

ORIGINAL

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PROCEEDINGS BEFORE**

NUCLEAR REGULATORY COMMISSION

COMMISSION MEETING

PUBLIC MEETING

DKT/CASE NO.

TITLE BRIEFING ON STAFF ACTIONS REGARDING LOCATION
OF EMERGENCY OPERATIONS FACILITIES

PLACE Washington, D. C.

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440 FIRST STREET, N.W.
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BRIEFING ON STAFF ACTIONS REGARDING LOCATION OF
EMERGENCY OPERATIONS FACILITIES
PUBLIC MEETING

Room 1130
1717 H Street, N.W.
Washington, D.C.

Wednesday, March 2, 1983

The Commission met, pursuant to notice, at
2:10 o'clock P.M.

COMMISSIONERS PRESENT:

- NUNZIO PALLADINO, Chairman of the Commission
- VICTOR GILINSKY, Commissioner
- JOHN F. AHEARNE, Commissioner
- THOMAS ROBERTS, Commissioner
- JAMES ASSELSTINE, Commissioner

STAFF AND PRESENTERS SEATED AT COMMISSION TABLE:

- SAM CHILK
- ED JORDAN
- R. DE YOUNG
- WILLIAM DIRCKS
- DARRELL EISENHUT
- R. VAN NIEL
- HERZEL PLAINE

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DISCLAIMER

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1 P R O C E E D I N G S

2 CHAIRMAN PALLADINO: Good afternoon, ladies
3 and gentlemen.

4 Our meeting this afternoon is to provide the
5 Commissioners with a briefing of staff actions regarding
6 the location of emergency operations facilities. The
7 criteria for the location of these facilities were
8 approved by the Commission in January, 1981.

9 Two options were approved at that time -
10 according to my understanding. The first option would
11 be to provide a facility within ten miles of the plant
12 with a backup EOF between ten and twenty miles.

13 The second option would provide for a single
14 facility at or beyond ten miles.

15 In the latter part of last year it became
16 clear that there may have been some confusion with
17 regard to whether or not deviations from the approved
18 criteria needed to be approved at the Commission level.
19 In order to clear up the confusion, I would suggest that
20 we proceed in the following manner:

21 First, the staff should review the status of
22 how utilities have proposed locating their facilities.

23 Second, the staff might indicate whether it or
24 the Commission has approved deviations from the criteria.

25 Third, we should discuss the course of action

1 to be taken with regard to the EDO's recommendation in
2 its February 15, 1983 memorandum.

3 In order to accomplish this, I would propose
4 letting the staff conduct the briefing, at least get
5 started on it. After we have reviewed the status
6 report, I would like to determine from the Commissioners
7 what further directives we might want to give to the
8 staff with regard to actions in the future.

9 Do any of the other Commissioners have
10 additional opening comments?

11 COMMISSIONER GILINSKY: I do. We got a set of
12 briefing slides this morning, another one twenty minutes
13 ago. I guess I would like to know to what extent they
14 differ from the original set. We got this last week.

15 We seem to be getting more and more in the
16 habit of getting these things shortly before meetings,
17 and that makes it very much harder to look at them. I
18 hope we can try to get them in earlier.

19 Aside from the general point, I wonder if you
20 could tell us something about these various sets of
21 briefing materials, to what extent they differ.

22 MR. DE YOUNG: Let me try to explain why we
23 have to send down various sets of slides. I think we
24 all know that the resources have been limited for the
25 staff and there has been an effect, there is no doubt

1 about it, that we feel really very tight with respect to
2 time. We do not have enough time to even do the
3 management jobs we have. It is getting harder and
4 harder to do these, the slides.

5 We try to meet the schedules that have been
6 set by the staff down here. We asked the staff to
7 provide them. The management that is going to give the
8 briefing has not had an opportunity to really look at
9 them and to get their thoughts into them. That is what
10 happened last week.

11 I had not had an opportunity to really look at
12 the slides. I just did not have it, and I took them
13 home during the weekend. I revised them. They changed
14 the slides slightly. I thought they should have more
15 details in them and I did not want to try to argue about
16 who was right and who was wrong. We wanted to present
17 the facts and get on with it.

18 We sent down a new set that I approved and
19 that I had done myself. I worked on the slides
20 yesterday, I guess. As we read those again, we saw some
21 typos on about three or four pages - just typos.

22 COMMISSIONER GILINSKY: Well, I guess I have
23 to sound pleased you are making the effort to make sure
24 these slides are what they ought to be. But if there is
25 this sort of problem, I guess I think we ought to adjust

1 the Commission meeting schedule.

2 MR. DE YOUNG: It is getting to be a real
3 problem. The staff is really stretched as far as
4 resources are concerned, the management. There is no
5 slack anymore the way we used to have it. I think we
6 are all feeling it. I think that is part of the reason
7 for some of these late dates and these changes that we
8 have to make at the last minute.

9 COMMISSIONER GILINSKY: Well, if that is the
10 case, I guess I think you ought to inform the chairman
11 and the secretary and then we ought to adjust the date
12 of the meeting so that we do have them and get a certain
13 amount of time to look at the materials.

14 MR. DE YOUNG: Maybe that is what we should
15 do. You know, we hate to postpone because next week is
16 worse than this week.

17 CHAIRMAN PALLADINO: Incidentally, we have
18 postponed this meeting at least once, and I have a
19 feeling it was twice.

20 MR. DE YOUNG: But if that is an acceptable
21 explanation, I can go into the briefing. You have more
22 to say?

23 I have a set of slides, the last set that we
24 will use. The first slide --

25 CHAIRMAN PALLADINO: I think I ought to

1 clarify my comment. We postponed it at least once and
2 the impression I got was that there was some
3 displeasure, at least on your part, Vic, that we should
4 not postpone it.

5 COMMISSIONER GILINSKY: Well, there was a lot
6 of displeasure about our not taking up this issue. I
7 also regard it as unacceptable to be taking it up when
8 we have had so little time to look at the slides.

9 Now, your explanation maybe a perfectly
10 acceptable one and I do not mean to lay this at your
11 feet. But the situation is an unacceptable one and
12 something has to give, either the slides will have to be
13 prepared earlier or we need to put our meeting off.

14 CHAIRMAN PALLADINO: Well, we also have
15 another item that develops, new information sometimes
16 develops, and that should not mean that we have to
17 postpone a meeting.

18 COMMISSIONER GILINSKY: Well, it depends on
19 the amount of material and we just have to exercise a
20 certain amount of judgment. If it is a minor matter,
21 then of course we do not postpone it. But if it is more
22 than that, then I think we need to postpone it.

23 MR. DE YOUNG: I have the first two slides.
24 The first slide talks about the initial --

25 COMMISSIONER GILINSKY: (Inaudible) -- issued

1 earlier.

2 MR. DE YOUNG: Yes. The first slide just
3 talks about the initial guidance as I see it, that we
4 received strong guidance from the Commission on the
5 location of the EOFs and the habitability requirements.

6 It was in what we call COMJA 80-37 in January
7 two years ago. That put up the two courses that we
8 might take for the EOF. There could be one that had two
9 facilities, the primary EOF would be within ten miles.
10 They would have a protection factor against direct
11 radiation of five, and they would have the capability to
12 isolate the ventilation system with HEPA filters.

13 The backup facility was specified to be
14 between 10 and 20 miles, and the location would be
15 coordinated with offsite authorities.

16 The other alternative was to have a single EOF
17 at or beyond ten miles, no special protection factor or
18 ventilation requirement. The location coordinated with
19 offsite authorities and, if beyond twenty miles, it
20 specifically stated that the approval of the Commission
21 for that deviation would be required and that some
22 provision would have to be made to move an NRC site team
23 closer than the more than twenty miles.

24 COMMISSIONER AHEARNE: If I could just
25 interrupt for one minute. It is to help three of my

1 colleagues who were not here at the time to perhaps see
2 why some of those elements are there.

3 This was generated out of a proposal by TVA.
4 TVA had come in and had asked for the ability to locate
5 their central facility at TVA headquarters which is many
6 miles away, I guess 40, 80 miles away in the case of the
7 Summer plants.

8 That had surfaced the issue of, there seemed
9 to be an inconsistent set of directives being put out.
10 The staff then had come in with the proposals. I recall
11 there were four separate options, and the Commission
12 then narrowed it down to modify those somewhat, and this
13 now was the result of that.

14 But that is also why, for example, those last
15 two, beyond twenty miles -- basically what we are
16 saying, if someone else wanted to do what TVA had
17 proposed, the Commission specifically would approve it
18 and there had to be some provision for an NRC site team
19 closer. That was the --

20 COMMISSIONER GILINSKY: I think that applies
21 to the beyond twenty miles.

22 COMMISSIONER AHEARNE: Yes, that is what I was
23 trying to do, I was trying to put that in perspective.

24 CHAIRMAN PALLADINO: Did that apply beyond
25 twenty miles for a single facility, or did it apply to

1 more than a single facility?

2 MR. DE YOUNG: Well, of all the requirements
3 that only one that had that requirement to come to the
4 Commission - specifically it said the Commission - and
5 we got a mind-set even after we received the additional
6 guidance that I am going to talk about on Slide 2.

7 In October, or rather on September 30 of 1981,
8 we got a response to a staff proposal to permit it to
9 approve deviations from the guidance that we had been
10 talking about before. And it is clear on re-reading
11 that, without a mind-set, that you said clearly that the
12 Commission has disapproved by a vote of five-nothing
13 your recommendation that the Commission authorized the
14 staff to process and approve licensee requests for
15 exceptions to the criteria there.

16 I think on reflection, without talking about
17 why, if we had read that with a clear mind, I think we
18 would have come to the conclusion that perhaps we should
19 have brought every deviation to you. It is no argument
20 that we thought that we had our mind set on that one
21 point that you had specifically provided, and we missed
22 the direction that you gave us on this.

