

YANKEE ATOMIC ELECTRIC COMPANY

2.C.2.1
FYR 82-85



1671 Worcester Road, Framingham, Massachusetts 01701

August 27, 1982

United States Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. Ronald C. Haynes,
Regional Administrator

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) USNRC Letter to YAEC, dated June 30, 1982

Subject: Response to Emergency Preparedness Appraisal

Dear Sir:

Reference (b) detailed the NRC Staff's findings of the Emergency Preparedness Appraisal conducted during the period of December 1-9, 1981. We have reviewed the findings of Appendices A and B of Reference (b) and our response to each has been prepared in the Attachment. Each response describes the planned actions, and in most cases, the completed actions for improving the items identified in Appendix A, and also discusses the results of our consideration of the items in Appendix B. Schedules for actions to be completed are also provided, where applicable.

Appendix C items of Reference (b) are currently being evaluated. Responses to each item and page changes to the Emergency Plan will be prepared and are expected to be submitted on schedule. We will notify you as soon as possible if this schedule changes.

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YANKEE ATOMIC
ATTACHMENT A
RESPONSE TO
EMERGENCY PREPAREDNESS APPRAISAL REPORT
APPENDIX A
"SIGNIFICANT EMERGENCY PREPAREDNESS FINDINGS"

1. FINDING DESCRIPTION

Perform a study to determine how the intent of the augmentation goals of NUREG-0654 can be achieved after the declaration of an emergency.

RESPONSE

a. Actions Which Have Been Taken

Three separate backshift augmentation drills were conducted on April 14th, 21st, and 28th of this year. The results were forwarded to the NRC Region I office for review and evaluation along with a description of the compensatory measures for any augmentation goals not met. [YAEC Letter to USNRC, dated May 7, 1982 (FYR 82-44)]. The following compensatory actions have been taken as a result of the findings:

- 1) OP-MEMO 2E4 has been revised to achieve staff augmentation goals by prioritizing individual call lists by response time and desired function;
- 2) Plant chemistry personnel have been placed on the Radio Pager System to afford earlier notification and earlier plant response;
- 3) HP-chemistry shift technicians have been trained in post-accident sampling techniques;
- 4) SCROs have been trained to assume responsibility for initial off-site dose assessment using a newly revised computerized model; and
- 5) Auxiliary Operators were provided additional Health Physics training.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

2. FINDING DESCRIPTION

Modify the Post-Accident Sampling Systems as required to ensure that coolant samples can be collected within the exposure limits of NUREG-0737.

RESPONSE

Under major accidents, acquisition of the sample may result in an accumulated exposure, which exceeds the limits of NUREG-0737 due to increased ambient radiation levels from the unshielded Vapor Container. USNRC letter to YAEC, dated July 10, 1981, stated that we should "assume an extracamerai or ambient radiation level of 25R/hr of 0.5 MeV gamma photons at the sampling location in addition to the radioactivity integrated on the sample...".

a. Actions Which Have Been Taken

The Primary Coolant Sampling System has been modified to permit sample collection from a remote location. Installation and testing was completed February 28, 1982. The design of the sampler and required transport mechanisms/handling techniques are such that radiation exposures to individuals using the system should not exceed 5 rem to the whole body or 75 rem to extremities.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

3. FINDING DESCRIPTION

Modify the Post-Accident Containment Sampling System as required to ensure that samples of the containment atmosphere can be collected within the exposure limits of NUREG-0737.

RESPONSE

Under major accident conditions, acquisition of a containment sample may result in an accumulated exposure, which exceeds the limits of NUREG-0737 due to increased ambient radiation levels from the Vapor Container. Retrieval of a containment sample would be prohibited based upon exposure levels at the sample location.

a. Actions Which Have Been Taken

The Post-Accident Containment Sampling System has been installed. The capability to obtain containment atmosphere samples (i.e., noble gases, iodines and cesiums, and nonvolatile isotopes) is provided via a Gas Sampling System in the Switchgear Room at the hydrogen monitor location. The system was designed in accordance with the exposure criteria stated in USNRC letter to YAEC, dated July 10, 1981. Installation and testing was completed February 28, 1982.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

4. FINDING DESCRIPTION

Modify the Stack Effluent Sampling System as required to ensure that samples can be collected within the exposure limits of NUREG-0737.

