ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

JOHN E. MAIER
Vice President

TELEPHONE
AREA CODE 716 546-2700

June 30, 1982

Mr. George H. Smith, Director
Division of Emergency Preparedness
and Operational Support
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, Pennsylvania 19406

Subject: Emergency Preparedness Appraisal 50-244/81-22
R. E. Ginna Nuclear Power Plant, Unit No. 1
Docket No. 50-244

Dear Mr. Smith:

In answer to your letter of May 20, 1982, we submit the attached responses to Appendices A and B items. Several of the Appendix A items were corrected in response to the immediate action letter of December 15, 1981 from Ronald C. Haynes. Other items have been corrected during the past six months. Those items which require further action on our part will be completed in the near future.

Many of the Appendix B items have already been corrected and action will be completed on the others according to the dates given in each item.

Very truly yours,

John E. Maier

Item - A1

Develop and implement administrative means to ensure adequate coordination between onsite emergency organizational elements. (See Section 1.3)

RG&E RESPONSE:

The position of Corporate Radiation Emergency Coordinator (See 31) will have the authority to ensure coordination between onsite emergency organizational elements. The lines of coordination will be shown in a procedure to be issued prior to January 1, 1983.

Item - A2

Establish an emergency organization which provides for all emergency functions needed during initial, intermediate and final phases of augmentation. Revise the Emergency Plan to include a description of the organization, and update implementing procedures to be consistent with the organization. The description shall include sufficient detail to define the command hierarchy; specify its structure, reporting chains and inter-relationships at any phase of augmentation; and include supervisory as well as non-supervisory elements. (See Section 2.1).

RG&E RESPONSE:

Our letter of December 30, 1981 to Mr. R. C. Haynes stated that the following was accomplished:

A new procedure, SC-1.1B Emergency Response Organization was reviewed and approved at a Plant Operations Review Committee Meeting on December 14, 1981.

The purpose of this procedure is to provide a method consistent with administrative controls to define and implement the Emergency Response Organization with respect to the various levels of Emergency Classifications as defined in Ginna procedures.

Procedure SC-1.1B has been updated and reviewed by PORC and reissued as SC-200 Rev.0 effective April 14, 1982, and Revision 1 effective May 26, 1982. This procedure entitled "Emergency Response Organization/Responsibilities" provides the method of defining and implementing the Emergency Response Organization. The functions and responsibilities of each position are also defined along with charts of the organizational structure.

The organization charts are included in SC-1 the Radiation Emergency Plan as Figures 4.2A and 4.2B.

Item - A3

For each functional area specified within the emergency organization provide a list of personnel trained and qualified to perform the tasks associated with the area. These lists shall identify the current status of each individual. Provisions to maintain lists current shall be developed and implemented. (See Section 2.1).

RG&E RESPONSE:

Our letter of December 30, 1981 to Mr. R. C. Haynes stated that the following was accomplished:

An existing procedure, SC-1.12A Immediate Call List, Revision 19, was reviewed and approved at a Plant Operations Review Committee Meeting on December 14, 1981.

This revision included attachments to the procedure which added lists of functions and such persons authorized to perform those functions. Due to recent changes in administrative processing, this procedure was issued with an effective date of December 21, 1981.

Since that response all SC procedures have been reviewed and renumbered. The list of functions and persons authorized to perform those functions has been moved from Procedure SC-1.12A to a new procedure SC-600 "Emergency Plant Qualification and Notification" effective March 17, 1982.

It provides a current list of individuals, and their home phone numbers, who are trained and qualified in the various functions needed within the Emergency Organization. Provisions to maintain the lists current are included in the procedure.

Item - A4

Realign the emergency plan training program to be consistent with the functional areas, requirements, and structure of the emergency organization. (See Section 3.1).

