



**LOUISIANA  
POWER & LIGHT**

142 DELARONDE STREET  
NEW ORLEANS, LOUISIANA

• P.O. BOX 8008  
70174-8008

• (504) 386-2345

July 29, 1983

W3P83-2529

3-A45

3-A1.01.04

Mr. G. L. Madsen  
Chief, Reactor Project Branch 1  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

SUBJECT: Louisiana Power & Light Company  
Waterford 3 SES  
Docket No. 50-382  
Response to Emergency Preparedness  
Appraisal Report 50-382/83-08

Reference: NRC Letter of May 27, 1983 to L.V. Maurin from G.L. Madsen

Dear Mr. Madsen:

This letter and its attachments have been prepared in response to the Waterford 3 Emergency Preparedness Appraisal which was transmitted by your letter of May 27, 1983. Attachment 1 provides a response to those items appearing in Appendix A of the Appraisal, Attachment 2 responds to Appendix B and Attachment 3 to Appendix C. These responses include completion dates where applicable and are cross referenced to appropriate sections of the Waterford 3 Emergency Plan and Implementing Procedures.

If you have any questions, please advise.

Very truly yours,

F. J. Drummond

FJD/RJP/ch  
Attachments

cc: W.M. Stevenson, E. Blake, B. Churchill, J. Collins, L. Constable,  
G. Groesch

IE 35  
11

ATTACHMENT 1

LP&L RESPONSE TO APPENDIX A -  
SIGNIFICANT PREPAREDNESS DEFICIENCIES

7-26-83 - Rev 13

382/8308-04

- Clearly define the authorities and responsibilities and the transfer thereof of the NOS-SS, Emergency Coordinator, and EOF Director with regard to the decision to notify and make recommendations of protective measures to offsite authorities.

#### LP&L RESPONSE

The Emergency Plan and Implementing Procedures will be revised to reflect the flow of authority and responsibility between the NOS-SS, Emergency Coordinator and the EOF Director.

#### Plan/Procedure Cross Reference:

Emergency Plan:	Sections 3.1.2.1	5.1.4.2.a
	5.1.2.1.a	6.2.1.1
	5.1.2.2.a	6.2.1.2
	5.1.3.1.a	6.2.2.3
	5.1.4.1.a	6.6.1.2

#### Implementing Document:

EP-2-052 Protective Action Guidelines  
EP-2-100 TSC Activation, Operation and Deactivation  
EP-2-102 EOF Activation, Operation and Deactivation

Schedule: 10/1/83

382/8308-05

- Provide the capability and identify the central point for the receipt, analysis, and coordination of all field monitoring data from state and utility offsite radiological monitoring teams.

LP&L RESPONSE

The capability for receipt, analysis and coordination of all field monitoring data is provided through Louisiana Nuclear Energy Division EOF work space, onsite equipment and the current EOF organization. The Emergency Plan and Implementing Procedures will be revised to more accurately reflect this.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 7.2.1, 5.1.4.2, 5.3.2.1, 6.2.2.6

Implementing Document: EP-2-102, 2-060

Schedule: 10/1/83

382/8308-06

- Submit the LP&L Emergency Operating Procedure that will be used by the CCC for the staff's review.

LP&L RESPONSE

The Corporate Command Center procedures will be submitted for staff review.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5.1.4.1

Implementing Document:

Schedule: 11/1/83

382/8308-12

- Provide the TSC with up-to-date records and documentation required by approved Emergency Plan and Implementing Procedures (EPIPs). See 382/8308-19

LP&L RESPONSE

The TSC will be provided with up-to-date records and documentation as indicated in EP-3-040.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-040

Schedule: 10/1/83

382/8308-13

- Provide a space within the control center portion of the TSC for NRC personnel identified by the NRC IV office.

LP&L RESPONSE

Space will be provided for an NRC representative in the Emergency Control Center. This location will have immediate access to the ENS & HPN.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7

Implementing Document: EP-2-100

Schedule: 10/1/83

382/8308-17

-- Install an operable HPN extension in the EOF.

LP&L RESPONSE

Installation of an operable HPN extension in the EOF will be coordinated with NRC Region IV.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7

Implementing Document: EP-2-101

Schedule: At the direction of NRC Region IV

382/8308-18

-- Install an operable ENS extension in the EOF.

LP&L RESPONSE

Installation of an operable HPN extension in the EOF will be coordinated with NRC Region IV.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7

Implementing Document: EP-2-101

Schedule: At the direction of NRC Region IV

382/8308-19

-- Provide the EOF with up-to-date records and documentation required by approved EPs.

LP&L RESPONSE

The EOF will be provided with up-to-date records and documentation as indicated in EP-3-040.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.2

Implementing Document: EP-3-040

Schedule: 10/1/83

382/8308-32

- Assure that functional analytical instruments are maintained, as designated, in the EOF.

LP&L RESPONSE

Samples will not actually be analyzed in the EOF, although coordination of analysis activities is done there. Those instruments that are provided in the EOF will be maintained as indicated in EP-3-040. EP-3-040 will be changed to reflect this.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 5.1.4.2, 7.2.1

Implementing Document: EP-3-040

Schedule: 10/1/83

382/8308-36

- Submit the Waterford 3 EPIP for NRC approval.

LP&L RESPONSE

See response to 382/8308-06

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 11/1/83

382/8308-39

- Correct emergency kit inventories to agree with procedure inventories.

LP&L RESPONSE

Emergency kit inventories and EP-3-040 are being reviewed/revised for consistency.