RESPONSE

Plant procedures presently identify deployment of off-site monitoring teams as an alternate means of obtaining stack effluent data if ambient radiation levels prohibit access to the stack sample location.

a. Actions Which Have Been Taken

Installation of equipment necessary for monitoring radioiodine and particulate effluents was completed on March 1, 1982. The Sampling System has been designed in accordance with the exposure criteria stated in USNRC Letter to YAEC, dated July 10, 1981.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

5. FINDING DESCRIPTION

Evaluate the need for: retention, transfer, storage, sampling and analysis of highly radioactive wastes that could be generated as a result of severe accidents.

RESPONSE

Planning of this nature would be the direct responsibility of the recovery organization. Due to the wide variety of transients which could result in some quantities of either high-or-low level liquid waste, it is not possible to proceduralize all possible treatment options available to the Emergency Response Organization. By plant design, following a severe accident sequence, all high-level radioactive liquid would be confined to Primary or Auxiliary Systems and would be treated on a controlled basis dependent upon a reduction in radiation levels due to decay. In-plant procedures presently exist which address the handling, sampling and analyses of liquid radwaste. The Recovery Manager's functions would include management considerations of radwaste volumes, radioactivity content, and treatment and discharge options. This activity would be part of the overall Recovery Manager's responsibility and action.

a. Actions Which Have Been Taken

No further actions are necessary.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

6. FINDING DESCRIPTION

Conduct a study to identify expanded support facilities required to process, train, and shelter incoming support personnel.

RESPONSE

Plant Emergency Implementing Procedures were revised in February, 1982. These procedures include the position of Manpower Assistant who is responsible for coordinating administrative and logistical support arrangements required by an expanded Emergency Response Organization. In the event that expanded support facilities are required beyond those available in the normal plant planning arrangements, the Manpower Assistant, aided by the Administrative Assistant and certain Engineering Support Center staff, would utilize any of the following options: 1) use of the Alternate EOF; 2) use of the Engineering Support Center facilities; or 3) use of the Vermont Yankee facilities upon request by the Recovery Manager.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

7. FINDING DESCRIPTION

Provide backup means for obtaining estimates of high-range PVS noble gas and main steam line releases during severe accidents.

RESPONSE

a. Actions Which Have Been Taken

Plant Procedures, "Measurement of Radioactive Airborne Release Rates Under Accident Conditions", and "Determination of Noble Gas Release Rates from the Main Steam Lines Under Accident Conditions", have been revised to include a backup method for evaluating noble gas release rates if the high-range monitor becomes inoperable.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

8. FINDING DESCRIPTION

Ensure that State/local officials have the capability to make prompt protective action decisions (e.g., evacuation) and that they can promptly activate the Public Alerting System and provide public instruction and direction once a decision has been made.

RESPONSE

a. Actions Which Have Been Taken

A meeting between the NRC, FEMA, State officials responsible for protective action decision making, and Yankee Atomic Electric Company staff was held on January 20, 1982. The purpose of the meeting was to discuss protective action recommendations; to develop assurance that the licensee can make protective action recommendations; and to discuss State/local official capability to make prompt protective action decisions, to promptly activate the Public Alerting System, and to provide public instruction and direction once a decision has been made. The results of the meeting indicated that the issue was to be resolved between NRC, FEMA, and the States.

b. Actions Which Will Be Taken

Yankee will monitor the progress of the NRC/FEMA/State official discussions in this area.

c. Schedule For Completion

None

9. FINDING DESCRIPTION

Review implementing instructions to ensure that they contain specific references to other procedures needed to perform specific actions.

RESPONSE

a. Actions Which Have Been Taken

A major revision to the Emergency Implementing Procedures was completed in February, 1982. The revisions included, where applicable, direct references in the implementing instructions to other plant procedures needed to perform a required task.

b. Actions Which Will Be Taken

All applicable procedures will be reviewed. Specific references to other procedures will be added if necessary.

c. Schedule For Completion

This secondary review will be completed by October 30, 1982.

10. FINDING DESCRIPTION

Revise Procedure OP-3310, "Evaluation of Radiological Data", to clearly indicate when each part of the procedure is to be implemented and who will be responsible for its implementation.

RESPONSE

a. Actions Which Have Been Taken

Procedure OP-3310, "Evaluation of Radiological Data", has been revised to directly state the emergency management personnel who have been assigned responsibility for implementation of each Appendix. The revision was made in February, 1982. Since that time, additional revisions have been incorporated.

b. Actions Which Will Be Taken

The procedure will be reviewed and appropriate changes will be made to emphasize implementation responsibility. Future training courses concerning this functional area will highlight the procedural requirements.

c. Schedule For Completion

The procedure will be reviewed and modified as necessary by October 30, 1982.

