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August 23, 1982
JPN-82-67

Ronald C. Haynes, Regional Administrator
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Mr. George H. Smith, Director
Division of Emergency Preparedness
and Operational Support

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Emergency Preparedness Appraisal

- References: 1. G.H. Smith (USNRC) to J.P. Bayne
(PASNY) dated April 28, 1982; same subject.
2. J.P. Bayne (PASNY) to R.C. Haynes (USNRC) dated
July 6, 1982 (JPN-82-59); same subject.


Dear Sir:

Attached is the Authority's statement on those items identified
in Appendix B to Emergency Preparedness Appraisal 50-333/82-03
(Reference 1).

Our response to the items in Appendix A of this appraisal was
previously transmitted to you via Reference 2.

If you have any questions, please contact Mr. J.A. Gray, Jr.
of my staff.

Very truly yours,


J.P. Bayne
Executive Vice President
Nuclear Generation

cc: Mr. Ron Barton
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STATEMENT CONCERNING EMERGENCY
PREPAREDNESS APPRAISAL 50-333/82-03
APPENDIX B ITEMS

POWER AUTHORITY OF THE STATE OF NEW YORK
James A. FitzPatrick Nuclear Power Plant
DOCKET NO. 50-333
Attachment to JPN-82-67

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

- Q. 1. Provision of written agreements with contractors for health physics support for emergency conditions beyond 24 hours. (Section 2.2)
- A. 1. At the present time written agreements between contractors for health physics support for emergency condition beyond 24 hours are being sought. As of 7/15/82, 1 contract agency has a written agreement with the plant and others have been contacted.
- Q. 2. Include more hands-on training; correct inconsistencies existing among various documents containing training requirements and criteria; provide training for local support personnel in radiation protection and site access; develop a mechanism to assure that all members of the emergency response organization and local support personnel review and are trained in procedural changes; and provide site specific training for non-licensee personnel. (Section 3.1)
- A. 2. Development of Training Department Procedure ITP-12, "Emergency Preparedness Training" delineates requirements for both classroom and hands-on training. The recent hiring of an Emergency Planning Trainer will expedite the development of site specific hands-on training. Lesson plans and training for site personnel will be completed in 1982. Annual retraining has been incorporated into ITP-12.
- Q. 3. Designate a central repository for all onsite and offsite emergency training records. (See Section 3.2)
- A. 3. The Emergency Plan Training Program administrator maintains a program file in accordance with ITP-12, "Emergency Preparedness Training". In addition, a duplicate file is maintained in accordance with the Training departments Administrative Procedure, ITP-1. Onsite PASNY employee training histories denote documentation of training. Contractor and support personnel training are stored in the program file.
- Q. 4. Provide for unrestricted space in the TSC "staffing area" to accommodate all assigned personnel including support staff, contractor representatives, and NRC personnel as well as provide ventilation for the TSC which will be comparable to the Control Room. (Section 4.1.1.2)
- A. 4. A dedicated TSC has been established at JAFNPP. More than ample space has been provided for each of the individuals designated to staff that facility in an emergency. The schedule for providing ventilation to the TSC that is comparable to Control Room remains the same as submitted previously to the NRC.
- Q. 5. Provide for an adequate means of receiving and displaying plant parameter and meteorology data at the EOF and AEOF as well as provide for necessary protective clothing, respiratory protection and dosimetry for EOF personnel. (Section 4.1.1.4)

- A. 5. Display boards and a hard copy telecopier have been dedicated for use in receiving and displaying plant parameter and meteorology data at the TSC and EOF. Material is available at the EOF to be transferred to the AEOF if that facility is established. Protective clothing and dosimetry has been provided for designated PASNY EOF personnel. A change to the existing Emergency Plan Procedure for activation of the EOF will include steps on relocating to an alternate EOF (AEOF) in the event that respiratory equipment is required in the EOF. This change will be included by 8/30/82.
- Q. 6. Re-evaluate reactor coolant sampling and analytical facilities for adequacy assuming a 10 Ci/ml post-accident reactor coolant source term. (Section 4.1.1.5)
- A. 6. The NSSS supplier has performed an analysis of the post-accident reactor coolant sampling system currently being installed. Findings indicate that the system is capable of sampling 10 Ci/ml samples. The system is designed to allow analysis of this sample while maintaining exposures less than NUREG-0578.
- Q. 7. Develop an alternate sampling capability for the Radwaste Building ventilation effluent. (Section 4.1.1.7)
- A. 7. Deleted per previous communication. (Reference)
- Q. 8. Evaluate the number of assembly areas if experiences based upon drills and exercises indicate administrative and logistical support problems in the areas of personnel accountability, radiation protection, and decontamination support. (Section 4.1.2.1)
- A. 8. The number of assembly areas have been reduced significantly. Provisions have also been made in the restricted area evacuation procedure that delineates certain procedural steps that will improve assembly and accountability.
- Q. 9. Include the Nine Mile Point decontamination facilities in the mutual support agreement and establish an alternate on-site decontamination facility in the event primary facilities are inaccessible. (See Section 4.1.2.3)
- A. 9. Discussions have been conducted with the representatives at Nine Mile Point concerning the use of their decontaminating facilities. Some reluctance has been exhibited, however, since the individual would require entering as a visitor to their site. Discussions will continue and an alternate facility will be developed for this purpose. This will be completed by 9/30/83.
- Q. 10. Finalize installation of telephone communications for media representatives. (See Section 4.1.4)
- A. 10. Telephone installation for media representatives have been completed.

