



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

September 10, 1982

Lawrence Brenner, Esq.
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James L. Carpenter
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Long Island Lighting Company
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322 (OL)

Dear Administrative Judges:

Enclosed is a draft copy of the Staff's confirmatory action letter which identifies the deficiencies noted by the Staff in its onsite emergency preparedness appraisal conducted at Shoreham from August 23 to September 2, 1982. The letter also identifies what actions will be needed by LILCO to correct the deficiencies. A copy of the final letter will be sent to the Board and parties next week. The full appraisal report is scheduled for October 1, 1982.

Sincerely,

A handwritten signature in cursive script that reads "Richard L. Black".

Richard L. Black
Counsel for NRC Staff

Enclosures: As stated
cc: See page two

DS07

cc: (w/enclosures)
 Matthew J. Kelly, Esq.
 Ralph Shapiro, Esq.
 Howard L. Blau, Esq.
 W. Taylor Reveley, III, Esq.
 Stephen B. Latham, Esq.
 John F. Shea, III, Esq.
 Atomic Safety and Licensing
 Board Panel
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 Hon. Peter Cohalan
 Mr. Jay Dunkleberger

DS07

OFC	:OELD	:OELD	:	:	:	:	:
NAME	:R.Black/les	:E.Reis	:	:	:	:	:
DATE	:09/10/82	:09/10/82	:	:	:	:	:

Ready for Final

~~DRAFT~~
~~Version~~
~~8/20/82~~

Docket No. 50-322
CAPL No. 82-24

Long Island Lighting Company
ATTN: ~~M. S. Pollock~~
Vice President
175 East Old Country Road
Hicksville, NY 11801

M. C. Cordaro
Vice President of Engineering

Vice President of Engineering

Gentlemen:

This refers to a meeting between Mr. W. O. Uhl, President, and other members of the Long Island Lighting Company, and Mr. ~~Nemen~~ M. Terc and other members of the NRC Emergency Preparedness (Appraisal Implementation) team, which was held at the Shoreham Nuclear Power Station on September 2, 1982, and to telephone conversations between ~~Mr.~~ M. C. Cordaro of your staff and Mr. Terc on September 9, 1982 and between ~~Mr.~~ M. C. Cordaro and Mr. G. L. Snyder on September 10, 1982. With regard to the matters discussed relating to emergency preparedness, we understand that you will undertake and complete the following actions:

I. Prior to fuel loading, you will

- 1. Administration
 - A. Assign corporate and onsite Emergency Planning Coordinators (EPCs) on a permanent basis who shall be given direct working level responsibility and authority over all aspects of the development and maintenance of the emergency preparedness program. Revise normal organization charts, position analysis descriptions, and other related documents to reflect the EPCs assignments and to describe the scope of their duties, authorities, and reporting chains.
 - B. Design, implement, and document a program to coordinate ~~on a~~ ~~continuous~~ basis emergency preparedness activities including such things as technical information exchange, training, site familiarization tours ~~between~~ the site and corporate headquarters, the general public, offsite support agencies, and the news media.

Coordination on a continuous basis is needed between

Terc/ Crocker/ Snyder/ Smith

2. Emergency Organization

A. Revise your emergency organization, and Emergency Plan to:

- (a) describe all functional areas of response and emergency tasks;
- (b) provide for all response sequences;
- (c) clarify responsibilities and inter-relationships between the various organizational elements; and
- (d) provide an organizational structure within the Operational Support Center (OSC) that will meet the demands of its emergency functions.

B. Demonstrate, after personnel involved are trained and qualified, that the augmentation of your emergency organization can be accomplished within the time-frames ~~provided in~~ *specified* NUREG-0654.

3. Facilities and Equipment

A. Complete installation and operational testing of meteorological equipment, radiation and non-radiation monitors, and ~~plant~~ *the* process computer ~~in the control room needed~~ to support emergency classification, assessment and response functions.

B. Complete installation of instrumentation in the Technical Support Center needed to provide data for ~~technical~~ support of operations.

4. ~~Backup Analytical Capabilities~~ *alternate Laboratory Facilities*

Provide *a permanent,* onsite, backup capabilities for performing chemical and radiochemical analysis, ~~on a permanent basis.~~

5. Assembly/Reassembly Areas *during emergency situations,*

Ensure that *provisions have been made at* assembly/reassembly areas ~~will allow~~ for accountability, and radiological assessment and protection on a continuous basis for personnel remaining onsite during severe accident conditions. In addition, make provisions for transportation of personnel to offsite locations suitable to protect them from inclement weather and ~~that will allow~~ radiological protection, personnel monitoring and decontamination.

for which provisions have been made for

6. Medical Treatment Facilities

~~Complete~~ Complete medical treatment facilities and provide equipment and supplies ~~as necessary~~ to ensure that such facilities will be able to perform their intended functions during emergencies.

7. Decontamination equipment

~~Place~~ Place decontamination equipment, instrumentation, supplies, and decontamination procedures in those locations where personnel would be decontaminated during ~~the various emergency scenarios,~~ ^{emergencies} and provide a ~~logical~~ method for handling a number of contaminated individuals.

8. Expanded Support Facilities

~~Specify~~ Specify facilities in the vicinity of the site which will be used for expanded support in the event of a continued large scale response to an emergency situation. Incorporate a description of such facilities in the Emergency Plan.

