Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

July 15, 1982

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. Denton:

DOCKETS 50-266 AND 50-301
EMERGENCY SUPPORT CENTER
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In accordance with the Nuclear Regulatory Commission Region III letter of May 4, 1982 regarding the Emergency Operations Facility (EOF) at Point Beach Nuclear Plant, we are providing the attached revised description of our proposed modifications for the EOF. It is requested that your staff review the description of conceptual design, concept of operations, and method of activation of the EOF as outlined in Attachment 1. NRC Region III has advised that since a part of the proposed EOF is to be located more than twenty miles from Point Beach Nuclear Plant, approval of the Commissioners is required.

We request that you inform us of the date the NRC Staff will present their review to the Commission. We would like to be present in order to answer any questions the Commissioners may have.

Very truly yours,

Executive Vice President

Sol Burstein

Copy to Region III

A045

ATTACHMENT 1

EMERGENCY OPERATIONS FACILITY
POINT BEACH NUCLEAR PLANT

Our letter of June 1, 1981 from Mr. Sol Burstein to Mr. H. R. Denton discussed the conceptual design and concept of operations of the emergency response facilities at Point Beach Nuclear Plant (PBNP). The report of the emergency preparedness audit conducted by Inspection and Enforcement personnel from Region III at PBNP in January, 1982 expressed some concern about the location of the Emergency Operations Facility as outlined in our June 1, 1981 letter. Due to this concern and our own concern for more efficient use of personnel and facilities, we are providing the following revised conceptual design, concept of operations, and description of activation procedures for the Emergency Operations Facility to further enhance emergency preparedness.

The Emergency Operations Facility (EOF) for PBNP is actually comprised of two buildings, the Emergency Support Center (ESC) and the Site Boundary Control Center (SBCC). These facilities and their staffs can fulfill all of the functions outlined for the EOF in NUREG-0696.

EMERGENCY SUPPORT CENTER

The ESC will have facilities and personnel who have responsibilities for:

1. Management of the overall emergency response,
2. Determination of recommended public protective actions, and
3. Coordination of emergency response activities with Federal, State, and local agencies.

It is proposed that the ESC, currently located at the Energy Information Center on the PBNP site, be relocated to the Wisconsin Electric Power Company (WE) corporate headquarters at 231 West Michigan Street, Milwaukee, Wisconsin.

The ESC staff is composed of senior Nuclear Power Department personnel normally located at WE headquarters. All communications between the ESC, the Technical Support Center (TSC), the SBCC, the control room, the Emergency News Center (ENC), and other agencies and individuals are by commercial telephone, corporate telephone, radio, or other dedicated communications lines. In fact, during our recent exercise, we observed that the physical presence of personnel from WE headquarters was not necessary at the site for the successful response to an emergency, since all communications were by remote electronic means. Locating the ESC in Milwaukee will resolve NRC concerns regarding habitability at the current primary and backup locations and will enhance emergency response in the following ways.

The manning of the ESC by corporate headquarters personnel can be done more quickly in the event of an emergency. The approximate range of response times for ESC personnel to the corporate office is from 15 to 45 minutes. Since the PBNP site is approximately 100 miles from WE headquarters, the usual response time to the current ESC location at the site is approximately two hours. During exercises and augmentation drills, plant personnel have performed the setup and activation procedures for the ESC within the required one hour. Plant personnel activation of the ESC has been adequate but has resulted in some minor information transfer delays to off-site agencies.

Rapid mobilization and prompt activation of the ESC is more readily assured for a Milwaukee location, since travel from Milwaukee to the PBNP site is subject to delays during adverse weather or road conditions. During the travel time, corporate officials are difficult to reach for consultation. The location of the ESC in a large metropolitan area makes the ESC more accessible to Federal and State officials as well as to corporate personnel.

Senior corporate officers, including the Emergency Director and other headquarters support personnel with whom the Emergency Support Manager communicates, can be better informed, without adverse impact on communications with the Site Manager, Emergency News Center Director, or the Federal, State, and county emergency agencies.

It should be pointed out that locating a facility for directing or coordinating emergency activities some distance from the scene of an emergency is neither novel nor new. Typically, utilities have a system control center which directs the dispatching, control, and repair of generation and distribution facilities and personnel within a large service area. Further, such a situation is customary for emergency response agencies such as police or fire departments. In all these cases, electronic communciations are relied upon.

