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September 17, 1982

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
THE CLEVELAND ELECTRIC ) Docket Nos. 50-440  
ILLUMINATING COMPANY, ET AL. ) 50-441  
 )  
(Perry Nuclear Power Plant, )  
Units 1 and 2) )

APPLICANTS' SUPPLEMENTAL ANSWERS  
PURSUANT TO ORDER OF AUGUST 18, 1982  
(CONCERNING A MOTION TO COMPEL)

By Order of August 18, 1982, the Licensing Board directed Applicants to answer certain interrogatories of the First Round Discovery Requests of Sunflower Alliance, Inc. et al. ("Sunflower"), dated December 2, 1981, with regard to which Sunflower had filed a motion to compel. Applicants hereby answer those interrogatories and state as follows:

All documents supplied to Sunflower for inspection will be produced at Perry Nuclear Power Plant ("PNPP"). Arrangements to examine the documents can be made by contacting Mr. Ronald Wiley of The Cleveland Electric Illuminating Company at (216)

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259-3737. Applicants will provide copies of any of the produced documents, or portions thereof, which Sunflower requests, at Applicants' cost of duplication. Arrangements for obtaining copies can be made with Mr. Wiley.

#### RESPONSES

6. Provide copies of all letters of agreement with agencies and/or organizations and individuals with an emergency response role in the EPZ's or on-site for the Perry Nuclear Power Plant. For each such letter of agreement, demonstrate that the letter specifies the emergency measures to be provided and that the letter includes mutually acceptable criteria for the implementation of such measures (as required by Criterion II.A.3, page 32, NUREG-0654, Rev. 1). For any such agency, organization, or individual, with an emergency response role that does not now have a letter of agreement, discuss whether letters are needed (and why or why not) and discuss when such letters will be obtained. As to those letters of Agreement which require Applicant to bear the costs of emergency planning of enabling the agency, organization or individual to participate in emergency planning then state: A) the cost involved; B) the legal reasons which support Applicants' assumption of these costs; C) the current status of any improvements to be assumed by Applicant for any such agency, organization or individual so that such agency, organization or individual may participate in such emergency plan; specifically state each item which such agency, organization or individual required Applicant to assume prior to such agency, organization or individual's agreement to participate in the emergency plan.

Response:

The Licensing Board has directed Applicants to provide Sunflower with "any agreements that have not already been provided and that relate to the possible use on-site of resources that also would be valuable off-site during an emergency." Order at 3. The only such agreements are the

letters of agreement between Applicants and the Perry Fire Department and Applicants and the Lake County Sheriff's Department. Copies of these letters of agreement can be found in Appendix B to Appendix 13A to the PNPP FSAR.<sup>1/</sup>

7. A FEMA-sponsored report, Evacuation Planning in the TMI Accident. (January 1980, RS 2-8-34, prepared for FEMA by Human Sciences Research, Inc.), concluded on page 173:

"Volunteers can be highly effective as supporting members of professional emergency management staffs, but they cannot be relied upon over extended periods of threat. . . They cannot. . . be regarded as a substitute for regular staff or as a mainstay of a crucial operating area like communications. Furthermore, they should not be expected to perform on the same basis as professionals over a prolonged standby period."

Regarding this conclusion, respond to the following:

- A. Do you agree with this conclusion? If not, fully explain why and discuss the basis for your alternative conclusion. Provide copies of all documents relied upon in reaching your conclusion.
- B. If you agree, discuss fully how this conclusion affects the ability of off-site emergency response organizations and agencies to respond to radiological emergencies at Perry and to drills.
- C. Regardless of your position on the above conclusion, for each off-site/on-site emergency response agency or organization, identify by position and by numbers of personnel how many such personnel are volunteers (non-paid personnel who may or may not hold regular jobs).
- D. Fully discuss the impact of reliance of each organization or agency with emergency response responsibilities on

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<sup>1/</sup> To the extent that the Licensing Board's ruling on Interrogatory #6 also is applicable to Interrogatory #19, Applicants have identified all agreements requested by Interrogatory #19 that are within the scope of the Licensing Board's ruling.

volunteers in terms of how such reliance may impact on the ability to maintain a 24-hour a day operation over a protracted period of time (as required by Criterion II.A.4, page 33, NUREG-0654, Rev. 1).

Response:

The Licensing Board has directed Applicants to answer part C of the Interrogatory. Order at 3. The only volunteers that Applicants anticipate may be used on-site are volunteer firemen. With the exception of the Fire Chief, the Perry Fire Department is staffed entirely with volunteers.

