

March 24, 1982

Mr. Ronald C. Haynes
Regional Administrator
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Re: Docket No. 50-220

Dear Mr. Haynes:

During the period of August 17-28, 1981, the NRC conducted an appraisal of the emergency preparedness program for the Nine Mile Point Nuclear Station Unit #1. Areas examined during this appraisal were documented in audit report 50-220/81-18 and transmitted to Niagara Mohawk on 2/22/82. The purpose of this letter is to provide our actions for improving the items identified in Appendix A and the results of our considerations of the items identified in Appendix B and C.

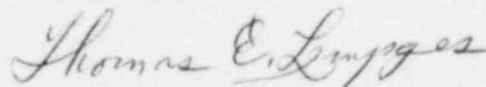
Enclosure 1 provides our assessment and/or actions to be taken for each item identified in Appendix A of report 50-220/81-18.

Enclosure 2 provides our assessment and/or actions to be taken for each item identified in Appendix B of report 50-220/81-18.

Enclosure 3 provides our assessment and/or actions which have been taken for each item identified in Appendix C of report 50-220/81-18.

Niagara Mohawk believes that the attached assessments and indicated responses to the NRC Emergency Preparedness Program Appraisal constitutes a positive and constructive reaction. Please contact me at your earliest convenience if the information does not meet with your approval. You may be assured of our continued cooperation.

Very truly yours,



Thomas E. Lempges
Vice President
Nuclear Generation

TEL/PV/jm
Attachments

ATTACHMENT 1

APPENDIX A COMMENTS

- A-1 Revise the emergency organization to provide for all the emergency functions required during initial, intermediate and final phases of augmentation; update the site Emergency Plan to describe the revised organization; and issue revised implementing procedures as necessary to be consistent with the revised organization. The updated description in the plan shall include a sufficient level of detail to: unambiguously delineate the command hierarchy; clearly specify its structure, reporting chains and inter-relationships at any phase of augmentation; and, include supervisory as well as non-supervisory elements. (See Section 2.1)

RESPONSE: In response to the confirmatory action letter of 9/8/81, Niagara Mohawk revised its emergency organization accordingly. The revision provided sufficient detail to delineate command hierarchy; provide for all the emergency functions required during initial, intermediate and final phases of augmentation; and specified reporting chains and inter-relationships at any phase of augmentation. A description of the revised emergency organization was transmitted to the Commission in a letter from T.E. Lempges to R.C. Haynes dated 10/28/81. Subsequent to this transmittal, an updated description of the emergency organization was incorporated into the Site Emergency Plan and Procedures and distributed to all official copy holders.

It is our belief that the previous referenced transmittal, coupled with the incorporation of this revised organization into our emergency plan, completes this item.

- A-2 Provide approved lists of personnel in the emergency organization segregated by individual training qualification which reflects each functional area specified within the emergency organization. These lists shall identify the current training status of each individual. Provisions to maintain the lists current shall be developed and implemented. (See Section 2.1)

RESPONSE: In response to the confirmatory action letter of 9/8/81, Niagara Mohawk provided the approved personnel lists in a letter from T.E. Lempges to R.C. Haynes dated 9/14/81. Subsequent to this transmittal, interim provisions to maintain the lists current were established between the Site Emergency Planning Coordinator and the Site Training Department. It is anticipated that these approved lists and a formal methodology for their maintenance will be incorporated into EPP-11 "Review and Revision of Site Emergency Plan and Procedures" by 6/1/82.

A-3 Develop a document to implement the Emergency Plan training program including the alignment of the training categories with the functional areas of emergency activity in the emergency organization. (See Section 3.1)

RESPONSE: The Emergency Plan training program is described and implemented through Administrative Procedure No. APN-10F. This procedure is currently being revised to align the training categories with the functional areas of emergency activity in the emergency organization. It is anticipated that this revision will be completed by May 1, 1982.

A-4 Provide training/retraining for all individuals with specific functional duties in the emergency organization to meet schedule requirements, and additional training between scheduled sessions, as needed, to update recipients on changes in emergency response (e.g. equipment, procedures). (See Section 3.1)

RESPONSE: As described in A-3, Administrative Procedure No. APN-10F describes and implements the entire Emergency Plan training program. The areas of scheduled training/retraining requirements for all individuals with specific functional duties in the emergency organization and additional training between scheduled sessions will be addressed in this procedure.

A-5 Develop a training course to cover all aspects of post-accident sampling. (See Section 3.1)

RESPONSE: A course to cover all aspects of post-accident sampling will be incorporated into the 1982 Emergency Plan Training Program. It is anticipated that this program will be completed prior to the 1982 small scale exercise tentatively scheduled for October 1982.