For all the foregoing reasons, we intend to modify our Emergency Plan to relocate the ESC to the Wisconsin Electric corporate headquarters in Milwaukee. This location of the ESC, with other provisions for space and communications capability near the site, has been discussed with the State of Wisconsin Divison of Emergency Government, Manitowoc County Emergency Government, and Kewaunee County Emergency Government; these agencies had no objection to the proposal. We have reviewed our new proposal with reference to NUREG-0696 and have the following comments regarding our proposed modified location.

The 4,700 ft^2 corporate headquarters location provides excellent functional and availability characteristics. Security at the Milwaukee ESC is adequate to ensure activation readiness for an emergency. Upon activation of the ESC, additional security protection will be provided to restrict access to those personnel assigned to the facility.

The NRC Staff and State and local agencies will be provided quarters within a new SBCC near PBNP, as well as at the ESC in Milwaukee.

Upon notification, the ESC can be activated and functioning within one hour. The notification procedure for the members of the ESC staff is based on a combination of radio pager use and telephone call out. The ESC can be fully staffed within two hours of the decision to activate the ESC. The Emergency Support Manager (Assistant Vice President, Nuclear Power Department) will be in charge of the ESC activities. Immediate supervision and coordination of radiological and environmental assessment, i.e., field monitoring, will be done from the SBCC. However, overall management of these functions will be the responsibility of the ESC personnel.

The ESC staff assignments are as follows:

1. Emergency Support Manager
2. RadCon/Waste Manager
3. Radwaste Technical Support Coordinator
4. Licensing Support Coordinator
5. Administrative & Logistics Manager
6. Design, Construction, & Planning Manager
7. Director, Quality Control
8. Utility Engineering Director

Support personnel such as clerical, security, and communications aides will also be designated for the ESC.

Since the location for the proposed ESC is a part of the present location of the Nuclear Engineering Section of the Nuclear Power Department, the working space is adequate for corporate personnel assigned as well as for NRC, FEMA, State, and local government personnel.

The ESC facility in Milwaukee has space adequate for all necessary communications equipment. Plant records and drawings are already provided. Separate office space to accommodate five NRC personnel is available. The attached floor plan of the ESC area shows allocation of the space to specific functional tasks. The plan also shows the telephone locations for the system described above. This space allocation plan takes into consideration traffic control, security, and the need for private conference areas.

Radiological monitoring is not necessary in the ESC due to the distance from the plant. Therefore, no radiological monitoring system is planned. The ventilation system is adequate for maintaining a comfortable environment.

A communications system is in place which provides management communications with the manager of the technical support center, the site boundary control center, and the control room. Communications with the Emergency News Center (ENC) and off-site agencies will be accomplished

with a communications system to be installed as described below. An information flow diagram is shown in Figure 1 to describe communications links. Note that many of the flow paths have redundancy. The system includes eight dedicated lines for coummunication between the plant and corporate headquarters. Three of these lines use a microwave link through Appleton, Wisconsin; the remainder are leased land lines between Milwaukee and PBNP.

This communications system provides the capability to manage Wisconsin Electric response resources, to manage the off-site radiological monitoring being done by PBNP personnel during an emergency, and to perform accident dose assessment.

Off-site emergency response coordination and notification, as well as dissemination of information and recommendation of protective actions to the State, can be done with normal land lines. Initial notification of a classification change will be done using a NAWAS phone to be installed in the ESC if agreed to by the State of Wisconsin. The existing NAWAS phone in the TSC will be maintained. In addition, a two-digit ringdown phone similar to the health physics network will be installed between the emergency response facilities of PBNP and Manitowoc and Kewaunee counties. This ringdown line will be used for direct communications with the counties to relay followup information.

Since the ESC and SBCC will have office space designated for NRC use, the NRC hotline will be installed in the ESC and/or in the SBCC, whichever is preferred by the NRC. The health physics network telephone will be relocated from the current ESC to the corporate headqaurters, if desired by the NRC.

A dedicated telephone for management communications will be provided between the ESC, TSC, and SBCC.

Notification to State and local operations centers will be accomplished with the NAWAS phone using normal land lines as a backup. The two-digit ringdown line mentioned above can also be used.