Plan/Procedure Cross Reference:

Emergency Plan: Appendix G and Section 7

Implementing Document: EP-3-040

Schedule: 10/1/83

382/8308-40

- Calibrate all dedicated emergency instruments and air samplers in accordance with approved procedures.

LP&L RESPONSE

All dedicated emergency instruments and air samplers have been calibrated.

Plan/Procedure Cross Reference:

Emergency Plan: Section 8.4

Implementing Document: EP-3-040, Health Physics "400 series" procedures.

Schedule: Complete

382/8308-41

- Provide respiratory protection, protective clothing, and a means of surveying for contamination in field monitoring kits.

LP&L RESPONSE

Protective clothing will be provided in the kits. LP&L feels there are problems associated with the use of respiratory equipment for field teams - these include communication difficulties and a lack of demonstrated need. The inclusion of potassium iodide in the field monitoring kits is sufficient to meet all likely scenarios. The Ludlum 2218 with Na I detector will be used for initial contamination surveys.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.4.1

Implementing Document: EP-2-060

Schedule: 10/1/83

382/8308-51

- Provide equipment and/or procedures to passively notify control room shift personnel of severe weather conditions affecting or likely to affect the site.

LP&L RESPONSE

This item is covered by Security Department Directive D-007 dated May 5, 1983. (The Security Department is tasked with monitoring severe weather reports and providing information to the Nuclear Operations Supervisor.)

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-52

- Provide the capability to obtain the basic meteorological parameters averaged over 15-minute periods in the control room.

LP&L RESPONSE

CEPADAS provides the capability to obtain the basic meteorological parameters averaged over 15 minute periods in the Control Room.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.11

Implementing Document: EP-2-051

Schedule: 9/1/83

382/8308-53

- Delete the use of National Weather Service temperature lapse rate from EP-2-050, Attachment 7.2, Section 2.3.1, and substitute another stability classification scheme.

LP&L RESPONSE

EP-2-050, Off-Site Dose Assessment (Manual) will be revised to comply with this comment. The use of temperature lapse rate will be deleted and replaced with the applicable stability index.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.5

Implementing Document: EP-2-050

Schedule: 10/1/83

382/8308-54

- Either justify or change the stability classification scheme presented in EP-2-050, Attachment 7.2, Section 2.1.1.

LP&L RESPONSE

LP&L has changed EP-2-050, Off-Site Dose Assessment (Manual) to comply with this comment. The stability classification scheme presented in Attachment 7.2 Section 2.1.1 has been changed to agree with that used in USNRC Regulatory Guide 1.23.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-050

Schedule: Completed

382/8308-58

- Provide a reliable communication link (primary and alternate) to local and state agencies. The primary and alternate links should have dissimilar vulnerability characteristics.

LP&L RESPONSE

The Operational Hotline is the primary communications link with the state and local agencies. The alternate link is the State Civil Defense Radio Network (LOEP, St. Charles and St. John Parishes), located in the Control Room, TSC and EOF. The Operational Hotline is powered from the New Orleans Central Office. The Civil Defense Radio Network is in the main communications room and is powered from a plant vital power supply. An extension of the Operational Hotline is located in the EOC and Sheriff's Office of both parishes and at LOEP and LNED. The Sheriff's dispatcher is immediately available 24 hours a day. Numerous drills and tests have demonstrated system reliability.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7  
Table 7-10

Implementing Document: EP-2-010

Schedule: Complete

382/8308-72

- Provide adequate control of revisions to the EPs in accordance with approved procedures.

LP&L RESPONSE

Adequate control is provided by UNT-1-003, "Procedure Development, Review, and Approval; Change and Revision; and Deletion" and UNT-4-009 "Control, Distribution and Handling of Program Descriptions and Plant Operating Procedures".

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-76

- EP-3-050, "Emergency Response Call List," must be approved and issued.

LP&L RESPONSE

EP-3-050, "Emergency Response Call List", Revision 0, has been approved and issued May 2, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-050

Schedule: Complete

382/8308-78

- Radiation protection of the offsite survey teams must be addressed in the procedures.

LP&L RESPONSE

EP-2-060 will be revised to address radiation protection for field teams.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-060

Schedule: 10/1/83

382/8308-79

- Radiation protection supplies must be available in the field monitoring kits.

LP&L RESPONSE

Protective clothing will be provided in the field monitoring kits. Potassium iodide and survey equipment are presently provided. TLDs and self-reading dosimeters are provided in the OSC Emergency Locker.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.4.1

Implementing Document: EP-2-060, EP-3-040

Schedule: 10/1/83

382/8308-82

- Procedures must be developed or reference made to specific health physics procedures for ensuring that onsite (out-of-plant) surveys will be made during emergencies.

LP&L RESPONSE

EP-2-100, 2-101, 2-102 and 2-140 will be revised to include ensuring that onsite (out-of-plant) surveys are made.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 6.3, 6.4, 6.6.2, 6.6.3.1, 6.7,  
7.1.3, 9.3.1

Implementing Document: EP-2-100, 2-101, 2-102, 2-140

Schedule: 10/1/83

382/8308-83

- A procedure addressing in-plant radiation surveys must be developed and implemented.

LP&L RESPONSE

EP-2-031 will be revised to provide additional guidance on in-plant surveys. HP-2-201 will be evaluated for adequacy for emergency situations and revised as necessary.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 6.3, 6.6.2, 6.6.3.1, 6.7,  
7.1.3, 9.3.1

Implementing Document: EP-2-031

Schedule: 10/1/83

382/8308-84

- Dedicated instruments for emergency use must be addressed in the EP.