23 So, I think while there is room for argument
24 and at the end we will propose some alternative because
25 of all the deviations and the slide deviations about how

1 to proceed from now on, but it was clear on reflection
2 that we should have gotten more from the guidance that
3 you gave us than we did get.

4 The next slide will talk about the plants that
5 meet the requirements, and I have requirements --

6 CHAIRMAN PALLADINO: In response -- on your
7 first paragraph, was this in response to a request to --

8 MR. DE YOUNG: Yes.

9 CHAIRMAN PALLADINO: Well, let me ask you,
10 what was this in response to?

11 MR. DE YOUNG: We had a request of the
12 Commission to permit us -- it was in response to a
13 specific request from Davis Besse. We came in and
14 requested general authority from the Commission for the
15 staff to proceed with approval of deviations from the
16 COMJA, you know, approve requirements that you had
17 passed on, on the very first slide.

18 It was part of that request. You reviewed it
19 specifically with reference to the Davis Besse, but in
20 the generic sense you told us that you wanted to pass on
21 it.

22 COMMISSIONER AHEARNE: You had given us at
23 that time, as I recall, a table saying, here is in
24 general the approach that you had planned on following.

25 MR. DE YOUNG: Yes, with protection factors of

1 various amounts.

2 COMMISSIONER AHEARNE: Yes.

3 CHAIRMAN PALLADINO: Did that include both the
4 situation where you had one facility and two facilities?

5 MR. DE YOUNG: I think everything. I think
6 everything.

7 The next slide begins to list the number of
8 plants as we see it now that meet the requirements - in
9 quotes because they are still not requirements.

10 Option one, where we have the two EOFs, there
11 are eight plants and we have some details later. In the
12 option two, a single EOF, 27 plants. So, for a total of
13 35 plants that meet the requirements.

14 COMMISSIONER GILINSKY: What does that mean,
15 Commission approval beyond twenty miles, and then you
16 have the 27 after that?

17 COMMISSIONER AHEARNE: No, the 27 is all.

18 MR. DE YOUNG: Right, 27 is all of option
19 two. As you will see from the detailed slides, there
20 are a number that you have approved specifically. Four
21 of those are included in that 27.

22 COMMISSIONER GILINSKY: I see.

23 MR. DE YOUNG: We have another slide that will
24 show the individual plants.

25 The next slide will indicate the number of

1 plants not meeting the requirements for one reason or
2 another. There are twelve that meet the requirements
3 for location, the protection factor if required, and the
4 ventilation isolation if required.

5 COMMISSIONER GILINSKY: Let's see, when we say
6 they are not requirements we mean what?

7 MR. DE YOUNG: It is not a rule, it is not a
8 regulation. We will get to that. It is not yet an
9 order.

10 COMMISSIONER GILINSKY: This is because of the
11 way 82-111 is structured?

12 MR. DE YOUNG: Yes. We will talk about that a
13 little later.

14 COMMISSIONER AHEARNE: That goes back all the
15 way --

16 COMMISSIONER ASSELSTINE: I think it goes more
17 back the way 0696 was structured.

18 COMMISSIONER AHEARNE: Yes.

19 MR. EISENHUT: Well, it actually even goes
20 back to -- the Commission approved NUREG-737. Remember,
21 it was a Commission-approved but not issued as a formal
22 requirement. It was part of the 737 package.

23 COMMISSIONER GILINSKY: It is not at this
24 point a legally-binding requirement, but there is not
25 any doubt about where we stand on it.

1 MR. DE YOUNG: That is right. There is no
2 doubt in our minds, and after what has happened these
3 past few weeks I do not think there is any doubt in any
4 of the utilities' minds. But we will get to that point
5 near the end of the presentation.

6 COMMISSIONER AHEARNE: I guess the way I would
7 have described it, it is a requirement that we placed on
8 the staff as far as staff approval of anything.

9 MR. DE YOUNG: So, to continue with the slides
10 --

11 CHAIRMAN PALLADINO: I don't understand your
12 first one. These are --

13 MR. DE YOUNG: The twelve?

14 CHAIRMAN PALLADINO: Yes, the twelve. These
15 have no backup EOFs but you are saying they do not meet
16 the requirements for a single?

17 MR. DE YOUNG: They have a primary EOF. They
18 selected where they would have two EOFs, I think - and
19 we will point out that some of these may be a little
20 wrong as we get into the details. But they have a
21 primary EOF.

22 CHAIRMAN PALLADINO: Should these twelve each
23 have a primary?

24 MR. DE YOUNG: Yes, but no backup.

25 CHAIRMAN PALLADINO: But do they plan a backup?

1 MR. DE YOUNG: Some of them do, and we will
2 get into that. There is a small defect in our slides.

3 CHAIRMAN PALLADINO: It says, number of plants
4 not meeting requirements. Now, one could meet a
5 requirement by having a single EOF that is within --

6 COMMISSIONER AHEARNE: Outside ten miles.

7 COMMISSIONER ASSELSTINE: Outside of ten miles.

8 CHAIRMAN PALLADINO: Outside of ten miles.
9 Well, what does this say? It does not say anything
10 about ten miles.

11 MR. DE YOUNG: They have not backup EOF. They
12 have one EOF within ten miles. They have no backup and
13 we think --

14 CHAIRMAN PALLADINO: Okay, within ten miles.

15 MR. DE YOUNG: Right. So, that is their
16 defect. They may be required to have the backup EOF and
17 they do not have it.

18 COMMISSIONER GILINSKY: Well, we have also not
19 set any schedule for compliance. You are going to talk
20 about that?

21 MR. DE YOUNG: We will talk about that later.
22 And without going into details, we have a detailed list
23 where you can see the plants that do not meet these
24 requirements. But the total, there are 42 plants that do
25 not meet the "requirements."

1 The next slide begins to lay out those that do
2 meet it and those that do not meet it. These are, eight
3 plants meet the requirements, option one requirements, a
4 primary EOF within ten miles; a backup EOF between ten
5 and twenty miles, the protection factor and the HEPA
6 filter requirements. They meet it, those eight plants
7 meet that requirement.

8 The next slide --

9 COMMISSIONER GILINSKY: Is that correct that
10 the Seabrook protection factor is 50?

11 MR. DE YOUNG: Yes, they had to be five or
12 more. There are some of them that have a tremendous
13 protection factor.

14 CHAIRMAN PALLADINO: Let's see, just to make
15 sure I understand, take Seabrook for example, the
16 primary EOF is in three-tenths of a mile?

17 MR. DE YOUNG: Right.

18 CHAIRMAN PALLADINO: It's got a --

19 COMMISSIONER GILINSKY: That is essentially on
20 site.

21 MR. DE YOUNG: That is on site.

22 CHAIRMAN PALLADINO: It's got a backup EOF --

23 MR. DE YOUNG: Of 14 miles.

24 CHAIRMAN PALLADINO: Of 14 miles.

25 MR. DE YOUNG: That is between ten and twenty

1 miles.

2 CHAIRMAN PALLADINO: So, why is it? Oh,
3 plants meeting option one requirements, excuse me. I
4 thought you were --

5 MR. DE YOUNG: These are the first eight that
6 meet them.

7 CHAIRMAN PALLADINO: Somehow I thought it --
8 yes, okay.

9 MR. DE YOUNG: The next slide presents those
10 plants that meet the option two requirement, a single
11 EOF between ten and twenty miles; and there are 27 of
12 these. And if you will notice the last four with the
13 asterisk on them, the Commission has approved exemptions
14 for these.

15 There are three of the TVA plants that
16 Commissioner Ahearne addressed before, and Rancho Seco
17 that had proposed to locate it at 23 miles at its
18 corporate headquarters. And that is the 27 plus the
19 previous eight, the 35 plants that do meet the
20 requirements.

21 The next slide begins to talk about those that
22 do not meet the requirements, and we have a point to
23 raise here about some of these in the initial guidance
24 that we received, the very first slide.

25 There was a footnote to that that I did not

1 include on there, but it states that if the utility has
2 begun construction of a new building for an EOF that is
3 located within five miles, that new facility is
4 acceptable with less than protection factor five and
5 ventilation isolation and HEPA filters, provided that a
6 backup EOF similar to (b) in option one is provided.

7 Some of these plants where I have the asterisk
8 in the last two columns for the protection factor and
9 the HEPA may actually meet that requirement. We have
10 not gone back to see when they started. As you will
11 note, they are all within five miles so they all meet
12 the within five miles. And we have not gone back to see
13 if they had started construction of that.

14 Some of these plants may also meet the
15 Commission's requirements. We will have to do another
16 check on that. But some of them will not. I am sure
17 that some of them will miss it.

18 MR. EISENHUT: And that in effect would be, as
19 you mentioned, Dick --

20 MR. DE YOUNG: The 35.

21 MR. EISENHUT: -- some of these plants would
22 go over to the 35 list, and that list would go up.

23 MR. DE YOUNG: So, maybe balance that half and
24 half of the plants. Half may be acceptable and roughly
25 half will be unacceptable for one reason or another.

1 Now, Turkey Point, we have just submitted a
2 paper to Mr. Dircks to send to the Commission,
3 requesting your approval of a deviation. Turkey Point
4 is the last plant on that list. It has an EOF, a single
5 EOF, located 24 miles at its corporate headquarters in
6 Miami, and we are recommending approval of that but that
7 will be submitted to you for your review and approval.

8 The next slide continues the number of plants
9 that do not meet the requirements for one reason or
10 another, and the asterisk indicates where they do not
11 meet it.

12 CHAIRMAN PALLADINO: Are you leaving this
13 slide, the one that has the 16 plants?

14 MR. DE YOUNG: Yes, I was leaving that.

15 CHAIRMAN PALLADINO: Can I just -- I want to
16 make sure I am following you. The Yanke Rowe, for
17 example, has a primary .5.

