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VICE PRESIDENT - NUCLEAR

SNRC-834
February 14, 1983

Mr. Thomas T. Martin, Director
Division of Engineering and Technical
Inspection Programs
U.S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Emergency Preparedness Appraisal 50-322/82-18
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr. Martin:

The purpose of this letter is to provide the Commission with additional information regarding actions taken to satisfy the findings resulting from Emergency Preparedness Appraisal 50-322/82-18. It is intended to supplement my letter of October 29, 1982. Thus, only selected findings are addressed below. This selection was based upon our judgement of those items which were of particular interest to the appraisal team or where the corrective actions being taken should be highlighted. This additional information should enable the NRC to plan for any follow-up activities which may be deemed necessary to close out the remaining findings.

Fuel load is currently scheduled for late in the second quarter of 1983. The schedule for completion of each of the findings remains as discussed in my October 29, 1982 letter with the exception of Appendix A Finding 21, which deals with the distribution of public information regarding the actions to be taken by the population within the EPZ. Resolution of this finding will not be required for operations up to 5 percent power in accordance with the January 14, 1983 letter from Mr. R. C. Haynes.

Appendix A Findings

1. Assign corporate and onsite Emergency Planning Coordinators (EPCs) on a permanent basis who shall be given direct working level responsibility and authority over all aspects of the development and maintenance of the emergency preparedness program. Revise normal organizational charts, position analysis descriptions, and other related documents to reflect the EPCs assignments and to describe the scope of their duties, authorities, and reporting chains.

Response

The permanent responsibility for Emergency Planning has been assigned. The Emergency Planning Coordinator (EPC) function has been assigned to the Nuclear Operations Support Department (NOSD) under the direction of an NOSD Division Manager. The EPC will have direct responsibility for both onsite and offsite aspects of LILCO's Emergency Plan. Appropriate modifications will be made to organizational documents to reflect this change.

2. Design, implement, and document a program to coordinate emergency preparedness activities including such things as technical information exchange, training, and site familiarization tours. Coordination on a continuous basis is needed between the site and corporate headquarters, the general public offsite support agencies, and the news media.

Response

Assistance to the EPC will be provided from the Office of Nuclear, Office of Engineering, and the Office of Public Affairs through the continuation of the task force. This insures coordination of activities between the site, corporate headquarters, the general public, etc., and provides for the orderly transition of work to the permanent organization. A program to accomplish this coordination on a formal basis will be developed and implemented before the task force is dissolved. The program will be sent to the NRC by late March 1983.

3. Revise your emergency organization and Emergency Plan to:
 - (a) describe all functional areas of response and emergency tasks;
 - (b) provide for all response sequences;
 - (c) clarify responsibilities and inter-relationships between the various organizational elements; and
 - (d) provide an organizational structure within the Operational Support Center (OSC) that will meet the demands of its emergency functions.

Response

The emergency organization, Emergency Plan, and Implementing Procedures are in the process of being revised to take into account this finding. We expect to have these documents completed by mid-March, at which time they will be forwarded to the NRC.

5. Complete the development of the training program to include the:
 - (a) designation of an individual to coordinate emergency preparedness training;
 - (b) development of written instructor qualifications;
 - (c) development of pass/fail performance criteria for written tests used to qualify emergency personnel;
 - (d) revision of lesson plans to specify performance objectives consistent with your implementing procedures;
 - (e) development of lesson plans and training courses for: personnel monitoring/decontamination, inplant surveys, post-accident sampling, repair and corrective actions, radwaste operations, and general employee training;
 - (f) complete training of all emergency response personnel in existing emergency related equipment and procedures; and
 - (g) retrain at least 25 percent of all emergency response personnel in new emergency related equipment and procedures. Such personnel shall be selected so as

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to provide trained individuals in all functional areas of emergency response.

- (h) Complete retraining of all emergency response personnel in new emergency related equipment and procedures.

Response

Items (a) through (e) were addressed in my October 29, 1982 letter and, therefore, are not repeated herein. Training to the existing procedures has now been completed. Upgrade training to the new and revised procedures is expected to commence during February. The upgraded training will be accomplished as follows:

1. A matrix has been prepared which aligns each position within the Emergency Organization with the appropriate procedures needed to carry out designated responsibilities.
 2. Appropriate implementing procedures will be assembled into packages corresponding to the positions within the Emergency Organization. A summary of the revised procedural changes will also be included. These packages will be distributed to the appropriate personnel for study.
 3. An additional classroom session, on an as needed basis, will be held to insure that the key personnel are familiar with any new responsibilities as a result of changes to the organization and procedures.
18. Complete the installation and operational testing of communications and notifications systems described in the Emergency Plan Implementing Procedures. In the event that restrictions continue to be imposed by local authorities, an alternative measure will be proposed by LILCO and agreed to by the NRC.