- Q. 11. Perform an engineering study of the ARM system and upgrade the system based on the study. In addition, complete installation and testing of all monitors. (See Section 4.2.1.2)
- A. 11. A preliminary engineering evaluation was completed on June 30, 1982. This study indicates that several channels of the ARM system may require modifications. The system supplier has been contacted and requested to perform a detailed evaluation of alternatives and schedules for system upgrade. It is anticipated that upon receipt of this information the system selection, installation, scheduling and budgeting can be finalized by December 31, 1982.
- Q. 12. Develop an action plan to implement appropriate recommendations contained in the environmental study. (See Section 4. 2.1.2)
- A. 12. The environmental qualification of Class IE equipment has been addressed in the James A. FitzPatrick Nuclear Power Plant response to NRC IE Bulletin 79-01B. Overall program commitments will be performed in accordance with that response to the 79-01B program. Responses to Bulletin 79-01B items will be addressed within the scope of the overall 79-01B program.
- Q. 13. Establish an alternate stability class determination scheme for use when the primary information source cannot provide the parameter; include the characteristic wind direction traces to determine atmospheric stability class in procedure EAP-4; and formalize the preventative maintenance program. (Section 4.2.1.4)
- A. 13. An alternate stability class determination scheme has been established for use with EAP-4 procedures. This item has been included in that procedure and will be included in the automated meteorological system procedure under development.
- A formalized preventive maintenance program will be established when the system modification has been completed.
- Q. 14. Provide assurance that the necessary respiratory protection is available for personnel in the EOF and that self contained breathing apparatus (SCBAs) will be available for each emergency team. (Section 4.2.2.1)
- A. 14. This item has been partially addresses in our response to Q.5. SCBAs have been budgeted for 1983. They will be purchased and made available for all the EOF emergency teams by 7/30/83.
- Q. 15. Develop written agreements with other utilities or agencies for obtaining additional supplies and equipment for damage control/corrective action. (See Section 4.2.4)
- A. 15. A written agreement with two other utilities exists at present.
- Q. 16. Provide reliable transportation to support the emergency planning effort. (Section 4.2.5)

- A. 16. Four vehicles have been designated as emergency response vehicles in addition to other duties. These vehicles will be equipped with the proper radio and electrical packages to ensure their function as emergency response vehicles. This will be completed by 12/30/82.
- Q. 17. Re-evaluate emergency and routine procedures to determine if sufficient emergency response information has been included. (Section 5.1.)
- A. 17. All emergency response procedures have been rewritten to include emergency response information and are in place.
- Q. 18. Reference all routine procedures necessary to complete assigned tasks in the implementing procedures. (See Section 5.3)
- A. 18. This has been completed and is in place.
- Q. 19. Clearly indicate in procedure EAP-1 when supporting groups would be notified based on the level and type of emergency as well as the conditions for issuance of follow-up and close-out messages. (Section 5.4.1)
- A. 19. EAP-1 is being revised into several sections that would include the above desired results. This will be completed by 9/30/82.
- Q. 20. Provide assurance that implementing procedure checklists will be adequate for orchestrating the emergency under changing emergency conditions as well as the assumptions used for the Dose Estimate calculator are correct. (See Section 5.4.2)
- A. 20. An extensively revised Emergency Plan Implementing Procedure has replaced the former procedure checklist. This procedure directs an individual to other procedures in the emergency plan and replaces the checklist concept.

A re-evaluation of the assumptions involved in the Dose Estimate calculator is in the process of being completed and will be examined in comparison to the automated calculations system, being installed. This evaluation will be completed by 12/30/82.