18 MR. DE YOUNG: On site.

19 CHAIRMAN PALLADINO: Basically on site. But
20 its backup is 12 miles --

21 MR. DE YOUNG: Which is fine.

22 CHAIRMAN PALLADINO: -- which falls within ten
23 and twenty. The problem here is on protection factor?

24 MR. DE YOUNG: Protection factor and the HEPA
25 filters. The asterisk means they do not meet that.

1 However, your guidance that we provided, the
2 footnote says if they had started construction of that
3 primary EOF within five miles it need not meet those two
4 last requirements. And we have not determined when they
5 started construction on each of these plants.

6 So, Yankee Rowe may well be acceptable.

7 CHAIRMAN PALLADINO: Read that footnote again?

8 MR. DE YOUNG: If the utility has begun
9 construction of a new building for an EOF --

10 CHAIRMAN PALLADINO: Either primary or
11 secondary?

12 MR. DE YOUNG: No, that is located within five
13 miles. That is the primary that they are talking
14 about. That new facility is acceptable with less than a
15 protection factor of five and that delays isolation and
16 HEPA filters.

17 You are saying if they have started it because
18 it was early guidance and some of the utilities say, "We
19 are going to hold off until they determine exactly what
20 the Commission requirements are," but some of the
21 utilities took your initial guidance and started it, and
22 you said, if they started it they need not meet --

23 COMMISSIONER AHEARNE: To be fair, Dick, they
24 got started. They did not take our initial guidance,
25 they got started.

1 MR. DE YOUNG: For one reason or another.

2 COMMISSIONER AHEARNE: Yes.

3 COMMISSIONER GILINSKY: Well, to be candid
4 about it, the staff gave them guidance saying that it
5 was okay. And the situation we got into when we started
6 thinking about the possibility that the center itself
7 may have to get evacuated was that a lot of utilities
8 had started construction, and --

9 MR. EISENHUT: That is right, there was a
10 footnote so that the guy who started construction did
11 not get penalized, as long as he had a backup, a
12 fall-back position.

13 COMMISSIONER AHEARNE: Right.

14 MR. DE YOUNG: And some of these 16 plants may
15 be acceptable.

16 CHAIRMAN PALLADINO: What is the date that
17 determines?

18 MR. DE YOUNG: Let's see, your guidance came
19 out to us on January --

20 COMMISSIONER AHEARNE: January 21, 1981.

21 MR. DE YOUNG: In '81. January 12, 1981.
22 That is two years ago, more than two years ago.

23 And we fully expect several of these plants to
24 fall into that category.

25 We move to the next slide that starts with

1 No., 17 through No. 51. The asterisks, again, indicate
2 the unacceptable portions of those four factors. All of
3 these plants have the backup ECF more than twenty miles.

4 COMMISSIONER GILINSKY: Then why did plants
5 come in with proposals like this?

6 MR. DE YOUNG: Many of them.

7 COMMISSIONER GILINSKY: I mean, this is just
8 so far out of line it takes my breath away.

9 MR. DE YOUNG: Davis Besse, for example, that
10 is not far out of line, that is 21 miles.

11 COMMISSIONER GILINSKY: Yes, but let's take a
12 look at one that is 95 miles or 100 miles, or 42 miles.

13 COMMISSIONER AHEARNE: Some of them are way
14 out, some of them are --

15 COMMISSIONER GILINSKY: Well, consider those.

16 MR. DE YOUNG: I don't know.

17 CHAIRMAN PALLADINO: Did anybody approve 95
18 and 100 miles?

19 MR. DE YOUNG: No, we have not approved
20 anything. Now, Waterford later on we will talk about,
21 we did send them a letter. But the letter did not --
22 the approval was not at a very high level, like at the
23 branch chief level. We will reconsider that.

24 MR. EISENHUT: Well, let me add one more thing
25 too. You have to be aware there are plants on here like

1 San Onofre where, remember that the Commission got
2 briefed on San Onofre Unit 2 and we went through the
3 whole process and granted San Onofree 2 full power OL
4 with that proposal on the books. The safety evaluation
5 basically said that we are going to be continuing to
6 review it.

7 COMMISSIONER AHEARNE: Yes, but on a lot of
8 those issues, as I seem to recall, the question came up,
9 what about these EOFs and such. And the answer -- I
10 thought the discussion was, well, we are going to have a
11 Commission meeting focus just on this issue. So --

12 MR. EISENHUT: You are absolutely right, and I
13 was just going to highlight that there are a few on
14 here, as you go through the entire package. On the last
15 list was McGuire, it is not as clean as you might wish
16 in the litany of paper.

17 COMMISSIONER AHEARNE: Oh, I would certainly
18 agree with that.

19 (Laughter)

20 MR. EISENHUT: And we are in the situation
21 where we are trying to pick up the pieces - as Dick said
22 - in a minute and we are going to try to systematically
23 go through them and straighten out the package.

24 But one could argue, and the utility believes
25 that he has got an approval on San Onofre by virtue of

1 the fact that he went through the licensing process, got
2 a full power approval on his package. It is probably as
3 far along on his permanent EOF as any plant in the
4 country. He has an operational EOF.

5 So, I am just saying it is not as clear as we
6 --

7 COMMISSIONER AHEARNE: Sure, but this might be
8 a good time to point out, the flavor I get in reading
9 some of the information is that there are some people
10 who seem to believe that this backup almost has the same
11 character of a major facility as the primary, and that
12 is not, has never been the --

13 MR. EISENHUT: Intent.

14 COMMISSIONER AHEARNE: As I can recall the
15 previous discussions we have had, we tried to make that
16 clear, we were not trying to say this backup should be
17 another big facility.

18 So, I am not certain whether I would share the
19 distress of a utility saying, "Well, we have already
20 gotten --

21 MR. DIRCKS: Again I think San Onofre, I am
22 sure, is the corporate headquarters.

23 MR. DE YOUNG: I am positive.

24 MR. DIRCKS: Thirty-five miles away, where
25 Southern California Edison has its plant.

1 MR. EISENHUT: Oh, yes. I do not think the
2 utility shows any distress over it.

3 COMMISSIONER AHEARNE: Yes.

4 MR. EISENHUT: The point I am making is, it is
5 not as clear and crisp as we were making it sound.
6 There is some fuzziness as to what was approved and what
7 was not approved, and you know, the documents speak for
8 themselves if you go back and look.

9 MR. DE YOUNG: And the hundred miles appears
10 to be a corporate headquarters, also.

11 COMMISSIONER GILINSKY: Let me ask you on this
12 San Onofre, your memo says this is approval buys only
13 their interim primary EOF for the purpose of granting an
14 operating license. That doesn't have a good ring to it.

15 MR. DE YOUNG: We used a unique language
16 because of the uncertainty about where we were going to
17 come out on this 80 or 81-111. We were very careful and
18 we did not want to say things too tightly. They had
19 proposed the interim EOF; they had committed to meet the
20 requirements that we established with the permanent EOF
21 when we had them.

22 I think we approved it, the interim is
23 acceptable for licensing purposes. We had hoped we
24 would have the final requirements established. And I
25 think we are very close to that now.

1 So, they had made a commitment to meet
2 whatever requirements we were going to come up with.
3 But in the interim they said, "Please, approve this for
4 initial licensing," and that is what we did. And the
5 words meant that, they are very loose words.

6 To the next slide. It continues with the
7 plants not meeting the requirements. There are twelve
8 that have no backup; they have a primay; they have the
9 protection factor; they have the HEPA but they have no
10 backup facility specified.

11 CHAIRMAN PALLADINO: Are they planning to put
12 in backup?

13 MR. DE YOUNG: I don't know, we will find out
14 with this.

15 COMMISSIONER AHEARNE: Would lit be fair to
16 characterize most of those as Summer?

17 MR. DE YOUNG: Yes.

18 COMMISSIONER AHEARNE: I noticed you sent us a
19 paper on Summer.

20 MR. DE YOUNG: Summer.

21 COMMISSIONER AHEARNE: Summer. And the
22 general attitude seemed to be there that they don't need
23 a backup because they are never going to have to
24 evacuate their EOF.

25 MR. DE YOUNG: Some of them.

1 COMMISSIONER GILINSKY: Let's see, they have
2 just decided they are not going to have a backup, that
3 is their proposal?

4 MR. DE YOUNG: I really don't know. We have
5 not gotten into the specific details because of the work
6 we did to develop the staff position and the Commission
7 position. That will be put out in the form of the
8 orders that we will be talking about later.

9 COMMISSIONER GILINSKY: I mean, not listening
10 at all.

11 MR. DE YOUNG: Yes. Some of them don't.

12 COMMISSIONER AHEARNE: Well, Summer, we just
13 got on Monday, we got a SECY paper on negative consent
14 and the staff is proposing to turn down Summer's
15 request. But what the licensee was requesting is not to
16 have a backup because they are not going to have to
17 evacuate.

18 COMMISSIONER GILINSKY: Did they not contact
19 us informally on this subject?

20 MR. DE YOUNG: Well, you know, it is not only
21 them, it is us, the staff, that we had not come to a
22 final position on these things. They asked us, "Well,
23 what will your position be," and we said we are not
24 certain yet. We are still developing it within the
25 staff. We are trying to coordinate all the requirements

1 for emergency preparedness and response, and it is going
2 to take us a little time yet.

3 So, we partly led to some of the confusion,
4 there is no doubt about it. We were not very specific.
5 The guidance we provided was not that specific.

6 The next slide talks about those, just lists a
7 few of those that we have informed that we have approved
8 their exceptions. The first three are TVA.

9 COMMISSIONER GILINSKY: Let me just go back to
10 the San Onofre case. The staff points out there is not
11 any requirement that this be an elaborate facility. Why
12 is it so difficult to have a facility that complies with
13 the Commission's guidance?

14 MR. DE YOUNG: I don't know.

15 COMMISSIONER GILINSKY: Why do we then agree,
16 "for the purpose of issuing a license?" I mean, it
17 sounds like we got lower standards for issuing a license.