8. For any example initiating condition in Appendix 1 to NUREG-0654, Rev. 1, which is not included within the Applicants' emergency plan, discuss why each such example initiating condition should not be included within the Applicants' emergency plan. Further, for accidents and emergencies involving initiation conditions other than those specified in Appendix 1 to NUREG-0654, demonstrate that there is adequate assurance that the Applicants' operating staff will promptly recognize such initiating conditions and promptly and correctly declare the appropriate emergency class (i.e., Unusual Event, Alert, Site Emergency, or General Emergency).

Response:

The Licensing Board has directed Applicants to answer the Interrogatory as to the omitted example initiating conditions, and to "discuss what kinds of analysis, modelling, or simulation it has used, if any, to determine the ability of operators to validly diagnose emergency conditions, including unusual conditions or unusual control room indications." Order at 4-5.

The following is a list of each NUREG-0654, Appendix 1, example initiating condition omitted from the emergency plan, with an explanation for each omission:

<u>NUREG-0654 (App. 1) Example Initiating Condition</u>	<u>Reason For Omission</u>
Notification of Unusual Event	
3.c.	Not applicable to BWR
5.(first part)	Not applicable to BWR
13.d.	Not applicable to PNPP because hurricanes not a serious threat to PNPP
17.	Not applicable to BWR
Alert	
1.c.	Not applicable to BWR
2.	Not applicable to BWR
3.	Not applicable to BWR
4.	Covered by Site Emergency Condition 3 (see PNPP FSAR, Appendix 13A, p. 4-15).
9.	Not applicable to BWR
17.d.	Not applicable to PNPP because hurricanes not a serious threat to PNPP
18.d.	Entry of uncontrolled toxic or flammable gases do not pose a threat to PNPP (see PNPP FSAR

NUREG-0654 (App. 1) Example  
Initiating Condition

Reason For Omission

§ 2.2.3)

Site Area Emergency

- |              |   |
|--------------|---|
| 3.           | Not applicable to BWR   |
| 5.           | Not applicable to BWR   |
| 9.           | Covered by Alert<br>Condition 7 ( <u>see</u><br>PNPP FSAR,<br>Appendix 13A, Table<br>4-1, page 4-13)              |
| 13.a. and b. | Covered by Site<br>Emergency<br>Condition 10 ( <u>see</u><br>PNPP FSAR, Appendix<br>13A, Table 4-1,<br>page 4-18) |
| 16.c.        | Entry of uncontrolled<br>flammable gases do<br>not pose a threat to<br>PNPP ( <u>see</u> PNPP<br>FSAR § 2.2.3)    |

General Emergency

- |    |                       |
|----|-----------------------|
| 5. | Not applicable to BWR |
|----|-----------------------|

Applicants presently are drafting emergency plan instructions establishing operator actions with regard to emergency action levels, emergency classification and notification. For all job positions requiring use of any of these instructions, appropriate training will be given. Applicants presently are reviewing not only the example initiating conditions in NUREG-0654, but also the initiating conditions discussed in

NUREG-0818 as well as the initiating conditions dealt with in other nuclear plant operating procedures.

9. Provide copies of the Applicants' Operating Procedures and/or Emergency Procedures (as appropriate) which contain instructions to plant operators regarding the declaration of an emergency (i.e., Unusual Event, Alert, Site Emergency, or General Emergency) pursuant to Appendix 1 of NUREG-0654, Rev. 1.

Response:

Applicants' procedures for classifying and declaring on-site and off-site emergencies still are being developed.

11. Pursuant to Criterion II.E.6 of NUREG-0654, Rev. 1, page 45, and 10 C.F.R. Part 50, Appendix E, Section IV.D.3, demonstrate that the administrative and physical means to be utilized to notify the public within the plume exposure pathway EPZ within 15 minutes. [sic] In your response, provide any and all documents discussing the Perry prompt alert and notification system, including bid specifications, sound surveys, engineering studies, evaluations of alternative hardware and systems, hardware location studies, and theoretical or actual field tests of system coverage. Describe who has the authority to activate the system the under what conditions. In addition, demonstrate that the system can successfully operate under the following conditions: loss of power, rain, icing, lightning, severe snowstorm. Further, demonstrate that the financial and administrative means exist to assure the operability of the system throughout the operating lifetime of the Perry Nuclear Power Plant, and discuss who has responsibility for testing and maintenance of the system once it is installed.