11. FINDING DESCRIPTION

Revise the procedures containing EALS to adequately address the requirements of NUREG-0654, Appendix 1.

RESPONSE

a. Actions Which Have Been Taken

Appropriate procedures have been revised as necessary to address the guidance of NUREG-0654, Appendix 1, in accordance with NUREG-0818 as specified in the Emergency Preparedness Appraisal Findings.

b. Actions Which Will Be Taken

Appendix A of the Yankee Emergency Plan is currently under revision to adequately address the changes in the Classification System. This revision will be completed by October 30, 1982.

The list of events in each emergency class specified in the Yankee Plan has been submitted to the States for review and approval. Verbal agreements on the changes to the Classification System have been received.

c. Schedule For Completion

As specified above.

12. FINDING DESCRIPTION

Hold a meeting between NRC, FEMA and State officials responsible for protective action decision making. The purpose of the meeting is to discuss protective action recommendation; to develop assurance that the licensee can make protective action recommendations; and to demonstrate that the State officials have the capability to make a public notification decision promptly on being informed by the licensee of an emergency condition.

RESPONSE

a. Actions Which Have Been Taken

A meeting was held in Greenfield, Massachusetts on January 20, 1982. Representatives from NRC, FEMA, Yankee and the EPZ States were in attendance.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

13. FINDING DESCRIPTION

Revise Procedure OP-3310 to incorporate means to compensate for the potential uncertainty associated with plume trajectories.

RESPONSE

a. Actions Which Have Been Taken

Procedure OP-3310, "Evaluation of Radiological Data", Appendix A, has been revised to include guidelines for determining plume trajectory based on stability class and wind direction.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

14. FINDING DESCRIPTION

Write a procedure and implement for estimating noble gas, radioiodine and particulate releases from the PVS under major accident conditions.

RESPONSE

Yankee presently has a procedure for estimating radioactive airborne releases under accident conditions, OP-8740. This procedure has been revised to incorporate the new sampling arrangements and selected personnel have been trained in its implementation.

No new procedure is deemed necessary.

a. Actions Which Have Been Taken

YAEC Letter to USNRC, dated June 1, 1982, was submitted in conjunction with the original Confirmatory Action Letter, Item 8. Yankee has installed a new Radioiodine Sample System and it has completed training the chemists and the radiation protection technicians in the use of both this system and the plant laboratory sample analysis equipment.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

15. FINDING DESCRIPTION

Conduct a study to determine the maximum radioactive concentrations of post-accident liquid wastes that could be sampled, the need for special sampling equipment, and shielding, and make any improvements as necessary.

RESPONSE

This area of post-accident response and compatibility would be part of the activities of the recovery organization. All the appropriate considerations (e.g., special sampling equipment, additional shielding, and appropriate personnel exposure criteria) would be incorporated in the recovery arrangements for the actual accident characteristics.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

16. FINDING DESCRIPTION

Develop an overall procedure addressing recovery and re-entry which includes the need to evaluate operational and radiological conditions prior to entering the recovery phase.

RESPONSE

a. Actions Which Have Been Taken

Procedure OP-3321, "Emergency De-Escalation Procedure", was written to address this finding. This procedure requires, through the step that calls for use of Procedure OP-3300, "Classification of Emergencies", a combined review of both off-site radiological conditions and in-plant operational conditions prior to implementing the de-escalation process. Training in this procedure has been completed.

This procedure provides guidance and authority for de-escalation from the emergency status to the recovery phase. The Recovery Manager's Checklist, Appendix VII to OP-3303, "Site Area Emergency", and to OP-3304, "General Emergency", defines a "work" list of items requiring his attention prior to implementing recovery operations.

b. Actions Which Will Be Taken

A new section to the Emergency Plan will be added called, "Emergency De-Escalation and Termination Criteria". This section will address the actions required to downgrade the emergency status and those actions required to make a transition to a recovery phase.

c. Schedule For Completion

This will be completed by October 30, 1982.

17. FINDING DESCRIPTION

Develop a comprehensive and objective audit program to evaluate all emergency preparedness areas.