LP&L RESPONSE

Dedicated instruments for emergency use will be addressed in EP-3-040 and EP-2-031.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.2, Appendix G

Implementing Document: EP-2-031, EP-3-040

Schedule: 10/1/83

382/8308-95

- Specific guidance for the conduct of radiation protection activities under emergency conditions must be provided in EP-2-031 or included in the normal health physics procedures.

LP&L RESPONSE

EP-2-031 will be revised to provide additional guidance on conduct of radiation protection activities under emergency conditions.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 6.3, 6.6.2, 6.6.3.1, 6.7,  
7.1.3, 9.3.1

Implementing Document: EP-2-031

Schedule: 10/1/83

382/8308-99

- Provide personnel accountability for the Plan and procedures.

LP&L RESPONSE

Personnel accountability has been addressed in the Emergency Plan and Procedures.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.6

Implementing Document: EP-2-190, PS-16-103

Schedule: Complete

382/8308-109

- Meet the requirements as set forth in 10 CFR 50.54(q).

LP&L RESPONSE

EP-3-030, Emergency Planning Review and Updating, will be revised to meet the requirements set forth in 10 CFR 50.54(q).

Plan/Procedure Cross Reference:

Emergency Plan: Section 8

Implementing Document: EP-3-030

Schedule: 10/1/83

382/8308-110

- Meet the requirements as set forth in 10 CFR 50, Appendix E, paragraphs IV.G and V.

LP&L RESPONSE

See 382/8308-109

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-030

Schedule: 10/1/83

382/8308-111

- Develop a procedure to reflect the requirements set forth in 10 CFR 50.54(q) and (t) and the recommended criteria in NUREG-0654.

LP&L RESPONSE

See 382/8308-109

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-030

Schedule: 10/1/83

382/8308-113

- Identify and coordinate with the St. John the Baptist Parish Civil Defense Director in the areas of communications, dosimetry for emergency workers, notification procedures, workers in chemical plants, and warning of individuals in fish camps.

LP&L RESPONSE

This deficiency addresses several areas. Each is discussed separately.

Communications - This refers to the operational characteristics of the operational hotline and the ability to monitor LNED field communications.

A feasibility study is presently being undertaken to assess providing St. John and St. Charles Parishes with the ability to ring-up W-3 during an emergency. The results of this study are expected by September at which time the decision to provide the Parishes with a ring-up capability will be made.

LNED is in the process of obtaining radio equipment which will permit their field teams to communicate with the LNED Field Response Center on 800 MHz band. Once this equipment is purchased and installed, a decision will be made to purchase equipment for the Parishes to allow them to monitor 800 MHz band.

Dosimetry for Emergency Workers - This refers to the availability of CDV-730's (0-20R) dosimeters and TLDs for by Parish emergency workers.

TLDs are available at both the St. John and St. Charles EOCs in quantities sufficient to meet the needs of Parish emergency workers. 200 CDV-730s are being placed in the St. John EOC for use by emergency workers.

Notifications Procedures - This refers to the ability of the St. John EOC to receive information from the W-3 site in a timely fashion.

During emergency preparedness drills held following the appraisal, improvements in information flow to the Parishes was noted. In addition, please see the response pertaining to the operational hotline under the communications questions.

Workers in Chemical Plants - This refers to the protection for chemical plant workers who might be required to assist with plant shut-down procedures in the event of an emergency at W-3.

The State is in the process of making arrangements for additional low level (0-20R) dosimeters which would be made available to chemical plant shut-down crews in an emergency. The State has also established a policy on the use of potassium iodide for use by emergency workers. Chemical plant shut-down crews will be considered as emergency workers by the Parishes and they will receive potassium iodide if its use is advisable.

Warning of Individuals in Fish Camps - This refers to providing a helicopter for use by St. John Parish for the notification of persons in fishing camps.

The St. John Civil Defense Director is in the process of obtaining an agreement for the availability of helicopters from a commercial provider.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 5.3.1, 6.6.2.4

Implementing Document:

Schedule: 10/1/83

382/8308-117

- Develop and implement an annual media seminar (initiate prior to fuel load).

LP&L RESPONSE

An annual media seminar was held on May 18, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 8

Implementing Document:

Schedule: Complete

382/8308-123

- Item 1.1.52 of the Plan should be changed from "Site Emergency" to "Site Area Emergency". Note: All other similar emergency classifications in the Plan should also be changed. (10 CFR 50, Appendix E, Part IV.C).

LP&L RESPONSE

Emergency Plan Section 1, Glossary, item 1.1.52 and all other occurrences of the emergency classification Site Emergency will be changed to "Site Area Emergency".

Plan/Procedure Cross Reference:

Emergency Plan: Throughout

Implementing Document: Throughout

Schedule: Emergency Plan Rev 5 10/1/83  
Implementing Document 10/1/83

382/8308-125

- Section 3.1.2.1 of the Plan should be clarified with respect to the line of authority and transfer of the responsibilities from the Nuclear Operations Supervisor - Shift Supervisor to Plant Manager. (NUREG-0654, Section II.B.3 and 4)

LP&L RESPONSE

The Emergency Plan will be revised to reflect the flow of authority and responsibility between the NOS-SS and Emergency Coordinator.

