FG = Port and General Electric Company

June 11, 1982

Trojan Nuclear Plant Docket 50-344 License NPF-1

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Clark:

Radiological Emergency Response Staffing

In response to your letter of April 7, 1982, PGE has conducted an analysis of the NUREG-0654, Table B-1, emergency response staffing criteria by emergency function. Attachment 1 delineates times that personnel are expected to be available, including notification and travel time, and demonstrates that PGE meets the intent of NUREG-0654, criterion B.7.

The augmentation results are estimates based on interviewing plant personnel to determine travel times from various offsite locations, and assume an average notification time of fifteen minutes. Off-duty personnel are notified by telephone, with backup radio pagers for duty managers and supervisors and a "phone tree" for other personnel. Attachment 1 represents the maximum number of plant staff who could respond and does not account for those who may be unavailable due to illness, vacation, etc.

PGE will test these augmentation capabilities during one of the annual exercises which will be conducted on the backshift as described in the Trojan Radiological Emergency Plan.

Your letter also made reference to our February 19, 1982 submittal and the need to incorporate the following requirements into the Trojan Radiological Emergency Plan:

- Implementation of a training program to ensure on-shift personnel are qualified to perform short-term emergency maintenance functions.
- Establishment of a duty call list for maintenance personnel.
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Mr. Robert A. Clark June 11, 1982 Page two

These provisions will be incorporated in the next Amendment to the Trojan Radiological Emergency Plan.

In our April 15, 1981 response to Generic Letter 81-10, PGE committed to maintain two Chemistry and Radiation Protection (C&RP) technicians on-shift beginning July 1, 1982. PGE is interpreting this commitment to apply only during plant operation in Modes 1 through 4. The Trojan Technical Specifications make this same distinction for Shift Technical Advisors. In Modes 5 and 6, one C&RP technician will be on-shift.

The Trojan Plant is currently in the midst of a refueling outage, and is not expected to return to power operation until about August 1, 1982. Therefore, PGE will begin to maintain two C&RP technicians on-shift during operation in Modes 1 through 4 when the Plant resumes operation following the current outage.

Sincerely,

Bart D. Withers Vice President Nuclear

Attachment

c: Mr. Lynn Frank, Director State of Oregon Department of Energy

> Mr. R. H. Engelken Regional Administrator Nuclear Regulatory Commission Region V

ATTACHMENT 1
PGE EMERGENCY RESPONSE AUGMENTATION CAPABILITIES

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE	ON SHIFT	CAPABILITY FOR ADDITIONS 30 Min 60 Min		cense NPF-1
Plant Operations & Assessment of		Shift Supervisor (SRO)	1			lear 344 F-1
Operational Aspects		Asst. Shift Supervisor (SRO)	1			
		Control Room Operator	1			Plant
		Asst. Control Room Operator	1			n n
		Auxiliary Operator	3			
Emergency Direction & Control		Shift Supervisor	1			
(Emergency Coordinator)		Duty Plant Manager			1	
Notification/Communication	Notify Licensee, State, Local & Federal Personnel,	Security Watch Supervisor/ Security Personnel	2(c)			
	& Maintain Communication	Shift Supervisor (a)	1		1	
		Duty Manager, Plant Services (EOF Director)			1	
		EOF Communications Staff		4		
Radiological Accident Assessment & Support of Operational Accident Assessment	Emergency Operations Facility (EOF) Director	Duty Manager, Plant Services			1	
	Offsite Dose Assessment (b)	Assistant Control Operator	1			
		Engineering Emergency Team		1	2	
		Duty Radiation Protection Supervisor			1	
		EOF Dose Assessment Staff		3	3	Pat Pat
	Offsite Surveys	C&RP Technicians		14(c)	7(c)	June 1 Attach Page 1
	Onsite (Out-of-Plant)/In- Plant Surveys/Chemistry/ Radiochemistry	C&RP Technicians	2(c)	14(c)	7(c)	A. Cla 1, 1982 ment 1 of 2

CAPABILITY

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE	ON SHIFT	FOR ADDITIONS 30 Min 60 Min		
Plant System Engineering, Repair,	Technical Support	Shift Technical Advisor	1			
& Corrective Actions		Duty Manager, Technical Services			1	
		Engineering Supervisor			1	
		Engineering Emergency Team		1	3	
		Duty Maintenance Supervisor			1	
	Repair & Corrective Actions	Auxiliary Operator Maintenance Emergency Team:	1(c)	12(c)		
		Mechanical Maintenance			9(c)	
		Electrical Maintenance		4(c)	1(c)	
		I&C Maintenance		6(0)	1(c)	
Protective Actions (In-Plant)	Radiation Protection: a. Access Control b. HP Coverage for Repair, Corrective Actions, Search & Rescue First Aid, & Fire Fighting c. Personnel Monitoring d. Dosimetry	C&RP Technicians	2(c)	14(c)	7(c)	
Fire Fighting		Fire Brigade	5(c)	Local	Support	
Rescue Operations & First Aid		C&RP Technicians	2(c)	Local	Support	
Site Access Control & Personnel Accountability	Security, Fire Fighting Communications, Personnel Accountability	Security Personnel	All pe Securi Plan			

NOTES:

- (a) Security Watch Supervisor and Security personnel perform initial notifications of State and County agencies; Shift Supervisor notifies NRC and maintains communications with state and local agencies until the TSC or the EOF are activated.
- (b) Assistant Control Operator performs dose assessments until TSC is activated; Engineering Emergency Team performs dose assessments at TSC until EOF is activated; Duty Radiation Protection Supervisor performs dose assessments at the EOF.
- (c) Personnel available to perform more than one function.