RESPONSE

Yankee Quality Assurance Program presently provides a comprehensive and objective audit program to evaluate all emergency preparedness areas. Commencing with the 1982 emergency preparedness audit cycle, the audit program will include on a sample basis:

- 1) Types of emergency equipment and supplies checked by auditors;
- 2) Nature and character of verification performed on corrective actions resulting from drills and exercises; and
- 3) Observations of drills or exercises will be included as part of the audit program. These observations will be performed by individuals with no immediate responsibility for the emergency preparedness program.

a. Actions Which Have Been Taken

The 1982 emergency preparedness audit was conducted in the month of July.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

YANKEE ATOMIC
ATTACHMENT B
RESPONSE TO
EMERGENCY PREPAREDNESS APPRAISAL REPORT
APPENDIX B
"EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS"

1. FINDING DESCRIPTION

Assign an individual to the position of on-site EPC.

RESPONSE

a. Actions Which Have Been Taken

The position has been filled as of July, 1982.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

2. FINDING DESCRIPTION

Provide administrative mechanisms for the EPC to have direct access to the Plant Superintendent as needed for resolving emergency planning issues.

RESPONSE

The EPC has good communication channels with all levels of on-site emergency response. The EPC also has direct communications with the Corporate Emergency Plan Coordinator. No additional authority is required. Therefore, we feel that present mechanisms for resolution of emergency planning issues are sufficient.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

3. FINDING DESCRIPTION

Describe when and how emergency functions (e.g., making protective action recommendations) are transferred to the Recovery Manager. This should include the notification of selected personnel concerning the transfer of authority.

RESPONSE

a. Actions Which Have Been Taken

Applicable implementing procedures have been revised to indicate this transfer.

b. Actions Which Will Be Taken

The transfer of emergency functions to the Recovery Manager will be addressed in a future revision to Section 8.3 of the Emergency Plan.

c. Schedule For Completion

This revision will be incorporated in the plan by October 30, 1982.

4. FINDING DESCRIPTION

Provide training to employees on emergency radiation protection considerations due to the unshielded containment.

RESPONSE

a. Actions Which Have Been Taken

This area has been discussed in previous training sessions.

b. Actions Which Will Be Taken

Section 12.2 of the Emergency Plan will be revised to address this consideration. Training in this area will be strengthened in the annual "General Plant Employee Training" session. 1982 sessions have been completed, therefore, this new training category will be incorporated in the 1983 training course.

c. Schedule For Completion

October 30, 1982 for the Emergency Plan revision and 1983 for the training session.

5. FINDING DESCRIPTION

Complete the training of all individuals assigned emergency functions.

RESPONSE

a. Actions Which Have Been Taken

A new emergency plan organizational concept was instituted just prior to the NRC Emergency Appraisal Visit. At that time, certain members of the plant staff had not completed their training. Since that time all 1981 training programs have been completed.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

6. FINDING DESCRIPTION

Complete the installation of the HEPA filters in the Control Room Com

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

The installation plans and schedule for the HEPA filter addition to the Control Room Ventilation System are being detailed now. It is anticipated installation will be completed by mid-1983.

c. Schedule For Completion

As stated above.

7. FINDING DESCRIPTION

Limit the number of individuals to the Control Room Complex, or provide a mechanism to prevent them from interfering with Control Room Operators during emergencies.

RESPONSE

By procedure, the TSC Coordinator is responsible for issuing a Control Room Access List which would limit the number of personnel allowed in the Control Room.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

8. FINDING DESCRIPTION

Provide backup voice communication links between the OSC, Control Room, and the TSC.

RESPONSE

The plant Telephone System acts as a backup voice communication link between the Control Room, the TSC, and the OSC.

a. Actions Which Have Been Taken

The plant Gaitronics System has been expanded to include the OSC.

b. Actions Which Will Be Taken

No further actions are necessary.

c. Schedule For Completion

None

9. FINDING DESCRIPTION

Modify the Emergency Plan to reflect the proper location of the OSC.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

Section 6.1.2 of the Emergency Plan will be revised to incorporate a floor plan of the OSC (both primary and backup).

c. Schedule For Completion

October 30, 1982

10. FINDING DESCRIPTION

Provide remote assembly and reassembly areas.

RESPONSE

a. Actions Which Have Been Taken

The Boiler Feed Pump Area has been designated as an assembly area in the event that radiation levels prohibit immediate evacuation of the plant.

b. Actions Which Will Be Taken

Off-site assembly areas will be reviewed in conjunction with handling site evacuees in a more effective manner. Section 10.4.2 of the Emergency Plan will be revised to reflect this new planning element.

c. Schedule For Completion

October 30, 1982

11. FINDING DESCRIPTION

Improve radio communications between the hospital and ambulance.