A-6

Complete the installation of ventilation and protective equipment to ensure the habitability of the TSC during the various accident scenarios, and rearrange communication equipment so that clustering of phones and personnel is prevented. (See Section 4.1.1.2)

RESPONSE: Modifications to complete the installation of ventilation and protective equipment to ensure habitability of the TSC are currently in progress. These modifications include the installation of communications consoles to minimize the clustering of the phones and personnel. In addition, the size of the TSC will be increased to 1600 square feet. This additional space will be used to provide more space for staff members, as well as separate office space for the five NRC TSC representatives. Furthermore, the TSC Continuous Air Monitor (CAM) was made fully operational on 11/30/81 and currently provides for the continuous assessment of airborne activity in the TSC during emergency situations.

Per our TMI action plan submittal for item III.A.1.2, Upgraded Emergency Support Facilities (letter D.P. Dize to D.G. Eisenhut, dated 6/1/81), it is anticipated that the TSC will be fully operational by October 1, 1982.

A-7

Re-evaluate interim facilities and equipment used for post-accident coolant sampling and analysis during accidents to determine maximum concentrations that could be sampled, handled and analyzed. Provide a written report of the results to the NRC Region I Office and include a schedule of any planned actions. (See Section 4.1.1.5)

RESPONSE: In response to the confirmatory action letter of 9/8/81, Niagara Mohawk re-evaluated interim facilities and equipment used for post-accident reactor water sampling and analysis. The results of this evaluation were transmitted to the Commission in a letter from T.E. Lempges to R.C. Haynes dated 10/20/81. It is our belief that this submittal completes this item.

A-8

Re-evaluate interim facilities, equipment for sampling and analysis of the drywell atmosphere, to determine maximum concentrations that could be sampled, handled and analyzed. Provide a written report of the results to the NRC Region I Office and include a schedule of any planned actions. (See Section 4.1.1.6)

RESPONSE: In response to the confirmatory action letter dated 9/8/81, Niagara Mohawk re-evaluated facilities and equipment used for post-accident drywell atmosphere sampling and analysis. The results of this evaluation were transmitted to the Commission in a letter from T.E. Lempges to R.C. Haynes dated 10/20/81. It is our belief that this submittal completes this item.

A-9 Re-evaluate facilities and equipment for sampling and analysis of noble gases, radioiodines and particulates to determine maximum concentrations that could be sampled and analyzed during accidents. Provide a written report of the results to the NRC Region I Office and include a schedule of any planned actions. (See Section 4.1.1.7)

RESPONSE: In response to the confirmatory action letter dated 9/8/81, Niagara Mohawk re-evaluated interim facilities and equipment used for post-accident sampling and analysis of effluent noble gases, radioiodines and particulates. The results of this evaluation was transmitted to the Commission in a letter from T.E. Lempges to R.C. Haynes dated 10/20/81. Subsequent to this, further clarification was requested and submitted in a letter from T.E. Lempges to R.C. Haynes dated 2/18/82. It is our belief that these submittals complete this item.

2-10 Complete the radioactive waste storage and demineralizer system to provide additional storage capacity for radioactive liquid wastes that may be generated during accidents. (See Section 4.1.1.8)

RESPONSE: Niagara Mohawk is currently in the process of completing construction of a Solidification and Waste Storage Building. It is anticipated that this building will be completed by 12/1/82. This building will provide additional storage capacity for radioactive wastes that may be generated during an accident. In addition the station has purchased a portable demineralizer system consisting of two (2) demineralizers and one (1) pre-filter. It is expected that this system would be used in conjunction with current systems to provide additional demineralizer capabilities during accident conditions.

A-11 Provide appropriate facilities and supplies needed to decontaminate the number of persons that might be expected to be contaminated during severe emergencies. (See Section 4.1.2.3)

RESPONSE: Niagara Mohawk maintains that sufficient personnel decontamination equipment and supplies were available at each of the primary assembly areas to handle the number of persons expected to be contaminated during severe emergencies.

In addition to the on-site personnel decontamination facility, additional shower facilities are located in the employee locker room immediately adjacent to the Station Health Physics Control Point. In the event large numbers of personnel became contaminated on-site, the locker room showers could be used to decontaminate these individuals. Decontamination supplies to assist in this effort would be made available from the normal decontamination facility or from the Station Storeroom. Additionally, the liquid wastes generated from these operations could be held up in the non-controlled shower's hold-up tank for analysis and final desposition.

With respect to the primary off-site assembly area, Niagara Mohawk also maintains that this facility was adequately equipped to handle expected numbers of contaminated individuals. Since the object of

this facility is to act as a holding area for non-emergency support personnel, it is not envisioned that personnel evacuating to this facility would be heavily contaminated. On the contrary, it is expected that they would have light surface contamination on clothing or vehicles as a result of their evacuating the site. Based on the foregoing assumptions, the amount of decontaminants and disposable clothing presently available at this facility should be more than adequate. In addition, sufficient amounts of strong decontaminants are also available to handle any stubborn or extensive cases of contamination that would arise. Furthermore, provisions requiring the capture of liquid wastes during decontamination are contained in EPP-15 and would be adhered to at this facility as well. Finally, should additional supplies and/or manpower be necessary to support decontamination operations, they would be obtained from the nearby James A. FitzPatrick Nuclear Power Plant per our memorandum of understanding.

