

POWER AUTHORITY OF THE STATE OF NEW YORK

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July 6, 1982
JPN-82-59

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Mr. Ronald C. Haynes, Regional Administrator
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U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
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Attention: Mr. George H. Smith, Director
Division of Emergency Preparedness and
Operational Support

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Emergency Preparedness Appraisal

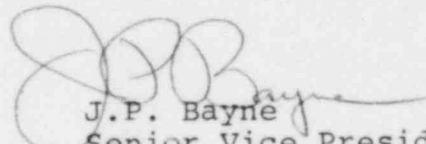
- References: 1. G.H. Smith (USNRC) to J.P. Bayne (PASNY)
dated April 28, 1982; same subject.
2. G.H. Smith (USNRC) to C.A. McNeill, Jr. (PASNY)
dated April 2, 1982; same subject.

Dear Sir:

Attached is the Authority's statement concerning those items identified in Appendix A to Emergency Preparedness Appraisal 50-333/82-03. This statement expands and clarifies the commitments and schedules agreed to during our February 25, 1982 meeting and subsequent telephone conversation. Reference 2 confirmed these discussions.

If you have any questions, please contact Mr. J.A. Gray, Jr. of my staff.

Very truly yours,


J.P. Bayne
Senior Vice President
Nuclear Generation

cc: attached

cc: Mr. J. Linville
Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 136
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Mr. Ron Barton
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Appendix A

POWER AUTHORITY OF THE STATE OF NEW YORK
JAMES A. FITZPATRICK NUCLEAR POWER PLANT

Response to
Emergency Preparedness Appraisal

50-333/82-03

Attachment to JPN-82-59

Item 1

Establish a centralized training/retraining program which assures coordination and control of all emergency preparedness training activities. Develop selection and qualifications criteria for instructors.

Response

With respect to item 1 of Appendix A of the subject document, the following has been accomplished.

FitzPatrick's indoctrination and training procedure has been revised. The revision of this procedure outlines in detail the training program and requirements for Emergency Preparedness Training. In addition, this procedure outlines the curriculum and requirements for all individuals on the Authorized Access List, off-site support agency personnel, and staff employees assuming positions in the Emergency Response Organization. Evaluation of our emergency preparedness, documentation of training, and qualification/requalification requirements are also addressed in the revision.

This revised procedure has been reviewed by both the Emergency Planning Coordinator and quality assurance personnel to ensure compliance with the references listed in Section 3.0 of the procedure, and to ensure accuracy and completeness of the procedures contents. Their comments have been incorporated.

Classroom training is presently being completed for response personnel, and along with extensive drills planned to begin in July. The Authority considers that this item has been properly addressed. With the completion of training, the Authority will consider this item closed.

Item 2

Evaluate facilities, equipment, and procedures for post-accident containment sampling and analysis to determine maximum concentrations that would be handled and analyzed under accident conditions. Provide a written report of the results of the evaluation to the NRC Region 1 Office. (By letter to Mr. Harold Denton, Director, Office of Nuclear Reactor Regulation, dated January 11, 1982, the Licensee requested an extension of time to implement post-accident sampling requirements.)

Response

Item two of Appendix A will be accomplished at James A. Fitz-Patrick nuclear power plant with the installation and operation of a new post-accident containment sampling system. Engineering and installation of this system is currently underway.

The Authority has requested an extension of the due date for the completion of this item until December 31, 1982

Item 3

Develop a plan and schedule for modifying the vent sampling and analytical system to permit collection, transport, and analysis of post-accident samples of noble gases, radioiodines and particulates using NUREG-0737 source terms as the basis.

Response

Installation of a dilution sample system with appropriate readout and annunciation has been evaluated. A system capable of meeting the intent of the NRC's criteria will be completed by October 31, 1983. This date is consistent with the integrated NUREG-0737 schedule previously submitted to you.

Item 4

Develop plans and procedures for post-accident sampling and analysis of liquids from systems known to be contaminated or normally contaminated with radioactive material. The procedures will contain guidance relating to: 1) whether the liquids can or should be transferred to other storage facilities, processed or discharged; 2) those precautions to be taken during sampling; and 3) those immediate actions required to evaluate the radiation levels of the liquids.

Response

PSP-4 (Waste Water Sampling and Analysis procedure) has been revised to include a section which provides instructions for post accident radioactive waste water sampling. In addition, RTP-31 (Reactor Water Sampling Post Accident Procedure) has been revised to include specific instructions for sampling high activity radwaste water. Since this procedure provided a method for sampling, handling and analysis of reactor water, only minor revisions are required to accomodate waste water sampling.

A section titled "Post Accident Control on Liquids" has been added to procedure OP-49 (Liquid Radioactive Waste System). This section addresses the following:

1. Special precautions for ensuring that a tank with high activity levels is not discharged.
2. How to reprocess to lower activity levels.
3. If the tank is in excess of what could conceivably be reprocessed, the recovery team will plan and make arrangements for what to do with the tank.

The Authority considers this issue resolved.

Item 5

Develop procedures for accurately detecting and measuring radioiodine concentrations of at least 10^{-7} uCi/cc in the presence of noble gases.

Response

A Revision to RTP-15 is in place that allows for detecting and measuring radioiodine concentration of 10^{-7} uCi/cc in the presence of noble gases. This procedure has been incorporated into the Emergency Plan procedure EAP 7.2 (Downwind Survey Dose Estimates), and training has begun on these changes.

Item 6

Develop unambiguous Emergency Action Levels (EALs) which provide prompt and accurate incident classification. These are to be based upon control room and plant instrumentation and actual plant conditions, and include appropriate references to the Emergency Operating Procedures and to the appropriate emergency classification scheme in the Emergency Plan. Update the Emergency Plan and implementing procedures.

Response

Procedure IAP-2 (Emergency Classification) has been extensively revised. The Emergency Action levels are now arranged in sequential format with a decision tree arrangement that allows for easy use of all the classification steps. Licensed Plant personnel have reviewed the revised EALs.

Future drills will determine system operability.

Emergency Action Levels have not been referenced in Emergency Operating Procedures. However, Emergency Operating Procedures have been referred to in IAP-2.