RG&E RESPONSE:

Our letter of February 24, 1982 to Mr. R. C. Haynes stated that this was completed prior to January 13, 1982. A new procedure A-103.8 was written, PORC reviewed and approved for use, which realigns the training program so that it is consistent with the revised Emergency Plan Organization and procedures.

Item - A5

Develop means to verify that all individuals with emergency duties have been trained and have attained a minimum level of proficiency. This shall include, but not be limited to hands-on training and walk-throughs. (See Section 3.2).

RG&E RESPONSE:

Our letter of February 24, 1982 to Mr. R. C. Haynes, stated that this item was completed by January 15, 1982.

Procedure A-103.8 has developed a training program which provides the classroom, walk-through and hands-on training required. Procedure SC-600 verifies that the training is complete and provides for periodic evaluation of individuals qualification to fulfill the required functions of the Emergency Plan.

Item - A6

Complete the installation and testing of equipment in the Technical Support Center (TSC) to ensure that it will be habitable and functional and able to perform its intended use during accident conditions. (See Section 4.1.1.2).

RG&E RESPONSE:

In response items mentioned in Inspection Report 50-244/81-22.

Radiation levels on routes between the TSC and CR would be monitored by portable equipment in the event there is need for passage between the two centers. The reason for design and construction of a TSC is to avoid the need for personnel to congregate in the Control Room. Therefore passage of personnel along this route would be minimal.

Plant operating parameters are available via the plant computer readout in the TSC. Adequate capability exists without a closed circuit TV system to the Control Room.

Maps used for dose assessment have degrees marked on them for alignment of overlays and any other uses deemed necessary under assessment procedures.

The ventilation system of the TSC has been made operational and tested as reported in our letter of February 24, 1982 to Mr. R. C. Haynes.

A dedicated telephone link between the TSC, Control Room, EOF and the State and Counties was installed and in use prior to our drill on January 21, 1982.

Radio facilities for communicating with field monitoring teams were in place and used during the drill on January 21, 1982.

An area Radiation Monitor and an Air Sampler with appropriate filters are part of the permanent emergency equipment in the TSC. This equipment is checked monthly per procedure SC-410 Appendix D.

A constant Air Monitor has been ordered and will be permanently placed in the TSC.

Item - A7

Provide for an Emergency Operations Facility (EOF) having sufficient and appropriate equipment to enable the direction, coordination and evaluation of Licensee's activities as demanded by the emergency organization. (See Section 4.1.1.4).

RG&E RESPONSE:

The Emergency Operations Facility (EOF) has been upgraded to include sufficient and appropriate equipment to enable the direction, coordination and evaluation of activities as demanded by the Emergency Organization. The following equipment has been added to the EOF since the November 2-13, 1981 Emergency Preparedness Appraisal 50-244/81-22 was conducted.

a.) Two (2) Radiation Survey Meters (Eberline Model RM-14).

b.) Four (4) Self-reading Dosimeters.

c.) Three (3) Check Sources.

d.) Four (4) Film Badges.

e.) Four (4) TLD's.

f.) A Dosimeter Charger.

g.) Two (2) Victoreen Air Samplers.

h.) Two (2) High Range Xetex 305B Dose Rate Meters.

i.) A 10 mile radius site area map with Population distributions and compass degrees on it. Also a 50 mile radius regional map and other site maps have been added.

j.) Four (4) clocks, Three (3) in the Main EOF and one (1) in the Dose Assessment Area.

k.) A dedicated telephone from the Main EOF to the TSC and C.R.

l.) Direct-line communications between the C.R., TSC, ESC, Main EOF, EOF Dose Assessment, New York State, Wayne County and Monroe County.

m.) NRC HPN line.

n.) NRC ENS line has been installed.

o.) Dedicated telephone from the TSC Dose Assessment to the EOF Dose Assessment.

p.) Three (3) radio transceivers; one (1) in Main EOF, one (1) in EOF Dose Assessment and one (1) in the Engineering Area.

q.) Numerous RG&E telephone system extensions.

r.) Two (2)18 channel Bearcat scanners; one (1) in the Main EOF and one (1) in the EOF Dose Assessment area.

s.) Two (2) Radiation Survey Team equipment footlockers.