Communications with the SBCC, which provides the off-site environmental monitoring support for the ESC, will be accomplished with a dedicated phone line using land lines or one of the eight plant lines as a backup. The ESC has adequate telephones for use by NRC or any other off-site agency.

Facsimile transmission between the locations of the ESC, TSC, and the NRC Operations Center already exists.

Upon approval of this ESC location, a data display device with accompanying status board will be located in the ESC. This device will make available:

1. Plant system variables;
2. In-plant radiological variables;
3. Meteorological information; and
4. Off-site radiological information.

The Emergency Support Manager and RadCon/Waste Manager will have access to this data display system. The data display will be operational on a schedule consistent with our responses to NUREG-0737 requirements, specifically those pertaining to the major new computer system installation.

The data display system will consist of a terminal in the ESC with a satellite terminal in the dose assessment area. See the attached space allocation plan for the ESC as shown in Figures 2 and 3. These terminals consist of a CRT and associated keyboard. One cubicle near the ESC will be designated as a repair area for any equipment located in the ESC.

The proposed ESC already has the following records:

1. Emergency Plan
2. Emergency Plan Implementing Procedures
3. Plant Technical Specifications
4. Plant operating procedures
5. Emergency operating procedures
6. Final Facility Description and Safety Anaysis Report
7. PBNP, State, and local emergency response plans
8. Off-site population distribution data
9. Evacuation plans
10. Environs radiological monitoring records
11. Up-to-date drawing, schematics, and diagrams showing plant structures and systems and the in-plant location of these systems.

As a result of our analysis of exercise and drill results, some methods of operation have been revised since the June 1, 1981 letter. In particular, after activation of the ESC, the ESC personnel will perform the dose projections and manage the field survey teams.

Figure 2 is a floor plan of the Nuclear Engineering Section (NES) offices at the Wisconsin Electric corporate headquarters. The ESC location at corporate headquarters will include all of the NES office space. However, the major functional area will be the ESC room in the northwest corner of the NES complex. The room will be dedicated to ESC function but may be used as a conference room during normal office operations. The data display system, status boards, and communications lines will be permanently installed and dedicated to emergency use.

If so desired, a health physics network line and emergency notification system line (red phone) can be added to the NRC office upon approval of this location. The NRC office space will be assigned as shown on the attached floor plan and already has communications capability for NRC, FEMA, State, and county agencies.

SITE BOUNDARY CONTROL CENTER

The current SBCC will be replaced with a new 6,000 ft^2 facility one mile southwest of the plant. This new facility will fulfill all the functions of the SBCC as outlined in our June 1, 1981 letter. The SBCC will serve as the coordination point for radiological monitoring of the environs and as a security and health physics control point for site access during site and general emergencies.

The SBCC staff assignments which are part of the Emergency Plan are the Health Physics Director and a Security Lieutenant. The SBCC will also have support personnel assigned for security, health physics monitoring, and off-site surveys.

The new SBCC will be a standard commercial building constructed in accordance with applicable Wisconsin Building codes and in accordance with NUREG-0696, i.e., HEPA filters will be provided, and a protection factor of 5 will be afforded.

The SBCC can also serve as a location for off-site agencies to coordinate their off-site monitoring activities or security activities. The NRC will have designated office space and communications for five personnel in the SBCC. This will give the NRC the option of locating personnel at the ESC and/or the SBCC.

Direct radiation and airborne radioiodine will be monitored in the SBCC. All the equipment for monitoring habitability or making off-site surveys will be stored at the SBCC except for some survey meters which will be kept at the health physics station in the plant. Emergency equipment and protective clothing will be maintained in the SBCC.

The SBCC will have a backup if it becomes radiologically uninhabitable. For security and monitoring team supervision, that backup facility is the TSC. Non-supervisory monitoring team personnel will be coordinated by radio and will report to a designated area of the Emergency News Center (ENC) when appropriate. The present use of the Two Creeks Town Hall as a backup to the ESC and SBCC will be discontinued.