RESPONSE

a. Actions Which Have Been Taken

A new Radio System has been installed in the Charlemont ambulance as a means of enhancing communications between the ambulance and hospital. The June 24, 1982, Yankee Medical Emergency Drill tested this new system and all parties concerned agree that this system is adequate.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

12. FINDING DESCRIPTION

Provide means for ensuring the availability of emergency decontamination kits.

RESPONSE

a. Actions Which Have Been Taken

Emergency decontamination kits have been provided with seals.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

13. FINDING DESCRIPTION

Provide security for the News Center.

RESPONSE

Security needs at the Media Center would be assessed at the time of its activation and use. If security arrangements were deemed necessary, they would be requested.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

14. FINDING DESCRIPTION

Include high range survey instruments in re-entry team kits; provide additional instruments at the EOF for monitoring personnel; and a method of protecting the off-site air sample monitors from inclement weather (e.g., rain, snow).

RESPONSE

Survey instrumentation for the EOF beyond that already available can be provided from the following sources: 1) normal plant inventory at the H. P. Control Point; 2) the emergency kits located at the Engineering Support Center; and 3) through a request for additional equipment from nearby plants under the Yankee Mutual Assistance Plan.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

Re-entry team kits will be upgraded by the addition of a high-range portable survey instrument and the off-site monitoring kits will be upgraded for the protection of the air sampler/survey instruments from inclement weather conditions.

c. Schedule For Completion

These upgrades will be completed by mid-1983.

15. FINDING DESCRIPTION

Assure that calibration procedures for area and process monitors are finalized and that installation of the containment main steam line and high-range PVS monitors is completed.

RESPONSE

a. Actions Which Have Been Taken

The installation of the containment, main steam line and high-range PVS monitors was completed June 30, 1982.

b. Actions Which Will Be Taken

Calibration procedures for the area and process monitors will be completed no later than April 1, 1983.

c. Schedule For Completion

As stated above.

16. FINDING DESCRIPTION

Establish a substantiated alternate data source of meteorological information during accidents.

RESPONSE

a. Actions Which Have Been Taken

An alternate meteorological tower has been in service since March 19, 1982. Sensor data from this tower is recorded and available in the Control Room Complex. A third source of meteorological information can be provided through the ESC's use of the Weather Services International System.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

17. FINDING DESCRIPTION

Include OSC protective clothing supplies in the Control Room supplies checklist.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

OP-3325, "Emergency Equipment Readiness Checklist", and Appendix B at the Emergency Plan will be revised to reflect this consideration.

c. Schedule For Completion

October 30, 1982

18. FINDING DESCRIPTION

Provide means to ensure higher reliability of the Nuclear Alert System.

RESPONSE

a. Actions Which Have Been Taken

A major upgrade/modification of the Nuclear Alert System was in progress during the appraisal visit. The upgrade has been completed, and daily operational checks indicate the system to be highly reliable.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

19. FINDING DESCRIPTION

Provide an Operational Backup Radio System for communicating with the monitoring teams that will have sufficient range to cover the plume EPZ.

RESPONSE

a. Actions Which Have Been Taken

The present radio system has been evaluated, and will be upgraded to address the identified difficulties.

b. Actions Which Will Be Taken

A new radio transmitter will be installed by December 31, 1982.

c. Schedule For Completion

As stated above.

20. FINDING DESCRIPTION

Provide an adequate location for the retrieval of repair/corrective action tools, supplies and equipment that may be needed during severe accidents.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

An emergency kit will be purchased which will contain common repair/corrective action tools. The kit will be placed in a readily accessible location.

c. Schedule For Completion

The kit will be in place prior to January 30, 1983.

21. FINDING DESCRIPTION

Review Control Room emergency alarm, abnormal occurrence procedures to identify and direct emergency classification whenever possible, and to ensure that all references are maintained current.

RESPONSE

These procedures do not need revision to "identify and direct emergency classification". Where applicable, these procedures reference OP-3300, "Classification of Emergencies", which is used by the Shift Supervisor to classify an emergency. These procedures are separate in their intent: OP-3300 implements the Emergency Plan whereas the emergency alarm/abnormal occurrence procedures implement corrective action.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

The procedures will be reviewed to ensure that all references are maintained current. This will be completed by January 1, 1983.

c. Schedule For Completion

As stated above.