Response:

The Licensing Board directed Applicants to "describe the assignment of administrative responsibility within its



organization" with regard to the prompt alert and notification system. Order at 5. Applicants have the administrative responsibility to provide, maintain and test the prompt alerting system. The responsibility for siren project coordination lies in the Nuclear Engineering Department of The Cleveland Electric Illuminating Company.

14. Pursuant to Criterion II.H.8 and Appendix 2 of NUREG-0654, Rev. 1, fully describe the meteorological instrumentation and procedures for the Perry Nuclear Power Plant. Include in your response the sensitivity of the system and the susceptibility of the system to adverse environmental conditions, such as lightning, loss of normal power, damaging winds, hail, icing.

Response:

PNPP's meteorological measurements program is described in detail in the PNPP FSAR, Chapter 2, § 2.3. PNPP's meteorological measurements program is administered by NUS Corporation. The measurement equipment and the availability of the system are discussed in NUS document 4512, "Presentation to the NRC of a Draft Plan for PNPP: Meteorological Support to Emergency Preparedness" (August, 1982). NUS document 4512 will be supplied for examination at PNPP.

15. Fully describe any dose projection system intended to be used by the Applicant and/or off-site authorities. Include in your response full design details of the system, including specifications, physical and conceptual limitations of the system, and the accuracy of the system. Fully describe the ability of the system to accurately predict off-site doses under the following conditions: a heated release, releases involving large quantities of radioiodines and/or particulates, and drifting wind patterns, and any combination of these factors.



Response:

The off-site dose projection system is a multi-user dual computer based data information system. The system contains redundant computers. Using meteorological data inputs and release point radiation monitor inputs, the system produces real time estimates of plume location and dose intensity for both liquid and gaseous releases. The output is displayed on color graphic terminals. Exact software and hardware design configurations still are being developed. The off-site dose projection system will account for heated releases. The system will model releases involving large quantities of radionuclides and/or suspended particulates. Precise details are not available at this time because exact software and hardware design configurations still are being developed. Drifting wind patterns will be accounted for in the system. Modelling details can be found in NUS document 4512. See Response to Interrogatory #14, supra.

24. Who are the off-site measuring groups established in section 4.1.4 of the Emergency Plan? What criteria and standards have been adopted to measure the effectiveness and expertise of the off-site measuring groups? What agreements exist between Applicant and the off-site measuring groups and attach copies of each agreement with each off-site measuring group.

Response:

The off-site emergency groups referred to in § 4.1.4 of the Emergency Plan are: (1) the State of Ohio radiological monitoring teams, and (2) any local radiological monitoring teams formed by the counties. As recommended by NUREG-0654, § I, these teams will be governed by their own organizations. The State of Ohio radiological monitoring teams are described in the State of Ohio Nuclear Power Plant Emergency Response Plan, § II.H. (December, 1980). The "effectiveness and expertise" of the State monitoring teams will be established through the appropriate training provided by the State, see § II.N. of the State Plan, as well as by drills and exercises of the emergency plan, see § II.O. of the State Plan. The county teams, if formed, will be described in the county emergency response plans presently being developed. No letters of agreement have been entered into between Applicants and the State of Ohio regarding the State radiological monitoring teams.

25. Describe in specific detail the specialized training and experience requirements of all persons who will hold the positions set forth on pages 5-2 and 5-3 of the Emergency Plan; further, set forth in specific detail the specialized training, experience and qualifications of shift supervisors; set forth in detail the procedures to be employed by Applicant to verify and to continue to verify that subject employees do have and will continue to have the specialized training, experience and qualifications required.

Response:

The Licensing Board has directed Applicants to answer the Interrogatory as to those employees "responsible for communicating with outside agencies or the public during an emergency." Order at 6. All such employees will be trained in the notification emergency plan instruction. That instruction still is being developed. It has not been determined at this time which positions will require training in the notification emergency plan instruction. Training and retraining schedules for the notification emergency plan instruction also still are being developed. The general training each position will receive is summarized in the PNPP FSAR, Figure 13.2-1. Relevant resumes are found in the PNPP FSAR, Table 13.1-3, at pages 13.1-24 - 13.1-61.

26. Set forth in detail the reasoning behind Applicants' decision not to have an emergency duty officer on-site 24 hours per day, seven days per week. What assurance does Applicant have that substitutes for the emergency duty officer will have the time, experience and ability to perform in an emergency situation in the absence of the emergency duty officer?

