



LOUISIANA
POWER & LIGHT

142 DELARONDE STREET
P O BOX 6008 • NEW ORLEANS, LOUISIANA 70174 • (504) 366-2345

October 3, 1978

D. L. ASWELL
Vice President-Power Production

LPL 9723
3-A45

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: Waterford SES Unit No. 3
Emergency Planning

Gentlemen:

Attached for your consideration in the evaluation of the Waterford 3 FSAR, Section 13.3/Appendix F, for "mini-review" is a copy of the letter of agreement between LP&L and the State of Louisiana regarding protective actions in the event of a radiological emergency.

We received this letter too late for inclusion in the initial submittal copy of the FSAR for mini-review, but it will be included in the docketed version.

Yours very truly,

D. L. Aswell

DLA/RWP/dd

Attachment

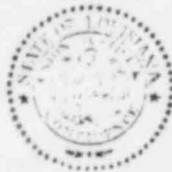
cc: W. M. Stevenson
E. Blake

LPDR

7810110115

PDR ADOCK 05-0-382 F 7810110115 B001/S/E*

State of Louisiana



R. T. SUTTON
COMMISSIONER

DEPARTMENT OF CONSERVATION
BATON ROUGE 70804

P. O. BOX 44275

September 25, 1978

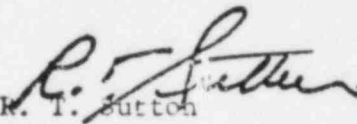
Mr. D. L. Aswell
Vice President-Power Production
Louisiana Power & Light Company
P. O. Box 6008
New Orleans, Louisiana 70174

Dear Mr. Aswell:

Enclosed is the revised Memorandum of Understanding between Louisiana Power & Light Company and the Commissioner of Conservation and the Administrator of the Nuclear Energy Division which provides for the implementation of protective actions on behalf of the general public in the event of a radiological emergency at Waterford 3.

The memorandum has been agreed to and signed by me and Mr. B. Jim Porter for inclusion in the LP&L Final Safety Analysis Report to the Nuclear Regulatory Commission.

Yours very truly,


R. T. Sutton
Commissioner

RTS/lwh

Enclosure



MEMORANDUM OF UNDERSTANDING

BETWEEN

LOUISIANA POWER & LIGHT COMPANY

AND THE

COMMISSIONER OF THE

LOUISIANA OFFICE OF CONSERVATION,

AND THE ADMINISTRATOR OF THE

NUCLEAR ENERGY DIVISION

TO PROVIDE FOR THE IMPLEMENTATION

OF PROTECTIVE ACTIONS ON BEHALF OF THE GENERAL

PUBLIC IN THE EVENT OF A RADIOLOGICAL EMERGENCY

AT WATERFORD 3

I. PURPOSE:

The purpose of this Memorandum of Understanding is to establish conditions upon which Louisiana Power & Light Company will notify the state government of Louisiana of a radiological emergency or occurrences and conditions potentially leading to an Offsite Emergency requiring consideration being given to the implementation of protective actions at any level. Proper and timely flow of information throughout the duration of any such incident, occurrences or conditions is essential in order for the Government of the State of Louisiana to discharge its obligation to maintain public health and safety by implementing a plan designated as the Louisiana Peacetime Radiological Response Plan and its Waterford 3 Annex. The same is a broad, flexible plan designated to maintain public confidence and to control exposure by any route to the population as a result of a release of radioactivity beyond the Waterford 3 exclusion area above prescribed limits.

II. DEFINITIONS:

To minimize the probability of a communications breakdown, the following definitions shall apply through out this Memorandum of Understanding:

A. Authority

The Governor, by law, is the chief executive officer of the State of Louisiana and is responsible for the safety and well-being of all citizens within the State. As part of these responsibilities, the Governor has given the Commissioner of Conservation, and the Administrator of the Nuclear Energy Division the overall responsibility for the administration, implementation, application and coordination of radiological emergency procedures in the event of a radiological incident.