22. FINDING DESCRIPTION

Revise the Event Classification Procedure to remove redundant listing of EALs.

RESPONSE

a. Actions Which Have Been Taken

This item was addressed in response to Item 11 in Appendix A of the Appraisal Report.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

23. FINDING DESCRIPTION

Provide the Control Room with a flow chart to allow for prompt classification of emergencies.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

This will be evaluated upon completion of the Emergency Plan revisions required by NUREG-0737, Item 1.C.1.

c. Schedule For Completion

None

24. FINDING DESCRIPTION

Revise implementing instructions to reference the call list contained in OP-MEMO 2E-5.

RESPONSE

Correction: The correct reference for this item is OP-MEMO 2E-4.

a. Actions Which Have Been Taken

All implementing procedures have been revised to reference the call list contained in OP-MEMO 2E-4.

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

25. FINDING DESCRIPTION

Keep the NAI Detector System (SAM-2 RD-22) power on to eliminate any warm-up time.

RESPONSE

There is sufficient time available for warm-up of the SAM-II System prior to its use. No further actions are deemed necessary.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

26. FINDING DESCRIPTION

Revise Procedure OP-3311 to: specify means for sample disposition (e.g., responsibilities, coordination, logistics); specify alternate means of communication; and provide monitoring techniques for ascertaining sampling locations relative to the plume.

RESPONSE

The procedure does specify monitoring techniques for ascertaining sampling locations relative to the plume (i.e., use of the shielded probe). The procedure does specify means for sample disposition (i.e., notification of a high activity level requires dispatch of the sample to the EOF and this is coordinated by the Sample Coordinator). Alternate means of communications are specified during training (i.e., relay to other teams or use of area telephone). No further actions are deemed necessary.

Actions Which Have Been Taken

a. None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

27. FINDING DESCRIPTION

Revise Procedure OP-3300 to include: equipment, survey forms, communication methods, and radiation protection guidance. In addition, provide diagrams showing expected doses in selected areas (e.g., motor control areas, OSC), as a function of the Accident Area Radiation Monitor levels.

RESPONSE

Correction: The correct reference for this item is Procedure OP-3330.

Therefore, the procedure will not be revised to incorporate tables of projected dose levels in selected plant areas as a function of the AARM readings. Radiation levels in plant areas during and following an accident will be defined by the information available from the newly installed Area Radiation Monitoring System. Further, before personnel would proceed into specific areas, detailed evaluations of the radiological conditions would be performed. This would be the action regardless of the availability of pre-established dose rate maps.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

OP-3330, "Emergency Radiation Exposure Control", will be reviewed to ensure that adequate radiation protection guidance is provided and that emergency documentation forms are available to the user. If deficiencies are recognized, then the procedure will be revised.

c. Schedule For Completion

Completion of this revision process is scheduled for January 30, 1983.

28. FINDING DESCRIPTION

Revise Procedure OP-9450 to: identify the manner in which samples are to be transported to the laboratory and the precautions appropriate during such transport; provide a schematic of valve lineup and indicate the need for a timely relay of results to personnel in charge of making protective action recommendations.

RESPONSE

Off-site protective action decision-making criteria does not utilize in-plant post-accident sample data. In-plant post-accident sample data only provides an accurate account of on-site conditions. It is limited in its usefulness when considering off-site impact.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

OP-9450 will be reviewed and revised as necessary in conjunction with this consideration.

c. Schedule For Completion

The revision process will be completed by January 30, 1983.

29. FINDING DESCRIPTION

Revise Procedures OP-8740 and OP-8741 to: identify the transporting devices of PVS iodine and particulate sample; specify the means of quantifying activity on the charcoal and particulate filters; address handling problems associated with highly radioactive particulate and charcoal filters; specify criteria for aborting taking the sample based on information available in the Control Room (e.g., AARM levels); and specify locations for quantifying noble gas releases due to steam generator tube failure.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

Procedures OP-8740 and OP-8741 will be reviewed in conjunction with this finding, and they will be revised as necessary.

c. Schedule For Completion

The revised procedures are expected to be completed by January 30, 1983.

30. FINDING DESCRIPTION

Review OP-3300 and OP-8700 to include guidance on accident dose rates resulting from the unshielded containment.