Response:

The Licensing Board has directed Applicants to "respond concerning [their] reasons for not hiring a special employee for the purpose of directing off-site communication in an emergency." Order at 6. Applicants will not have such a

"special employee" for the reason that the Shift Supervisor is fully qualified and capable to direct off-site communication. It should be noted that, in the event of an emergency, the Shift Supervisor on duty will be designated the Emergency Duty Officer, and will assume the full responsibilities of that position. This initially designated Emergency Duty Officer then will be replaced by an assigned Emergency Duty Officer when the assigned Emergency Duty Officer arrives at the plant. The Shift Supervisors, however, will have qualifications for the Emergency Duty Officer functions equal to or better than those of the assigned Emergency Duty Officers.

36. When will the Emergency Operations Facility be planned and implemental [sic]? Where will it be located? How will it have access to data displays and information readouts from the control room?

Response:

The Licensing Board has directed Applicants to answer the following questions:

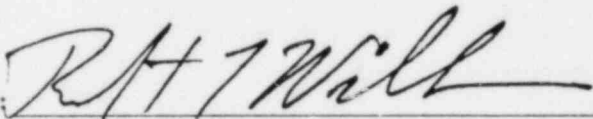
What communications, if any, concerning emergency evacuation will originate in the Emergency Operations Facility? What procedures, if any, will be used in the Emergency Operations Facility to collect relevant information about the condition of the Perry reactor and related information necessary to communicate to outside agencies fully and accurately about the risks attendant to a dangerous condition or accident.

Order at 7.

All communications, including protective action recommendations, between Applicants and off-site agencies will originate in the Emergency Operations Facility once the facility is activated. Information on plant status, meteorology and dose assessment for transmission to off-site agencies from the Emergency Operations Facility is collected on the Essential Information Form recommended by the State of Ohio Nuclear Power Plant Emergency Response Plan (December, 1980). The information then is transmitted in this format to off-site agencies. The emergency plan instructions will establish the procedures to be used by plant personnel for obtaining the information to be communicated off-site. These instructions still are being developed.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: 

Jay E. Silberg, P.C.

Robert L. Willmore

Counsel for Applicants

1800 M Street, N.W.

Washington, D.C. 20036

(202) 822-1000

Dated: September 17, 1982

CLEVELAND ELECTRIC ILLUMINATING COMPANY

CLEVELAND, OHIO

Rebecca B. Coffey, being duly sworn according to law ~~according~~ <sup>ABC</sup>  
~~to law~~, deposes and says that she is Associate Environmentalist,  
Licensing and Permits Section, The Cleveland Electric Illuminating  
Company, and that the facts set forth in the foregoing Applicants'  
Supplemental Answers to Sunflower Alliance Inc., et al. First round  
Interrogatories 6, 7, 8, 9, 11, 14, 15, 19, 24, 25, 26, and 36 dated  
December 2, 1981, are true and correct to the best of her knowledge,  
information and belief.

Rebecca Barber Coffey

Subscribed and sworn  
before me this 16<sup>th</sup> day  
of September, 1982

Caroline M. Wilde

CAROLINE M. WILDE  
Notary Public, State of Ohio  
My Commission Expires April 17, 1985  
(Recorded in Lake County)

UNITED STATES OF AMERICA

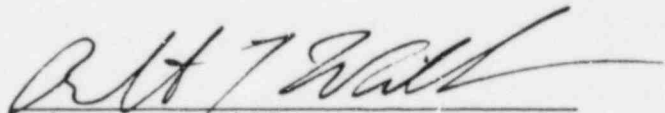
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
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THE CLEVELAND ELECTRIC ) Locket Nos. 50-440  
ILLUMINATING COMPANY, ET AL. ) 50-441  
 )  
(Perry Nuclear Power Plant, )  
Units 1 and 2) )

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing "Applicants' Supplemental Answers Pursuant To Order of August 18, 1982 (Concerning A Motion to Compel)," were served by deposit in the U.S. Mail, First Class, postage prepaid, this 17th day of September 1982, to all those on the attached Service List.

  
Robert L. Willmore

Dated: September 17, 1982



## NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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THE CLEVELAND ELECTRIC	)	Docket Nos. 50-440
ILLUMINATING COMPANY, <u>et al.</u>	)	50-441
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(Perry Nuclear Power Plant,	)	
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