

DMB

February 1, 1984

Docket No. 50-341  
Reference -EF2-66,773

The Detroit Edison Company  
ATTN: Mr. Donald A. Wells  
Manager, Quality Assurance  
2000 Second Avenue  
Detroit, MI 48226

Gentlemen:

Thank you for your letter of January 5, 1984 which includes your scheduled actions planned in response to the areas of your emergency preparedness program which were not complete at the time of our appraisal (Report No. 50-341/83-24). These areas were identified in Appendix A of our November 28, 1984 letter. The staff has reviewed these responses as well as those to Appendix B items which were identified as Improvement Items in the appraisal report. We will examine these items during a subsequent inspection.

We disagree with your response to Item 16 of Appendix A. This item requested that EALs as presently described for accident classifications should, in some instances, be more specific with numerical values for instrument readings that provide such, particularly for those systems representing high radiation levels, e.g., effluent monitors and containment high range radiation monitors. Along this line, if a minimum flow is necessary to maintain reactor cooling, such a flow value must be specified.

The walk-throughs conducted by our appraisal team should not be construed as an approval for use of current EALs to indicate accident classification. Rather it was a small cross-section of some EALs which were used to determine if Control Room personnel could effectively use the procedures and were trained to make appropriate classifications, notifications, protective action recommendations, and implement onsite emergency actions. The walk-through process was not designed to determine if the EALs were acceptable in meeting the requirements of 10 CFR 50.47 (b)(4) and Section IV.B of Appendix E to 10 CFR Part 50. This area is discussed in Section 5.3 of the report. Based on that review the NRC staff determined that contrary to the referenced requirements, the implementation of providing EALs "based on inplant conditions and instrumentation as well as onsite and off-site monitoring" in the emergency plan implementing procedures is not sufficiently specific.

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Mr. Donald A. Wells

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Please reconsider your response to Item 16 of the Appendix A - Open Items along the lines listed in the above paragraph. If you believe further discussions will resolve this issue please contact me.

Please inform us when you have completed all actions required prior to fuel load so that a timely reinspection can be completed such that licensing activities will not be delayed.

Your cooperation with us is appreciated.

Sincerely,

*C. J. Paperiello*

C. J. Paperiello, Chief  
Emergency Preparedness and  
Radiological Safety Branch

Enclosure: Lts. from Jens to Paperiello  
dtd. 1/4/84

cc w/encl.:  
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