B. Exclusion Area

That area as defined in 10 CFR 100.3(a) which has an Exclusion Area Boundary (EAB) of 914 meters from the Waterford 3 reactor.

C. Louisiana Peacetime Radiological Response Plan

State of Louisiana Emergency Response Plan for all radiological emergencies in the State and near its borders.

D. Louisiana Peacetime Radiological Response Plan, Waterford 3 Annex

State of Louisiana Emergency Response Plan for the implementation of protective actions in the event of a radiological emergency at Waterford 3.

E. Offsite

That area outside the exclusion area.

F. Offsite Emergency

An inadvertent release of radioactive material into the environment that, through initial information and assessment, warrants protective actions offsite.

G. Protective Actions

Those emergency measures taken after an inadvertent release of radioactive material has occurred for the purpose of preventing or minimizing radiological exposures to persons that would be likely to occur if the actions were not taken.

H. Protective Action Guide

The projected dose to population groups or individuals in the population which warrants taking protective action.

I. Radiological Emergency

A radiological emergency may be defined as an incident which results in the loss of control of radioactive materials and which involves a hazard or potential hazard to the health and safety of people or to property, or in which there has been a potential accidental exposure to people from a source of radiation such as a radiation producing machine.

J. State

The State of Louisiana.

K. Utility

Louisiana Power & Light Company.

III. AGREEMENT:

The following terms shall be binding upon the State and Utility:

- A. The Utility and State (Administrator Louisiana Nuclear Energy Division and personnel designated by him) shall cooperate at all times in developing, reviewing, modifying, and rehearsing emergency plans.
- B. The State and Utility shall participate in at least one annual coordinated training session. The utility shall be responsible for scheduling the annual training session at a time and place agreeable to both parties.
- C. The State and Utility shall participate in at least one annual coordinated drill. This drill shall, as a minimum, test the communications links of the total emergency organization. The Utility shall be responsible for scheduling the annual drill at a time agreeable to both the State and the Utility.
- D. The State and the Utility shall review emergency plans on an annual basis and submit a report of findings within 30 days thereafter to the Commissioner of the Louisiana Office of Conservation and the Vice President-Power Production, LP&L respectively.
- E. State personnel designated in the Louisiana Peacetime Radiological Response Plan, Waterford 3 Annex shall have access to the Waterford 3 Station during radiation emergencies.

The State recognizes the obligation of Utility personnel remaining in the Control Room to do all that is possible to bring an emergency under control, to obtain system status information, and the potentially stressful conditions prevailing under such circumstances.

The State personnel will therefore exercise best efforts to minimize contact with Control Room personnel, but in no way will the Utility restrict the State's right to access if necessary for the purpose of obtaining information essential for offsite response management. If necessary the Utility agrees to provide escorts for State personnel responding to an emergency that requires physical access to the plant's protected area.

- F. The Utility shall furnish the State and its supporting agencies copies of the Waterford 3 Emergency Plan and Implementing Document and amendments thereto as they are issued. The State shall furnish the Utility with copies of the State plans and amendments thereto as they are issued.
- G. It is the Utility's duty and obligation to notify the State if any one of the following conditions occur:
 - (a) Limits established by the Louisiana Peacetime Radiological Response Plan are reached or exceeded;
 - (b) An Offsite Emergency has been declared or is imminent;
 - (c) The Protective Action guides as defined in the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" - EPA 520/1-75-001, September, 1975 are reached or exceeded;
 - (d) The limits stated in Attachment I are reached or exceeded.
- H. Notification will be made by the Utility to the Louisiana Nuclear Energy Division through the 24 hour telephone number specified in the Louisiana Peacetime Radiological Response Plan, Waterford 3

Annex. In the event that the Louisiana Nuclear Energy Division can not be reached, The Louisiana State Police shall be notified by the Utility through the 24 hour telephone number specified in the Louisiana Peacetime Radiological Response Plan, Waterford 3 Annex. Message forms for initial notification to the State in the event of a radiation incident shall be developed and agreed to by the State and the Utility.