18 CHAIRMAN PALLADINO: Just for operating.

19 MR. DE YOUNG: Darrell, maybe you can refresh
20 my mind about the backup EOF.

21 MR. EISENHUT: Let me back up on that just to
22 make sure that we are not on San Onofre confusing the
23 issue. At the time of licensing Unit 1, which goes back
24 in early '81 the SERs were issued, et cetera, the
25 requirement on San Onofre on our safety evaluation said

1 they had an interim EOF, and the interim was
2 acceptable. San Onofre, Southern California, has then
3 committed to meeting whatever our requirement was for
4 the permanent facility.

5 They proposed a close-in hardened permanent
6 facility. As a license condition on San Onofre 1 was
7 that it be complete, in fact, by January 1, 1983 or
8 December 31st of 1982.

9 They have met that commitment. The thing that
10 we need to do yet in going through our review is, the
11 proposal that was in-house from San Onofre was to have
12 the permanent, you know, beautiful facility hardened,
13 close-in. It is right here on the site --

14 COMMISSIONER GILINSKY: Right.

15 MR. EISENHUT: And they would like to have
16 their backup --

17 COMMISSIONER GILINSKY: It is not on the site,
18 though.

19 MR. EISENHUT: It is very close. It is a
20 really nice, complete facility.

21 COMMISSIONER GILINSKY: Right.

22 MR. EISENHUT: The other part of their
23 proposal was to have their backup at 35 miles.

24 MR. DE YOUNG: At their corporate
25 headquarters.

1 MR. EISENHUT: At the corporate headquarters
2 in Rosemont, or Rosemead.

3 MR. DE YOUNG: Rosemead.

4 MR. EISENHUT: What we need to do, then, is
5 complete our evaluation and say that is unacceptable.
6 And I do not think there is a great resistance from
7 Southern California Edison. I think we just have to go
8 through the process, close out that loose ends. They
9 have a facility and they have arguments why they believe
10 the backup at 35 miles is in fact acceptable.

11 But it is a matter of going through the
12 process. So, you know, it has evolved over time on this
13 and it is a matter now of, I think, closing up the loose
14 ends.

15 CHAIRMAN PALLADINO: Let me ask you -- maybe I
16 should ask this of John and Vic, they were here. When
17 you approved TVA, was that because it was at corporate
18 headquarters?

19 COMMISSIONER AHEARNE: Well, it was a
20 combination. TVA had built up a fairly elaborate
21 response system which involved communication links and
22 technical support at the corporate headquarters. So,
23 they had put a lot of effort into developing the
24 information transfer system.

25 CHAIRMAN PALLADINO: But they were

1 categorically -- you said you were thinking of denying
2 this one at 35 miles?

3 MR. EISENHUT: Oh, I did not say that yet
4 because I&E is doing the review.

5 I said it needs to complete the review process.

6 CHAIRMAN PALLADINO: Okay.

7 MR. EISENHUT: Southern California Edison is
8 presenting arguments very similar to the TVA arguments.

9 CHAIRMAN PALLADINO: Just because it is at
10 corporate headquarters.

11 COMMISSIONER AHEARNE: But if they can be very
12 similar then I would for myself look at, do they have
13 the same level of resources already invested --

14 MR. EISENHUT: That's correct.

15 COMMISSIONER AHEARNE: -- at the facility.

16 COMMISSIONER GILINSKY: And there too, you are
17 talking about a very elaborate facility.

18 COMMISSIONER AHEARNE: That's right.

19 COMMISSIONER GILINSKY: Now just --

20 COMMISSIONER AHEARNE: TVA had a very --

21 COMMISSIONER GILINSKY: It is not a backup
22 facility.

23 CHAIRMAN PALLADINO: But maybe they might come
24 up with something.

25 COMMISSIONER AHEARNE: Along with their, as I

1 recall, they also had the dedicated helicopters to
2 transfer the people.

3 CHAIRMAN PALLADINO: I don't know if that is
4 part of the potential either.

5 COMMISSIONER AHEARNE: I don't know. You
6 asked the question.

7 MR. EISENHUT: Well, on San Onofre the other
8 piece you need to know is that I am overdue on getting
9 my set of slides down for the full power briefing to the
10 Commission, and in fact this is an issue that will be
11 addressed.

12 COMMISSIONER AHEARNE: Yes.

13 MR. EISENHUT: I think the meeting is on the
14 14th of March.

15 COMMISSIONER AHEARNE: To be fair to the
16 staff, as I recall the staff opposed the TVA.

17 COMMISSIONER GILINSKY: Right.

18 MR. DE YOUNG: Yes.

19 MR. EISENHUT: But partly the arguments on San
20 Onofre are very similar to what Commissioners Ahearne
21 mentioned on TVA, they are the same kinds of arguments.

22 MR. DE YOUNG: That slide continues. There
23 are three TVA plants, Rancho Seco, which is 23 miles
24 from the plant site. That is at their corporate
25 headquarters. We recommended approval and the

1 Commission granted it.

2 CHAIRMAN PALLADINO: Which slide are we on? I
3 am sorry.

4 MR. DE YOUNG: This is the communication of
5 findings.

6 CHAIRMAN PALLADINO: Okay.

7 MR. DE YOUNG: Waterford was the one with the
8 staff approval. They have the proposed EOF, backup EOF
9 25 miles from the plant site. That was reviewed and
10 approved at a lower level. Not too many people looked
11 at it. It was one of those that slipped by the guidance
12 to bring the exceptions to the Commission. We are going
13 to look at that again and tell the Commission what we
14 did, what the basis was for, you know, that we used to
15 grant tht exception. And we will come back with a piece
16 of paper on that.

17 CHAIRMAN PALLADINO: Can I just ask a
18 question? How does approval like this go out, over
19 whose signature? Can it go over a branch chief's
20 signature?

21 MR. DE YOUNG: I think what happened here was
22 that we had a meeting between the I&E people at the
23 branch chief level and the NRR people at a similar level
24 or at the project manager level. They discussed it with
25 the utility. It sounded acceptable and the utility sent

1 something in to NRR that said, on the basis of our
2 meeting of such-and-such we believe we have agreed to
3 the following. And then an assistant director at NRR
4 wrote them back saying, yes, generally you have our
5 approval.

6 MR. EISENHUT: It was no assistant director.
7 It was an IE chief and an NRR chief, they were both
8 chiefs.

9 MR. DE YOUNG: Branch chiefs.

10 CHAIRMAN PALLADINO: I guess I was asking a
11 more fundamental question. At what level can a utility
12 take responses as authoritative?

13 (Laughter)

14 COMMISSIONER ROBERTS: That is a very good
15 question.

16 COMMISSIONER AHEARNE: I suppose you would
17 have to really ask a lawyer on that issue.

18 MR. DE YOUNG: I did not hear your question.

19 CHAIRMAN PALLADINO: Maybe my question might
20 better be, have we ever settled or identified the level
21 of approval that would be authoritative from the NRC?

22 MR. DE YOUNG: We are trying to do that in one
23 of the last slides today.

24 MR. EISENHUT: The question is a lot broader,
25 though, than the EOF.

1 CHAIRMAN PALLADINO: Yes, I know.

2 MR. EISENHUT: We have a standard approach in
3 NRR for all OLS that the safety evaluation is approved
4 by a division director and up. Any deviations -- we in
5 fact canvassed the staff to identify any deviations from
6 the regulations. We go to all the appropriate technical
7 division chiefs and say, "Are there any deviations here
8 because they need to be highlighted." We do that prior
9 to any licensing decision.

10 So, that elevates them at least to a division
11 director level as standard practice. And we furthermore
12 have a formal delegation authority. Exemptions to any
13 regulations have to be either, in NRR, issued --
14 exemptions to all requirements, both on licensing
15 matters and operating reactors, have to be issued by no
16 lower than myself. I am the first level of authority
17 that can issue exemptions.

18 Typically, probably 95 percent I sign out,
19 exemptions.

20 So, any deviation from a regulation
21 requirement, rule, whatever, has to -

22 CHAIRMAN PALLADINO: Are those all spelled out?

23 COMMISSIONER AHEARNE: But this is a
24 "whatever."

25 MR. EISENHUT: This is clearly a "whatever."

1 But as I said, even on the "whatevers," for OLs it has
2 to get to the same comparable level.

3 COMMISSIONER AHEARNE: But Waterford is an OL.

4 MR. EISENHUT: Waterford has not gone through
5 the process yet, though, and does not have an OL.

6 COMMISSIONER AHEARNE: Right.

7 MR. EISENHUT: And I feel very confident that
8 this would have gotten caught on the backup EOF before
9 it made it through the system.

10 CHAIRMAN PALLADINO: No, I was addressing a
11 more fundamental question. Do we have written down, for
12 the benefit of the people we license, what level of
13 authority they should look for in certain kinds of
14 actions? I gather we do not.

15 COMMISSIONER GILINSKY: It seems to me there
16 are two questions. One is the level of authority at
17 which things are approved.

18 CHAIRMAN PALLADINO: Yes.

19 COMMISSIONER GILINSKY: And the other is, what
20 is the point of contact. It seems to me that varying
21 levels of authority are important, depending on the
22 importance of the issue.

23 MR. EISENHUT: I think that's right.

24 COMMISSIONER GILINSKY: But I think each
25 utility ought to have one point of contact from which --

1 CHAIRMAN PALLADINO: No, I am looking
2 backwards from the utility's standpoint. If I am doing
3 business with any organization, I would like to know who
4 is authorized to make a commitment on behalf of the
5 organization. There is some general law. I am not a
6 lawyer but I noticed the general law about those kinds
7 of things when you work in the private sector.

8 I am sort of surprised that we do not have
9 something similar.

10 MR. EISENHUT: No, I think we do have
11 something similar. On all projects --

12 CHAIRMAN PALLADINO: It would be nice to have
13 it.

14 MR. EISENHUT: No, I think we do, and we do
15 have a formal delegation of who has authority to approve
16 what kinds of things., And this one, I believe, was
17 just an error.