Provide work facilities and resources in the vicinity of the site which would be available for corporate, contractor, and non-licensee augmentation personnel in the event of a large, prolonged response. (See Section 4.1.3)

RESPONSE: Niagara Mohawk maintains that the EOF and emergency personnel assigned to that facility will provide for these services. Section 7 of the Site Emergency Plan and Emergency Implementing Procedure 23 describe the EOF as,

"...an area whereby expanded control/recovery activities can be directed by the Corporate Emergency Director/Recovery Manager. This facility shall also serve as an operation center for corporate administrative and support personnel; reactor vendor personnel and representatives of local, state and federal agencies."

Therefore, in the event of a large, prolonged response, work facilities for corporate, contractor and non-licensee augmentation personnel would be located in the EOF. Should this facility become overcrowded or additional resources necessary, it would be the responsibility of the EOF Administrative/Logistic Manager to provide for these services.

With respect to a scheme to accomplish the recruitment of necessary personnel, the same procedures and contacts used to obtain personnel during day to day operations and outages would also be utilized during these circumstances. Should these attempts prove fruitless, the Institute of Nuclear Power Operations, the James A. FitzPatrick Nuclear Power Plant or the Robert E. Ginna Nuclear Station would be contacted for support personnel.

A-13

Provide space and install communications and other equipment in the Emergency News Center, as needed to ensure the performance of its designated functions during emergencies. (See Section 4.1.4)

RESPONSE: Subsequent to the August audit, modifications and procurements for the Emergency News Center (ENC) were expedited to resolve the issues of space, communications and audiovisual equipment. These improvements include:

- a. Relocation of city offices from the ENC wing of the building. This development leaves these offices available for use by news media personnel.
- b. Installation of a new Mitel Telephone Switch for the ENC has been completed. This switch provides more than enough telephone trunks to ensure adequate communications for utility, County, State, Federal and public media personnel.
- c. Procurement of additional audiovisual equipment for use in the ENC. This equipment has been stored at the Energy Information Center and Syracuse Corporate Headquarters for transportation to the ENC during its activation.

A-14

Provide portable instruments to measure radioiodine from cartridges in accordance with criteria set forth by NUREG-0654. (See Section 4.2.1.1)

RESPONSE: Niagara Mohawk maintains that portable instruments used to detect and measure radioiodine from cartridges in accordance with the criteria set forth in NUREG 0654 were in fact available. There was, however, a concern expressed by auditors over the detection efficiency being used for I-131 and its supporting documentation.

In response to the confirmatory action letter dated September 8, 1981, Niagara Mohawk re-evaluated our provision to detect and measure airborne radioiodine concentrations under field conditions. The results of this evaluation was transmitted to the Commission in a letter from T.E. Lempges to R.C. Haynes dated October 20, 1981. It is our belief that this submittal and related correspondence completes this item.

A-15

Rewrite Implementing Instructions for each emergency class, from the perspective of the ED to orchestrate other detailed emergency implementing procedures, so that a coherent emergency direction is made possible. (See Section 5.3)

RESPONSE: Niagara Mohawk maintains that any emergency which escalates to an Alert classification or higher (or requires an evacuation of station personnel), poses a radiological hazard and thus should be treated as a "Radiation Emergency". It was with this thought in mind

that EPP-1 "Radiation Emergency" was prepared. EPP-1 provides not only the station response to a radiological accident, but also guidance to the Emergency Director in coordinating the overall site emergency response and the issuing of protective action recommendation to offsite agencies. It performs the latter two functions in conjunction with EPP-20 "Emergency Classification and Notification". Therefore, EPP-1 and EPP-20 used collectively provide the Emergency Director with appropriate implementing instructions for any emergency classification.

Based on the above clarification, Niagara Mohawk does not see the need for developing separate emergency plan implementing procedures for each emergency classification. On the other hand, it does see the need for providing the Emergency Director with proper guidance in orchestrating other implementing procedures. To accomplish this end, EPP-1 and EPP-20 shall be revised by July 1, 1982, to provide for appropriate cross referencing to other implementing procedures to ensure coherent emergency direction.

A-16

Prepare an overall procedure which integrates the various sources of radiological assessment information to allow the RAC to make a coherent response and enable him to estimate the radiological consequences resulting from the various accidents scenarios. (See Section 5.4.2)

RESPONSE: Niagara Mohawk maintains that although no written procedure was available to guide the Radiological Assessment Coordinator (RAC), guidance had been presented and re-inforced during the 1981 Site Emergency Plan Training Program and follow up drills.