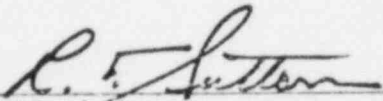
- I. The Utility shall have the right to recommend protective actions to the State Radiological Response Team Captain in the event of an Offsite Emergency. In the event that the State Radiological Response Team Captain cannot be immediately contacted, the Utility will make protective action recommendations to The St. Charles Parish Sheriff's Office and the St. John The Baptist Parish Sheriff's Office.
- J. The State and the Utility both endorse the protective action guides and protective actions developed and provided by the United States Environmental Protection Agency in the "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents" - EA 520/1-75-001, September, 1975.
- K. To maintain public confidence and to avoid public apprehension, information shall be released to the public as soon as possible in as coordinated a manner as possible. This condition in no way abridges the right of the Utility or the state to release information to the public. The

Utility and State agree to a cooperative annual review among personnel responsible for public contact and they further agree to exert their best efforts to advise each other by phone of any information release to the mass media prior to issuing such a release concerning a radiation incident. In keeping with this delineation of authority and responsibility, each party further agrees to restrict public statements to those areas for which each party is responsible.

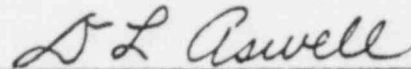
The terms of this Memorandum of Understanding shall apply to Waterford 3.

This agreement shall be effective immediately upon execution of the parties hereto:

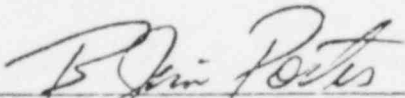
IN WITNESS WHEREOF, the parties have hereunto executed this Memorandum of Understanding, dated this 25th day of September, 1978.



Commissioner
Louisiana Office of Conservation

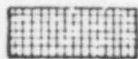


Vice President
Power Production
Louisiana Power & Light Company



Administrator
Nuclear Energy Division

RADIATION INCIDENTS			TELEPHONE & TELEGRAPH						WRITTEN			
			IMMEDIATE NOTIFICATION			24 HOUR NOTIFICATION			30 DAY NOTIFICATION			
			LP&L	NRC	LNED	LP&L	NRC	LNED	LP&L	NRC	LNED	
OVEREXPOSURE	TO WHOLE BODY IN EXCESS OF	25 REM										
		5 REM										
		MPE-10CFR20										
	TO SKIN IN EXCESS OF	150 REM										
		30 REM										
		MPE-10CFR20										
	TO THE EXTREMITIES IN EXCESS OF	375 REM										
		75 REM										
		MPE-10CFR20										
OTHER INCIDENTS	EFFLUENT RELEASE IN EXCESS OF	5000 MPC										
		500 MPC										
		10 MPC										
	PROPERTY DAMAGE	>\$100,000										
		>\$1,000										
	LOSS OF FACILITY USE FOR	ONE WORK WEEK										
ONE WORK DAY												



INDICATES NOTIFICATION IS REQUIRED TO: LP&L- LOUISIANA POWER & LIGHT COMPANY GENERAL OFFICE, OR
 NRC - NUCLEAR REGULATORY COMMISSION-REGION IV OFFICE, OR
 LNED-- LOUISIANA NUCLEAR ENERGY DIVISION.

NOTE: THE LOUISIANA NUCLEAR ENERGY DIVISION WILL BE NOTIFIED IF ANY OF THE FOLLOWING OCCUR:

- a) UNNECESSARY RADIATION EXPOSURE OF ANY INDIVIDUAL;
- b) NON-ROUTINE RELEASES OF RADIOACTIVE MATERIALS TO THE ENVIRONMENT; AND
- c) A DISCHARGE OF RADIONUCLIDES AT ALARM CONDITIONS AND/OR AUTOMATIC SHUT-OFF OF ANY RADIOACTIVE RELEASE.

MPE - MAXIMUM PERMISSIBLE EXPOSURE

MPC - MAXIMUM PERMISSIBLE CONCENTRATION