALD: Not NPC at that point.

24 MR. WHEELER: All right, available to FEMA.

25 MR. McKENNA: We ultimately need them on the

1 docket, but that can be well down the road. What has to  
2 happen at the hearing stage is that there is sufficient  
3 information available for them to address the  
4 contentions. It is going to be one of these things  
5 where on one issue all we need is a draft of a plan, and  
6 the next issue we might need a draft of specific  
7 procedure. There are going to be all sorts of this kind  
8 of thing going on.

9           But there has to be enough so the testimony  
10 can be placed in the record that clearly shows that  
11 while the issue may not be resolved, it is resolvable  
12 and a course of action has been identified that will fix  
13 it in time for the licensing. Those are typically the  
14 steps involved.

15           So, it is going to be tough. As soon as we  
16 get the contentions we will probably be able to do a  
17 better job of deciding what needs to be done offsite;  
18 after that, formalizing.

19           But I would like to start talking about that  
20 with FEMA, that would be a good topic, I think.

21           MR. WHEELER: Does anybody else have any  
22 particular issues they want raised here with regard to  
23 working them into the schedule? If not, what I propose  
24 we do is take about a ten-minute break. I am going to  
25 review my notes and come out with the schedule that I

1 think we worked on here. I will write it on the  
2 blackboard here and we can all look at it and see  
3 whether or not it is what we think we have said. We may  
4 want to make some adjustments.

5 And then also come up with the list of those  
6 things that I heard we want to discuss at a future  
meeting at the site.

8 MR. McKENNA: Before we do that, if you want  
9 to make a list I think all we have had is a few of  
10 them. I think we want to talk about centers in additon.

11 MR. WHEELER: Sure. All I am saying, let's  
12 take about ten minutes and get my thoughts up on the  
13 board, and then go from there.

14 (Whereupon, at 11:15 a.m. a short recess was  
15 taken.)

16 MR. WHEELER: All right, I will read what is  
17 on the board. It represents the schedule that we have  
18 developed here.

19 First of all, for the remainder of 1982, May 6  
20 and 7, prehearing conference, which will be up at  
21 Portsmouth. The Licensing Board there will determine  
22 the emergency preparedness contentions.

23 The third week in July we get answers from the  
24 utility on all open issues and answers in the form of  
25 plan revisions.

1           In September I will publish the Safety  
2 Evaluation Report.

3           October of 1982, the local and state plans are  
4 complete and made available to FEMA.

5           In 1983, the fourth week of January, FEMA and  
6 the NRC file formal testimony in preparation for hearing.

7           In March, the hearings will begin. By the  
8 fourth week in June we will need the emergency  
9 preparedness procedures submitted to the NRC.

10          In July will be the formal onsite appraisal.  
11 August will be the exercise. In September the exercise  
12 results sent from FEMA to the NRC. And the first week  
13 in October we resolve all of the open items that are  
14 still with us, relating to the plant, the appraisal, and  
15 the exercise. And October is the Licensing Board  
16 initial decision.

17          MR. McKENNA: I see one thing we lost.

18          MR. WHEELER: All right, we will bring it up  
19 in just a minute.

20          Over there on the right side of the board are  
21 just a few extracts of my notes on things that I thought  
22 ought to be discussed at a future meeting at the site.

23          Number one is onsite appraisal, both the plans  
24 and the requirements. We did talk about the needs to  
25 delve into that further.



1           A review of the exercise dates, and scheduling  
2 of the state and local planning efforts.

3           Now, taking a look at this is a rough draft  
4 of what we are trying to produce here, what adjustments  
5 are appropriate.

6           MR. ROBINSON: We left out the NRC appraisal  
7 report. That would be some time in September, would  
8 it?

9           MR. McKENNA: I think that was that other,  
10 that one, that I had you erase.

11          MR. TERC: Also, we left out the NRC exercise  
12 results and the reports, the FEMA and NRC, two different  
13 reports.

14          MR. McKENNA: Why don't we just make it "and?"

15          MR. TERC: Yes.

16          MR. McKENNA: That was easy.

17          MR. WHEELER: Say again the right words that  
18 belong in here.

19          MR. McKENNA: Appraisal, issue appraisal  
20 report.

21          MR. WHEELER: All right, in September of '83,  
22 issue the appraisal report.

23          MR. MACDONALD: And then you have to resolve  
24 the appraisal report findings in the first week of  
25 October? I think we have to back up from that one. We

1 need more room between the issuance of the appraisal  
2 report and the resolution of deficiencies.

3 MR. WHEELER: Good point.

4 MR. ROBINSON: If we could back up a month.

5 MR. WHEELER: Tom, if we specified here the  
6 first week of September, that would give us essentially  
7 a month from the first week of September until the first  
8 week of October. Will that work, taking a look at it?

9 MR. TERC: I don't know, it depends on the  
10 number of findings that we have.

11 MR. McKENNA: They may need a lot of time.  
12 Especially, you see what happens is - let me tell you  
13 what happens. We will find a procedural problem or we  
14 will find an equipment problem. That will require a  
15 procedureal change which will require new training.  
16 That takes a long time, every shift has to be trained.

17 MR. TERC: Everything is intertwined.

18 MR. McKENNA: It takes months, sometimes. It  
19 will be chaos.

20 MR. MACDONALD: When you talk about the  
21 original time you have to talk about, you know, we have  
22 to resolve just what we are expected to do, licensing  
23 wise, with this appraisal.