Niagara Mohawk recognizes the need for coordinating the various sources of radiological assessment information. In order to ensure an integrated, coherent response, EPP-8 "Offsite Dose Estimate" will be revised to include the evaluation and assessment of inplant as well as offsite radiological conditions. In addition, the revision will include a checklist to guide the RAC in integrating all sources of radiological assessment information. It is anticipated that this revision will be completed by July 1, 1982.

A-17

Clarify and simplify the dose assessment calculation procedure (EPP-8). (See Section 5.4.2)

RESPONSE: Niagara Mohawk believes that EPP-8 contains adequate, concise instructions for the technically qualified individual performing offsite dose assessment. There is, however, a need to simplify this procedure for use by the Control Room Operator. Therefore, EPP-8 shall be revised by July 1, 1982, to provide a simpler methodology for use by Control Room operators on back shifts.

A-18 Review procedures for dose projections and protective action recommendations to take into account uncertainty of plume locations. (See Section 5.4.2)

RESPONSE: Niagara Mohawk is currently conducting a study to determine the proper location for an Inland Supplementary Meteorological Tower to resolve this concern. It is anticipated that this supplementary tower, in conjunction with our primary tower, will provide an adequate determination of plume location during lake breeze conditions.

This study is being undertaken as part of the Meteorological/Dose Assessment System Update required per Appendix 2 of NUREG 0654. It is expected to be completed by late summer of 1982. At that time, input from both the Primary and Supplementary Tower will be used in conjunction with our upgraded plume transport model to better define plume location and any associated uncertainties.

In the interim, EPP-8 shall be revised by July 1, 1982, to take into account the uncertainty of plume location during lake breeze conditions when making protective action recommendations.

A-19 Review EPP-7 and 8 to include guidance on how to deal with errors resulting from variance in the plume pathway. (See Section 5.4.2)

RESPONSE: As stated in our response to A-18, the updated Meteorological/Dose Assessment System required by Appendix 2 to NUREG 0654 will provide this guidance. In the interim, the procedure revision delineated in A-18 should provide sufficient guidance to the RAC and Survey Team Coordinators in dealing with errors resulting from variance in plume pathway.

A-20 Revise EPP-6 to include: radiation protection precautions for unusual plant conditions; radiological survey and sample counting instructions (within the action steps); time of dose rate measurements; techniques for taking radiation measurements (e.g. ground level versus waist level); and, disposition of original data sheets. (See Section 5.4.2.3)

RESPONSE: Niagara Mohawk maintains that radiation protection procedures for unusual plant conditions are currently covered in EPP-6 and other related sample taking procedures. In addition, the need for the inclusion of radiological survey and sample counting instructions and techniques for taking radiation measurement in the procedure are not necessary. Since both these items are routinely performed by Radiation Protection Technicians during their daily functions, the need to clutter the procedure with this information is not warranted.

Niagara Mohawk does see the need for updating EPP-6 to include the recording of the time dose rate measurements were taken and the disposition of original data sheets. Both of the latter items will be included in EPP-6 by July 1, 1982.

- A-21 Revise NI-PSP-10 to include limiting exposure; clear assignment of responsibility; a check list for radiological precautions to be taken during sampling, transportation and analysis; communications; maximum concentrations of radioactivity in the sample for handling and analysis; and ALARA considerations. (See Section 5.4.2.4)

RESPONSE: Since the August audit, a new General Electric Post-Accident Sampling System has been installed to handle the sampling of high activity reactor water. Sampling under this new system is currently described in PSP-13. Therefore, PSP-10 and 13 will be reviewed and revised, as appropriate, by August 1, 1982, to provide for the items listed in the audit finding.

- A-22 Develop a procedure for analyzing liquid waste samples resulting from severe accidents. (See Section 5.4.2.11)

RESPONSE: Niagara Mohawk does not see the need for developing a new procedure for the analyses of liquid waste samples resulting from accidents. Since a procedure for normal sampling and analysis currently exists (CAP-60), this procedure will be revised by August 1, 1982, to provide appropriate instructions for analyzing high activity waste samples.

- A-23 Revise EPP-04 and -15 to include specific guidance on technique for personnel monitoring for the number of persons expected during emergencies; and cross-references to decontamination and follow-up bioassays. (See Section 5.4.3.4)

RESPONSE: EPP-04 and -15 shall be revised by July 1, 1982, to provide for specific guidance on techniques for personnel monitoring for the number of persons expected during emergencies; and cross-references to decontamination and follow-up bioassays.

- A-24 Develop procedure to orchestrate the transition from an emergency classification to a recovery mode, including specific criteria upon which the emergency classes will be downgraded and provisions for notification of federal, state and local officials prior to entering a downgraded mode. (See Section 5.4.6)

RESPONSE: A new procedure will be developed by July 1, 1982, to provide for the transition from an emergency classification to a recovery mode. Included in this procedure will be specific criteria upon which the emergency classes will be downgraded and provisions for the notification of federal, state and local officials prior to entering a downgraded mode.

