



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 17 1980

Docket No. 50-344

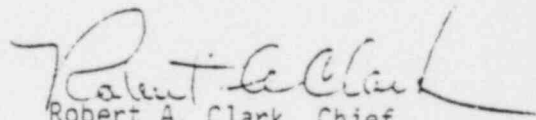
Mr. C. Goodwin, Jr.
Assistant Vice President
Thermal Plant Operations and Maintenance
Portland General Electric Company
121 S.W. Salmon Street
Portland, Oregon 97204

Dear Mr. Goodwin:

The staff has completed its review of the Trojan Radiological Emergency Plan, May 1980. As you are aware, new acceptance criteria for evaluating licensee, State and local emergency plans have been jointly developed by NRC and FEMA. These criteria are contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants". Accordingly, your emergency plan was reviewed against the provisions contained in that document. Our review identified additional information and commitments that are required before we are able to conclude that your emergency preparedness program is acceptable.

Enclosed are the staff comments generated as a result of our review and the July 28, 1980, site visit. Your emergency plan should be revised to address these comments and a revision should be submitted to us within 60 days.

Sincerely,


Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure: Staff Comments

cc w/enclosure: See next page

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Mr. Charles Goodwin, Jr.
Portland General Electric Company

cc: Mr. J. W. Durham, Esquire
Vice President and Corporate Counsel
Portland General Electric Company
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Director, Technical Assessment Division
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U. S. Environmental Protection Agency
Region X Office
ATTN: EIS COORDINATOR
1200 6th Avenue
Seattle, Washington 98101

REVIEW COMMENTS - TROJAN RADIOLOGICAL EMERGENCY PLANDocket No. 50-344

The following staff comments and requests for clarification require resolution:

Chapter 1, Overview of Manual

<u>Section</u>	<u>Page</u>	<u>Comment</u>
6.0	1:6-6	Revise to indicate that NRC inspectors are to be provided by the regional office.
10.0	1:10-1	Describe the provisions for a "designee" to assure there is a capability for 15 minutes activation of the alerting system. Restate the capabilities of the warning system in terms of design parameters.

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Comment

11.0

1:11-1

How was it assured that KEX (1190 AM) can be received (day & night throughout the plume EPZ)?

The provisions for public information must include:

1. information available for ready reference during an emergency
2. information for transients (e.g., boaters, hotels)
3. the action which parents are to take if children are at school.

Indicate when the initial public education brochure will be submitted to the NRC.

Tables 1:6-2, 3,
4,5

Provide for closeouts (written & verbal) in accordance with NUREG-0610. Provide for

<u>Section</u>	<u>Page</u>	<u>Comment</u>
		prompt (2 hours not acceptable) notification of offsite officials of unusual events.
Appendix 1-A	—	Revise to indicate that recommendation of plume protective actions beyond 10 miles may be required.
Table 1:A-1	—	<p>How will failure of containment to isolate be detected? If outside monitoring is to be performed state the criteria used to dispatch the monitoring individuals (see Comment on Section 6.2.2.1.1).</p> <p>How will release duration (long- or short-term) be determined?</p> <p>Clearly indicate that "shelter" applies to entire plume EPZ.</p> <p>Why is evacuation phase based on wind direction?</p>

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Comments

How were the shelter factors of local buildings considered?

How will evacuation time estimates be used and when will the time estimates be incorporated into the plan?

An implementation schedule for the siren system must be provided to include estimated:

1. order date,
2. delivery date,
3. installation date, and
4. test date.

Section

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Comment

Chapter 2, PGE Radiological Emergency Response Plan for the Trojan Nuclear Plant

Table 2:4.1-1,
2, 3, 4

—

What is the basis for the assumptions used in the calculation of iodine doses? How will the iodine levels be confirmed during an event? (See Comments on Section 6.2.2.1.1.)

Indicate that an emergency will be declared if a condition exists that corresponds to the NUREG-0610 class description even if an EAL has not been established for that specific condition. This could be accomplished by addressing the following NUREG-0610 example initiating conditions:

Unusual Event #15,

Alert #9, and

Site #15.

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Describe how the submitted EALs are being revised and improved and specify when they will be resubmitted to the NRC.

Describe how the EALs and their recognition will be incorporated into plant procedures.

Indicate why the Condition II and III occurrences analyzed in the FSAR are not specifically covered by the EALs.

Table 2:4.1-1

How were NUREG-0610 Unusual Event, Example Initiating Conditions 9, 11, 13 and 15 addressed?

Table 2:4.1-2

How was NUREG-0610, Alert Condition #14 addressed?

How was NUREG-0610, Site Condition #11 addressed?

<u>Section</u>	<u>Page</u>	<u>Comment</u>
		Why is 30 minutes specified for conditions 5 and 6 vs. 15 minutes as specified in NUREG 0610?
Table 2:4.1-4	—	Condition 1 - Include results of field monitoring.
5.2.2.5	2:5.2-17	Clarify who will recommend protective measures (ECC or Emergency Coordinator in TSC) once the TSC and ECC have been activated.
5.2.3(6.4.1.1)	2:5.2-24	Make provision to assure that plant evacuees will not be required to wait at the ECC for an excessive amount of time before monitoring and decontamination during the backshift.
5.3	2:5.3-1	Identify the provisions for additional health physics support.

