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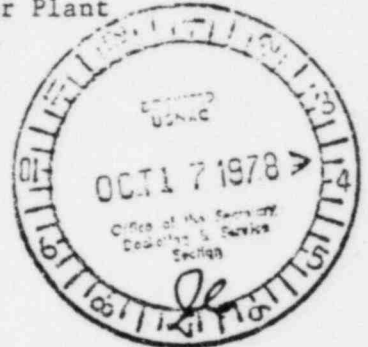
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D. J. BROEHL
ASSISTANT VICE PRESIDENT

October 11, 1978

DOCKET NUMBER
PROPOSED RULE PR-50(43FR37473) ⁽¹⁶⁾

Trojan Nuclear Plant
Docket 50-344
License NPF-1



Mr. Samuel J. Chilk
Secretary of the Commission
ATTN: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Chilk:

We at Portland General Electric Company would like to respond to your request for comments on the proposed rule change to 10 CFR Part 50, Appendix E, "Emergency Plans Production and Utilization Facilities", published in the Federal Register, Volume 43, No. 164, Page 37473-5, dated August 23, 1978. We believe 10 CFR Part 50, Appendix E, in its present form is sufficient to ensure the health and safety of the public living in the environs of a nuclear facility.

Our Radiological Emergency Response Plan for the Trojan Nuclear Plant has been in effect since April 1974. The Trojan plant is situated near the Oregon-Washington border, so our Low Population Zone (LPZ) extends into both Oregon and Washington. This requires us to have emergency response agreements and plans for the emergency assistance agencies and health care organizations in both Oregon and Washington.

We have conducted four annual drills to test our notification and response capabilities for evacuating the area within the LPZ. We have varied our scenarios, our times of conducting the drills - both normal business hours and off-hours, and the responses required by ourselves and by Federal, State, and local assistance agencies. We have demonstrated, in every drill, our ability to adequately respond to an emergency. We have retained consistent support and approval from participants and media. Extension of the area to be tested would not add anything to our Plan's proven workability. Its concept is sound and an enlargement of its scope would add nothing to that concept.

The agreements and plans of both States are already included in our Plan. The only addition of Plan development would be at the local or county level. The response capability of these additional county and local agencies, for general emergencies including wartime nuclear events, has already been assessed by the State agencies which are currently a

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part of our emergency response team for evacuation within the LPZ. PGE currently interfaces with approximately 75 State and local agencies to provide specific response capability for evacuation of the area included within the LPZ. This requires the efforts of one full-time staff member. We believe the commitment of additional manpower and funds for contacting, writing, and implementing plans for a significant number of additional local agencies would not be justified by the benefits achieved.

Present emergency response planning for nuclear power plants far exceeds that required for nonnuclear catastrophic accidents such as dam ruptures, major oil spills and explosions during toxic material manufacturing and transportation. We believe it is unwarranted to single out the nuclear industry for additional emergency response planning when they already have an unsurpassed safety record. We believe your proposed regulations should be reviewed specifically by other Federal agencies dealing with emergency planning and responses, in order to evaluate the appropriate distribution of required planning effort among real hazards to life and property. We would like to receive comments you get from these other Federal agencies, such as the Defense Civil Preparedness Agency.

The proposed rule change offers no specific guidance as to what action should be taken in planning for emergency evacuation beyond the LPZ. This leaves the scope of the response preparedness to individual agency interpretation. Also, the type of accident should be added to design features of the facility, physical and population characteristics of the land surrounding the Plant site, and acceptable protective actions developed by Federal, State, and local authorities as criteria to define any area beyond the LPZ that is to be evacuated. The maximum accident assumed should be no greater than a Design Basis Accident (DBA) for consistency with the regulations stated in 10 CFR Part 100, "Reactor Site Criteria". The likelihood of an accident occurring with greater consequences than a DBA is sufficiently low to preclude formal emergency response planning.

We strongly believe present emergency response planning is adequate, and we oppose the proposed change to 10 CFR Part 50, Appendix E.

Sincerely,

c: Defense Civil Preparedness Agency