ATTACHMENT 2

APPENDIX B COMMENTS

- B-1 Formally assign a Corporate EPC or another qualified individual to assist the site EPC so that all aspects of the development and maintenance of the site and corporate emergency response capability are addressed with sufficient depth. (See Section 1.1)

RESPONSE: Niagara Mohawk identified the need for such assistance prior to the August audit. At that time, a request had been submitted for approval to staff an Assistant Emergency Planning Coordinator. Shortly after the audit, approval was received and personnel selection commenced. On October 1, 1981, personnel selection was completed and the position awarded. It is expected that this formal assignment will provide the Site Emergency Planning Coordinator with assistance in the development and maintenance of the Site and Corporate Emergency Response Plans and Procedures.

- B-2 Outline of a scheme to ensure that a sufficient number of professionals and technicians will be available to support a continuous emergency response beyond 24 hours. (See Section 2.2)

RESPONSE: Appropriate Emergency Plan Implementing Procedures will be revised to incorporate a scheme for ensuring a sufficient number of support personnel will be available to support a continuous emergency response beyond 24 hours. It is anticipated that this will be completed by July 1, 1982.

- B-3 Upgrade emergency training material in the Security Department to ensure consistency with present Emergency Plan and Procedures. (See Section 3.1)

RESPONSE: Emergency training material utilized by the Security Department was upgraded as of December 1981. At present, this material is consistent with the Site Emergency Plan and Procedures and, therefore, resolves this item.

- B-4 Provide formal documentation for emergency training program conducted for all offsite organizations; including responsibilities for training in each area, frequency of training, instructors' lesson plans and record keeping. (See Section 3.1)

RESPONSE: A description of the emergency training program conducted for all offsite organizations is provided in Section 8.1 of the Site Emergency Plan and APN 10-F. These documents provide course

B-4 Continued

content, responsibilities for training in each area and frequency of training. Implementation of this program will be discussed in APN-10F. This procedure will provide requirements for instructor lesson plans and record keeping. As discussed in Appendix A, Item 3, revision to APN-10F is expected to be complete May 1, 1982.

B-5 Provide means to ensure that all personnel assigned emergency functions are properly trained and qualified to fulfill their duties; and are made cognizant of their responsibilities during emergency conditions. (See Section 3.2)

RESPONSE: A means of ensuring that all personnel assigned emergency functions are properly trained and qualified to fulfill their duties will be accomplished through APN-10F. During training sessions, both primary and alternate staff members will be made aware of their responsibilities. Additionally, the approved personnel lists discussed in Appendix A Item 2 will be structured to provide, where applicable, an order of succession for each position.

B-6 Provide a separate office for NRC personnel with adequate habitability and communications. (See Section 4.1.1.2)

RESPONSE: As indicated in our response to Appendix A, Item 6, the TSC will be expanded to 1600 square feet of space. A portion of this area will be used to provide an NRC office area. In addition, this area will be provided with sufficient communication to allow the NRC the ability to carry out their intended role.

B-7 Complete and rearrange the communications network in the EOF to improve its efficiency and lower noise levels. (See Section 4.1.1.4)

RESPONSE: The EOF communications network was completed subsequent to the audit on 9/4/81. It was furthermore evaluated during simulated emergency conditions during the September 15, 1981 NRC/FEMA observed exercise. Based on the observations received from the exercise, EOF communications were found to be more than adequate. In addition, background noise levels from installed telephone equipment did not interfere with EOF operations. Therefore, Niagara Mohawk feels no further improvements in EOF communications are necessary.

B-8 Develop means for calibrating the high range survey meters for high radiation fields. (See Section 4.2.1.1)

RESPONSE: Equipment to calibrate high range survey meters was received from Eberline in September of 1981. Following receipt of the equipment, delays were encountered in obtaining necessary calibration data

B-8 Continued

from the manufacturer. At present, all necessary data has been received and operational readiness of the calibration equipment is expected to take place on April 30, 1982.

B-9 Describe the method to deal with illegible wind direction traces during on-shore flow conditions. (i.e. A 0-360 degrees wind vane rather than 0-540). (See Section 4.2.1.4)

RESPONSE: It is anticipated that the current 0-360^o wind vanes will be replaced by 0-540^o vanes as part of the NUREG 0654 Appendix 2 Updated Meteorological System modifications. As described in our letter of June 30, 1981, (D.P. Dise to D.G. Eisenhut), it is anticipated that this upgraded system will be installed and operational by July 1, 1982. In the interim, current procedures require a Chemistry and Radiation Management Department Supervisor to visually observe and pass on meteorological information between the Control Room and TSC. It is our belief that this visual observation should be adequate to identify north winds.

