

SEP 30 1982

Docket No. 50-322

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

Gentlemen:

Subject: Emergency Preparedness Appraisal 50-322/82-18

To verify that licensees have attained an adequate state of onsite emergency preparedness, the Nuclear Regulatory Commission is conducting special appraisals at each power reactor site. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives of the appraisal at each facility are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. We use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements, but also for effecting improvements in NRC requirements and guidance.

During the period of August 23 - September 2, 1982, the NRC conducted an appraisal of the emergency preparedness program for the Shoreham Nuclear Power Station. Areas examined during this appraisal are described in the enclosed report 50-322/82-18. Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices and interviewed personnel.

The findings of this emergency preparedness appraisal indicate that certain corrective actions are required in your emergency preparedness program. These are described in Appendix A "Significant Emergency Preparedness Findings". All of these were included in the Confirmatory Action Letter to you dated September 13, 1982. Your commitment to resolve these items by specified times is also described therein. A copy of the letter is enclosed for convenience.

Other areas needing improvements are described in Appendix B, "Emergency Preparedness Improvement Items."

Appendices A and B of this letter contain an inclusive listing of all outstanding emergency preparedness items at your facility at this time.

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We recognize that an explicit regulatory requirement pertaining to each item identified in Appendices A and B may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty (30) days of the date of this letter, describing your planned actions for improving each of the items identified in Appendix A and the results of your consideration of each of the items in Appendix B. This description is to include, (1) steps which have been taken, (2) steps which will be taken, and (3) a schedule for completion of actions for each item.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

The reporting requirements contained in this letter affect fewer than ten persons and therefore are not subject to Office of Management and Budget clearance as required by PL 96-511.

You should have questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

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

Enclosures:

1. Appendix A, Significant Emergency Preparedness Findings
2. Appendix B, Emergency Preparedness Improvement Items
3. NRC Region I Inspection Report Number 50-322/82-18
4. Confirmatory Action Letter, dated September 13, 1982

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cc w/encl:

- 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)
- State of New York
- NRC Resident Inspector

bcc w/encl:

- Region I Docket Room (with concurrences)
- L. Narrow, Region I  
Chief, Operational Support Section (w/o encls)

*[Handwritten Signature]*  
 RI DEP&OS  
 Terc/cgl

9/27/82

*[Handwritten Signature]*  
 RI DEP&OS  
 Crocker  
 9/30/82

*[Handwritten Signature]*  
 SNYDER  
 9/30/82

*[Handwritten Signature]*  
 SMITH  
 9/30/82

## APPENDIX A

### SIGNIFICANT EMERGENCY PREPAREDNESS FINDINGS

Based on the results of the NRC's appraisal of the Shoreham Nuclear Power Station Emergency Preparedness Program conducted August 23 - September 2, 1982, the following improvements are required: (References are to sections in NRC Region I Inspection Report No. 50-322/82-18.)

1. 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 organizational 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. (See Section 1.1)
2. 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. (See Section 1.3)
3. 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. (See Section 2.1)
4. 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. (See Section 2.1)

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5. 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 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;
  - (f) Complete training of all emergency response personnel in existing emergency related equipment and procedures; and
  - (g) 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.
  - (h) Complete retraining of all emergency response personnel in new emergency related equipment and procedures. (See Sections 3.1 and 3.2)
6. 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. (See Sections 4.1.1.1, 4.2.1.2, and 4.2.1.3)
7. Complete installation of instrumentation in the Technical Support Center needed to provide data for support of operations. (See Section 4.1.1.2)
8. 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 (See Section 4.1.1.5);
  - (b) sampling and analysis of the post-accident containment atmosphere (See Section 4.1.1.6);

- (c) sampling and analysis of post-accident gas and particulate effluent (See Section 4.1.1.7); and
  - (d) the transfer storage, sampling and analysis of post-accident liquid wastes. (See Section 4.1.1.8)
9. Provide a permanent, onsite, back-up capability for performing chemical and radiochemical analysis during emergency situations. (See Section 4.1.1.9)
  10. Ensure that provisions have been made at assembly/reassembly areas for radiological assessment and protection of 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. (See Section 4.1.2.1)
  11. 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. (See Section 4.1.2.2)
  12. Place decontamination equipment, instrumentation, supplies, and decontamination procedures in those locations where personnel would be decontaminated during emergencies, and provide a method for handling a number of contaminated individuals. (See Section 4.1.2.3)
  13. 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. (See Section 4.1.3)
  14. 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. (See Section 4.2.1.1)
  15. Complete the installation and calibration of meteorological instrument readouts in the Emergency Response Facilities needed to perform dose assessment functions during accidents. (See Section 4.2.1.4)
  16. 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 for the continuous availability of air for self contained breathing apparatus. (See Section 4.2.2.1)



17. Provide protective clothing at the locations necessary to support emergency response functions consistent with the types and levels of radioactive contamination expected during accidents. (See Section 4.2.2.2)
18. 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. (See Section 4.2.3)
19. Review Emergency Plan Implementing Procedures and make revisions to:
  - (a) Clarify required actions and the duties and responsibilities of personnel performing these actions;
  - (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 structures. (See Section 5.1)
20. 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. (See Section 5.1)
21. Prepare and distribute public information material regarding the actions to be taken by individuals within the Emergency Planning Zone. (See Section 5.4.7)



## APPENDIX B

### EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Shoreham Nuclear Power Station Emergency Preparedness Program conducted August 23 - September 2, 1982, the following items should be considered for improvement: (References are to sections in NRC Region I Inspection Report No. 50-322/82-18).

1. Develop and implement selection and qualification criteria for personnel assigned emergency planning responsibilities. (See Section 1.4)
2. Develop a training program for individuals who are assigned emergency preparedness responsibilities which will enable them to attain and maintain a state-of-the-art knowledge in the field of emergency preparedness. (See Section 1.4)
3. Review your Emergency Plan and make appropriate revisions to specify on an annual basis retraining of all employees who received General Employee Training. (See Section 3.1)
4. Construct an overpass to facilitate commuting between the Control Room and the Technical Support Center. (See Section 4.1.1.2)
5. Provide an alternate Operations Support Center (OSC) and a scheme for moving OSC personnel in the event the primary OSC became uninhabitable. (See Section 4.1.1.3)
6. Develop and implement inspection and maintenance procedures for instruments on the 33-foot meteorological tower. (See Section 4.2.1.4)
7. Establish means for obtaining information on severe weather conditions, and for calibrating meteorological instruments on a quarterly basis. (See Section 4.2.1.4)
8. Provide NRC with the results of the study which compared and correlated measurements from the meteorological towers, and which incorporated the effects of the land sea interface in the dose assessment model. (See Section 4.2.1.4)
9. Evaluate dedicated equipment needs for damage control, corrective action and maintenance, and the positioning of this equipment at specified locations for use during an emergency. (See Section 4.2.4)

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10. Develop provisions for a periodic review cycle, a quarterly telephone number check and a controlled distribution list for the Emergency Plan; distribute controlled copies of emergency preparedness documents and ensure that the NRC, New York State and Suffolk County receive updated copies. (See Section 5.5.3)
11. Complete the schedule for auditing the emergency preparedness program. (See Section 5.5.4)