9. Emergency Kits and Emergency Survey Instrumentation and Equipment

~~Provide~~ Provide dedicated instruments and supplies in accordance with Procedure SP 69.062.01 and ensure that they are readily available ~~and operable~~ for emergency use. ^{Operational and}

10. Meteorological Equipment

~~Complete~~ Complete the installation and calibration of meteorological instrument readouts in the ~~various~~ Emergency Response Facilities ~~as needed~~ to perform dose assessment functions during accidents.

11. Respiratory Protection Program

~~Complete~~ Complete the respiratory protection program needed to support emergency response activities (e.g., fitting and testing of respirators); provide respiratory protection for persons expected to remain onsite during site and general emergencies; and ~~provide~~ ^{provide for the continuous availability of air} for ~~refilling~~ self contained breathing apparatus.

12. Protective Clothing

~~Provide~~ Provide protective clothing ^{at the locations necessary} to support ~~the various~~ emergency response functions consistent with the types and levels of radioactive contamination expected during ~~severe~~ accidents.

*See attached
for additional
sentence*

13. Communications Equipment

~~3.~~ Complete the installation and operational testing of communications and notifications systems described in the Emergency Plan Procedures. *In the event,*
Implementing

14. Emergency Plan ~~and~~ Implementing Procedures

A. Review Emergency Plan Implementing Procedures and make ~~appropriate~~ revisions to:

- (a) Clarify required actions, and the duties and responsibilities of personnel performing these actions;
- (b) Correct ambiguities, inconsistencies, omission^s, errors, wordy discussions, unnecessary references, lists of contents, and other extraneous materials which do not help the users to perform their duties during emergencies;
- (c) Provide specific cross-references to other procedures in the action steps ~~if~~ needed to further detail and clarify actions;
- (d) Include lines of command, communications, and information flow ~~if~~ necessary to perform emergency tasks and response actions; and
- (e) Ensure that emergency response tasks are coordinated between the appropriate elements of the emergency organization and are consistent with the organizational structure.

B. Provide Emergency Plan Implementing Procedures and other procedures needed to implement the Emergency Plan, including the following:

- (a) In-plant surveys during emergencies;
- (b) Repair and corrective actions during emergencies;
- (c) Security during emergencies;
- (d) Radiation protection during emergencies;
- (e) Drills and exercises;
- (f) Sampling and analysis of post-accident liquid wastes;
- (g) Sampling and analysis of primary coolant during accidents;

- (h) Sampling and analysis of containment air during accidents;
- (i) Sampling and analysis of stack effluents during accidents;
- (j) Calibration procedures for the above, when pertinent;
- (k) Alarm response procedures; and
- (l) Emergency operations procedures.

15. Public Information

- ~~3~~ Prepare and distribute public information material regarding the actions to be taken by individuals within the Emergency Planning Zone.

16. Training

- A. Complete the development of the training program to include the:

- (a) Designation of an individual to coordinate emergency preparedness training;
- (b) Development of written instructor qualifications;
- (c) Development of a pass/fail performance criteria for written tests used to qualify emergency personnel;
- (d) Revision of lesson plans to specify performance objectives consistent with your implementing procedures;
- (e) Development of lesson plans and training courses for: personnel monitoring/decontamination, inplant surveys, post-accident sampling, repair and corrective actions, radwaste operations, and general employee training.

RV in addition

16. Training

- B. (a) Complete training of all emergency response personnel in existing emergency related equipment and procedures. ~~prior to fuel loading.~~
- (b) Retrain ~~25%~~ ^{at least 25 percent} of all emergency response personnel in new emergency related equipment and procedures. ~~prior to fuel loading.~~ Such personnel shall be selected ~~among the various functional areas of emergency response.~~

*so as to provide
trained individuals in
all*

Long Island Lighting Company

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~~2) 5000~~
II. ~~Prior to attaining~~ power level greater than five percent

16 ~~5000~~ Complete retraining of all emergency response personnel in new emergency related equipment and procedures, ~~upon reaching 5% Power Level Generation.~~

17. Post-Accident Sampling

~~Prior to~~
Complete ~~by fuel loading, depending on availability of parts and equipment or upon reaching 5% Power Level Generation~~ the installation and assure the operability of facilities and equipment incorporating the guidance of NUREG-0737 for the following:

- (a) Sampling and analysis of post-accident primary coolant;
- (b) Sampling and analysis of post-accident containment atmosphere;
- (c) Sampling and analysis of post-accident gas and particulate effluents; and
- (d) Sampling and analysis of post-accident liquid wastes.

If our understanding of your planned actions, described above is not in accordance with the actual plans and actions being implemented, please contact Mr. H. W. Crocker of this office by telephone (215) 337-~~5008~~ within 24 hours of the receipt of this letter. 5208

In addition, if any ~~restriction~~ ^{circumstance} develops which could delay the planned completion of any of the above items, please contact Mr. Crocker at your earliest convenience.

Sincerely,

Add *Mrs. Pollock*
Vice President - Nuclear

~~Samuel H. Wayne~~ *George H. Smith*
~~Regional Administrator~~

- cc:
- J. Rivello, Plant Manager
 - J. L. Smith, Manager of Special Projects
 - Director, Power Division
 - Edward M. Barrett, Esq.
 - Jeffrey L. Futter, Esq.
 - T. F. Gerecke, Manager, QA Department
 - Public Document Room (PDR)
 - Local Public Document Room (LPDR)
 - Nuclear Safety Information Center (NSIC)
 - NRC Resident Inspector
 - State of New York

Continuation of
item 13

~~13~~
In the event that restrictions continue to be imposed by local authorities, alternative arrangements measure will be proposed by Lico and agreed to by the NRC.