The EOF Dose Assessment Area is located on the Seventh Floor in close proximity to the Main EOF. A first aid room is available to the EOF.

Item - A8

Provide sampling equipment at penetrations 124 and 203; maintain sampling apparatus ready for prompt connection to the penetration isolation valves; and evaluate the need for additional area monitoring equipment at the sample stations. (See Section 4.1.1.6).

RG&E RESPONSE:

The three identified containment penetrations for post accident sampling were established as interim locations until the permanent Post Accident Sampling System (PASS) is installed as required by NUREG-0737. We had expected this system to be operational by September 1, 1982. However, as reported in a letter to Mr. D. Crutchfield, NRC, dated June 17, 1982, due to a labor strike, we may not be able to complete the system by that date.

Sampling apparatus will be kept ready for prompt connection to the penetration most likely to be used because of its low dose potential.

Portable radiation monitoring equipment is specified in the procedure for use when taking the sample.

Item - A9

Evaluate the need for: retention, transfer, storage, sampling and analysis of highly radioactive liquid wastes that could be generated as result of severe accidents. (See Section 4.1.1.8).

RG&E RESPONSE:

A study will be initiated to make such an evaluation.

Item - A10

Evaluate the types of instrumentation needed to rapidly and accurately measure radiation and radioactive contamination levels based on the needs of the various functional areas of response during emergencies, and implement their use. (See Section 4.2.1.1).

RG&E RESPONSE:

Eberline RO-2 dose rate meters (e.g. ionization chambers reading a maximum of 5 R/hr have been provided for the survey teams. Beta Gamma count-rate meters are also available. Both of these items are included in Procedure SC-410 "Inspection of Emergency Equipment."

Only silver zeolite cartridges are available for iodine absorption in air samples. Carbon cartridges used for training have been clearly marked "DO NOT USE".

A RO-2 dose rate meter is included for the team which will do a survey of the ESC. A survey of the ESC and the assembly area is one of the first duties of the Survey Center Manager. An Eberline RM-3C with a 260 probe & SH-4 shield is available to increase the minimum level of detectability.

Additional high range pocket dosimeters have been placed in the ESC. Procedure SC-410 will be revised to show 8 each of 5R and 10R maximum dosimeters. TLDs are also available for emergency response tasks such as life saving.

The RG&E Emergency Plan does not dispatch in-plant survey teams from the ESC. In-plant survey teams have SCBA available in the Control Room and at the Health Physics Office. Extremity dosimeters would be issued by the plant Health Physicist to repair teams as they are sent from the OSC or TSC, and as required by the RWP's.

Item - A11

Include in the Emergency Plan the current means used for determining the magnitude of release, and for continuous dose assessment. (See Section 4.2.1.4).

RG&E RESPONSE:

Procedure SC-420 (formerly SC-1.13) "Estimating Offsite Doses" was revised on January 16, 1982 to reflect current means for determining the magnitude of releases and for performing continuous dose assessment. Also incorporated in the SC-420 procedure are the whole body and thyroid-dose conversion curves given in EPA 520/1-75-001 "Manual for Protective Actions." This approach is consistent with the dose assessment methodology used by the State of New York (see NYS Radiological Emergency Response Plan) and was recommended by a member of the Emergency Preparedness Appraisal team during Inspection 81-22.

The SC-1 Emergency Plan will be revised to include the current means used for determining the magnitude of release, and for continuous dose assessment before September 30, 1982.

Item - A12

Install state and county hot lines from the TSC and complete the installation of communications equipment within the EOF. (See Section 4.2.3).

RG&E RESPONSE:

A "hot line" providing communications with the state and county EOC's has been installed and was used for the January 21, 1982 exercise as described in Item A6.