Plan/Procedure Cross Reference:

Emergency Plan:	Sections 3.1.2.1	5.1.4.2.a
	5.1.2.1.a	6.2.1.1
	5.1.2.2.a	6.2.1.2
	5.1.3.1.a	6.2.2.3
	5.1.4.1.a	6.6.1.2

Implementing Document:

Schedule: See 382/8308-04

382/8308-126

- The authority and responsibilities of the onsite Emergency Coordinator and those responsibilities which are to be transferred to the Emergency Operations Facility Director and the methods to be used which will provide a clear, unambiguous transfer of these responsibilities should be clarified and strengthened. As a minimum, the following sections of the plan should be addressed:

5.1.2.2.a (p. 5-10)  
 5.1.4.2.a (p. 5-28)  
 6.2.1.1.a (p. 6-2)  
 6.2.1.2.a (p. 6-3)  
 6.2.2.3 (p. 6-6)  
 (NUREG-0654, Section II.B.3 & 4)

#### LP&L RESPONSE

The Emergency Plan and Implementing Procedures will be revised to clarify and properly reflect the flow of authority and responsibility between the NOS-SS, Emergency Coordinator and the EOF Director.

#### Plan/Procedure Cross Reference:

Emergency Plan	Sections 3.1.2.1	5.1.4.2.a
	5.1.2.1.a	6.2.1.1
	5.1.2.2.a	6.2.1.2
	5.1.3.1.a	6.2.2.3
	5.1.4.1.a	6.6.1.2

#### Implementing Document:

EP-2-052 Protective Action Guidelines  
 EP-2-100 TSC Activation, Operation and Deactivation  
 EP-2-102 EOF Activation, Operation and Deactivation

Schedule: See 382/8308-04, 125

382/8308-127

- In Section 5.1.3.1.b of the Plan, identify the individual who is designated as the official LP&L spokesperson for addressing the news media at press conferences. (NUREG-0654, Section II.G.4)

LP&L RESPONSE

Section 5.1.3.1.b will be revised to reflect that the Project Support Manager - Nuclear is not designated as the technical spokesperson. The technical spokesperson will be designated in the Waterford 3 Emergency Information Plan.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5.1.3.1.b

Implementing Document:

Schedule: 11/1/83

382/8308-128

- In Section 5.1.4.2.c of the Plan, identify the individual to whom the Technical Services Coordinator reports. (NUREG-0654, Section II.B.7)

LP&L RESPONSE

Section 5.1.4.2.c of the Plan will be revised to reflect that the Technical Services Coordinator reports to the Operations Coordinator.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5.1.4.2.c, Figure 5-4

Implementing Document: EP-2-100, 101, 102, 3-050

Schedule: 10/1/83

382/8308-129

- In Section 5.1.4.2.f of the Plan, identify the alternate for the position of Public Relations Coordinator. (NUREG-0654, Section II.B.7)

LP&L RESPONSE

The Emergency Plan will be revised to indicate the position of the alternate Public Relations Coordinator.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5.1.4.2.F, Table 5-3

Implementing Document:

Schedule: 10/1/83

382/8308-130

- Figure 5-4 of the Plan should be changed to reflect the current structure of the near-site emergency organization. (NUREG-0654, Section II.B.6)

LP&L RESPONSE

Figure 5-4 will be revised to reflect the current structure of the emergency organization.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5, Fig. 5-4

Implementing Document: EP-2-100, 101, 102

Schedule: 10/1/83

382/8308-131

- Section 6.6.1.2.c (pp. 6-21, 6-22) of the Plan implies that certain radiological, meteorological, and operational information (e.g., field monitoring team data) is required before a decision to recommend that offsite protective measures will be made. This section should be made consistent with Section 6.2.1 of the Plan which specifies a 15-minute time constraint for notification of offsite agencies following the declaration of an emergency. (10 CFR Part 50, Appendix E, Part IV.D.3)

LP&L RESPONSE

The sections of emergency preparedness program addressing off site protective action recommendations will be reviewed and revised to ensure that prompt protective action recommendations are made and that the basis for these recommendations consider both radiological release information, if available, or those situations where precursors to a release indicate prompt protective actions are required.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.6.1.2

Implementing Document: EP-1-001, Recognition and Classification of Emergency Conditions. EP-2-052, Protective Action Guidelines.

Schedule: 10/1/83

382/8308-132

- Section 7.4.11.a (p. 7-26, lines 19-21) requires clarification. (NUREG-0654, Section II.I.3)

LP&L RESPONSE

The Emergency Plan will be revised to clarify this section.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.11

Implementing Document:

Schedule: 10/1/83

382/8308-133

- Section 7.4.11.a (p. 7-28, lines 8-13) requires clarification. (NUREG-0654, Section II.I.5)

LP&L RESPONSE

The Emergency Plan will be revised to clarify this section.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.11

Implementing Document:

Schedule: 10/1/83

382/8308-134

- Provide the revision number and date of the current State Plan. (10 CFR 50.54(s)(1))

LP&L RESPONSE

The State Plan is at Rev. 4, February, 1982, Attachment 1 is at Rev. 5, October 1982.

Plan/Procedure Cross Reference:

Emergency Plan: Appendix D

Implementing Document:

Schedule: 10/1/83

382/8308-135

- Provide the revision number and date of the current Attachment 1 to the State Plan. (10 CFR 50.54(s)(1))

LP&L RESPONSE

The State Plan is at Rev. 4, February, 1982, Attachment 1 is at Rev. 4, February 1982.

Plan/Procedure Cross Reference:

Emergency Plan: Appendix E

Implementing Document:

Schedule: 10/1/83

382/8308-136

- Clarify the location of all offsite survey kits listed on page 6. (NUREG-0654, Sections II.I.7 and 8)

LP&L RESPONSE

LP&L will undertake a complete review and revision of Appendix G.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 6.7.3, 7.4.8, 7.4.10, 8.4,  
Appendix G and I

Implementing Document: EP-2-060, 2-031, 2-032, 2-081, 2-101,  
3-040

Schedule: 10/1/83

382/8308-137

- Provide the procedure cross-reference list. (NUREG-0654, Section II.P.7)

LP&L RESPONSE

Emergency Plan Appendix H, Procedure Cross Reference will be reviewed, updated and included as part of revision 5 of the Emergency Plan.