18 CHAIRMAN PALLADINO: Yes.

19 COMMISSIONER ASSELSTINE: Those are in the
20 manual, are they not?

21 CHAIRMAN PALLADINO: Maybe they are.

22 COMMISSIONER ASSELSTINE: Certainly the higher
23 level ones, I know.

24 MR. EISENHUT: I think the higher level ones
25 certainly are. And there is a formal --

1 MR. DIRCKS: It is laid out who signs orders.

2 COMMISSIONER ASSELSTINE: Yes.

3 MR. EISENHUT: Well, and there is a formal
4 delegation that we have that is concurred in by ELD that
5 authorizes the appropriate levels in NRR. This clearly
6 was an error.

7 CHAIRMAN PALLADINO: This is a slip, yes.

8 MR. EISENHUT: But let me get to other data
9 points.

10 CHAIRMAN PALLADINO: However, my point is more
11 fundamental than that. If I were the utility and I got
12 it from John Doe who was not at the right level, I would
13 say, "Hey, wait a minute, that is not the final action."

14 COMMISSIONER GILINSKY: It seems to me they
15 should not have to inquire as to what is approved at
16 which level here. I think they should always --

17 CHAIRMAN PALLADINO: You can moralize on that,
18 but actually in contract law, if a person is a vice
19 president you have a right to presume that he has
20 authority. There are certain presumptions in the law
21 that you can make.

22 Now, with agencies in regulating I do not
23 think we have such presumptions in law, and I think it
24 would be well for the utility to know - just as well as
25 we want to know, who is authorized to approve something

1 - and that might be another way to catch slips.

2 COMMISSIONER GILINSKY: I can't compete on the
3 legal side here but it seems to me that even if Darrell
4 is signing the thing out, or Harold, or Bill, it ought
5 to come to the utility from the same point, in other
6 words issued, then come back to a single point --

7 COMMISSIONER ASSELSTINE: Right.

8 COMMISSIONER GILINSKY: -- whether it is the
9 project manager or the assistant director, or whoever it
10 is, so they are always receiving it from the same
11 place. And once it comes through that place they know
12 that is an official instruction.

13 MR. EISENHUT: I think we attempt to do that,
14 and we attempt to do it even more so now that we have
15 certain actions, remember, coming out of NMSS that we
16 are trying to run.

17 We have certain things we are farming out to
18 the regions where we are getting regional evaluations
19 back to us. And it is getting much harder to integrate
20 it all together to be sure -- we have to have a single
21 focal point and that single focal point is the project
22 manager and the branch chief. And there is a certain
23 amount of, everthing that goes out, approving anything,
24 at least has to be a branch chief and that is the lowest
25 level of approval.

1 But it is getting harder because you have to
2 orchestrate to be sure that you realize how complicated
3 the agency gets when we are talking about numbers of
4 people and plans required for NMSS, emergency security
5 functions, for operating functions. If you go through
6 fire brigades and a number of things, there are a lot of
7 these requirements; and that is one where they integrate
8 together very tightly.

9 You have to have the one focal point or it
10 really gets out of hand. So, I think we try to do
11 that. Everything comes to a project manager. That
12 project manager is a dedicated person to a project. It
13 is his full-time job to assure that everything is
14 integrated together from all the different arms. Then,
15 for what gets approved, there is a formal signature
16 level that says what kinds of things are going to get
17 approved.

18 COMMISSIONER GILINSKY: Suppose you have
19 approved something, does that then get passed to the
20 utility by the project manager?

21 MR. EISENHUT: Oh, absolutely, he concurs on
22 it. The project manager will concur on it before I
23 would look at it.

24 COMMISSIONER GILINSKY: But does it then go
25 back to him?

1 MR. EISENHUT: It goes back to him. He
2 formally dispatches it. Usually he calls the utility.
3 He has been in contact with the resident inspector
4 because if you do not do that kind of a system, you end
5 up with a resident sitting at a plant out of touch; a
6 utility in a corporate office out of touch; regional
7 operations out of touch.

8 COMMISSIONER GILINSKY: Well, that sounds like
9 the right way to handle it.

10 MR. EISENHUT: It does not always work. I
11 mean, it is a very complicated system and it is --

12 COMMISSIONER ROBERTS: Well, do we utilize the
13 project manager when we are discussing proposed
14 enforcement actions?

15 MR. EISENHUT: Yes. In fact, recently
16 proposed enforcement actions are coming over to us more
17 and more for review, quite often from either I&E or from
18 the region. But the licensing office gets --

19 MR. DE YOUNG: We get their views, not that
20 they have to agree to it.

21 COMMISSIONER ROBERTS: I understand.

22 MR. DE YOUNG: But we get their views.

23 CHAIRMAN PALLADINO: With regard to the
24 Waterford one, did that go through the project manager
25 or did that slip by the way?

1 MR. EISENHUT: Yes, it did. In fact, the
2 letter was written by the project manager, signed by his
3 chief as a result of a letter that came from I&E's chief
4 saying that, you know, this meets all of our criteria.

5 CHAIRMAN PALLADINO: All right, you have
6 answered my question.

7 MR. EISENHUT: There was a breakdown across --

8 COMMISSIONER AHEARNE: The single focal point
9 works fine in making sure everybody knows it is being
10 approved, but it does not get to the issue of who
11 approved it.

12 MR. EISENHUT: That is correct.

13 MR. DE YOUNG: Millstone, we had a staff
14 approval of an EOF, 1.1 miles from the plant site in
15 early 1980. No mention of a backup EOF was made because
16 the Commission requirements were not developed at that
17 time.

18 We had not established that a back-up EOF was
19 required.

20 COMMISSIONER AHEARNE: Then it would not
21 really be correct to call that an approval of an
22 exception because --

23 MR. DE YOUNG: That's right.

24 COMMISSIONER GILINSKY: Well, wait a minute.
25 I am sorry, John, you --

1 COMMISSIONER AHEARNE: See, my argument is
2 that you could not say --

3 MR. DE YOUNG: That we put it in there.

4 COMMISSIONER AHEARNE: -- that we approved,
5 that the staff approved an exception if the staff's
6 argument is we had not put on the requirements yet.

7 COMMISSIONER GILINSKY: Yes. Now, what is
8 going to happen on those?

9 MR. DE YOUNG: We will review that again. We
10 are going back to each utility, approved and not
11 approved, and make sure. We will touch on that at the
12 end.

13 COMMISSIONER GILINSKY: It seems to me they
14 just have to have a backup EOF. I cannot see how we
15 could come at it any other way.

16 MR. DE YOUNG: The next slide talks about
17 recent events, and 81-111 was the mechanism --

18 COMMISSIONER GILINSKY: Let's see, is there
19 any question about whether they are going to be required
20 to have a backup EOF?

21 MR. DE YOUNG: I would like to hear what they
22 say.

23 COMMISSIONER GILINSKY: I mean, what is there
24 to say? We are not requiring --

25 MR. DE YOUNG: Well, I don't know.

1 COMMISSIONER GILINSKY: The reason for the
2 backup EOF is the basic concern that an EOF that is
3 close to the plant may itself have to be evacuated. You
4 do not want to be in a situation where you don't have a
5 manned center while you are giving the public advice on
6 public protection.

7 MR. DE YOUNG: I would say the probability is
8 very low that we would approve anything without a backup
9 EOF. But until you look at something, until you bring
10 it to the Commission for review, I don't know.

11 The inclination would be not to approve no
12 backup.

13 The next slide talks about recent events. The
14 most recent I think of major importance is 81-111B.
15 That was a revision of 81-111 which tried to tie
16 together all the emergency preparedness and response
17 requirements of the Commission.

18 COMMISSIONER GILINSKY: Let me just go back to
19 that one. I mean, what conceivable argument could there
20 be for not having a backup?

21 MR. DE YOUNG: I don't know. I can't think of
22 all the pros and cons. I can't think about any.

23 COMMISSIONER GILINSKY: I mean, I can
24 understand arguing a mile this way or a mile that way.

25 MR. DE YOUNG: We thought there was no reason

1 to approve the TVA.

2 (Laughter)

3 MR. DE YOUNG: I just don't know. It did not
4 seem like a logical approach. I don't know. I can't
5 think of a logical reason to approve it.

6 COMMISSIONER ROBERTS: Yes, yes.

7 COMMISSIONER GILINSKY: Well, I am not asking
8 you to predict what the Commission is going to do, I am
9 asking about your views.

10 MR. DE YOUNG: Well, I cannot perceive
11 approving Millstone without a backup. But, you know,
12 they may come up with some reason.

13 (Laughter)

14 MR. DE YOUNG: I don't know. I would hate to
15 say we have made up our minds about it.

16 COMMISSIONER GILINSKY: What you are saying
17 is, you don't know what the Commission will do.

18 (Laughter)

19 CHAIRMAN PALLADINO: Well, I suggest we not
20 force him to --

21 (Laughter)

22 CHAIRMAN PALLADINO: -- he answered now.

23 MR. EISENHUT: I do point out, you will have
24 another "lick" at Millstone III --

25 MR. DE YOUNG: Millstone.

1 MR. EISENHUT: -- because Millstone III we
2 just docketed for their OL, and I have told them they
3 are going to have to have a backup for the Millstone III.

4 MR. DE YOUNG: 82-111 we did get approval by
5 the Commission to put this out. And this was what we
6 sent out as -- I forget what we called it, Darrell,
7 Supplement 1 to NUREG-07-37 which was approved by the
8 Commission.

9 CHAIRMAN PALLADINO: What did you send out?

10 MR. DE YOUNG: Darrell sent out to all
11 licensees that the Commission approved guidance, all of
12 the integrated emergency response capabilities, SPDS.
13 They are listed in the generic letter that Darrell sent
14 out last November. It is the integrated response
15 capability needs. It includes the SPDS, the control
16 room design requirements, Reg. Guide 197, application to
17 ERF, the upgrade of the emergency operating procedures,
18 any ERFs themselves, which includes the EOF.

