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J. T. Beckham, Jr.
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June 22, 1982

U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/81-30
50-366/81-30

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

In your letter of February 17, 1982, transmitting the results of your Emergency Preparedness Appraisal (Report Nos. 50-321/81-30 and 50-366/81-30), you requested a written response addressing forty-six recommended improvement items. On April 2, 1982, we responded to your recommendations, but noted a number of items requiring additional assessment. Attached is an item-by-item discussion of these remaining items. As with our previous response, we have not included specific completion dates; however, completion, unless otherwise specified, is scheduled to support incorporation into the next full-scale exercise.

Should you have any questions concerning our response to these items, please contact this office.

Very truly yours,

J. T. Beckham, Jr.

SCE/mb

Attachment

xc: H. C. Nix, Jr.
R. F. Rogers, III

81-30-14

Recommendation

Provide shielding for the reactor building vent and main stack sampling equipment.

Response

The filter cartridges for the reactor building vent and main stack samples are equipped with quick disconnects for easy and speedy removal. Installation of shielding, while providing some protection, would make the disconnect process more awkward and time consuming. We believe the addition of shielding would provide a marginal benefit at best and perhaps result in some increase in exposure.

81-30-15

Recommendation

Establish procedures and equipment for counting high activity samples on or near the plant site.

Response

Work is currently being done at the plant to install a new post accident sampling system which will provide a means to measure primary coolant activity and containment atmosphere samples remotely. Part of this system contains a sample volume with inline radiation detectors which will give readings at a remote panel. The system also includes provisions for taking grab samples should the activity of the sample be too great for these inline detectors to measure. At the current time, however, counting other high activity samples, without prior dilution, is beyond the scope of our existing facilities. We believe special analyses or isotopic analyses of extremely high activity samples which cannot be diluted or easily shielded for counting on existing equipment are best handled in a hot cell. It is for this reason that we still feel that high activity samples will have to be sent offsite for analysis at a facility which has the capability for accurately measuring these samples.

81-30-18

Recommendation

Work facilities/resources have not been designated for corporate, contractor, and non-licensee personnel.

Response

At the present time, space in our existing Emergency Response Facilities (i.e., EOF, TSC) is not abundant. This situation will change dramatically upon completion of the final Emergency Operations Facility which will be located in the new Simulator Training Building and the new Technical Support Center which will be located in the Service Building Annex, both of which are under construction. When these new ERFs are habitable, we feel that we will have more than adequate space and resources available for the large number of personnel that can be expected during an emergency condition at the plant.

81-30-21

Recommendation

The wind direction indicator and chart recording should be aligned and torus water temperature recording should be made more readable.

Response

The fact that the wind direction indicator and chart recording are not aligned presents no problem because standard operating procedure for control room personnel at the plant dictates the use of the chart recordings only. We feel that the alignment of indicators and chart recorders is not necessary as a result of these standard operating procedures. Based upon conversations with control room personnel, we do not feel that there is difficulty in obtaining a reading of the torus water temperature. The only concern is the time it takes for the Unit 1 multipoint recorder to complete a cycle and return to the torus water temperature. The new Safety Parameter Display System (SPDS) which will be installed at the plant will provide a continuous and direct readout of the important parameters in the plant, including torus water temperature. We feel that the current method of reading the torus water temperature is appropriate until the new SPDS system is installed.

Implementation

The new SPDS system is scheduled for installation by October 1983.

81-30-27

Recommendation

The emergency, alarm, abnormal occurrence and fire protection procedures should state emergency classifications, where appropriate or make more specific references. Each procedure should also contain well defined "Immediate Action" and "Followup Action" sections.

Response

Section D of the Plant Hatch Emergency Plan will be modified to more clearly list the emergency classifications, initiating conditions, equipment status and parameter values. Following the modification to Section D, all affected procedures will be revised to reflect these changes.

Implementation

All work in this area is underway; however, a completion date has not yet been established.

81-30-30

Recommendation

There is no procedure which indicates how containment sample results would be used in dose assessment.

Response

A new calculational program for determining offsite doses has been developed, and the applicable procedure (HNP-4852) has been revised to provide the capability of entering isotopic data from containment samples into the dose calculations and to make dose projections based upon this isotopic data. Training in the new dose calculational program, and the revised procedure has been given to all personnel who would be called upon to perform these dose calculations during an emergency condition at the plant.

81-30-34

Recommendation

Delete statements in the emergency procedures that state that high-level samples will be sent to offsite vendors for analysis and implement onsite or near site capabilities.

Response

As stated in our response to Item No. 81-30-15, a new post accident sampling system will be installed at the plant. If the level of activity of these samples is too high to measure with the new system, grab samples may be obtained. In all likelihood, samples that are too "hot" to be measured by the new system may be sent offsite for analysis in a hot cell facility.

81-30-38

Recommendation

Establish proper procedures for the labeling and disposition of all post accident samples (including liquid effluent samples) and consider using preformatted data sheets when obtaining the samples.

Response

Provisions for the labeling and disposition of all post accident samples will be made through either a new procedure or through incorporation into existing procedures. Preformatted data sheets will be developed and included in the appropriate procedure(s).

81-30-39

Recommendation

Clarify the method by which reactor building vent and main stack samples are transported from the sampling area to the analysis facility and the location of shielding for these samples to be used during transport.

Response

Procedure HNP-4830 "Charcoal and Particulate Sampling of Gaseous Effluents Under Emergency Conditions" has been revised to clarify the method by which reactor building vent and main stack samples are transported from the sampling area to the analysis facility. When the sample is obtained, it is placed in shielded bucket, which is located near the sampling stations, and then lowered to the ground. We are ordering a cart and a lead pig for transporting the samples to the counting room.

81-30-41

Recommendation

The exposure criterion for aborting an attempt to obtain specific samples or readings (e.g., stack monitor reading in HNP-4850, airborne radioactivity sample in HNP-4826) should be re-evaluated to determine if a reading or sample could be obtained without exceeding the emergency exposure guideline of 3 rem.

Response

The exposure criterion for aborting an attempt to obtain specific samples or readings will be re-evaluated to determine if a reading or sample could be obtained without exceeding the emergency exposure guideline of 3 rem.

81-30-44

Recommendation

Plant Security Procedures do not make reference to the Security actions required in the Administrative and Emergency Implementing Procedures.

Response

Plant Security Procedures will be updated where appropriate to incorporate these references.