Plan/Procedure Cross Reference:

Emergency Plan: Appendix H

Implementing Document: Throughout

Schedule: 10/1/83

ATTACHMENT 2

LP&L RESPONSE TO APPENDIX B -  
EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

7-26-83 - Rev 10

382/8308-01

- The Emergency Planning Coordinator should be assigned to staff position reporting directly to the Plant Manager-Nuclear or higher.

LP&L RESPONSE

The Nuclear Operations organization is presently being evaluated. As soon as this evaluation is complete, we will provide the results of our analysis to the NRC.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 10/1/83

382/8308-02

- The Emergency Planning Coordinator should be assigned to the Plant Operating Review Committee.

LP&L RESPONSE

The Emergency Planning Coordinator will not be a member of the Plant Operating Review Committee.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-11

- All emergency response documentation in the control room should be periodically inventoried and stored together in such a manner as to assure its immediate availability for use at all times.

LP&L RESPONSE

Emergency response documentation in the Control Room will be periodically inventoried and stored together for immediate availability.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-040

Schedule: 10/1/83

382/8308-14

- A roster of crafts personnel should be maintained in the Operations Support Center for call-in by the Operations Support Center Supervisor as needed.

LP&L RESPONSE

A booklet including all craft maintenance personnel is placed in the OSC cabinet. This personnel roster is reviewed and updated on a yearly basis.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-15

- Telephones in the backup Operations Support Center should be labeled with the extension numbers.

LP&L RESPONSE

The proper extension numbers have been affixed to the telephones in the Backup OSC.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-16

- EP-2-101 should specify what essential records and equipment should be transported to the backup Operations Support Center in the event the primary location becomes uninhabitable.

LP&L RESPONSE

EP-2-101 will be upgraded to include guidance on records, equipment and documents, etc., required to be relocated to the Backup OSC.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-101

Schedule: 10/1/83

382/8308-20

- The Emergency Operations Facility should be equipped with as-built plant layout drawings to facilitate job planning and training in re-entry under accident conditions.

LP&L RESPONSE

A set of aperture cards reflecting the latest revisions of drawings will be available for positioning in the EOF. These cards will duplicate those in the TSC.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 10/1/83

382/8308-21

- The Emergency Operations Facility should be equipped with a first-aid kit and decontamination supplies.

LP&L RESPONSE

A small Trauma Kit was placed in the EOF as per EP-2-081 and will be checked monthly and inventoried quarterly as per FP-2-200. A decon kit is located in the EOF. EP-3-040 will be revised to assure maintenance of this kit.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-040

Schedule: 10/1/83

382/8308-33

- Distribute emergency first-aid kits in the plant as described in the Plan.

LP&L RESPONSE

The First Aid Kits (Trauma Kits) have been distributed in three First Aid Lockers and Fire Lockers, and a small Trauma Kit in the EOF.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-081

Schedule: 10/1/83

382/8308-34

- Make provisions for transporting individuals from the plant to the helicopter landing site.

LP&L RESPONSE

The primary means of transport for contaminated injured personnel to support hospitals is via land based vehicles (ambulance). In the event the helicopter is used, the appropriate vehicle will be used to transport injured personnel to the helicopter landing site. This will be addressed in EP-2-020.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.7.4

Implementing Document: EP-2-020

Schedule: 10/1/83

382/8308-37

- Make provisions for an information center large enough to accommodate the expected number of media representatives for an incident at Waterford 3.

LP&L RESPONSE

The LP&L information center will be moved from the General Office in Algiers to 317 Baronne St. in New Orleans. This center will be large enough to handle the expected number of news media.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.2.2

Implementing Document:

Schedule: 9/1/83

382/8308-38

- Make provisions and include arrangements for additional telephone service.

LP&L RESPONSE

Conceptual design efforts are in progress with regard to the design of the media communications capability.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-42

- Assure that equipment in emergency lockers is accessible at all times to the emergency response personnel.

LP&L RESPONSE

Accessibility to Fire Lockers and First Aid Lockers is by a key which is in the Control Room and is sent to the locker by the Team Leader/Operator when the team is activated.

1. The OSC Supervisor has a key to the OSC Fire Locker at +7 RAB.
2. Security has a key to the First Aid Lockers beside the Control Room. NOTE: When W-3 implements its On-Shift First Aid Team or before fuel load, an emergency key box will be put on each First Aid Locker. Also by fuel load, the permanent locks on the Fire Lockers should be changed out to break away locks, if vandalism is not a problem. All other emergency lockers will be provided with breakaway seals.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Fuel Load

382/8308-43

- Identify emergency lockers with signs or labels.

LP&L RESPONSE

All emergency lockers have signs on the front doors.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.7.3 and 7.4.6

Implementing Document: EP-2-081

Schedule: Complete

382/8308-44

- Provide assurance that the instruments in use can detect air iodine activities as low as  $1\text{E-}7$  uCi/cc and air particulate activities as low as  $1\text{E-}9$  uCi/cc.

LP&L RESPONSE

Testing of Ludlum 2218s has been conducted, including demonstration of their ability to detect levels less than  $1\text{E-}7$  uCi/cc of Iodine 131.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-45

- Provide extremity radiation monitoring instruments in in-plant survey lockers and kits for emergency response personnel.

LP&L RESPONSE

Standard TLDs are used for monitoring extremity doses. Numerous TLDs are available for use during emergencies, some of which are located in emergency lockers.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.2.7

Implementing Document:

Schedule: Complete

382/8308-46

- Provide a self-reading dosimeter charger for each hospital emergency locker where self-reading dosimeters are maintained.