24 MR. McKENNA: We expect those items to be  
25 corrected, now. The Salem experience was that they did

1 correct them in a very short period of time because they  
2 had that appraisal just before they were tring to come  
3 up. However, it was a big effort on their part and I do  
4 not think you want to go through that.

5 MR. TERC: Are we shooting for the final, for  
6 one appraisal for power, and that is it?

7 MR. McKENNA: Right.

8 MR. MACDONALD: Yes.

9 MR. McKENNA: In July.

10 MR. MACDONALD: Right.

11 MR. TERC: Then I think we should go back  
12 maybe a month on the appraisal, then. If you go back a  
13 month on the appraisal that would give them two months.

14 MR. ROBINSON: That means we get the  
15 procedures in in May?

16 MR. TERC: The first part of June, and then we  
17 issue the report in August. And the emergency  
18 procedures should be submitted to us about three weeks  
19 before the appraisal. So, that would be in May. Does  
20 everyone agree with that?

21 MR. STRICKLAND: You want to move it up to May?

22 MR. WHEELER: We will change that.

23 MR. TERC: Yes, the procedures submittal  
24 should be in May. That looks good.

25 MR. MACDONALD: No less than 180 days prior to

1 scheduled issuance of operating license. So, that may  
2 be the beginning of May for procedures. Can we consider  
3 the ASLB as the operating license?

4 MR. WHEELER: I will have to get a reading on  
5 it since we are now dealing with two different levels of  
6 licenses. Tom might be able to have an answer based on  
7 recent experience. We will wait until he gets off the  
8 phone.

9 (Discussion off the record.)

10 MR. WHEELER: We are back on the record now.

11 Tom, would you review the regulation there as  
12 it specifies 180 days? Can you tell us whether that  
13 would apply to the low power or full power license?

14 MR. McKENNA: Well, since we are treating them  
15 both the same, it is a full power license. So, we need  
16 that 180 days, yes.

17 MR. WHEELER: Not less than 180 days.

18 MR. TERC: Not less. We have more.

19 MR. McKENNA: Prior to 180 days.

20 MR. WHEELER: All right, presuming a November  
21 of December full power license, we meet that requirement  
22 coming in in May.

23 MR. MACDONALD: That is still May.

24 MR. WHEELER: Just leave it the way it is.

25 MR. McKENNA: We have even been accepting

1 draft procedures to meet that.

2 I just got some information on low power  
3 licensing, if you are interested. Do you want to  
4 digress for a second, or do you want to do it later?

5 On December 15, 1981 - and I did not even know  
6 this - in 46 FR 511.33, a proposed regulation went out  
7 on low power license and its relationship to emergency  
8 preparedness. I do not now if you have seen that. I  
9 will get it.

10 MR. MACDONALD: Yes, that was the Federal  
11 Register Notice about exercise.

12 MR. McKENNA: Exactly. You have to prove  
13 onsite capability.

14 MR. MACDONALD: That's it.

15 MR. McKENNA: All right, you know that.

16 MR. MACDONALD: It has not been acted on, has  
17 it?

18 MR. McKENNA: Well, I have just heard that it  
19 is down at the Commission and they think it is going to  
20 be acted on favorably shortly. So, like John said, what  
21 it amounts to is that you do not have to have findings  
22 on offsite at all to get a low power; no findings on  
23 offsite.

24 However, onsite does have to be demonstrated  
25 and certain interface points offsite have to be

1 demonstrated - notification, communications, police,  
2 fire, and probably some point of contact with protective  
3 action procedure, something like that. Basically in  
4 line with what we discussed. Very good.

5 MR. WHEELER: What additional adjustments are  
6 appropriate to the schedule here? Is anybody cognizant  
7 of any other issues that we are going to want to discuss  
8 at a future meeting up ther at the site?

9 We were talking earlier about taking all day  
10 for such a meeting.

11 MR. ROBINSON: Are we going to talk about  
12 facility scheduling?

13 MR. WHEELER: At the site?

14 MR. ROBINSON: I mean in conjunction with this  
15 overall schedule.

16 MR. WHEELER: We can discuss facility  
17 scheduling.

18 MR. ROBINSON: As far as when the public  
19 notification system will have to be in place and  
20 testing. Would that come within the schedule?

21 MR. McKENNA: Normally, that is done as part  
22 of the exercise.

23 MR. WHEELER: That is within the realm of this  
24 meeting, yes.

25 MR. McKENNA: Normally, that is exercise.



1 Realizing, under this change to the rule on the warning  
2 system, you are supposed to conduct a test and give us  
3 some test results that show your design standards. We  
4 are not saying it meets FEMA's or ours or anybody  
5 else's, but you go ahead and start, test it some way;  
6 describe what you did, send us the results. That is one  
7 thing you do.

8 But the warning system test traditionally is  
9 done at the time of the exercise. Now, that is an issue  
10 that I think should be discussed at this other meeting,  
11 too because that is really a FEMA issue. When is FEMA  
12 going to do that.

13 MR. ROBINSON: They are still working on a  
14 test procedure.

15 MR. McKENNA: I understand it is about ready  
16 to finally pop out. I just heard that.

17 Duke, I think one of the issues up here on the  
18 meeting is FEMA's intention on the warning system test  
19 because right now it is up -- I think for this case they  
20 are going to have to resolve it. I don't think we are  
21 going to let them slide.

22 MR. ROBINSON: I think they will have their  
23 test procedure in place prior to that time.

24 MR. McKENNA: All right, good.

25 On the other centers' appraisal. Now, I do

1 not know if you know what our intention is on the  
2 emergency centers.