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Page

Comment

6.2.2.1.1 Table 2:5.2-1 2:6.2-3

How will it be determined when the following personnel actions (tasks), required immediately to classify an event as part of the EALs, will be performed?

1. taking measurements outside containment,
2. determination of iodine fraction in a release,
3. taking of "grat" samples, and
4. exclusion boundary monitoring.

Assure that there are adequate qualified personnel available during the backshift to perform the above tasks in a timely manner. Revise Table 2:5.2-1 to show who will perform these tasks during the backshift.

<u>Section</u>	<u>Page</u>	<u>Comment</u>
		What assumptions will be used concerning the iodine levels if gross containment radiation levels and leak rates are used to project offsite doses.
6.2.2.1.2	2:6.2-4	Revise the method of determining meteorological parameters to represent current conditions.
6.2.2.1.2	2:6.2-5	Revise the method used, if meteorological instruments are inoperable, to be more representative of current conditions
6.2.2.1.3 & 6.2.2.1.4	2:6.2-5&7	Provide the assumptions used to develop the equations specified.
6.2.2.1.3	2:6.2-5	Revise the system outlined to estimate doses inside the exclusion area so that it will not result in overly conservative thyroid dose estimates.

<u>Section</u>	<u>Page</u>	<u>Comment</u>
6.4.1.1	2:6.4-1	Provide the capability for personnel accounting within 30 minutes of declaration of the emergency. Describe the provisions for continuing accountability.
6.4.1.2	2:6.4-1	Provide for evacuation of nonessential personnel from exclusion area upon declaration of a "site" or "general" emergency.
6.4.1.2	2:6.4-3	Provisions to direct evacuees to offsite monitoring points (if necessary) must be provided.
6.5.1	2:6.5-1	Clarify how the total dose received by plant personnel and non-plant personnel will be recorded.
6.5.2	2:6.5.3	The second complete sentence at the top of this page indicates that five actions

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Comment

will be taken by the Radiation Protection Emergency Team. With respect to action Nos. 2 and 3, how can the Team request the team to survey the patient or direct the team to decontaminate?

7.1.3

2:7.1-2

At the top of this page it states that during the time required to set up the alternate ECC, the Manager, Operations and Maintenance, assumes the role of Emergency Coordinator. The effect of this requirement is not clear because both the Plant General Manager, who is usually the Emergency Coordinator, and the Manager, Operations and Maintenance, are suppose to be in the Technical Support Center. The intent of this requirement appears to be no longer necessary because of the establishment of the Technical Support Center. However, there will be a need to

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Comment

temporarily transfer the duties and responsibilities of the ECC during the move to an alternate ECC site. The plan does not presently provide for such transfer.

7.1.5

2:7.1-2

Specify the expected travel time between the interior TSC and control room.

7.1.7

2:7.1-4

How will the ECC receive the meteorological data required to perform its functions?

7.2

—

Specify the range of the field monitoring team radios.

7.3.1.1

2:7.3-1

Where do instruments on the 33 ft. tower display?

7.3.2.2

2:7.3-7

Facilities and response times for an alternative laboratory to analyze samples containing large

<u>Section</u>	<u>Page</u>	<u>Comment</u>
		amounts of activity (primary water samples) must be specified.
Table 2:7.3-9	—	An instrument for use in very high radiation field should be assigned to the rescue team(s).
8.1.1	2:8.1-1	Describe how personnel will demonstrate the ability to perform their assigned tasks (qualification) and how it will be documented.
8.1.2	—	An annual test of the public warning system must be provided.
8.1.2.1	2:8.1-5	The radiological monitoring drill must be revised to include collection of all sample media.
Appendix A	—	The agreements with the State and local governments and Coast Guard must be revised to endorse the Plan or updated to reflect the provisions of the Plan. Specify when revised agreements and revised state and local plans will be submitted to the NRC.

<u>Section</u>	<u>Page</u>	<u>Comment</u>
Appendix C	—	Procedures do not need to be included if described and the relationship between the plan and procedure specified.
General	—	<p>The plan submitted to the NRC should <u>not</u> include specific individuals' names or phone numbers.</p> <p>Provide an updated submittal schedule for those items not contained in the May 1980 draft.</p>



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

C. Trammell

Background

September 8, 1980

Docket No. 50-344

MEMORANDUM FOR: Robert A. Clark, Chief ^{1602/8/80}
Operating Reactors Branch #3
Division of Licensing

FROM: Frank G. Pagano, Chief
Emergency Preparedness Licensing Branch

SUBJECT: TRANSMITTAL OF TROJAN QUESTIONS ON EMERGENCY PREPAREDNESS

We have completed our initial review of the May 1980 version of the Trojan Nuclear Plant Radiological Emergency Plan. The plan was reviewed against the provisions and guidance contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants". However, satisfactory responses to the attached issues must be obtained before we can make a final conclusion as to the acceptability of the plan. We suggest that a forwarding letter similar to the draft attached be used. The questions should be transmitted to the applicant in their entirety.

Should you or the applicant have any questions, please feel free to contact Mr. Tom McKenna (492-7939) of my branch.

Frank G. Pagano, Chief
Emergency Preparedness Licensing Branch

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