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

Long Island Lighting Company
ATTN: Dr. M. C. Cordaro
Vice President of Engineering
175 East Old Country Road
Hicksville, NY 11801

Gentlemen:

This refers to a meeting between Mr. W. O. Uhl, President, and other members of the Long Island Lighting Company staff, and Mr. N. M. Terc and other members of the NRC Emergency Preparedness Implementation Appraisal team, which was held at the Shoreham Nuclear Power Station on September 2, 1982, and to telephone conversations between Dr. M. C. Cordaro, and Mr. Terc on September 9, 1982 and between Dr. 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:

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 emergency preparedness activities including such things as technical information exchange, training, and site familiarization tours. Coordination on a continuous basis is needed between the site and corporate headquarters, the general public, offsite support agencies, and the news media.

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;

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- (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 specified in NUREG-0654.

3. Facilities and Equipment

- A. Complete installation and operational testing of meteorological equipment, radiation and non-radiation monitors, and the plant process computer needed in the control room to support emergency classification, assessment and response functions.
- B. Complete installation of instrumentation in the Technical Support Center needed to provide data for support of operations.
- 4. Alternate Laboratory Facilities

Provide a permanent, onsite, back-up capability for performing chemical and radiochemical analysis during emergency situations.

5. Assembly/Reassembly Areas

Ensure that provisions have been made at assembly/reassembly areas 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 for which provisions have been made for radiological protection, personnel monitoring and decontamination.

6. Medical Treatment Facilities

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

7. Decontamination equipment

Place decontamination equipment, instrumentation, supplies, and decontamination procedures in chose locations where personnel would be decontaminated during emergencies, and provide a method for handling a number of contaminated individuals.

8. Expanded Support Facilities

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 dedicated instruments and supplies in accordance with Procedure SP 69.062.01 and ensure that they are operational and readily available for emergency use.

10. Meteorological Equipment

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

11. Respiratory Protection Program

Complete the respiratory protection program needed to support emeragency 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 for the continuous availability of air for self contained breathing apparatus.

12. Protective Clothing

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

13. Communications Equipment

Complete the installation and operational testing of communications and notifications systems described in the Emergency Plan Implementing Procedures. In the event that restrictions continue to be imposed by local authorities, an alternative measure will be proposed by LILCO and agreed to by the NRC.

- 14. Emergency Plan and Implementing Procedures
 - A Review Emergency Plan Implementing Procedures and make revisions to:
 - (a) Clarify required actions and the duties and responsibilities of personnel performing these actions;

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- (b) Correct ambiguities, inconsistencies, omissions, 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 needed to further detail and clarify actions;
- (d) Include lines of command, communications, and information flow 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
 - (1) Emergency operations procedures.

15. Public Information

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.
- B. (a) Complete training of all emergency response personnel in existing emergency related equipment and procedures.
 - (b) Retrain at least 25 percent of all emergency response personnel in new emergency related equipment and procedures. Such personnel shall be selected so as to provide trained individuals in all functional areas of emergency response.
- II. Prior to attaining a power level greater than five percent:
 - 16. Training (Continued)
 - B. (c) Complete retraining of all emergency response personnel in new emergency related eclipment and procedures.
 - 17. Post-Accident Sampling

Complete 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.

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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) 337-5208 within 24 hours of the receipt of this letter.

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

Sincerely,

Original Signed By:

George H. Smith, Director Division of Emergency Preparedness and Operational Support

CC:

W. O. Uhl, President

M. S. Pollock, Vice President - Nuclear

J. Rivello, Plant Manager

J. L. Smith, Manager of

Special Projects

Director, Power Division

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State of New York

bcc:

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