3 MR. MACDONALD: I think you mentioned it.

4 MR. McKENNA: Right. We had planned to have  
5 another appraisal for centers for the operating plans.  
6 But in this case I suspect it is all the same  
7 appraisal. I cannot imagine coming out with two  
8 appraisals, do one for centers. So, the center should  
9 be up and running, come appraisal time.

10 MR. MACDONALD: However, as it stands right  
11 now you have no idea what you would appraise them.

12 MR. McKENNA: Exactly. And our review  
13 criteria an appraisal criteria, center review criterion,  
14 which is a planning. So, it is more than just the  
15 appraisal.

16 MR. WHEELER: Criteria appraisal and  
17 scheduling, when are you going to have things built.

18 MR. McKENNA: Yes, when are you going to have  
19 them built. When do we need pieces of paper to review  
20 what is our intention. I do not know the answer to any  
21 of those questions, as you know.

22 MR. ROBINSON: That may be decided sometime  
23 the next month or so?

24 MR. McKENNA: What does that say?

25 MR. WHEELER: That says construction schedule.

1           MR. McKENNA: Yes. Other issues - I am  
2 looking at your thing. You have "evacuation analysis"  
3 down here. That is ours. I can give you the status on  
4 that.

5           As they know, we were doing an independent  
6 evacuation analysis. Schedule wise I do not know when  
7 it is due out, but I know that the computer runs are  
8 being done right now. That is all I can tell you. They  
9 are physically running the codes the last few days.

10          MR. MACDONALD: What is going to happen on  
11 that, the contractor is running their code with the  
12 input of vehicles, or whatever. They are coming out  
13 with the results and does the NRC publish the report?

14          MR. McKENNA: There will be a report  
15 published, that I all I can tell you; there will be a  
16 report published. The data used was primarily data  
17 independent.

18          MR. WHEELER: If it is all right, we will just  
19 put this down as something to be discussed, perhaps, at  
20 the next meeting, the independent evacuation analysis  
21 that the NRC is performing right now.

22          MR. McKENNA: The next one, that says our  
23 request for information, categorization, clarification.  
24 Categorization, I think, we can discuss here.  
25 Clarificaton, I think, we need to discuss up there.

1 Right?

2 MR. MACDONALD: Even if it involves an RAI  
3 that strictly deals with the station procedures,  
4 equipment, personnel, organization, etc.? There are a  
5 number of those we would like clarification on that do  
6 not involve any offsite agency or authority.

7 MR. WHEELER: Frankly speaking, it is beyond  
8 the scope of this meeting. Now, categorization within  
9 what, for instance? Give us an example.

10 MR. MACDONALD: Categorization of RAIs that we  
11 have information now sufficient to answer.  
12 Categorization of RAIs that have to await offsite  
13 emergency plan agency development.

14 Another category that involves procedures and  
15 equipment development for in-plant activities.

16 A few that are answered already in the  
17 emergency plan as submitted.

18 MR. WHEELER: OK, a category that a particular  
19 RAI would drive when you would be giving us your  
20 response?

21 MR. MACDONALD: That's right.

22 MR. WHEELER: We can discuss it, as long as we  
23 stay away from the actual content of the response  
24 itself. You can identify the kind of information, but  
25 let's not get into any great discussion of whether or

1 not the information is acceptable to us.

2 MR. MACDONALD: All right.

3 MR. WHEELER: Do you need this information now?

4 MR. MACDONALD: Yes. There are a number of  
5 RAIs I would like clarification on to find out what is  
6 meant by the question, so that we know we are answering  
7 the question asked. Can we do that?

8 MR. WHEELER: Yes, you can ask clarification  
9 questions.

10 MR. MACDONALD: Well, then I get into my long  
11 list.

12 MR. DODGE: One of the things on the schedule,  
13 you are still planning to have a 20-21 meeting up at  
14 Seabrook; is that right?

15 MR. McKENNA: Yes. Hopefully the agenda is  
16 the thing on the right. You know what I would like to  
17 do also, let's try to tentatively get up a list of  
18 attendees while we are here to see if anybody can think  
19 of anybody else who we might invite. I am going to need  
20 our center guys, we are going to meet FEMA, we are going  
21 to need the lawyers.

22 MR. WHEELER: Fine. Write it all down and  
23 give it to me and when I generate the meeting notice and  
24 the agenda, I will get input from you.

25 MR. McKENNA: Great, that sounds good.

1 MR. MACDONALD: Would you need licensee legal,  
2 or is that up to us?

3 MR. McKENNA: I would.

4 MR. MACDONALD: You would recommend it.

5 Now we are at the point of RAIs. It is ten  
6 minutes to twelve, do you want to break for lunch now?

7 MR. McKENNA: How long do you think you are  
8 going to take?

9 MR. WHEELER: Yes, I was going to say, keeping  
10 in mind that all you are going to be doing is asking for  
11 clarification of what we meant when we said what we  
12 said, and looking at those that you want to cover, how  
13 long is this going to take?

14 MR. MACDONALD: I cut it down considerably.  
15 We might as well push on and find out how long it takes  
16 after we are all done.

17 MR. McKENNA: I think that is what he wants,  
18 he wants to work through. We understand.

19 MR. MACDONALD: Do you have a copy of the RAIs  
20 in front of you?

21 Well, I guess under the revised procedures  
22 here for this meeting I go to RAI 10.4 first.

23 MR. McKENNA: What is it?

24 MR. MACDONALD: The question about the plume  
25 EPZ boundary.



1           MR. McKENNA: All right, I have it. I  
2 renumbered 1 to 101, if that will help.

3           MR. MACDONALD: I have those renumberings on  
4 the margin, that is what I am going by.

5           MR. McKENNA: All right, good.

6           MR. MACDONALD: Was this a question that came  
7 from a review of our table listing of pounts in the EPZ  
8 or the figure?