Communications equipment at the EOF has been installed and was used during the January 21, 1982 exercise and the January 25, 1982 incident. Equipment was sufficient to maintain communications with all personnel and centers as needed.

Item - A13

Review general emergency implementing instructions to assure adequate guidance and necessary detail is provided for the emergency coordinator. (See Section 5.3).

RG&E RESPONSE:

Procedure SC-1.4 "General Emergency" has been reviewed and rewritten as SC-204. Adequate guidance and necessary detail is provided for the emergency coordinator by reference to other procedures which require action. SC-1.1A "Ginna Station Event Evaluation and Classification" has been rewritten as SC-100 (Same title) which gives clearer guidance on the parameters which will classify the severity of an event.

Item - A14

Develop a technique for making protective action recommendations based on a method which considers: source, elevation, and buildings in the vicinity of the release; the real-time characteristics of the release and actual meteorological information. (See Section 5.4.2).

RG&E RESPONSE:

(See response to Item No. A11). Further refinements to the dose estimating methodology which will address nearby buildings, specific source elevations, real-time release characteristics and meteorology will be incorporated into a computerized dose assessment system.

Item - A15

Identify techniques to compensate for potential uncertainties associated with plume trajectories, and include the technical basis as an appendix to the emergency plan. (See Section 5.4.2).

RG&E RESPONSE:

The approach of SC-1 is to recommend protective actions for the general public by Emergency Response Planning Areas (ERPAs) within a ten-mile radius, not by plume "compass sector". Uncertainties in specific plume trajectories are thus compensated for, since protective actions would be implemented uniformly throughout the potentially affected EPRAs which comprise much wider populated areas.

Item - A16

Re-evaluate provisions to rapidly and accurately detect and measure airborne radioiodine under field conditions, in the presence of noble gases and develop a method for field determination of plume immersion as opposed to overhead exposure. (See Section 5.4.2.1).

RG&E RESPONSE:

Our letter of February 24, 1982 to Mr. R. C. Haynes stated that this item was completed prior to January 15, 1982.

The equipment we currently use for field radioiodine determination should perform the function of rapidly and accurately monitoring radioiodine under field conditions.

The use of the silver zeolite collection media, the Radeco "medium" volume sampler (1.5 CFM) and the RM-14/HP 190 counting system allows good flexibility and simple operation in the field. The detectable range for this system covers a broad range of iodine concentrations which include the various protective action guide "signal" concentrations. For the predesignated sampling procedure, the detectable range extends from 2×10^{-8} to 3×10^{-5} uCi/cc (12 mRem to 18 Rem adult two hour thyroid dose). the upper range can be extended to 3×10^{-4} uCi/cc (70 Rem adult two hours thyroid dose) by reducing the sample time to one minute. This concentration of radioiodine exceeds the highest PAG signal concentration by nearly a factor of three, so if the concentration was higher for immediate actions, the actual concentration would be meaningless.

NOTE: The iodine dose rates were determined using the EPA 520 manual of Protective Action Guides and Protective Actions for Nuclear Incidents (2/80).

Procedure SC-1.7D has been rewritten as SC-323. In this procedure Appendix II provides the method for determination if the survey readings are due to immersion in the radioactive cloud or if they are due to an overhead plume.

Item - A17

Provide means for obtaining gas concentration readings from R-12; provide criteria for selecting containment air sampling location; and incorporate data sheets in the procedure. (See Section 5.4.2.6).

RG&E RESPONSE:

Procedure PC-23.2 will be reviewed and revised as necessary. The use of PASS (See A8) will also affect this procedure.

Item - A18

Undertake and complete a review of all emergency plan implementing procedures and make appropriate revisions or write new procedures as necessary, to:

a.) Clarify required actions, and eliminate existing ambiguities, inconsistencies and errors.

b.) Clarify duties and responsibilities of personnel involved in the various actions.

c.) Provide specific cross-references to other procedures in the action step as needed to detail and clarify further actions.