RESPONSE

Proceduralizing projected accident dose rates, which are specific to a particular set of accident conditions, may be misleading. Emergency Response personnel are trained to recognize exposure levels and to responded in accordance with this exposure criteria.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

The General Employee Training Program will be revised to emphasize site radiation levels under accident conditions. This will be completed in the 1983 training lectures.

c. Schedule For Completion

1983

31. FINDING DESCRIPTION

Clarify responsibility to authorize the use of KI for all shifts.

RESPONSE

The present procedure identifies who is responsible for the authorization of KI (Procedure OP-3330 delineates protective action responsibility). If backshift emergency personnel identify the need for KI use, then the Shift Supervisor/Plant Emergency Director insures it is distributed.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

32. FINDING DESCRIPTION

Develop a procedure for immediate evacuation of nonessential personnel to a predetermined remote location and include instructions in the call-up procedures to direct augmentation personnel to these remote assembly areas.

RESPONSE

By current procedural arrangements, non-assigned personnel are first evacuated to the EOF and further directed from there. Emergency augmentation call-up includes instructions on reporting location, i.e., in-plant, EOF, alternate EOF. No further actions are deemed necessary.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

33. FINDING DESCRIPTION

Revise OP-3344 to account for individuals who may be at the Training Center during site evacuation, and identify individuals responsible for the accounting of evacuees at the Boiler Feed Pump Room.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

The procedure and Section 10.4.1 of the Emergency Plan will be revised to address these concerns. These revisions will be completed by January 30, 1983.

c. Schedule For Completion

As stated above.

34. FINDING DESCRIPTION

Describe the location to be used for retrieving repair/corrective action tools/supplies and other equipment that may be needed during severe accidents.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

Refer to the response provided for Appendix B, Item 20.

c. Schedule For Completion

Refer to the response provided for Appendix B, Item 20.

35. FINDING DESCRIPTION

Revise Procedure OP-3341 to include a quarterly communication test with the ingestion EPZ States, post-accident sampling drills, and backshift drills.

RESPONSE

The plant does not contact the ingestion EPZ State. The State of Vermont has incorporated the responsibility for notifying the State of New York in their state plan.

Procedure OP-3341 distinguishes between exercises and drills. Drills are specified as supervised periods of instruction, and as such, are not necessary to conduct during backshift periods. Exercises, on the other hand, involve not only the plant and company but many off-site organizations as well. Coordination with these organizations on the timing of the exercises is required, which prevents the plant from unilaterally committing to backshift exercises. For information, the most recent exercise, held in March, 1982, began during the midnight to eight shift.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

OP-3341 will be revised to reflect the commitment of annual post-accident sampling drills. The revision process will be completed by January 30, 1982.

c. Schedule of Completion

As stated above.

36. FINDING DESCRIPTION

Develop means for verifying and updating emergency phone numbers found in procedure and call lists on a quarterly basis.

RESPONSE

Use of the OP-MEMO mechanism provides for quarterly update of the call lists.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None

37. FINDING DESCRIPTION

Complete the distribution of site-specific public information and provide a copy to the NRC of the information when distributed. This should include information for posting for the transient populations.

RESPONSE

a. Actions Which Have Been Taken

Site-specific public information brochures were distributed to the population within the plume EPZ. This was completed in early 1982. The distribution included spares for use in areas subject to transient populations.

b. Actions Which Will Be Taken

A copy of the brochures will be provided along with the next Emergency Plan revision.

c. Schedule For Completion

As stated above.

38. FINDING DESCRIPTION

Revise OP-3340 to make provisions to document the training received by members of the news media.

RESPONSE

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

OP-3340 will be revised to include a documentation requirement for news media training.

c. Schedule For Completion

January 30, 1983

39. FINDING DESCRIPTION

Conduct the required semiannual Health Physics drill.

RESPONSE

a. Actions Which Have Been Taken

The first semiannual Health Physics drill was conducted on December 17, 1982. The second was on March 25, 1982.

b. Actions Which Will Be Taken

The next semiannual Health Physics drill will be completed prior to September 30, 1982.

c. Schedule For Completion

As stated above.

40. FINDING DESCRIPTION

Test the aspects of message content and understanding during communications drills.

RESPONSE

This training aspect is evaluated during drills and exercises concurrently with message transmission.

a. Actions Which Have Been Taken

None

b. Actions Which Will Be Taken

None

c. Schedule For Completion

None