B-10 Establish an alternate stability class determination scheme for use when the primary source of information cannot provide this parameter. (Consider the data types available from the alternate data sources). (See Section 4.2.1.4)

RESPONSE: Emergency Implementing Procedure No. 8 "Offsite Dose Estimate" will be revised to include an alternate stability class determination scheme. It is anticipated that this revision will be completed by 7/1/82.

B-11 Include the characteristic wind direction traces to determine atmospheric stability class in EPP-8 rather than depend on posted material external to the plan or procedures. (See Section 4.2.1.4)

RESPONSE: Emergency Implementing Procedure No. 8 "Offsite Dose Estimate" will be revised to include the characteristic wind direction traces used to determine atmospheric stability class. It is anticipated that this revision will be completed by 7/1/82.

B-12 Identify the method for adjusting wind speed measurements (32' or 200') to the characteristic release height (32' or 350'). (Wind speed profiles, for example could be used to apply the appropriate value to the dose projection contingent on release pathway.) (See Section 4.2.1.4)

RESPONSE: This improvement appears to contradict your request for simplicity as addressed in Appendix A, Item 17. Niagara Mohawk originally provided this correction but abandoned it later for

simplicity's sake. This correction would vary from 1.13 to 1.44 depending on stability class. Since it is readily agreed throughout the industry that the accuracy of dose projections can vary as much as a factor of 2 to 10 from actual measurements, the need for correcting our current manual dose projection methods with these values would seem unnecessary. On the other hand, Niagara Mohawk understands the need for reducing the compounding of errors when performing calculations. Therefore, this correction will be provided on our computerized dose calculation methodology which will be instituted as part of the NUREG 0654 Appendix 2 updates.

B-13

Relocate the cascade generator to an area which would be accessible under accident conditions to provide quality breathing air, and obtain written agreements with offsite groups to ensure alternate air refilling services. (See Section 4.2.2.1)

RESPONSE: The cascade air filling system will be relocated to an area accessible under accident conditions. In addition, the City of Oswego Fire Department will be contacted to provide an updated letter of agreement which will also specify providing alternate air refilling services. It is anticipated that both these items will be complete by August 1, 1982.

B-14

Develop means to permit audible radio communications within the plant. (See Section 4.2.3)

RESPONSE: Prior to the audit, Niagara Mohawk had already identified the reception difficulties being encountered with our in-plant radio communications. A review of the situation was conducted by our System Radio Coordinator. This review recommended the installation of an inplant repeater system to alleviate the problem. Installation of the inplant repeater was completed on 2/15/82 and pre-operational testing is currently in progress. It is anticipated that pre-operational testing and hardware modifications to site portable radios will be completed by August 1, 1982.

B-15

Include cross-references to specific EOP in operating procedures. (See Section 5.2)

RESPONSE: Niagara Mohawk Control Room Operators currently employ an event oriented philosophy in responding to emergency operating conditions (i.e. Turbine Trip, Rx Scram, Loss of Feedwater, etc.). Therefore, the cross-referencing of Emergency Operating Procedures in the (normal) Operating Procedure would be of little benefit to Control Room Operators. These procedures are intended only to provide instructions relative to the startup, operation and shutdown of system components. Should an emergency condition arise,

the operators would assess initiating events and implement appropriate Emergency Operating Procedures. Based on this assessment, Niagara Mohawk does not feel the cross-referencing of specific Emergency Operating Procedures in Operating Procedures is warranted.

B-16

Review EPP-7 and 8 to include radiological protection measures for survey team members, backup communications and a protocol for relaying survey results. (See Section 5.4.2.1)

RESPONSE: EPP-7 will be revised by July 1, 1982, to include references to radiological protective measures needed for survey team members, instructions on backup communications, and protocol for relaying survey results.

B-17

Revise EPP-7 to include radiation protection guidelines and modify data sheets to provide space for recording the time at which each sample was taken, and team member's names. (See Section 5.4.2.2)

RESPONSE: As indicated in Item B-16, EPP-7 shall be revised to include references to radiological protective measures. In addition, the data sheets shall be modified to provide space for recording the time at which each sample was taken and team member's names. Instructions will also be given as to the disposition of completed data sheets. It is anticipated that these changes will be completed by July 1, 1982.

B-18

Specify how to dispose of samples and provide instructions indicating the flow of information from field survey teams to other elements of the emergency organization. (See Section 5.4.2.2)

RESPONSE: The Site Emergency Plan and Procedures identify two positions for the coordinating of survey/sample data and instructions. It is obvious from their titles that environmental data would be transmitted to the Environmental Survey/Sample Team Coordinator and station (inplant) data to the Station Survey/Sample Team Coordinator. Both these individuals report to the Radiologic Assessment Coordinator, who in turn reports to the Emergency Director. Therefore, per the guidance of EPP-13, the flow of data and information to other elements of the emergency organization has been provided. Furthermore, this flow was stressed during training sessions and drills and was found to be acceptable. Based on the foregoing assessment, Niagara Mohawk does not see the necessity of revising procedures to include this detail.