RG&E RESPONSE:

In a letter from Mr. John E. Maier of February 24, 1982 to Mr. Ronald C. Haynes, and subsequent letters of April 19, 1982 and May 25, 1982, we stated:

All of the listed procedures have been reviewed and appropriate revisions were recommended by PORC prior to February 18, 1982. Many of the other implementing procedures of our Emergency Plan were also reviewed and recommended for approval prior to March 15, 1982. However, due to the pressing work load of shutdown the balance of the implementing procedures were not completed until April 14, 1982.

As indicated in our letter of April 19, 1982 the revision of the Emergency Plan SC-1 was completed prior to start-up after our 1982 Refueling shutdown.

Thus we have met the requirements of Item A18, a, b, and c. Additionally you listed procedures in which specific matters need to be addressed as described in referenced sections of

the report. A complete review of all emergency plan implementing procedures of the SC series have been done and they were rewritten using a new numbering system. The procedures will be reviewed again and appropriate recommendations from your report incorporated by September 30, 1982.

Item - A19

Include in the Emergency Plan, the method to be used for determining the magnitude of and for continually assessing the impact of the release of radioactive materials. (See Section 5.4.2).

RG&E RESPONSE:

See responses to items A11 and A14. The method will be included in the Radiation Emergency Plan (SC-1) before September 30, 1982.

Item - A20

Provide means for reassembling personnel in alternate assembly areas. (See Section 4.1.2.1).

RG&E RESPONSE:

An alternate assembly area will be located and the means for reassembling personnel will be developed before September 30, 1982.

Item - B1

Assign another individual to assist the EPCs on their emergency planning duties. (See Section 1.1).

RG&E RESPONSE:

An organization change is being proposed to company management to establish the position of Corporate Radiation Emergency Coordinator. If approved the position will be established by September 30, 1982.

Item - B2

Establish a specific formal selection criteria for personnel responsible for emergency planning. (See Section 1.4).

RG&E RESPONSE:

When the position of Corporate Radiation Emergency Coordinator is established, a job description will be written. A job description for other emergency planners will also be written and the organization chart will be revised to show the positions. This will be incorporated into the necessary procedures by January 1, 1983.

Item - B3

Preposition sampling and monitoring equipment to detect and measure airborne and particulate radioactivity in the Control Room. (See Section 4.1.1.1).

RG&E RESPONSE:

A letter and attachments sent to Mr. Dennis Crutchfield from Mr. John E. Maier on September 4, 1981 addressed Control Room Habitability. Section 5 addressed Modifications and Further Investigations relative to Control Room Habitability. This will be completed as scheduled in that letter. Equipment for detecting and measuring airborne particulate radioactivity is part of the emergency supplies (SC-410) available in the Control Room.

Item - B4

Provide radiation monitoring and radiation protective equipment and supplies in the OSC. (See Section 4.1.1.3).

RG&E RESPONSE:

Potassium Iodide tablets and self reading pocket dosimeters are included in the equipment stored in the OSC. Radiation monitoring equipment for surveys of the OSC or for use out on a job is available in the TSC. The procedure for manning the OSC (SC-312, includes the requirement for a habitability survey, with relocation to the TSC if necessary.

Item - B5

Evaluate need for additional permanent shielding in the counting room and nuclear sample room. (See Section 4.1.1.5).

RG&E RESPONSE:

An evaluation of the need for additional permanent shielding in the count room and the nuclear sample room was performed and submitted to the NRC in a letter from Mr. L. D. White, Jr. to Mr. Dennis Ziemann dated December 20, 1979. Additional shielding was proposed to be installed as a result of that evaluation. Subsequently, we purchased a Post Accident Sampling System (PASS) and reduced the amount of shielding that otherwise would have been required. The PASS and new shielding requirements were described in a letter dated September 4, 1981 from Mr. John E. Maier to Mr. Dennis M. Crutchfield. The shielding modifications were installed during our 1982 refueling outage. The status of the PASS is discussed in Item A8.