- Q. 21. Develop procedures clarifying survey instrument usage: the collection media for radioiodine sampling; and alternate locations for survey instrumentation. (See Section 5.4.2.1 and 5.4.2.2)
- A. 21. Procedures clarifying survey instrument usage and collection of media for radioactive sampling have been revised.

Alternate locations for survey instruments are presently under evaluation.

- Q. 22. Provide a means of recording in-plant survey data in procedure EAP-6 as well as assurance that preprogrammed analysis routines will work with all anticipated samples (charcoal versus silver zeolite cartridges). (Section 5.4.3.3)
- A. 22. EAP-6 has been revised to incorporate this requirement. This procedure is presently in place.
- Q. 23. Revise procedure RTP-31 to include provisions for a detailed checklist; diagram of sample location and set-up; and precautions for transporting reactor water samples. (Section 5.4.2.4)
- A. 23. Procedure RTP-31 was revised on June 30, 1982. It is currently under review to assure that described items are adequately addressed. Review and revision, if necessary, will be completed by 8/31/82.
- Q. 24. Provisions for an alternate counting facility and methods to count highly radioactive samples within procedure RTP-31 as well as provisions for transmitting original data sheets to the organizational element responsible for assessment. (Section 5.4.2.5)
- A. 24. Procedure RTP-31 was revised on June 30, 1982. It is currently under review to assure that the described items are adequately addressed. Review and revisions if necessary, will be complete by August 31, 1982.
- Q. 25. Inclusion of data sheets and specification of reporting requirements to the element of the emergency organization responsible for dose assessment. (Section 5.4.2.7)
- A. 25. Emergency Plan Procedures EAP-1.1 has been written in conjunction with state, local and plant representatives to provide data sheets in emergency situations.
- Q. 26. Provide a schematic in procedure RTP-30 for each sample location; define the purpose of the procedure to reflect its post-accident vent sampling capabilities; and provide sequential action steps for handling and transporting high activity samples. (Section 5.4.2.8)
- A. 26. Procedure RTP-30 was revised to reflect these post-accident sampling considerations and issued 6/30/82.
- Q. 27. Provide sequential action steps and cross references between procedures for handling and analyzing highly radioactive silver zeolite, particulate, and noble gas vent samples. (Section 5.4.3.3)
- A. 27. A list of sequential action steps and a cross reference will be developed and in place by 12/30/82.

- Q. 28. Revise procedure EAP-8 to include a firm commitment to the 30 minute requirement of NUREG-0654. (Section 5.4.3.3)
- A. 28. As detailed in our letter of April 21, 1981 (JPN-81-27), the Authority considers a 30-minute call-out as impractical to achieve and unnecessary for the FitzPatrick plant. The Authority considers the minimum shift crew adequate to manage the plant for the initial 60 minutes when additional personnel will be available.
- Q. 29. Revise applicable procedures to include provisions for recording the names and brief status of all individuals surveyed for contamination; special considerations for skin contaminated with radioiodine; ensuring that collected data are provided to the organizational element responsible for radiation protection during emergencies; and recording the serial number of the instrument used to conduct the survey. (Section 5.4.3.4)
- A. 29. Procedures will be revised to include this by 12/30/82.
- Q. 30. Perform an evaluation to determine if radiological and environmental services personnel can reasonably provide radiological support to the various emergency teams; personnel monitoring and decontamination services at restricted areas; and the fifteen primary assembly areas. (See Section 5.4.3.4)
- A. 30. The number of assembly areas has been reduced. This, in turn, reduces the extent of personnel monitoring and decontamination services required and will allow for more realistic dispersal of technicians under emergency conditions.
- Q. 31. Provide a procedure for addressing emergency planning contingencies; i.e., physical barriers, alarm systems, access control, etc., and possible interface for security and local law enforcement personnel. (Section 5.4.4)
- A. 31. Special instructions "Security During Emergencies" was completed 2/23/82 and issued to the Shift Security Coordinators and Sergeants to address the above items during emergency conditions.
- Q. 32. Revise procedure EAP-13 to include references to the use of Work Activities Control Procedures (WACPs) during emergency conditions. (Section 5.4.5)
- A. 32. This has been completed and is in place.
- Q. 33. Revise the Emergency Plan to include an annual audit. (Section 5.6.4)
- A. 33. This will be completed by 9/30/82.
- Q. 34. Revise procedure SAP-1 to indicate how exercise and drill improvement items will be corrected. (See Section 7.1)
- A. 34. This will be completed by 9/30/82.