Instructions concerning sample disposition are provided by the appropriate Team Coordinator based upon radiological requirements or the need for re-analysis of the sample. Normally, samples will be retained but disposition will be decided depending on radiological conditions at the time of the sampling.

B-19 Review procedure used for primary coolant analysis to instruct the user on relaying information to organizational elements performing assessment functions (e.g. EO, RAC). (See Section 5.4.2.5)

RESPONSE: SEE RESPONSE TO ITEM B-18.

B-20 Reevaluate procedures for containment (drywell) sampling in accordance with findings in Section 4.1.1.6. (See Section 5.4.2.6)

RESPONSE: SEE RESPONSE TO APPENDIX A, ITEM 8.

B-21 Review NI-PSP-11 to include instruction for the user to forward data to organizational elements performing offsite dose assessment (e.g. RAC, ED) and how to dispose of samples. (See Section 5.4.2.7)

RESPONSE: See response to B-18 for discussion on forwarding data to emergency organization elements.

With respect to the disposition of samples, since only senior Chemistry and Radiation Protection Technicians would draw and analyze a drywell air sample, they are well aware that all high level samples would be brought to the shielded end of the High Level Laboratory Hood. Niagara Mohawk does not see the need for re-addressing in all procedures items which are routine or common knowledge to all senior technicians. Based on this assessment, the need for providing such information is not seen.

B-22 Review Stack Effluent Sampling Procedure to incorporate guidelines for: conducting pre-entrance precautionary meetings during off-shifts; handling highly radioactive charcoal and other filter media; and relaying data to organizational elements in charge of making offsite dose assessment. (See Section 5.4.2.8)

RESPONSE: See response to B-18 for discussion on forwarding data to emergency organizational elements.

With respect to other areas, Niagara Mohawk maintains that the delay caused by the requirement for a precautionary meeting prior to sampling was intentional to provide management the ability to assess radiological protective measures for sampling personnel. In addition, no major delay is anticipated since the Chemistry and Radiation Management Department maintains an On-Call Supervisor available during off hours to coordinate these emergency sampling activities.

B-22 Continued

Furthermore, procedure NI-SP-7 "Stack Sampling" does address radiation hazards associated with handling sampling media. It specifically address the use of tongs when handling samples, storing of samples in shielded containers and purging of charcoal cartridges to strip excessive noble gases. Based on this and the instructions or guidance to be provided by the appropriate Survey/Sample Coordinator, Niagara Mohawk does not see the necessity for revising the Stack Effluent Sampling Procedure.

B-23 Review NI-SP-7 to include radiological precautions expected when handling and analyzing highly radioactive samples and instructions for the user to relay information to emergency personnel responsible for offsite assessment actions (e.g. FD, RAC). (See Section 5.4.2.9)

RESPONSE: SEE RESPONSE TO B-22.

B-24 Develop a procedure for sampling liquid wastes which addresses the radiological conditions expected during severe accidents. (See Section 5.4.2.10)

RESPONSE: Niagara Mohawk does not see the need for developing a new procedure for sampling liquid wastes during accidents. On the other hand, it does see the necessity for addressing these radiological conditions. Therefore, PSP-4 "Liquid Waste Sampling, Analysis and Record Keeping" will be revised by August 1, 1982 to address radiological conditions when sampling during accidents.

B-25 Revise emergency implementing procedures to include responsibilities for radiological protection (e.g., briefings of emergency personnel, dosimetry, etc.) in the action steps portion of the procedures. (See Section 5.4.3.1)

RESPONSE: Emergency Implementing Procedures will be reviewed and revised by July 1, 1982, as appropriate, to include responsibilities for radiological protection in the action steps portion of the procedures.

B-26 Include provisions for evacuation of park area around the EIC. (See Section 5.4.3.2)

RESPONSE: Revisions will be made by July 1, 1982, to appropriate Emergency Implementing Procedures to include provisions for the evacuation of park area around Energy Information Center.

B-27 Include body sketches and data sheets to record decontamination progress. (See Section 5.4.3.4)

RESPONSE: Niagara Mohawk is in the process of updating its Chemistry and Radiation Protection procedure dealing with decontamination. This upgrading would include the addition of body sketches and data sheets to record decontamination progress. Once this upgrading has been accomplished it shall be incorporated into Emergency Implementing Procedures.

B-28 Provide consistent personnel decontamination limits between the Emergency Plan and those stated in EPP-04 and 19. (See Section 5.4.3.4)

RESPONSE: EPP-4 and 19 shall be reviewed and revised as appropriate to make decontamination limits consistent with the Site Emergency Plan. It is anticipated that this item will be complete by July 1, 1982.