Item - B6

Develop improved remote sample handling equipment. (See Section 4.1.1.5).

RG&E RESPONSE:

The installation of a Post Accident Sampling System (PASS) is underway. In a letter from Mr. John E. Maier to Mr. D. Crutchfield dated April 23, 1982 we committed to have it completed by September 1, 1982. Recently some work on this project has been stopped due to a labor strike, so the completion date is now in jeopardy. (See A8). The addition of sample line shielding, improved sampling procedures, equipment and training has provided sufficient capability to meet the post accident sampling dose requirements.

Item - B7

Perform a study to determine the number of detectors (ARMs) with sufficient high range to provide in-plant post-accident radiation measurements useful to accurately detect and classify emergency conditions. (See Section 4.2.1.2).

RG&E RESPONSE:

A study will be made to determine if additional ARMs with

high range capability are required to accurately detect and classify emergency conditions.

Item - B8

Establish a mechanism to assure that a continuous record of meteorological information is available in the CR, the TSC and EOF. Include, as a minimum, a hard copy listing of 15 minute averaged values or a continuous trace of wind direction and speed and an estimate of atmosphere stability. (See Section 4.2.1.4).

RG&E RESPONSE:

Descriptions of intended changes to the Ginna meteorological system configuration were provided in submittal letters from Mr. John E. Maier to Mr. Dennis Crutchfield on April 28, 1981 and on July 1, 1981. No formal NRC review has been performed to our knowledge on the content of these submittals, which addressed the meteorological assessment requirements of NUREG-0737 and NUREG-0654. During the November, 1981 Emergency Preparedness Appraisal Inspection (81-22), NRC team members indicated they had not been made aware of the April 28 and July 1 RG&E submittals. In addition, certain acceptance criteria apparently used in the 81-22 Inspection Report with regard to the meteorological system layout have not been formally issued by the Commission. Appraisal team members indicated that newly-revised criteria would be forthcoming which would provide the rationale for the NRC's evaluation of proposed meteorological programs. This revised documentation has not been received by RG&E.

A continuous trace of wind speed and direction (33-foot level) is available in the Control Room, along with instantaneous indications of temperature (33,150 and 250-foot) by computer and digital display. Computer printouts are currently available of instantaneous wind speed, direction and temperature values (33,150 and 250-foot) in the CR, TSC and EOF. It is anticipated that 15 minute averaged meteorological values will be available in the TSC and EOF by computer terminal for purposes of emergency dose assessment.

Item - B9

Revise the Emergency Plan, and procedures (e.g. RD-14 and CP-250) to ensure they are consistent with the equipment currently in place. (See Section 4.2.1.4).

RG&E RESPONSE:

Section 6.3.8 of the Radiation Emergency Plant (SC-1 Rev. 18) does describe the meteorology equipment currently in place. The plan and procedures RD-14 and CP-250 will be reviewed to ensure they are consistent with the equipment currently in place. This will be completed before September 30, 1982.

Item - B10

Identify an alternate source of meteorological data. (See Section 4.2.1.4).

RG&E RESPONSE:

Section 6.3.8 of the Radiation Emergency Plan (SC-1) and the implementing procedure "Estimating Off-Site Doses" SC-420 does identify alternate sources of meteorological data. The weather tower at Station 13A and the National Weather Service in Rochester are given as alternates.

Item - B11

Evaluate present SCBA refilling air facilities to ensure that SCBA refilling capabilities will be available under the most severe accident scenarios. (See Section 4.2.2.1).

RG&E RESPONSE:

A station work order to move the cascade system for filling SCBA cylinders to a location of low radiation level during severe incidents, has been given to the maintenance section. This will be completed before September 30, 1982.