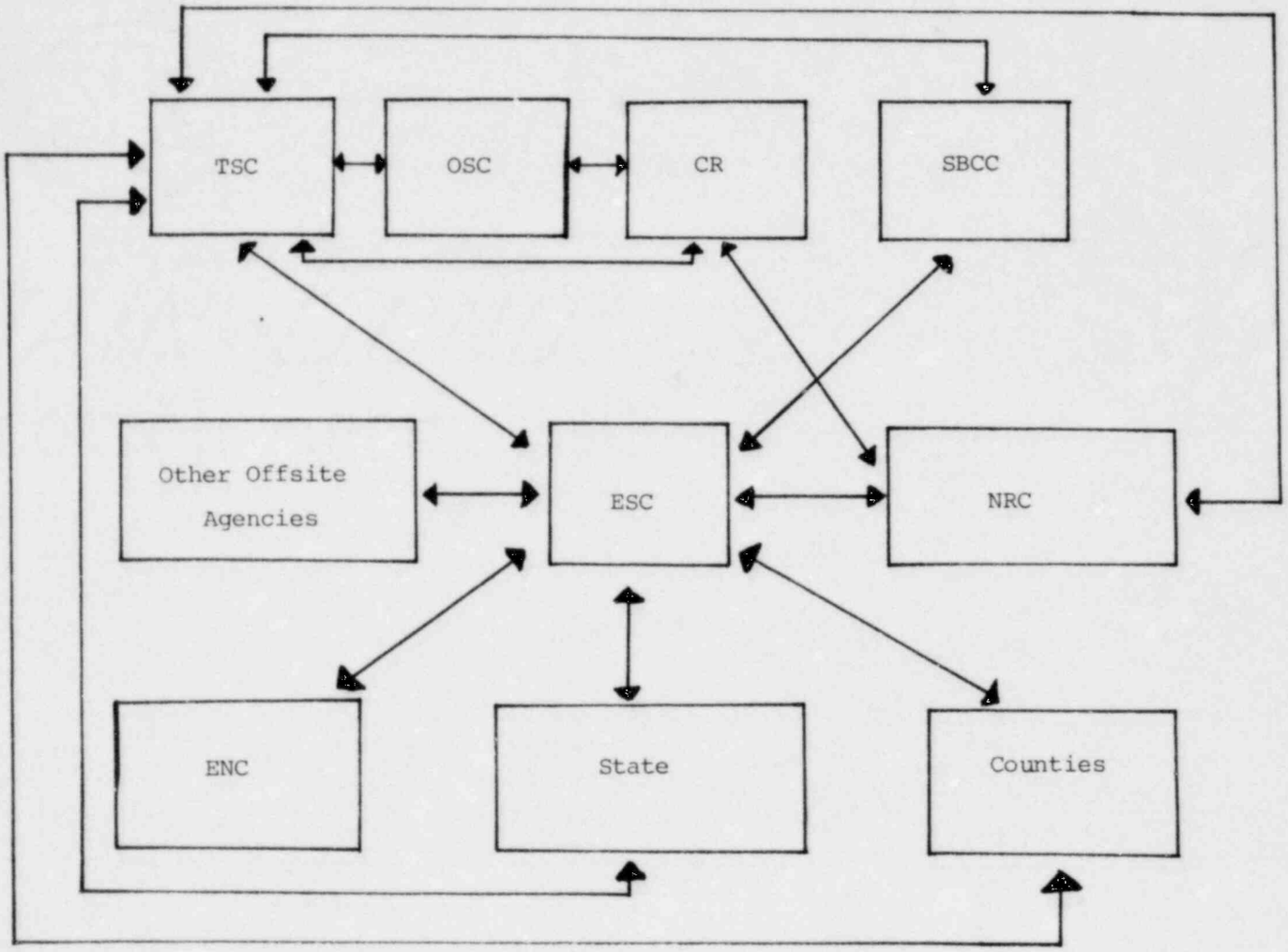
If the SBCC becomes uninhabitable, the NRC personnel stationed there will be provided space in the TSC building in addition to that which is already allocated for NRC use. State and local agencies will be provided with space at the ENC.

The new SBCC will have adequate space for the security and environmental monitoring personel. There will also be adequate space and communications sytems for those personnel assigned to the site during an emergency. Radio communications with the mobile monitoring teams will be available at both the SBCC and the TSC. Counting equipment for use by SBCC health physics support personnel will also be provided.