19 COMMISSIONER AHEARNE: But as far as the
20 table, was it not just the same?

21 MR. DE YOUNG: The table was the same. But to
22 get back to a point that I did not want to raise before
23 when we were talking about who can approve it, in that
24 document that we sent out on EOFs there is, on page 24
25 of the document, it states that licensees should assure

1 that the design of ERFs satisfies these requirements.
2 Exceptions from or alternative methods of implementing
3 these requirements should be discussed with NRC staff
4 and in some cases could require Commission approval.

5 I think we interpret that now to mean in all
6 cases, and we will be talking about requesting some
7 deviation from that. Licensees should continue to work
8 on ERFs to complete them according to schedules that
9 will be negotiated on a plant-specific basis.

10 So, this was approved by the Commission and it
11 is a rather large document. I know you don't really
12 read every word and neither do we half the time. And
13 some of this gets out. And as late as a few months ago
14 we all, together, approved these types of words. And we
15 are here today to get further guidance.

16 COMMISSIONER GILINSKY: Let me ask you, on
17 plants that are under construction where utilities come
18 and ask your advice, would you advise them one way or
19 the other regarding these two options?

20 MR. DE YOUNG: No one has come to me. They
21 may have come to some of the staff.

22 COMMISSIONER GILINSKY: Because, you know, I
23 said earlier that the problem is that you may have to
24 evacuate one of these facilities that is close in. It
25 is not just that because we do require protection

1 factors.

2 MR. DE YOUNG: Yes.

3 COMMISSIONER GILINSKY: It is that if the area
4 is contaminated you cannot bring people in and out.

5 MR. DE YOUNG: Right.

6 COMMISSIONER GILINSKY: It is just not as
7 useful a center as it ought to be, which is why we are
8 led to back-up centers. Ideally, I think we would have
9 had all the centers some distance away.

10 COMMISSIONER AHEARNE: Yes, I think that is
11 true.

12 MR. DE YOUNG: I tend to agree with that.

13 COMMISSIONER AHEARNE: We really went to the
14 idea of the backup because so many people had already
15 started close in.

16 MR. DE YOUNG: Close in.

17 COMMISSIONER GILINSKY: I guess I don't think
18 it is a good idea for more of them, to the extent they
19 still have the freedom, to build their primary facility
20 close in.

21 MR. DE YOUNG: There are not too many more of
22 them left, you know, that we have not covered.

23 MR. EISENHUT: Yes, most plants in
24 construction already have the applications in and they
25 are formally under review. So, most of them are well

1 along.

2 MR. DE YOUNG: This generic letter that
3 Darrell sent out in November specified that we are going
4 to conduct workshops to explain and to answer questions
5 about all of these requirements and so on, how we are
6 going to implement the entire system. Those workshops
7 are concluding this week. The last one will be Friday,
8 I believe, in Region 3.

9 CHAIRMAN PALLADINO: Dick, did you say there
10 was a note on this table from SECY-111B?

11 MR. DE YOUNG: No, there is a --

12 CHAIRMAN PALLADINO: Oh, it was not on 111B?

13 MR. DE YOUNG: Yes.

14 MR. EISENHUT: Yes, it should be.

15 MR. DE YOUNG: It was put on 111B itself, not
16 on the SECY.

17 CHAIRMAN PALLADINO: No, I meant on the table.

18 MR. DE YOUNG: No, not on the table. It is on
19 page 24.

20 CHAIRMAN PALLADINO: I did not expect that, I
21 have a copy of the table.

22 MR. EISENHUT: I should add that the letter
23 that Dick referred to, Supplement No. 1 to 737, this
24 package also addresses the question of who can approve
25 schedules, for example, and integrating them together.

1 It encourages, you will recall, the licensee to work with
2 the project manager and then it says the agreement will
3 be formalized per an order, which means it has to again
4 come to me for signature; which means it will also carry
5 I&E concurrence or the appropriate offices.

6 MR. DE YOUNG: That generic letter requires
7 each licensee to advise the staff by April 15 - next
8 month - of the schedules to meet all of the requirements
9 and the Commission-approved set of requirements.

10 The last page talks, after you have seen all
11 these deviations where protection factors, HEPA -- we
12 think that it would not be the most efficient use of
13 your time to review each and every exception.

14 And the last slide requests you to permit the
15 staff to review all requested exceptions, EOF location
16 and habitability requirements. Permit the director of
17 IE to approve such exceptions, and those of special
18 interest - which would include anything like 95 miles or
19 100 miles, or no EOF - if we were to propose approval of
20 no EOF, we would come back to you.

21 COMMISSIONER GILINSKY: I suggest you bring
22 them all up on a negative consent basis, that is a
23 reasonable middle way, so we are informed.

24 COMMISSIONER AHEARNE: I will have to comment
25 that it certainly has not been too big a burden so far.

1 (Laughter)

2 CHAIRMAN PALLADINO: Dick --

3 MR. DE YOUNG: I do not think it will be a
4 major burden.

5 CHAIRMAN PALLADINO: I don't understand your
6 recommendation. You say permit staff to review all
7 requested exemptions to EOF location and habitability
8 requirements.

9 MR. DE YOUNG: Location and habitability. For
10 example, there are --

11 CHAIRMAN PALLADINO: But that does not say
12 anything about coming to the Commission.

13 MR. DE YOUNG: We would just come on those
14 that we think were worthy of your consideration.

15 CHAIRMAN PALLADINO: Well, couldn't we
16 identify the ones that would come back to the
17 Commission? I mean, the class?

18 COMMISSIONER GILINSKY: Why don't they simply
19 come back with all of them on a negative consent basis,
20 just the way Summer came up?

21 MR. DE YOUNG: There are some, for example --
22 you know, it does take a burden to prepare a paper, it is
23 additional staff work. For example, let me point out --

24 COMMISSIONER GILINSKY: But it also makes it
25 less likely the exemptions will be granted.

1 MR. DE YOUNG: I don't think so.

2 CHAIRMAN PALLADINO: That is not what we want.

3 MR. DE YOUNG: I don't think so. I can take
4 you back to one that was granted. I don't know --

5 CHAIRMAN PALLADINO: Well, I was not hearing
6 all the discussions but I gather you do not want it too
7 close to the plant, and I can see that.

8 COMMISSIONER AHEARNE: Right.

9 CHAIRMAN PALLADINO: Now, what were the
10 considerations on how far away it can afford to be,
11 twenty miles?

12 COMMISSIONER AHEARNE: Actually, the original
13 staff proposal, as I recall, was 15 miles, and we moved
14 it out to twenty.

15 And the argument there was that you ought to
16 at least give them some flexibility to try to find a
17 location. It is not a major -- the concept was, it
18 would not actually be a new facility in most cases, it
19 would be to use space in an existing facility. So, it
20 was to try to give them some flexibility to find a place.

21 But if you go too far away, you are going to
22 move outside the range in which the local officials are
23 going to be wanting to meet also.

24 MR. DE YOUNG: That is right.

25 COMMISSIONER AHEARNE: And also, the utilities

1 have pointed out to us on previous occasions, if you are
2 too far away they are not going to want to have their
3 people there because they will be too far from the
4 plant. They will want to stay within reasonable
5 proximity of the plant.

6 COMMISSIONER GILINSKY: I think the idea was
7 basically, it ought to be at the edge of the ten-mile
8 zone.

9 MR. DE YOUNG: The ten-mile zone.

10 COMMISSIONER GILINSKY: Roughly around there.

11 MR. DE YOUNG: Let me give you an example of
12 the thing that I might do. We have specified you will
13 have a primary, you know, within ten miles, and then a
14 backup between ten and twenty. Or you could have a
15 single between ten and twenty miles.

16 Say someone has a good primary 9.9 miles away,
17 why should he have to have a backup if he can
18 demonstrate the roads --

19 COMMISSIONER AHEARNE: Sure.

20 MR. DE YOUNG: And that is the type of thing
21 that I think we would exempt, something like that.

22 COMMISSIONER ROBERTS: I mean for me, I am not
23 interested in the negative consent.

24 CHAIRMAN PALLADINO: What was that, Tom?

25 COMMISSIONER ROBERTS: I am not interested in

1 that coming to me for negative consent.

2 COMMISSIONER GILINSKY: What would you like to
3 have come to you?

4 COMMISSIONER ROBERTS: Exactly what the last
5 bullet says, those of special interest, and we were
6 given several examples, a hundred miles or no EOF.

7 COMMISSIONER GILINSKY: Thirty miles?

8 COMMISSIONER ROBERTS: It depends on the
9 circumstances.

10 COMMISSIONER GILINSKY: That means you would
11 like to see it.

12 COMMISSIONER ROBERTS: Not necessarily.

13 COMMISSIONER AHEARNE: I guess for myself, I
14 have put a footnote on one of the previous Commission
15 decisions and I have to, I guess, take that back for a
16 while.

17 So, I guess I would go with the negative
18 consent and then encourage the Commission to revisit
19 that perhaps in the future, after a while. But for the
20 near term, I think it is unfortunately important.

21 MR. DE YOUNG: It may not appear on some of
22 the papers that it has been reviewed in some depth. But
23 when we sent a paper, even a negative consent paper, it
24 does take staff resources.