Item - B12

Provide means to ensure that at lest one emergency vehicle would be available to perform offsite monitoring functions under severe weather conditions. (See Section 4.2.6).

RG&E RESPONSE:

A 4-wheel drive vehicle with two way radio communication is available at all times. As stated in our letter of October 17, 1979 and December 28, 1979 in response to Item 2.2.1b of TMI Lessons Learned the Duty Engineer uses this vehicle to respond

whenever he is called in. The Duty Engineer is one of the first persons notified of any unusual condition and called to the site. This vehicle would be available for an off-site monitoring team under severe weather conditions.

Item - B13

Review EOPs to incorporate clear and concise instructions for the user to link emergency action levels and emergency classifications. (See Section 5.2).

RG&E RESPONSE:

Ginna EOPs are being reviewed under the Westinghouse Owners Group emergency procedures guidelines. However, the action levels and classification are addressed in a site specific manner. Emergency action levels and emergency classification will be referenced in each EOP by directing the operator to evaluate conditions using SC-100 "Ginna Station Event Evaluation and Classification." Using SC-100 procedure the proper level and subsequent notification is quickly evident.

All EOPs will be reviewed and revised as referenced in the letter of June 11, 1982 from Mr. John E. Maier to Mr. Dennis Crutchfield.

Item - B14

Provide augmented notifications to local authorities comparable to that given the state authorities. (See Section 5.4.1).

RG&E RESPONSE:

Augmented notifications and any reclassification of an event will be made over the state and county "hot line" so that all EOCs will be notified at the same time and have the same information.

Item - B15

Provide offsite dose projections for abnormal releases and link them to EPA recommended protective action guides. (See Section 5.4.1).

RG&E RESPONSE:

See responses to items A11 and A14.

Item - B16

Rectify the Specialized Call List (SC-1.12C) distribution error. (See Section 5.4.1).

RG&E RESPONSE:

Corrected copies of the Specialized Notification List containing names and phone numbers have been placed in the TSC, Control Room, and plant library. the procedure number has been changed from SC-12C to SC-606.

Item - B17

Develop means to minimize distribution errors in emergency procedures, and to verify that vital lists would be readily available to the elements responsible for making the notification. (See Section 5.4.1).

RG&E RESPONSE:

Procedure A-602 "Plant Procedure Distribution" contains the means to assure procedures are properly distributed and readily available to those groups which need them. Each group on the distribution list is responsible for maintaining their binder of procedures current and up-to-date. This system has been in effect and worked well for many years.

Procedures are proof-read by the originator before they are distributed. A current index is distributed quarterly which can be used to check for proper revisions in the binder. Also Quality Control makes periodic checks on binders to verify that they are up to date.

Item - B18

Provide instructions for obtaining keys for air sample stations. (See Section 5.4.2.1).

RG&E RESPONSE:

It is not necessary for the air samples to be collected

rapidly at the off-site air sample stations since they are 8-16 miles from the site. The instructions to collect these samples will be deleted from the survey team procedure (SC-323). Therefore keys will not be needed by emergency teams.

Item - B19

Reconsider the value of TLD placement against plume tracking by air sampling and direct radiation measurements. (See Section 5.4.2.1).

RG&E RESPONSE:

TLD placement is not given priority over air sampling or direct radiation measurement. Each survey team takes an air sample at a designated location and places several TLDs along its route. A survey of the area is done continually as the team traverses its route. TLDs do make for integrated dose readings and therefore should be placed as early in the incident as practical. These actions are specified in the applicable procedures.

Item - B20

Review the sample analysis areas of PC-23.2 to upgrade radiation protection guidance consistent with activity levels and source terms specified in NUREG-0737. (See Section 5.4.2.7).

RG&E RESPONSE:

Procedure PC-23.2 will be revised to upgrade the radiation protection guidance by September 30, 1982. (See Item A17).