LP&L RESPONSE

Self-reading dosimeter chargers have been provided to each hospital.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-040

Schedule: Complete

382/8308-49

- Resolve the inconsistency between the seismic annunciator number specified in EP-1-001, Attachment 7.1, Table F, and the locations of the annunciators actually installed in the control room.

LP&L RESPONSE

Seismic annunciator window number/location have been verified and the procedure corrected.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-1-001

Schedule: Complete

382/8308-50

- A means of determining river level from the control room should be provided, or appropriate procedures should be implemented to provide the Nuclear Operations Supervisor-Shift Supervisor with river level information on a timely basis if river level approaches +24 ft.

LP&L RESPONSE

Operations off-normal procedure OP-901-045, Severe Weather and Operations Group Surveillance Procedure OP-903-064, Mississippi River Level Monitoring address river level reporting to the NOS-SS.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-55

- The procedures for the scheduling of inspection and recording systems should be documented. Verification that these procedures are being followed should be ascertained.

LP&L RESPONSE

The procedures for scheduling of inspection and recording systems will be completed.

These procedures are:

MI-3-395 - Primary Met Tower Inspection and Calibration  
MI-3-396 - Backup Met Tower Inspection and Calibration  
MI-4-299 - Bi-Weekly Met Tower Checks

Verification that these procedures are being followed will be via entry of these tasks on the Maintenance Tracking System.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 10/1/83

382/8308-56

- The procedures for and scheduling of meteorological sensor calibrations should be documented. Verification that these procedures are being followed should be maintained.

LP&L RESPONSE

The procedure for and scheduling of wind speed/direction calibration (MI-3-397) will be completed August 30, 1983.

Verification that this procedure is being followed will be via entry of this task on the Maintenance Tracking System.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 8/30/83

382/8308-57

- Consider the feasibility of moving the compressors to a habitable location; e.g., piping in immediate area may preclude moving the compressors.

LP&L RESPONSE

The SCBA compressors have been relocated to the Turbine Building in a location which allows easy removal in an emergency situation.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-65

- Provide reserves of radiological survey and monitoring equipment for emergency equipment that must be removed from service for repair or calibration.

LP&L RESPONSE

Sufficient quantities of each type of instrument will be available to permit calibration, maintenance and repair without causing a shortage in operational instruments. The normal inventory of survey and monitoring equipment in conjunction with that stored in the emergency lockers is adequate.

Plan/Procedure Cross Reference:

Emergency Plan: Section 8.4

Implementing Document: EP-3-040

Schedule: Complete

382/8308-66

- Provide administrative controls that assure vehicles are available and functional when needed for offsite emergency response.

LP&L RESPONSE

LP&L will conduct a complete review of vehicle capabilities in order to address items 66-70 by September 1, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.7.4

Implementing Document: EP-2-060, 2-101

Schedule: 9/1/83

382/8308-73

- The revision number should not be specified for procedures referenced in the Emergency Procedures, as each revision to the referenced procedure necessitates a change to the Emergency Procedure.

LP&L RESPONSE

The revision number will be omitted from the reference section of the Implementing Procedures.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-020, 2-050, 2-030, 2-071, 2-091,  
EP-3-020

Schedule: 10/1/83

382/8308-74

- Wherever an Emergency Procedure directs the user to perform operations covered under plant procedures, the number of the specific procedure should be included in the action step.

LP&L RESPONSE

The Emergency Plan Implementing Procedures will be reviewed to ensure that the number of the specific procedure is included in the action step.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: Throughout

Schedule: 11/1/83

382/8308-75

- The functional responsibilities which the Emergency Coordinator may not delegate to other elements of the emergency organization should be specified.

LP&L RESPONSE

The Emergency Plan and Implementing Procedures will be revised to reflect the responsibilities that the Emergency Coordinator may not delegate.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5.1.2.2

Implementing Document:

EPIPs - EP-2-100 TSC Activation, Operation and Deactivation  
EP-2-102 EOF Activation, Operation and Deactivation

Schedule: 10/1/83

382/8308-77

- The procedure for setting up the answering machines should be carefully examined to ensure that the machines can be quickly activated and the initial notifications completed within 15 minutes.

LP&L RESPONSE

EP-2-010, "Notifications and Communications", Attachment 7.1, Revision 3, has been revised to simplify the procedure for the operation of the answering machines.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-010

Schedule: Complete

382/8308-80

- The procedure should address a means of backup communications for the offsite survey teams.

LP&L RESPONSE

LP&L will use portable radios and telephone communications as a means of backup communications to the installed vehicle radios. EP-2-060 will be changed to reflect this.

Plan/Procedure Cross Reference:

Emergency Plan: Table 7-10, Appendix G, Section 6.4.1.1

Implementing Document: EP-2-060, 2-101, 3-040

Schedule: 10/1/83

382/8308-81

- The procedure should state where and how vehicles will be obtained for offsite surveys.

LP&L RESPONSE

This item will be addressed in appropriate changes to EP-2-060 and EP-2-101.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-060, 2-101

Schedule: 10/1/83

382/8308-100

- The contamination level (individuals or equipment) specified in EP and health physics procedures should be consistent.

LP&L RESPONSE

All contamination limits are now consistent in procedures. The fact that EP-2-032 uses 1000 dpm and HP-2-704 uses 100 cpm is not inconsistent. HP uses an efficiency of 10% for pancake GM probes therefore 100 cpm = 1000 dpm

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-101

- Include specific 10 CFR 20 dose limits in repair/corrective action procedures.