9           MR. McKENNA: I think it came from the  
10 figure. I think you just used the circle, or did you?  
11 I can't remember.

12          MR. DODGE: Yes, we did.

13          MR. McKENNA: You did use a circle.

14          MR. DODGE: Ten-mile radius.

15          MR. McKENNA: I get confused sometimes. All  
16 right, the idea is, the plume EPZ boundary is supposed  
17 to be -- the demarkation of the plume EPZ boundary is  
18 supposed to be by features that can be recognized by the  
19 local population so that they know whether they are or  
20 are not in the zone, for one thing.

21                 So, when you submit you have to show us that  
22 and discuss how demography, topography, land  
23 characteristics, and that sort of thing, were taken into  
24 consideration.

25                 That can probably be done. If the map is

1 fairly clear that may answer itself. In other words, if  
2 you use access roads and jurisdictional boundaries that  
3 will be clear. If you are doing it according to  
4 topography or land characteristics, or demography, it  
5 may require a little bit of an explanation because  
6 sometimes those things are not clear. Like if you have  
7 a ravine and you are going to use a ravine, that might  
8 now show up.

9 MR. STRICKLAND: Local roads.

10 MR. McKENNA: The kind of stuff that shows up.

11 MR. STRICKLAND: Municipal boundaries?

12 MR. McKENNA: Yes.

13 MR. MACDONALD: In this case they are  
14 jurisdictional governmental boundaries. That will be  
15 even easier.

16 MR. McKENNA: That is easy.

17 MR. MACDONALD: And the determination has to  
18 be with the state.

19 MR. McKENNA: Exactly.

20 MR. McKENNA: On A 10.5, we do not understand  
21 why we are being asked for letters of agreements with  
22 any Federal agency.

23 MR. McKENNA: That is a general statement if  
24 you are relying on any support from a Federal agency,  
25 like Coast Guard. Pilgrim uses the Coast Guard for

1 offsite monitoring support.

2 MR. MACDONALD: If we are not using anyone, we  
3 do not need a letter agreement. And that is the case  
4 for a local agency as well, right?

5 MR. McKENNA: We are talking about local here,  
6 typically that is fire departments.

7 MR. TERC: Hospitals.

8 MR. McKENNA: Hospitals.

9 MR. TERC: Ambulances.

10 MR. MACDONALD: Certainly we are relying on  
11 them for support, but there are no local town agencies  
12 just because they are set up emergency plan wise.

13 MR. McKENNA: Exactly. I just want to make  
14 sure I take notes of what I am saying here -- oh, I  
15 don't need to do it.

16 MR. MACDONALD: The next one, what kind of  
17 information are you looking for, what kind of detailed  
18 information are you looking for from us in connection  
19 with 810.11?

20 MR. McKENNA: Is that specified response times?

21 MR. MACDONALD: Yes, Table B-1.

22 MR. McKENNA: I think, one, we want to know  
23 who is on shift, period. Secondly, that is the on-shift  
24 and you will have to meet the minimum on-shift manning.

25 Secondly, for offsite augmentation, what we

1 have been looking for are -- let's put it this way,  
2 there are probably a lot of different approaches on how  
3 to demonstrate compliance with that table.

4           One approach being used is to tell us where  
5 people live by emergency function and travel time and  
6 discuss notification times, so that we have some idea of  
7 their response times - supported by some sort of  
8 information on how long it does actually take to notify  
9 these people based on some sort of evac real test.

10           I would suggest that you look at the  
11 correspondence to operating plants such as Vermont.

12           MR. MACDONALD: Of course, a back-shift  
13 exercise of this nature will not be conducted for quite  
14 some time.

15           MR. McKENNA: Well, you provide us that  
16 information and then a commitment to conduct this and  
17 just figures accordingly.

18           MR. MACDONALD: On 810.50, what phase are we  
19 talking about there, emergency planning or an actual  
20 emergency response?

21           MR. McKENNA: That is 15?

22           MR. MACDONALD: Right.

23           MR. McKENNA: Let me read the question.

24 Specify who will provide corporate level interface with  
25 governmental authorities?

1 MR. MACDONALD: Right.

2 MR. McKENNA: What we are looking for here is  
3 if somebody over at the emergency response center, i.e.,  
4 one of the Commissioners, wants to talk to somebody at  
5 the highest level of corporate authority during an  
6 accident at Seabrook, who does he call. That is exactly  
7 who we are talking about.

8 So, if Palladino wants to pick up the phone,  
9 who does he call?

10 MR. MACDONALD: So, it is in connection with  
11 an actual emergency.

12 MR. McKENNA: Who could be considered the  
13 corporate level representative. It may not be the  
14 normal guy.

15 MR. MACDONALD: Is by governmental authorities  
16 only meant the NRC?

17 MR. McKENNA: No, I would not say that. I  
18 guess I could see cases where you might be talking with  
19 - depending on how big it got you might be talking with  
20 other people. You might be talking to DOE nationally,  
21 clearly. You could be talking to people like the Coast  
22 Guard.

23 But since things will be coordinated through  
24 the NRC and through FEMA, those are probably the two  
25 primary agencies we are talking about. The highest

1 levels of the NRC and FEMA, they want to talk with  
2 equivalent people at your site. Who is that?

3 MR. MACDONALD: Tom, I am a little puzzled by  
4 810.18, since our understanding is that the Federal  
5 response plan is initiated by the NRC, not us.