Response

The Emergency Plan utilizes the plant paging system (Gai-Tronics) to notify plant personnel of emergency conditions. Preoperational testing of this system as designed has been completed.

In order to take into account I&E Bulletin No. 79-18, which addresses notification of personnel in high-noise areas of an operating plant, modifications will be made. It is our intention to provide, in select areas of the plant, an automatic volume override which would produce maximum

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speaker volume during an evacuation. Initially, the modification will involve four speakers on Elevation 8 in the reactor building, two speakers in the diesel generator rooms, and two speakers in the fire pump house. The above areas will be modified prior to fuel load.

Surveys of audibility under approximate operating conditions will also be conducted during the power ascension test period. Any such areas identified as in need of modifications will be so modified. By necessity, this work needs to be done after fuel load when the plant noise levels are high enough to allow a meaningful survey. The NRC Resident Inspector, Mr. Higgins, is being kept advised of the details of this program.

The primary means of communications and notification as described in the Emergency Plan, which rely on the cooperation of local authorities, is the initiation of the Prompt Notification System. The present plan calls for personnel from the Suffolk County Police Communications Department or the Suffolk County Emergency Operations Center to activate this system when notified by LILCO that a General Emergency exists.

Our contingency plan, in the event Suffolk County will not cooperate, would allow the Prompt Notification System to be activated by LILCO upon the direction of New York State instead of by the County. Specifically in the event of a General Emergency, LILCO would notify the New York State Office of Disaster Preparedness (ODP). Upon the direction of the ODP, the Prompt Notification System would be activated by LILCO as follows:

1. WALK would be notified to begin broadcasting the Emergency Broadcast System Message.
2. The sirens located within the 10-mile Emergency Planning Zone would be activated.

We intend to prepare a detailed procedure for this contingency plan. It should also be noted that the necessary sirens and tone alert radios have all been installed.

19. Review Emergency Plan Implementing Procedures and make revisions to:
 - (a) clarify required actions and the duties and responsibilities of personnel performing these actions;
 - (b) correct ambiguities, inconsistencies, omissions, errors, wordy discussions, unnecessary references, lists of contents, and other extraneous materials which do not help the users to perform their duties during emergencies;
 - (c) provide specific cross-references to other procedures in the action steps needed to further detail and clarify actions;
 - (d) include lines of command, communications, and information flow necessary to perform emergency tasks and response actions; and
 - (e) ensure that emergency response tasks are coordinated between the appropriate elements of the emergency organization and are consistent with the organizational structures.

Response

Revisions to the Emergency Plan Implementing Procedures have been completed. The procedures are currently in the process of being approved. We expect to forward approved procedures to the NRC in mid-March.

20. Provide Emergency Plan Implementing Procedures and other procedures needed to implement the Emergency Plan, including the following:
 - (a) In-plant surveys during emergencies;
 - (b) Repair and corrective actions during emergencies;
 - (c) Security during emergencies;
 - (d) Radiation protection during emergencies;
 - (e) Drills and exercises;
 - (f) Sampling and analysis of post-accident liquid wastes;
 - (g) Sampling and analysis of primary coolant during accidents;

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- (h) Sampling and analysis of containment air during accidents;
- (i) Sampling and analysis of stack effluents during accidents;
- (j) Calibration procedures for the above, when pertinent;
- (k) Alarm response procedures; and
- (l) Emergency operations procedures.

Response

New Emergency Plan Implementing Procedures (EPIP) have been prepared to address items (a) through (i). Items (j), (k), and (l) are addressed in Plant Procedures. The EPIPs will be forwarded to the NRC in mid-March.

Appendix B Findings

The Appendix B Findings have also been specifically addressed in my October 29, 1982 letter. These items are being worked on in accordance with the schedule as stated therein. Finding No. 8 involves submitting a study which compares measurements from the meteorological towers. This study will be submitted to the NRC by the end of February.

Very truly yours,

M. S. Pollock

M. S. Pollock
Vice President-Nuclear

cc: Mr. J. Higgins
All Parties