Item - B21

Develop a method to ensure that only currently authorized procedures are present in the procedure binders. (See Section 5.5.3).

RG&E RESPONSE:

See Item - B17.

Item - B22

Provide administrative means to ensure that letters of agreement with off-site agencies are updated on an annual basis. (See Section 6.1).

RG&E RESPONSE:

Letters of agreement will be renewed bi-annually. This will be administered by requesting updated letters from the support organizations in January of the even numbered years. This guidance will be made part of Section 4.3 of the Radiation Emergency Plan.

Item - B23

Implement means of public information other than the dissemination of brochures (e.g. posters in public place, media announcements, notices in the Yellow Pages of the Telephone Directory, etc.). (See Section 6.2).

RG&E RESPONSE:

An announcement of "Nuclear Emergency Information" is in the current (1982) Rochester Telephone Directory. They will not accept a yellow page advertisement from us. We will contact New York Telephone Company for a similar announcement.

A layout for a poster has been developed and will be printed and distributed to businesses in the 10 mile EPZ. We also are planning to distribute quantities of our brochures to individual businesses. Audio tapes have been prepared and are on the "ASK RG&E" system - a tape library accessible by telephone. Callers outside the 716 area can call this library collect.

Through the RG&E Speakers Bureau, program information is available to public or educational groups wanting to hear a presentation of the subject of emergency response.

Media announcements will be developed for radio and television stations in the RG&E service area to familiarize the public with details of the emergency plan.

Item - B24

Provide annual training for news media representatives, to familiarize them with emergency plans, radiation, points

of contact for release of public information, locations and equipment to be used during emergencies. (See Section 6.3).

RG&E RESPONSE:

Educational meetings will be scheduled for representatives of area media organizations prior to RG&E's annual drill, expanding on a pattern followed prior to the drill held in January, 1982. On that occasion, a substantial number of media representatives had already attended voluntary sessions on radiation, which included academic experts with no ties to the utility industry. Familiarization tours of RG&E facilities were also provided prior to the drill; these included the press/briefing areas set up in the RG&E headquarters building and the Emergency Offsite Facility (EOF) also located there. Informational sessions with media and representatives of county, municipal, and emergency groups were also held prior to the drill; these sessions will be repeated on an annual basis.

Item - B25

Evaluate current post-accident plant vent sampling facilities to assure that a representative sample can be collected, transported, and analyzed such that whole body and extremity doses would be as low as reasonably achievable. (See Section 4.1.1.7).

RG&E RESPONSE:

An evaluation of the current sampling procedure and facilities will be done during the semi-annual health physics training drill. Based upon that evaluation procedures will be revised and/or equipment modified so as to maintain doses ALARA. This will be completed by September 30, 1982.

Item - B26

Re-evaluate EALS to assure that initiating conditions are defined as far as practicable in terms of specific, observable parameters (e.g. measured effluent release rates) which are readily available in the Control Room. (See Section 5.3).

RG&E RESPONSE:

Procedure SC-1.1A has been rewritten as SC-100. The new procedure assures adequate guidance and necessary detail is given so that initiating conditions are defined in terms of specific, observable parameters available in the Control Room. Emergency Action Levels to classify an incident are based on

given Control Room parameters.

Item - B27

Provide for early assessment of plume pathway so that instructions about the location of the plume will be given to offsite survey teams. (See Section 5.4.2.1).

RG&E RESPONSE:

Procedures will be revised so that off-site survey teams will be advised of the direction of plume travel before leaving the site. This will be completed before September 30, 1982.

Item - B28

Evaluate the need for maintaining a supply of selected damage control, and corrective action equipment and supplies, and for positioning the same so that it will be accessible for use during emergencies. (See Section 4.2.4).

RG&E RESPONSE:

A committee (including members from the maintenance section, health physics, technical engineering and emergency planning) will be set up to evaluate what supplies should be kept on hand and in what quantity. A report will be made to PORC before December 31, 1982.