6 MR. McKENNA: Scratch 18, that has been  
7 resolved. Wait a minute, let me see.

8 OK, scratch the section that says, "To request  
9 assistance directly through the Federal Radiological  
10 Monitoring and Assistance plan." However, let me look.  
11 Before I say anything, let me see what the criteria says  
12 before I am letting you off on that.

13 We still want in your plan, though, a listing  
14 of what would be available, and by general category how  
15 long you expect it to be there since you know what kind  
16 of support you can expect and how fast it would be there.

17 Also, something in the plan that would  
18 indicate to the Feds if they were going to respond what  
19 is available to them to be used in their response, i.e.,  
20 is there an Air Force base nearby; is there that kind of  
21 assistance.

22 MR. MACDONALD: See, I am having a problem  
23 here. I am getting into potentially answering these  
24 RAIs in addition to clarifying them. I guess I have to  
25 hold this off until May.

1           MR. McKENNA: OK, I can explain the  
2 requirement. The requirement basically is, we want you  
3 to know - you being a little special case because you  
4 clearly know but not all licensees clearly know, and we  
5 apply the requirements to everybody equally - we want  
6 you to know what Federal support is available. Like,  
7 you know, you can have the airplane out of Brookhaven,  
8 it takes the airplane a couple of hours to get there.

9           So, it is nice to know those kinds of general  
10 things. You can have air-borne monitoring. You  
11 probably have a mobile lab, these kinds of things, it  
12 takes them so long to get here, in general. That is a  
13 simple listing.

14           Secondly, if the Feds had to go to that site,  
15 what is available locally that they could use so that if  
16 that support had to be sent we would have some idea of  
17 where to go look for places to set up - nearby airports,  
18 nearby military installations, that kind of thing.

19           We are not looking for letters of agreement or  
20 anything like that with those facilities, just a listing  
21 of what is available. That is sort of a resource for  
22 us. Now, if you want to talk about more?

23           MR. MACDONALD: I certainly would. DOE does  
24 not look at our plan at all for what is in the area.  
25 That is already well known, where we are going to go in



1 case of an accident in any of the facilities of the  
2 country.

3 MR. McKENNA: That was not my understanding.  
4 I will make myself a note on that. It is more than DOE,  
5 by the way, it is us too. So, what is available? You  
6 know, it is not just DOE.

7 MR. MACDONALD: Radiological Monitoring is.

8 MR. McKENNA: Yes, Radiological Monitoring is,  
9 all these other helpful things we will do for you.

10 MR. MACDONALD: On 810.19, can you clarify  
11 what you mean by "principal offsite governmental EOC?"  
12 Are you talking just the Massachusetts and New Hampshire  
13 State EOCs?

14 MR. McKENNA: Yes. If that is the way they  
15 operate, I don't know. We will start off with the site  
16 and then, within a few hours we are going to move to  
17 some regional EOC. You know, there will be a transfer.  
18 If they are going to do something like that, if that is  
19 what is going to happen, then the principal -- whoever  
20 the principal is.

21 MR. MACDONALD: On 810.22, what do you mean by  
22 the term "job aids?"

23 MR. McKENNA: Wait a minute, classic problem,  
24 it seems to be getting a little better. But typically  
25 the procedures developed for implementation of the EALs,

1 a list of EALs which tracks pretty close to what is in  
2 0654. When it comes time for the operators to use them  
3 they start reading, they go to the first page and start  
4 reading; then they go to the second page and say, "Oh,  
5 yes, I think that one." And then they will go, "Oh,  
6 this one too," and then it goes on, and on, and on.

7 One, it is too slow. Two, it is very  
8 confusing. Three, it just does not work. So, take a  
9 hard look at it and come up with something that works.

10 I think the key here is, go try it out because  
11 we certainly will when we show up at the site. So,  
12 whatever works. In some ways this finding comes  
13 directly out of the appraisals.

14 MR. TERC: Whatever you do, make it short.

15 MR. McKENNA: Whatever you do, make it short.

16 And a point, a real important point - and this  
17 is something everybody is doing wrong, although I get  
18 the feeling if I remember correctly, you folks have  
19 figured this one out.

20 The AELs in the procedures do not have to  
21 address every single one of those initiating conditions  
22 specifically. In other words, you can have a set of  
23 EALs for general emergency and what they are, are EALs  
24 that will get you to declare a general emergency for all  
25 the initiating conditions.

1 But if you are going to have the same set of  
2 EALs for ten different initiating conditions, you do not  
3 have to repeat them. Just one set of EALs so the  
4 operator does not have to go through and read all  
5 initiating, two or three fission product areas -- if it  
6 is the same set of EALs, get rid of all the redundancy  
7 and try to collapse it down.

8 For instance, a lot of people felt that they  
9 had to repeat them, for instance. That is not  
10 necessary. The thing is, you have a set of measurable,  
11 observable things the control room operators can use  
12 quickly with the minimum probability of making mistakes.,

13 And the key, we find this every place we go,  
14 nobody has checked them with the operators. "Has anyone  
15 ever come down to talk to you?" - "No." I don't know if  
16 corporate did this. That kind of stuff.

17 We will do that at the appraisal, we will do  
18 it several times during the appraisal. That man will  
19 probably check every shift.

20 You have had lots of experience.

21 MR. MACDONALD: On 810.28, Tom, are you  
22 referring to the emergency public information brochure  
23 that is distributed before an accident?