LP&L RESPONSE

EP-2-101 will be revised to include reference to EP-2-030 for those repair activities with potential for exceeding 10 CFR 20 limits. EP-2-030 will be revised to include the specific 10 CFR 20 dose limits.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-101, 2-030

Schedule: 10/1/83

382/8308-102

- Include coordinating with the NRC any recommendations for exceeding 10 CFR 20.

LP&L RESPONSE

LP&L agrees with the intent of this comment. However, there may be instances where time constraints and personnel safety considerations would preclude lengthy discussions and decision making processes. LP&L will make appropriate changes to EP-2-030, EP-2-031, EP-2-032, EP-2-081, EP-2-101, EP-2-140, EP-2-170 and E-Plan 3.1.2.1.c, 6.7.1 and 9.3 to reflect coordination with the NRC to the extent practicable.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 3.1.2.1.c, 6.7.1, 9.3

Implementing Document: EP-2-030, 2-031, 2-032, 2-081, 2-101, 2-140, 2-170

Schedule: 10/1/83

382/8308-103

- Revise inventory procedures to assure that personnel performing inventories sign and date the inventory form.

LP&L RESPONSE

EP-3-040 approved May 2, 1983 completes this item.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-040

Schedule: Complete

382/8308-104

- Revise the R0-2 portable survey meter calibration procedure, as necessary, to reflect the changes made in the calibration set up.

LP&L RESPONSE

HP-2-408, "Calibration of the Eberline R0-2 and R0-2A" has been revised to reflect the changes made in the calibration set up.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-105

- The exercise scenario should state that the scenario will not be distributed to emergency exercise participants or members.

LP&L RESPONSE

EP-3-020, Emergency Preparedness Drills and Exercises, lines 5.2.5 and 5.2.6 and attachment 7.1 will be revised to indicate that the drill package will not be distributed to participants prior to the drill or exercise.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-020

Schedule: 10/1/83

382/8308-106

- The scenario/observer cue card submittal should reflect the lead time for the NRC and FEMA.

LP&L RESPONSE

EP-3-020, Emergency Preparedness Drill and Exercises, revision 0, approval date May 5, 1983 as issued contains as Attachment 7.7 annual exercise scenario submittal guidelines. The addition of these guidelines ensure the lead time required. Additionally these guidelines will be strengthened to ensure the submittal of sufficient scenario information to permit an adequate assessment of the scenario by NRC and FEMA.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-020

Schedule: Complete

382/8308-107

- The exercise report distribution should be corrected to include the Vice President-Nuclear Operations.

LP&L RESPONSE

EP-3-020, Emergency Preparedness Drills and Exercises, Revision 0, line 5.4.2 will be changed to include the Senior Vice-President Nuclear Operations.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-020

Schedule: 10/1/83

382/8308-108

- Copies of all exercise critiques, comments, resolutions, and reports should be retained for a period of 5 years.

LP&L RESPONSE

EP-3-020, Emergency Preparedness Drills and Exercises, Revision 0, approval date May 5, 1983 line 5.4.4 states; "All drill records, including the scenario critiques, comments, resolutions and reports shall be retained for a period of 6 years."

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-020

Schedule: Complete

382/8308-112

- Review, upgrade as necessary, and verify that all agreement letters are in force.

LP&L RESPONSE

LP&L is presently reviewing and updating letters of agreement to ensure they are in force.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 10/1/83

382/8308-119

- Additional training should be provided for the communicators, including regular hands-on practice with all the communication equipment that may be required in an emergency.

LP&L RESPONSE

Refresher training was provided to the communicators on or before 5/20/83. If the task analysis discussed in Item 382/8303-118 shows that hands-on practice should be included in the classroom training, it will be incorporated into the training program.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Ongoing

382/8308-124

- The reference to the Southern Mutual Radiological Assistance Plan should be removed from Section 2.5.f since it is not a governmental agency.

LP&L RESPONSE

The reference to SMRAP will be deleted from the applicable portions of the Emergency Plan. The reference to SMRAP remains in the Louisiana State Plan (which is also a portion of LP&L's Plan - Appendix D).

Plan/Procedure Cross Reference:

Emergency Plan: Sections 1.2.50, 2.5.f.6, 5.3.2.1.c

Implementing Document:

Schedule: 10/1/83

ATTACHMENT 3

LP&L RESPONSE TO APPENDIX C -  
EMERGENCY PREPAREDNESS AREAS PENDING APPLICANT COMPLETION

7-26-83 - Rev 12

382/8308-03

- Identify the title of individuals down to the working level who are assigned to the various emergency teams.

LP&L RESPONSE

Emergency positions will be identified down to the working level for the various emergency teams.

Plan/Procedure Cross Reference:

Emergency Plan: Section 5

Implementing Document: EP-2-130, EP-3-050

Schedule: 10/1/83

382/8308-07

- Provide an augmentation capability consistent with the commitment of 30 minutes expressed in Table 5-1 of the Plan or an acceptable alternative.

LP&L RESPONSE

A re-evaluation of the augmentation capability, including response times, is being conducted. Upon the completion of the evaluation augmentation capability will be consistent with response time commitments.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 3, 5, 6

Implementing Document: EP-3-050

Schedule: 10/1/83

382/8308-08

- Provide a formal training program for onsite and offsite emergency response personnel in accordance with established procedures.

LP&L RESPONSE

Revision 2 to PMD-TR-003, Emergency Plan Training is presently awaiting management approval. This revision incorporates "new" essential personnel positions into the onsite training matrix and outlines the training to be provided to offsite agencies. The level of detail in PMD-TR-003 is adequate to constitute the formal training program.