25 COMMISSIONER AHEARNE: I understand.

1 MR. DE YOUNG: We have been talking about why
2 Darrell is late with the slides on San Onofre.

3 MR. EISENHUT: Nothing to do with this.

4 (Laughter)

5 MR. DE YOUNG: But staff resources are tight,
6 and if there is any way to avoid them. --

7 COMMISSIONER AHEARNE: We recognize that.
8 However, Commissioner resources are also tight. I am
9 sure, as you people well recognize, it is a difficult
10 burden for us to read all the material that comes up.
11 And that is the reason that it is probably best for us
12 to try to lay out the issues, lay out policy issues and
13 directives, and policy guidance, and then leave it to
14 the staff. Occasionally, and for whatever reasons --

15 COMMISSIONER ROBERTS: I am with you right to
16 that point.

17 COMMISSIONER AHEARNE: I understand that.
18 Occasionally, for whatever reason, communication does
19 not seem to work too well. And at that stage, I guess
20 more to establish the principle that we really mean what
21 we say, I think it is then for a while necessary to then
22 step in and even look more closely. I think this is now
23 one of those cases and that I why I go with the negative
24 consent on this issue.

25 CHAIRMAN PALLADINO: This would be a negative

1 consent on those exemptions, or any exemption --

2 MR. DE YOUNG: From the EOF location and
3 habitability requirements.

4 COMMISSIONER AHEARNE: Now, as Dick has
5 already pointed out, that it may not be 42 because there
6 are a number there that may fall under the footnote.

7 CHAIRMAN PALLADINO: And you would consider
8 those not exemptions.

9 MR. DE YOUNG: Not exemptions.

10 COMMISSIONER AHEARNE: I would consider them
11 not exemptions because --

12 MR. DE YOUNG: It was in Commission guidance.

13 COMMISSIONER AHEARNE: Yes.

14 CHAIRMAN PALLADINO: Would you also indicate
15 if in a situation, inadvertent or otherwise, there was
16 approval given, I would be interested in knowing that,
17 too. For example, Waterford you said there were some --

18 MR. DE YOUNG: We would bring that to you. We
19 will reconsider and tell you what the facts are and what
20 was done, what we recommend, and then let it up to you
21 with the negative consent phase.

22 COMMISSIONER AHEARNE: And it would seem to me
23 that you really probably have four categories.

24 You have one category which are those that fit
25 under the footnote.

1 You have a second category in which you look
2 closely at them, as your case of the 9.9, the
3 hypothetical. There are several in there, I think, in
4 that list that are very close to the margin and I think
5 those are ones that I for one would have not problem
6 agreeing with the waiver on that because we all
7 understand that the ten and twenty, and all of those
8 numbers, are not fine-tuned analytic numbers.

9 There is a third set which I would feel, as
10 Commissioner Gilinsky has pointed out on the Millstone,
11 it is just going to be very hard to believe that there
12 is a waiver.

13 So, those are the three sort of obvious
14 categories and I would guess there is a handful of tough
15 cases.

16 CHAIRMAN PALLADINO: Yes, and I was trying to
17 think of seeing if there is something plus or minus,
18 approximately ten percent would --

19 MR. DE YOUNG: Fifteen percent would help.

20 CHAIRMAN PALLADINO: I do not want to look at
21 21 miles and have to vote on that.

22 COMMISSIONER GILINSKY: Well, it does not look
23 like there are very many of those.

24 CHAIRMAN PALLADINO: Well, there are 21, there
25 are 22.

1 COMMISSIONER GILINSKY: At least a 9.9
2 category.

3 COMMISSIONER AHEARNE: Negative consent you do
4 not have to vote.

5 COMMISSIONER ASSELSTINE: There are not any of
6 the 9.9s, there are 7.5.

7 MR. DE YOUNG: Eight-point seven.

8 COMMISSIONER ASSELSTINE: Yes, that is right.

9 CHAIRMAN PALLADINO: The belief that you do
10 not have to vote on negative consent is misleading
11 because you have to read it, you have to do all the
12 work. The only thing that you do not have to do is sign
13 a piece of paper.

14 COMMISSIONER AHEARNE: Well, it helps the
15 process along.

16 CHAIRMAN PALLADINO: Yes, I appreciate that.

17 MR. DE YOUNG: That completes our presentation.

18 CHAIRMAN PALLADINO: I would like to provide
19 the additional guidance to those that are only minor
20 deviations, they should be so identified and we should
21 waste less time on that.

22 COMMISSIONER GILINSKY: Well, there is also a
23 question of whether there ought to be any deviations at
24 those at all. As John pointed out earlier, we are not
25 talking about fancy, dedicated facilities.

1 MR. DE YOUNG: For the backup.

2 COMMISSIONER GILINSKY: For the backup. We
3 offer a lot of flexibility and it does not seem to me,
4 you know, barring exceptional circumstances, that the
5 post is for mere convenience.

6 CHAIRMAN PALLADINO: I guess there are a lot
7 of special problems that make it difficult to get it
8 exactly between ten and twenty miles.

9 MR. DE YOUNG: Well, there are three plants.

10 COMMISSIONER GILINSKY: Well, I don't want to
11 rule out the possibility --

12 CHAIRMAN PALLADINO: And find out, by golly,
13 just go another half a mile or one mile --

14 MR. DE YOUNG: A couple miles. There are
15 three plants, for example, that did not put it between
16 ten and twenty but they put it, one at seven miles, one
17 at eight miles, and one at 8.7 because of the road
18 network conditions.

19 COMMISSIONER GILINSKY: That is their primary
20 facility?

21 MR. DE YOUNG: That's their backup. Their
22 primary is on site. Their backup is like seven, eight,
23 and 8.7 miles. And it appears to be because of the road
24 networks, the convenience of getting there and things
25 like that.

1 COMMISSIONER GILINSKY: Why don't they put
2 their primary at that location?

3 MR. DE YOUNG: I don't know.

4 COMMISSIONER GILINSKY: Se, it is quite
5 another thing when you talk about a primary at 9.5 miles
6 or nine miles - which I think is a much better situation
7 than having the primary at .1 mile and the backup at 19
8 miles.

9 MR. DE YOUNG: The negative consent paper does
10 not give us too much problem.

11 CHAIRMAN PALLADINO: I am just exploring
12 negative consent. I don't think we want to -- let me
13 begin this way. I think the staff is our technical arm
14 and that there may have been misunderstanding on past
15 directives. I would be willing to delegate this as they
16 have indicated on this recommendation.

17 I will also go with negative consent if that
18 is the will of the group.

19 COMMISSIONER ROBERTS: Well, like John has
20 expressed himself, I would agree with what the staff has
21 recommended.

22 (Laughter)

23 COMMISSIONER AHEARNE: Jim?

24 COMMISSIONER ASSELSTINE: I guess I come down
25 on the negative consent side in this particular case,

1 although, let me raise another possibility.

2 Why not allow the staff to deny exemptions and
3 only come to us where the staff proposes to agree to an
4 exemption?

5 CHAIRMAN PALLADINO: We would have never
6 passed TVA.

7 MR. DE YOUNG: That's right.

8 COMMISSIONER ASSELSTINE: Well, TVA is done
9 now.

10 (Laughter)

11 COMMISSIONER GILINSKY: That seems a perfectly
12 acceptable proposal.

13 CHAIRMAN PALLADINO: Now, if you are going to
14 go negative consent, I think --

15 COMMISSIONER ASSELSTINE: Go all the way?
16 Okay.

17 CHAIRMAN PALLADINO: Go all the way.

18 COMMISSIONER GILINSKY: What happened to your
19 faith?

20 (Laughter)

21 CHAIRMAN PALLADINO: No, it is the Commission
22 I do not understand.

23 (Laughter)

24 CHAIRMAN PALLADINO: That is why I say, go all
25 the way. I gather we are going to go negative consent

1 and leave it at that.

2 Any more that we should discuss?

3 I did not mean the Commission being
4 unpredictable is -- perhaps they have good reason for
5 doing things.

6 COMMISSIONER GILINSKY: In fact, I had assumed
7 it was going to work the way Jim suggested. I assumed
8 that what would come up here were all the proposals
9 which you were supporting.

10 COMMISSIONER AHEARNE: No. For example, I
11 assume what came up to us is the case that Jim cited,
12 they had requested an exemption and staff proposes to
13 deny it.

14 MR. DE YOUNG: Any exemption request we would
15 review, analyze, take a position and submit it to you.

16 CHAIRMAN PALLADINO: There may be good reason
17 to have these centers near corporate headquarters if
18 they are not too far away. You get a better chance of
19 prompt, high-level management attention. But that is
20 something we would explore and discuss in this recent
21 paper.

22 MR. DE YOUNG: Correct.

23 CHAIRMAN PALLADINO: Okay, anything more we
24 should do on this?

25 Thank you very much. We will stand adjourned.

1 (Whereupon, at 3:15 P.M. the hearing of the
2 Commission was adjourned.)

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NUCLEAR REGULATORY COMMISSION

is to certify that the attached proceedings before the
COMMISSION MEETING

the matter of: PUBLIC MEETING - Briefing on Staff Actions regarding
Operation of Emergency Operations Facilities

Date of Proceeding: March 2, 1983

Docket Number: _____

Place of Proceeding: Washington, D. C.

held as herein appears, and that this is the original transcript
of the file of the Commission.

M. E. Hansen

Official Reporter (Typed)

M. E. Hansen

Official Reporter (Signature)

STAFF ACTIONS REGARDING
LOCATION OF
EMERGENCY OPERATIONS FACILITIES

Commission Briefing

March 2, 1983

Office of Inspection and Enforcement

GUIDANCE ON EOF LOCATION & HABITABILITY

CCMJA - 30-37 (1-21-81)

OPTION 1 - TWO FACILITIES

- . PRIMARY FACILITY
 - . WITHIN 10 MILES
 - . PF \leq 5
 - . VENTILATION ISOLATION WITH HEPA
- . BACKUP FACILITY
 - . BETWEEN 10-20 MILES
 - . LOCATION COORDINATED WITH OFFSITE AUTHORITIES

OPTION 2 - ONE FACILITY

- . AT OR BEYOND 10 MILES
- . NO SPECIAL PF
- . LOCATION COORDINATED WITH OFFSITE AUTHORITIES
- . IF BEYOND 20 MILES:
 - . SPECIFIC APPROVAL OF THE COMMISSION REQUIRED
 - . SOME PROVISION FOR NRC SITE TEAM CLOSER

GUIDANCE ON EOF LOCATION & HABITABILITY

SECY-81-509 (SEPTEMBER 30, 1981)

THIS IS TO ADVISE YOU THAT THE COMMISSION HAS DISAPPROVED (BY A VOTE OF 5-0) YOUR RECOMMENDATION THAT THE COMMISSION AUTHORIZE THE STAFF TO PROCESS AND APPROVE LICENSEE REQUESTS FOR EXCEPTIONS TO NUREG-0696 EOF LOCATION AND BACKUP CRITERIA.