24 MR. McKENNA: No.

25 MR. MACDONALD: Or messages during an accident?

•

1           MR. McKENNA: Public messages during an  
2 accident. Now, that can be done through reference to  
3 the state plan if we have that. Let me say a few words  
4 about that.

5           We want some kind of reference. In addition -  
6 I know it is tough because it is an offsite planning  
7 area, but the messages have to address protective  
8 action, they just can't be the thing we see so often  
9 which is "stand by for more information."

10          MR. MACDONALD: That is not our jurisdiction.

11          MR. McKENNA: I know. I am warning you that  
12 this is a problem. OK, the next issue.

13          MR. MACDONALD: By 810.35, what do you mean by  
14 "posting information for transient population?"

15          MR. McKENNA: just that there will have to be  
16 some kinds of provisions to make available information  
17 for posting. What I am saying --

18          MR. TERC: Public beaches.

19          MR. McKENNA: Public beaches, for instance.

20          MR. MACDONALD: Posting what on public beaches?

21          MR. TERC: A sign saying, in case of a nuclear  
22 accident do this or that, or call here.

23          Transient population would not receive a  
24 brochure, for example. Your tourist population, for  
25 example, that would be at beaches and other places. You

1 would have to have devised means to provide the people  
2 with some kind of information because they will be  
3 completely ignorant, I guess because they do not live  
4 there.

5 MR. McKENNA: Now, the way we look at it,  
6 private establishments you cannot go in and twist their  
7 arms and make them nail it up. You can make it  
8 available to them.

9 MR. MACDONALD: A motel or a hotel, or  
10 something like that?

11 MR. McKENNA: Right. But public places - and  
12 this is a FEMA review item, so we are really getting out  
13 of scope. We look at that a little differently. But I  
14 would just as soon not go beyond the scope of the  
15 meeting.

16 MR. TERC: Yes.

17 MR. MACDONALD: On 810-38, what do you mean  
18 by, "and their relation with possible plant conditions  
19 during the media programs?"

20 MR. McKENNA: What we are trying to do here  
21 is, we are trying to say that the public information  
22 with the media, you should make available some sort of  
23 discussion basically of the methodology you are going to  
24 use to recommend protective actions, i.e., if you get a  
25 core melt, we are going to recommend you are going to

1 start moving people. If there is some kind of slow kind  
2 of release going on it will not be.

3           The idea is theoretically - and I say  
4 theoretically - the idea is that it will help their  
5 understanding of why certain protective actions would be  
6 recommended and why it is important that those  
7 protective actions be followed and not others.

8           MR. MACDONALD: Now, on 810.40, of course, we  
9 have the great uncertainty about the applicability of  
10 NUREG-0696.

11           MR. McKENNA: Exactly. I will check with Ed  
12 Williams and have Ed Williams at that meeting.

13           I think, to be honest with you, 41 falls under  
14 exactly that same blanket.

15           MR. MACDONALD: My question on that one was  
16 where you got it.

17           MR. McKENNA: It came out of 696.

18           MR. MACDONALD: Out of 696.

19           MR. McKENNA: Yes, the same blanket.

20           MR. MACDONALD: On 810.46 I am a little  
21 confused about the request for "habitability  
22 demonstration of the OSC." We are unaware of a  
23 habitability requirement.

24           MR. McKENNA: It is not a requirement. I  
25 think that the plan should indicate -- the idea is, you



1 should know whether it would or would not.

2 MR. TERC: Can I add something?

3 MR. McKENNA: Yes.

4 MR. TERC: You are right, there is no  
5 requirement for habitability of the OSC. However, the  
6 only thing you should look forward to is to be able to  
7 move those people to another location where they would  
8 be accessible so they can also remain. Have some kind  
9 of a scheme in the event that the OSC or the selected  
10 location for the OSC is uninhabitable. Then they should  
11 be able to move to another location because you may need  
12 the people to take corrective action, this kind of  
13 thing. That is all you need.

14 MR. McKENNA: It is not a habitability  
15 requirement, we are just trying to say that you should  
16 take a look at some of the accidents that might happen  
17 and what that would probably do to your OSC.

18 MR. ROBINSON: I think that is reasonable.

19 MR. MACDONALD: Well, are you looking at an  
20 accident analysis of the OSC for habitability?

21 MR. McKENNA: A formal accident analysis, no.  
22 You know, you take a look around, you have no pumps that  
23 are going to be shining; there is no direct shine from  
24 the containment; you do not have a charging pump sitting  
25 right down in the corner.



1 MR. MACDONALD: Review.

2 MR. McKENNA: Yes. We looked around and we  
3 think this is OK. We looked around and it looks like we  
4 can get people in and out, realizing at the time of an  
5 accident everybody is going to be running around -  
6 hopefully the survey meters and the area radiation  
7 monitors will support that.

8 But you don't want to stick it some place like  
9 you forgot there is a charging pump over there and that  
10 is going to blow you out of there right away. Give it a  
11 little thought.

12 MR. MACDONALD: Well, did you review the plan  
13 to see where it is?

14 MR. McKENNA: Where is it?

15 MR. MACDONALD: The administration building.

16 MR. McKENNA: I will look at the plan, and  
17 this may require no further information.

18 MR. TERC: What you are saying is that a  
19 location is already selected?

20 MR. MACDONALD: There is not any charging pump.

21 MR. McKENNA: You do not have one.

22 MR. MACDONALD: It is difficult to resist the  
23 temptation to answer some of these.

24 MR. McKENNA: We just have to do it.

25 MR. TERC: There is a possibility that the

1 plume may go in that direction.