FIGURE 1

POINT BEACH NUCLEAR PLANT

EMERGENCY INFORMATION FLOW DIAGRAM



TSC - Technical Support Center
CR - Control Room
ROC - Recovery Operations
OSC - Operations Support Center
SBCC - Site Boundary Control Center
ESC - Emergency Support Center
ENC - Emergency News Center
NRC - Nuclear Regulatory Commission

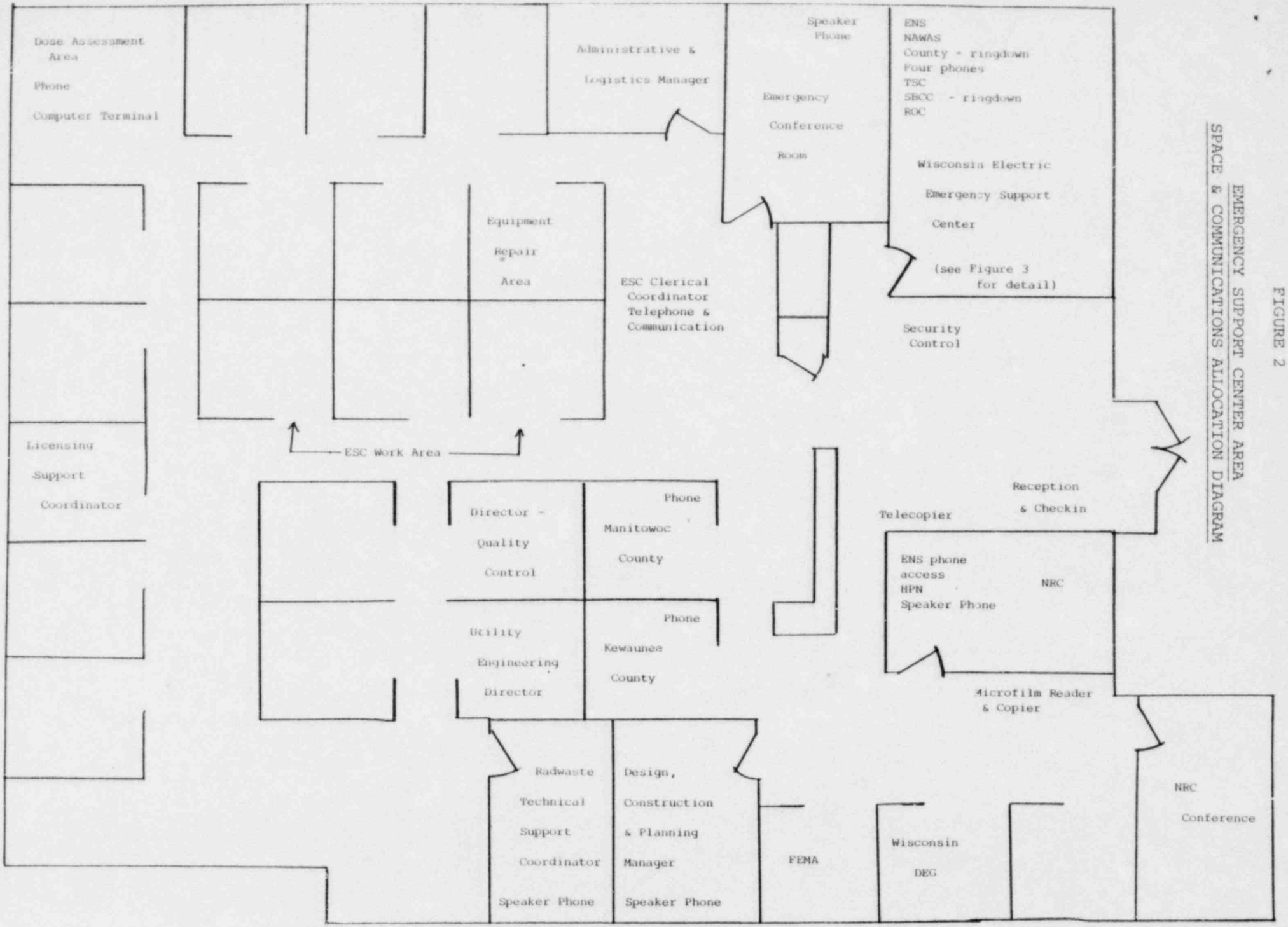


FIGURE 2

EMERGENCY SUPPORT CENTER AREA
SPACE & COMMUNICATIONS ALLOCATION DIAGRAM

FIGURE 3

EMERGENCY SUPPORT CENTER SPACE ALLOCATION