THE COMMISSION AGREES THAT THE STAFF CAN ACCEPT CLOSE-IN HARDENED EOF'S, PROVIDED THAT EACH EMERGENCY PLAN IDENTIFY AN ALTERNATE LOCATION WHERE UTILITY AND GOVERNMENT OFFICIALS CAN MEET TO DISCUSS PLANT STATUS AND APPROPRIATE PUBLIC PROTECTIVE ACTIONS, AND THAT THE EMERGENCY PLAN INDICATE THAT CONTINGENCY ARRANGEMENTS HAVE BEEN MADE TO PROVIDE EQUIPMENT FOR NECESSARY COMMUNICATION WITH THE TSC IN THE EVENT OF AN EMERGENCY. THIS WOULD BE CONSISTENT WITH THE EARLIER COMMISSION APPROVAL OF OPTION I IN NUREG-0696 (JANUARY 21, 1981, S. J. CHILK MEMO TO W. J. DIRCKS).

NUMBER OF PLANTS MEETING "REQUIREMENTS"

OPTION 1

- . PRIMARY EOF
 - . WITHIN 10 MILES
 - . PROTECTION FACTOR ≥ 5 3
 - . VENTILATION ISOLATION (HEPA)
- . BACKUP EOF
 - . WITHIN 10 - 20 MILES

OPTION 2

- . SINGLE EOF
 - . AT OR BEYOND 10 MILES
 - . COMMISSION APPROVAL BEYOND 20 MILES 27

TOTAL 35

NUMBER OF PLANTS NOT MEETING "REQUIREMENTS"

o NO BACKUP EOF	12
o NO BACKUP EOF VENTILATION & PROTECTION FACTOR UNACCEPTABLE	1
o VENTILATION UNACCEPTABLE	3
o VENTILATION & PROTECTION FACTOR UNACCEPTABLE	8
o VENTILATION & PROTECTION FACTOR UNACCEPTABLE BACKUP EOF BEYOND 20 MILES	3
o BACKUP EOF BEYOND 20 MILES	11
o BACKUP EOF LESS THAN 10 MILES	1
o BACKUP EOF LESS THAN 10 MILES PROTECTION FACTOR UNACCEPTABLE	1
o BACKUP EOF LESS THAN 10 MILES VENTILATION & PROTECTION FACTOR UNACCEPTABLE	1
o PRIMARY EOF BEYOND 20 MILES	<u>1</u>
TOTAL	42

PLANTS MEETING OPTION 1 "REQUIREMENTS"

<u>NO.</u>	<u>PLANT</u>	<u>MILES</u>		<u>PF</u>	<u>HEPA</u>
		<u>PRIMARY EOF</u>	<u>BACKUP EOF</u>		
1.	Beaver Valley	0.3	10	> 5	OK
2.	Cooper	On Site	11	> 5	OK
3.	Farley	0.5	16	> 5	OK
4.	Hatch	On Site	11	5	OK
5.	Perry	0.5	10.5	5	OK
6.	Seabrook	0.3	14	> 50	OK
7.	Susquehanna	0.5	13	> 5	OK
8.	Zion	< 1.0	12	5	OK

PLANTS MEETING OPTION 2 "REQUIREMENTS"

<u>NO.</u>	<u>PLANT</u>	<u>MILES</u>	<u>NO.</u>	<u>PLANT</u>	<u>MILES</u>
1.	Braidwood	13	14.	LaCrosse	19
2.	Big Rock Point	15	15.	LaSalle	13
3.	Byron	18	16.	Limerick	17
4.	Calvert Cliffs	12	17.	Midland	18
5.	Crystal River	10.1	18.	Palisades	10
6.	D.C. Cook	11	19.	Quad Cities	15
7.	Diablo Canyon	11.7	20.	St. Lucie	10.5
8.	Dresden	11	21.	Sequoyah	18
9.	Duane Arnold	10	22.	Shoreham	18.5
10.	Fort Calhoun	17	23.	Zimmer	16
11.	Fort St. Vrain	12	24.	Bellefonte	45*
12.	Ginna	18	25.	Browns Ferry	110*
13.	Kewaunee	15	26.	Watts Bar	45*
			27.	Rancho Seco	23*

* Commission Approved Exemption

PLANTS NOT MEETING "REQUIREMENTS"

<u>NO.</u>	<u>PLANT</u>	<u>PRIMARY EOF</u>	<u>BACKUP EOF</u>	<u>PF</u>	<u>HEPA</u>
1.	Indian Point 2	On Site	16	OK	*
2.	Indian Point 3	On Site	16	OK	*
3.	Oconee	0.5	14	OK	*
4.	Catawba	0.1	18	*	*
5.	Fitzpatrick	0.6	11	*	*
6.	McGuire	0.5	15	*	*
7.	Nine Mile Point	0.5	14	*	*
8.	Oyster Creek	0.82	19	*	*
9.	Pilgrim	On Site	19	*	*
10.	Trojan	0.5	13	*	*
11.	Yankee Rowe	0.5	12	*	*
12.	Palo Verde	On Site	8*	OK	OK
13.	Arkansas	0.65	7*	*	OK
14.	Vermont Yankee	0.35	8.7*	*	*
15.	South Texas	On Site	*	*	*
16.	Turkey Point	24 *	-	-	-

*UNACCEPTABLE

PLANTS NOT MEETING "REQUIREMENTS"

<u>NO.</u>	<u>PLANT</u>	<u>PRIMARY EOF</u>	<u>BACKUP EOF</u>	<u>PF</u>	<u>HEPA</u>
17.	Davis Besse	0.4	21*	OK	OK
18.	Clinton	0.2	22*	OK	OK
19.	River Bend	1.1	23*	OK	OK
20.	Callaway	1.0	25*	OK	OK
21.	Maine Yankee	On Site	25*	OK	OK
22.	San Onofre	1.0	35*	OK	OK
23.	Monticello	1.0	37*	OK	OK
24.	Prarie Island	0.5	40*	OK	OK
25.	Wolf Creek	2.75	95*	OK	OK
26.	Point Beach	1.0	100*	OK	OK
27.	Waterford	On Site	25*	OK	OK
28.	TMI	0.5	42*	*	*
29.	North Anna	0.25	43*	*	*
30.	Surry	0.2	51*	*	*

*Unacceptable

PLANTS NOT MEETING 'REQUIREMENTS'

<u>NO.</u>	<u>PLANT</u>	<u>PRIMARY EOF</u>	<u>BACKUP EOF</u>	<u>PF</u>	<u>HEPA</u>
31.	Brunswick	On Site	*	OK	OK
32.	Comanche Peak	1.2	*	OK	OK
33.	Fermi	1.1	*	OK	OK
34.	Grand Gulf	0.5	*	OK	OK
35.	Haddam Neck	On Site	*	OK	OK
36.	Millstone	1.1	*	OK	OK
37.	Peach Bottom	0.2	*	OK	OK
38.	Robinson	On Site	*	OK	OK
39.	Salem	7.5	*	OK	OK
40.	Summer	2.6	*	OK	OK
41.	WNP-2	0.75	*	OK	OK
42.	WNP-3	0.85	*	OK	OK

*Unacceptable

COMMUNICATION OF FINDINGS

THE FOLLOWING LICENSEES WERE INFORMED OF APPROVAL OF EXCEPTIONS:

BELLEFONTE	}	COMMISSION APPROVED THE TVA CONCEPT OF EOF OPERATIONS
BROWNS FERRY		
WATTS BAR		
RANCHO SECO	-	COMMISSION APPROVED LOCATING THE EOF 23 MILES FROM THE PLANT SITE.
WATERFORD	-	STAFF APPROVED LOCATING THE BACKUP EOF 25 MILES FROM THE PLANT SITE
MILLSTONE	-	STAFF APPROVED BUILDING A HARDENED EOF 1.1 MILES FROM THE PLANT SITE ON 4/16/80. NO MENTION OF A BACKUP EOF WAS MADE BECAUSE COMMISSION REQUIREMENTS WERE NOT DEVELOPED AT THIS TIME.

RECENT EVENTS

. SECY 82-111B (11-22-82)

. NRR GENERIC LETTER 82-33 (12-17-82)

. INTEGRATED RESPONSE CAPABILITY NEEDS

. SAFETY PARAMETER DISPLAY SYSTEM

. CONTROL ROOM DESIGN

. RG-197: APPLICATION TO ERF's

. UPGRADE EMERGENCY OPERATING PROCEDURES

. ERF's

. WORKSHOPS

. LICENSEES TO ADVISE STAFF BY APRIL 15, 1983 OF SCHEDULES
TO MEET THE REQUIREMENTS

RECOMMENDATION RE EOF's

. PERMIT STAFF TO REVIEW ALL REQUESTED EXEMPTIONS TO EOF
LOCATION & HABITABILITY REQUIREMENTS

. PERMIT DIRECTOR, IE, TO APPROVE SUCH EXCEPTIONS

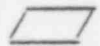
. THOSE OF SPECIAL INTEREST WOULD BE REVIEWED WITH COMMISSION
IF SO DESIRED

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Meeting Title: Briefing on Staff Retention Re Location of Emergency Operations Facilities

Meeting Date: 3/2/83 Open Closed

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