2 MR. MACDONALD: There is a possibility of what?

3 MR. TERC: Of the plume going in that  
4 direction and affecting the area of the OSC. So, you  
5 want to move them to another location anyway just  
6 because of the plume itself, not because of direct  
7 radiation levels.

8 MR. MACDONALD: We will look at it.

9 MR. TERC: Yes, that is just a scheme.

10 MR. McKENNA: All right.

11 MR. MACDONALD: On 810.59, 60 and 61 I guess  
12 the question is just, what are you looking for here.

13 MR. McKENNA: On the first one, traditionally  
14 the sites that had assembly areas on site or right  
15 outside the gate or something at which they conduct  
16 monitoring and make a decision on what they are going to  
17 do from there.

18 We are saying that you should have provisions  
19 if you get into a condition, for instance, a core melt  
20 condition where you think you are going to have a big  
21 release or something, that you could send people farther  
22 away from the plant than that and have them assemble  
23 there for monitoring.

24 Now, that does not have to be much more than  
25 just that, an area they will go to and wait, and then

1 you could grab the kits or something and go out there.  
2 It could be where the state people are going to set up  
3 the monitoring location. Just some place they can go to  
4 directly without waiting for monitoring and that sort of  
5 stuff.

6 MR. MACDONALD: Well, is this evacuees,  
7 nonessential evacuees?

8 MR. McKENNA: Yes. You can go by your scheme  
9 you have now, where you do it outside the gate or  
10 something. I do not know what you have now. But under  
11 very special circumstances you should have identified  
12 the place so that the emergency planning coordinator -  
13 whoever is in charge - does not think he wants them  
14 sitting out there, then tell them all to get out.

15 They should somehow or other be able to be  
16 told how to do that. One way is, people have a bunch of  
17 pamphlets and have them stuck away. But if you ever  
18 have to, you just hand them to them and tell them to go  
19 there and wait. And, you know, don't mingle with the  
20 people until a team gets there, or something.

21 It is a place away from the plant you can go  
22 to if things get really bad. That is what that is.

23 MR. STRICKLAND: Is there any distance  
24 criteria?

25 MR. McKENNA: Just not real close. I said

1 five miles, is what I said. The area that you might  
2 require, immediate evacuation of offsite population,  
3 that is about two to five miles.

4 MR. TERC: The question is, why not send them  
5 home? If that is the case they can go home.

6 MR. McKENNA: The question I asked is, what  
7 about monitoring.

8 MR. STRICKLAND: You are assuming that we do  
9 not have the time to monitor.

10 MR. McKENNA: No, you would not want to hold  
11 them up for monitoring, just tell them to get out -  
12 monitoring, tagging, decon and all that kind of stuff can  
13 take a long time.

14 MR. STRICKLAND: These evacuee monitoring  
15 points in question 61, I take it that is the same place  
16 we are sending these people to, or is that monitoring  
17 points in this station?

18 MR. McKENNA: That is the station monitoring  
19 points.

20 MR. STRICKLAND: So, that has nothing to do  
21 with it.

22 MR. McKENNA: No, just station. This other  
23 thing is really a special case.

24 MR. STRICKLAND: Because 810-60 says, "Specify  
25 the criteria used to determine when plant evacuee

1 monitoring is required and the criteria for allowing  
2 immediate evacuation and further monitoring and  
3 decontamination offsite. Provide for monitoring at the  
4 offsite assembly areas if onsite monitoring is not  
5 possible."

6           Do we have to provide a decontamination  
7 capability based upon this question, at this offsite  
8 assembly area, or just a way of controlling the people  
9 until we can get them back in to decontamination, is  
10 what I am asking.

11           MR. McKENNA: I think that provisions to  
12 control decontamination later are OK. I think, however,  
13 some sort of provisions should be made so that you can  
14 get some kind of monitoring out there, at least to spot  
15 check to see if that would be required or not.

16           MR. STRICKLAND: I understand that.

17           MR. McKENNA: That's it. I do not expect you  
18 to have a shower some place out there.

19           This is a very special case.

20           MR. MACDONALD: All right, the next one is  
21 810.67. The implication given here is that it would  
22 have different emergency exposure guidelines for  
23 different groups.

24           MR. McKENNA: Pardon me, where?

25           MR. MACDONALD: In 810.67. That is not your

1 intent, is it?

2 MR. McKENNA: No. I think, to be honest with  
3 you, I think this is primarily a paper problem. You  
4 just have to clearly indicate -- the criteria has that  
5 list of activities. I think you just have to basically  
6 show how these categories fall within the guidelines you  
7 already established.

8 MR. TERC: Which one was that?

9 MR. MACDONALD: In 67.

10 MR. McKENNA: K-1.

11 MR. TERC: I think there is a typo here, is  
12 there not? If you look at 810.56, there is no ten to  
13 the minus.

14 MR. MACDONALD: What number are you on, Nemen?

15 MR. TERC: At 810.56, we have ten to the minus  
16 seven there.

17 MR. MACDONALD: Are you ready for the next?

18 MR. McKENNA: Yes.

19 MR. STRICKLAND: Could I hear the response  
20 again?

21 MR. MACDONALD: On 67?

22 MR. McKENNA: If you want you can either  
23 establish separate ones or you can tell me how those fit  
24 into the established criteria, the emergency exposure  
25 guidelines that are already established.



1           MR. MACDONALD: The next one is 58. What are  
2 you looking for there, are you looking for a procedure  
3 to handle that? Recognizing that the state, of course,  
4 has a big role in this kind of area. But are you only  
5 talking about --

6           MR. McKENNA: Just onsite, just onsite. It is  
7 probably a sub-part of another procedure. In the  
8 planning all you really do have to say is that, you  
9 know, this will be contained in the procedure, addressed  
10 by procedures.