B-29 Incorporate into EPP-22 the criteria and logistics of selection of team members and communication means to be employed. (See Section 5.4.5)

RESPONSE: EPP-22 shall be reviewed and revised by July 1, 1982, to include criteria and logistics of team selection and communication means to be employed during Damage and Control Team activities.

B-30 Revise EPP-21's format to clearly outline responsibilities, guidelines and specific sequential actions required of the various individuals dealing with public information during accidents. (See Section 5.4.7)

RESPONSE: Niagara Mohawk maintains that the format currently used in EPP-21 adequately outlines the responsibilities and actions required by individuals dealing with public information during an accident. This procedure was implemented during the September 15, 1981, NRC/FEMA Observed Exercise with no major deficiencies being identified. Therefore, Niagara Mohawk does not see the need to update this procedure for format at this time.

B-31 Develop provisions for responding to public inquiries separate from the news media. (See Section 5.4.7)

RESPONSE: The Inquiry Response Team, identified in EPP-21, would not be limited solely to responding to media inquiries, but could also be used to handle inquiries from the general public. Niagara Mohawk does see the need for developing a separate Inquiry Response Program to deal with the general public. Therefore, EPP-21 will

B-31 Continued

be revised by August 1, 1982, to provide for a clearer description of the Inquiry Response Program to be used for the news media, as well as the general public.

B-32 Revise of EPP-10 to include: unambiguous specification of radiation survey instrumentation consistent with their intended use; development of procedures for operationally checking the same; and a criteria for acceptance or rejection of instruments. (See Section 5.5.1)

RESPONSE: EPP-10 shall be revised by July 1, 1982, to include: specification of radiation survey instruments consistent with their use; development of procedures for operationally checking the same and a criteria for acceptance or rejection of instruments.

B-33 Review Emergency Plan and procedures to include a requirement for updating letters of agreement with offsite support agencies. (See Section 6.1)

RESPONSE: NUREG 0654 requires all organizations to update its plan and agreements as needed, and review and certify it to be current on an annual basis. It does not require the literal renewal and updating of the letters on an annual basis.

Currently, the plan and procedures call for contact with each outside emergency response agency on a quarterly interval to verify telephone numbers, that responsible individuals have not changed, and that procedures identified in their letters of agreements have not changed. If changes have occurred, new letters of agreement are obtained, which reference plans, procedures or other written agreements when detail for their implementation cannot reasonably be put in such a letter.

Niagara Mohawk feels that this quarterly check is superior to the annual update requested by the audit findings. In addition, it prevents the needless and time consuming task of renewing letters of agreement when such letters are current with respect to contacts, responsible individuals and procedures.

B-34 Disseminate emergency planning information brochures to the public within the plume exposure EPZ. (See Section 6.2)

RESPONSE: Emergency Planning information brochures were distributed to the general public within the 10 mile EPZ on October 16, 1981.

Review the Emergency Plan to include a description of the media educational program, responsibilities, implementation dates and its frequency. (See Section 6.3)

RESPONSE: Niagara Mohawk maintains that Section 8 of the Site Emergency Plan provides an adequate breakdown of the media educational program as it relates to content, responsibilities and frequency. Since the initial implementation date has passed and future dates will vary from year to year, the inclusion of these program dates into the Site Emergency Plan is not deemed necessary.

ATTACHMENT 3

APPENDIX C COMMENTS

As directed by your appraisal letter (50-220/81-18), copies of page changes correcting the deficiencies noted in Appendix C have been distributed under Revision 9 of the NMPNS Site Emergency Plan in accordance with 10 CFR 50, Section 50.54(q). This revision corrects all the deficiencies noted in Appendix C except the following:

H-3 Identify the onsite monitors for obtaining hydrologic information which may be used for initiating emergency measures in accordance with criteria H.5.a of NUREG-0654.

RESPONSE: Niagara Mohawk does not have any onsite monitors from which hydrologic information can be obtained. Therefore, this information cannot be used as an initiating emergency measure in accordance with criteria H.5.a of NUREG 0654.

I-2 Provide detailed information on the methods and techniques used for determining the source term of releases of radioactive material within plant systems. As an aid in assessing the extent of potential core damage include plots which show the containment radiation monitor reading vs time following release of gap activity, 1% release of fuel inventory, and 10% release of fuel inventory.

RESPONSE: Niagara Mohawk maintains that detailed information on the methods and techniques for the sampling, analysis and assessment of source term should not be part of the Site Emergency Plan, but rather incorporated or referenced in appropriate Emergency Implementing Procedures.

Revision 9 to the Site Emergency Plan provides a list of onsite and offsite assessment facilities, as well as an example plot, which could be used in relating containment radiation monitor readings to source terms for a NUREG 0737 defined LOCA. Niagara Mohawk feels that this information should be sufficient in providing the information requested in the audit finding.

Niagara Mohawk fails to understand how plots of the referenced fuel activities could be used in assessing the source term of radioactive material within plant systems and requests further clarification on this issue.