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Docket Nos.: 50-440/441

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Mr. Dalwyn R. Davidson  
 Vice President  
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 The Cleveland Electric Illuminating Company  
 P. O. Box 5000  
 Cleveland, Ohio 44101

Dear Mr. Davidson:

Subject: Transmittal of report on Emergency Preparedness Meeting for the Perry Nuclear Power Plant (Units 1 and 2)

This letter transmits a summary report documenting the emergency preparedness meeting, requested by your staff, held in Bethesda, Maryland on October 6, 1982. The summary report is enclosed.

Your attention is particularly directed to the Emergency Plan deficiencies highlighted in the enclosed report. Your staff expressed a full understanding of the work which must still be accomplished to realize an Emergency Plan acceptable to the staff and consistent with NRC requirements, and committed to upgrade the Plan as Revision 1 for submittal on/or about January 15, 1983. It is urged that every effort be made to improve on this committed date in order that this Safety Evaluation Report outstanding issue will not impact on the current licensing schedule, and to enable the NRC staff to prepare for the Board hearing on the admitted contention issue of the adequacy of emergency evacuation plans.

Should there be any questions or corrections required to the enclosed report, please advise the project manager, John J. Stefano, accordingly.

Sincerely,

A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing

Enclosure: As stated

cc: See next page

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SURNAME	JStefano:pt	ASchwencer					
DATE	10/3/82	10/3/82					

EMERGENCY PREPAREDNESS MEETING REPORT  
PERRY NUCLEAR POWER PLANT (UNITS 1 AND 2)

- A. Purpose: The NRC staff met with the applicant (CEI) to discuss the status of emergency preparedness for the Perry Nuclear Power Plant. The staff had received for review, prior to the meeting, a copy of a revised Emergency Plan (CEI Report No. OM-15A, Rev. 0, dated September 22, 1982) and draft responses to the NRC comments transmitted to the applicant on August 30, 1982, which served as the basis for discussion.
- B. Date and Location: The meeting was held on October 6, 1982 in conference room 6110 of the Maryland National Bank Building in Bethesda, MD.
- C. Participants: The following CEI and NRC staff representatives participated in the meeting:

<u>CEI</u>	<u>NRC</u>
W. Coleman	C. Van Niel, EPLB
R. Coffey	F. Kantor, EPLB
D. Hulbert	P. Robinson, EPLB
G. Heffner	J. Fairbent, AEB
	W. Pasciak, RAB
	R. Struckmeyer, RAB
	J. Nehemias, RAB
	J. Stefano, LB2

- D. Summary of Discussions: The staff noted that while the revised Emergency Plan was an improvement over the earlier Plan (submitted by CEI letter dated February 15, 1982), much additional information was still required. In particular, the Emergency Plan, as a licensing document, must contain sufficient information to demonstrate compliance with each of the planning standards in 10 CFR 50.47(b) as well as the elements of Appendix E to 10 CFR 50. Guidance for meeting the planning standards is contained in NUREG-0654 which was discussed with the applicant.

The staff stated that the Emergency Plan must be a "stand alone" document; that is, it should not rely upon information in other documents such as the FSAR to provide essential Plan information. However, information required to support other licensing requirements, such as details on emergency response facilities and the technical bases for radiological transport and assessment models which would be too detailed for inclusion in the Emergency Plan, should be provided in separate submittals. For some aspects of the Emergency Plan, such as emergency action levels (EALs), the staff indicated it would be acceptable to include some of the detailed information in emergency plan implementing procedures. In this case, the procedures should be submitted at the same time as the revised Emergency Plan for review purposes. However, even for this latter situation, the Emergency Plan should contain an overview of the subject area.

The staff emphasized responsiveness to the evaluation criteria of NUREG-0654 criteria was essential in developing an acceptable plan. Significant deficiencies were noted in the functional areas of atmospheric transport and radiological assessment; EALs for General Emergencies based on core and containment conditions; and the interfacing of the onsite emergency response organization with offsite organizations, in particular, the prompt protective action decision making chain.

The applicant was informed that the draft responses to the staff's latest set of comments were generally inadequate. Again, the main problem was a lack of substantive information. The staff's comments were intended to guide the applicant toward correcting deficiencies in the plan rather than to just elicit short responses to the comments themselves. The staff expected to see the responses incorporated into the revised Emergency Plan and that it would be acceptable for the applicant to refer to the appropriate sections of the plan in the formal responses to the staff's comments of August 30, 1982.

The status of offsite emergency preparedness was discussed with the applicant. Ashtabula and Geauga Counties have had draft plans reviewed by the State of Ohio and a second draft incorporating the State's comments has been completed by Ashtabula County. A second draft of the Geauga plan is expected by October 1982. Lake County has submitted a draft plan to the State but has not yet received comments back. It was expected that Lake County would have a second draft done by the end of November 1982. Although a finding on offsite preparedness is not required to load fuel and for low power test (see below), the status of offsite preparedness is expected to be a significant factor in the upcoming hearing on the emergency preparedness contention.

The requirements to achieve an acceptable level of emergency preparedness for the Perry facility were reviewed. These included the following:

- An emergency plan in conformance with the requirements of 10 CFR 50.47(b) and 10 CFR 50, Appendix E.
- Acceptable findings from an onsite appraisal to establish that the Emergency Plan is capable of being implemented.
- Submission of State and local emergency response plans in accordance with 10 CFR 50.33(g). No NRC or FEMA finding concerning offsite emergency preparedness is necessary for an OL authorizing fuel load and low power operations up to 5% of rated power. However, NRC review of onsite preparedness will necessarily include aspects of some offsite elements.
- A full scale joint exercise prior to operation above 5% of rated power.

The applicants were informed that timely submittals responsive to the NRC concerns were required to meet the licensing schedule and to prepare for the ASLB hearing.

- E. Agreements and Commitments: CEI committed to provide, for NRC review and approval, an upgraded (revised) Emergency Plan on/or about January 15, 1983

Perry

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