11           MR. DODGE: For clarification, do you mean  
12 "contamination" control measures or "decontamination"  
13 control measures?

14           MR. McKENNA: Contamination control measures.

15           MR. TERC: Contamination control, that is  
16 something in 10 CFR 20.

17           MR. STRICKLAND: Radiation protection, what  
18 controls that even in an emergency.

19           MR. TERC: Yes.

20           MR. McKENNA: That is an interesting point.  
21 You might as well bring it up now. We say procedures in  
22 by May. We need all the procedures that might be used  
23 in an emergency. So, if you have other supporting  
24 procedures that would be crucial that we look at to be  
25 able to understand how you respond - like post accident



1 sampling procedures or if you are going to rely on your  
2 normal decon procedure, we need those too. We need the  
3 package.

4 MR. MACDONALD: Oh, on 810.84.

5 MR. McKENNA: Right, "The annual exercise  
6 should simulate."

7 MR. MACDONALD: While you recognize that the  
8 annual exercises are a big-ticket item with a lot of  
9 organizations involved, the licensee cannot commit for  
10 other agencies.

11 So, we have a little bit of difficulty saying  
12 we are going to do all that without agreement by other  
13 Federal, state and local agencies.

14 MR. TERC: Yes, but you can still make a  
15 statement saying that you have provisions as long as the  
16 others agree.

17 MR. MACDONALD: We will make the commitment  
18 subject to agreement.

19 MR. TERC: Right, contingent on agreement.

20 MR. MACDONALD: That is not much of a  
21 commitment.

22 MR. TERC: But you will be prepared.

23 MR. MACDONALD: Yes.

24 MR. TERC: That is the only thing you can do.

25 MR. MACDONALD: My last question of this

1 nature here for this meeting is 99.

2 MR. McKENNA: Oh, I love it.

3 MR. MACDONALD: Is a cross-reference still  
4 required? You have already reviewed the plan.

5 MR. McKENNA: Let me tell you this, we will  
6 not delay fuel loading for a cross-reference, I  
7 guarantee it. It certainly would be helpful to me to  
8 have that.

9 MR. TERC: It will be useful to you in order  
10 to review the emergency plan farther on.

11 MR. McKENNA: Let me say this, too, if you do  
12 not want to put it in the plan so it will have to be  
13 updated and all that sort of stuff, it certainly will be  
14 helpful if you could just provide it at some point.

15 MR. MACDONALD: Well, by 654 it is only to be  
16 provided on the initial submittal. We have already made  
17 that.

18 MR. TERC: Right.

19 MR. McKENNA: I wondered why that dropped  
20 out. I still look at it, though.

21 MR. DODGE: One more question, a generic  
22 question regarding responses. Some responses are going  
23 to be informational and are not going to yield a direct  
24 change or modification to the plan; others may yield a  
25 statement that says the plan will be amended as follows.

1           It is OK to use both?

2           MR. McKENNA: We will take a look at each one,  
3 yes. You know, some of the stuff we might want in the  
4 plan. Some of these things you think are just  
5 informational but we want them in the plan because the  
6 plan is that tie between the regulation and what you do  
7 in the field. So, some of this stuff we do want in the  
8 plan no matter what.

9           But yes, try to explain it the best you can  
10 and then we will work it out.

11          MR. DODGE: All right.

12          MR. TERC: The procedures implement the plan,  
13 so you have to have all the elements in the plan in  
14 order to implement it.

15          MR. WHEELER: If that wraps up your request  
16 for clarifications, then let's review what we have a  
17 accomplished here.

18          We have developed a schedule, and it is a  
19 tentative proposed schedule, for the emergency  
20 preparedness review from now until the completion of  
21 that review.

22          I understand that you came to this meeting  
23 desiring to discuss a few other issues outside of the  
24 scheduling considerations. We are going to set those  
25 issues aside, they have been identified. They will be

1 discussed at a meeting in the future that will be held  
2 up in the vicinity of the site.

3           We have gotten some clarification of our  
4 request for information which was sent to you at an  
5 earlier date.

6           Now, with regard to those three things, does  
7 anybody else have anything here that they wish to add to  
8 those?

9           All right, what is going to happen then is, I  
10 am going to generate a summary of this meeting and part  
11 of that will be the schedule that we developed.

12           I am also going to start working on an agenda  
13 for the next meeting that will be held up at the site  
14 sometime around the third week of May. If you have  
15 anything that you want included into that agenda, let me  
16 know, I would say, within the next several working days.

17           Now, of course those things that we identified  
18 to be discussed, the independent evacuation plan and so  
19 forth, will all be put in there.

20           If you have anything else when you get back to  
21 your offices and discuss this with your people that you  
22 want us to work into this agenda for the third week in  
23 May, let me know, as I said, within the next couple of  
24 working days.

25           Does anybody else have anything? All right,

1 the meeting is closed.

2 (Whereupon, at 12:30 p.m. the meeting in the  
3 above-entitled matter was closed.)

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NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the

in the matter of: Preliminary Discussion of Emergency Preparedness Review  
Process and Development of Schedule of Major Emergency

Preparedness Date of Proceeding: April 29, 1982  
Review

Milestones Docket Number: \_\_\_\_\_

Place of Proceeding: Bethesda, Maryland

were held as herein appears, and that this is the original transcript  
thereof for the file of the Commission.

M. E. Hansen

Official Reporter (Typed)

M. E. Hansen

Official Reporter (Signature)