Plan/Procedure Cross Reference:

Emergency Plan: Section 8

Implementing Document:

Schedule: 9/1/83

382/8308-09

- Provide emergency plan training for all onsite personnel, as appropriate, and offsite support personnel as delineated in Section 8 of the Plan.

LP&L RESPONSE

Lists and schedules were distributed to personnel needing training and training was conducted both onsite and offsite. Training will be provided on a set frequency in the future (annually at a minimum).

Plan/Procedure Cross Reference:

Emergency Plan: Section 8

Implementing Document:

Schedule: Complete

382/8308-10

- Upgrade the training files in accordance with established procedures to reflect the emergency training that has been conducted. Include in the files the training conducted for all offsite groups.

LP&L RESPONSE

Emergency Plan Training records for onsite personnel have been verified and recorded. A file system for offsite training has been established.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

382/8308-22

- Complete installation of the post-accident coolant sampling and analysis equipment.

LP&L RESPONSE

Post Accident sampling and analysis equipment will be installed prior to fuel load and fully tested and operational prior to exceeding 5% power. This is consistent with the Waterford 3 Safety Evaluation Report Supplement 2 Section 22.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.12

Implementing Document: EP-2-091

Schedule: Prior to exceeding 5% power

382/8308-23

- Designate the person(s) responsible for post-accident coolant sampling and analysis.

LP&L RESPONSE

Chemistry is responsible for post-accident coolant sampling and analysis is identified in chemistry procedures:

CE-3-900, Operation of the Post Accident Sampling System

CE-3-902, Post Accident Boron Analysis

CE-3-903, Post Accident Gamma Spectroscopic Analysis

CE-3-904, Post Accident Hydrogen Analysis

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-24

- Complete the installation of the containment air sampling and analysis equipment.

LP&L RESPONSE

See response to 382/8308-22 for containment air sampling equipment. Analysis equipment will be provided at the -4 Chemistry Lab and onsite backup lab.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Prior to exceeding 5% power

382/8308-25

- Designate the person(s) responsible for containment air sampling and analysis.

LP&L RESPONSE

Chemistry is responsible for post-accident coolant containment air sampling and analysis as identified in chemistry procedures:

CE-3-901, Post Accident Sampling of Containment Atmosphere  
CE-3-903, Post Accident Gamma Spectroscopic Analysis  
CE-3-904, Post Accident Hydrogen Analysis

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-26

- Provide equipment capable of obtaining a representative sample of the stack effluents under accident conditions.

LP&L RESPONSE

Equipment has been installed capable of obtaining a representative sample of the stack effluents under accident conditions.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 1/1/84

382/8308-27

- Provide equipment to analyze stack effluent samples under accident conditions.

LP&L RESPONSE

Analysis equipment will be provided at the -4 Chemistry Lab and onsite backup lab.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/1/83

382/8308-28

- Designate the person(s) responsible for stack effluent sampling and analysis under accident conditions.

LP&L RESPONSE

Chemistry is responsible for stack effluent sampling and analysis under accident conditions as identified in Chemistry procedures:

CE-3-903, Post Accident Gamma Spectroscopic Analysis  
CE-3-906, Post Accident Stack Effluent Sampling

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/1/83

382/8308-29

- Install or provide equipment capable of obtaining a representative sample of the liquid effluents under accident conditions.

LP&L RESPONSE

Equipment capable of obtaining a representative sample of the liquid effluents will be provided for normal operations and will be available for use in accident conditions.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 11/1/83

382/8308-30

- Provide equipment to analyze liquid effluent samples under accident conditions.

LP&L RESPONSE

See response to 382/8308-27

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/1/83

382/8308-31

- Designate the person(s) responsible for liquid effluent sampling and analysis under accident conditions.

LP&L RESPONSE

Chemistry is responsible for liquid effluent sampling and analysis under accident conditions as identified in Chemistry procedures.

CE-3-903, Post Accident Gamma Spectroscopic Analysis  
CE-3-907, Post Accident Liquid Effluent Sampling

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/1/83

382/8308-35

- The decontamination facilities must be complete and functional.

LP&L RESPONSE

The decontamination facilities are essentially complete with only minor work remaining.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 7.1.3, 7.4.10

Implementing Document:

Schedule: 8/5/83

382/8308-47

- Area radiation monitors and process radiation monitors that are utilized during an emergency for accident assessment and dose projection must be fully installed, tested, and operational.

LP&L RESPONSE

The Fuel Handling Building, the RCB, RAB and Process/Effluent Radiation Monitoring subsystem will be completed by fuel load.

That portion of our Radiation Monitoring System required by Regulatory Guide 1.97 Rev 2 and the remainder of the radiation monitoring system will be complete prior to exceeding 5% power.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4

Implementing Document:

Schedule: Prior to exceeding 5% power

382/8308-48

- Provide an operable seismic monitoring system and associated annunciators.

LP&L RESPONSE

The seismic monitoring system is complete.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.7

Implementing Document:

Schedule: Complete

382/8308-59

- Place radios in emergency lockers in the Operations Support Center.

LP&L RESPONSE

Three portable radios on the operations and maintenance frequency with battery chargers are positioned in the OSC cabinet. Five portable radios (with battery chargers) on the radiation monitoring frequency for use by field monitoring teams are positioned in the OSC Health Physics cabinet.

Plan/Procedure Cross Reference:

Emergency Plan: Sections 7.1.3, 7.5, Table 7-10

Implementing Document: EP-2-101, 3-040

Schedule: Complete

382/8308-60

- Sound powered headsets must be installed and operational in the remote shutdown panel room.

LP&L RESPONSE

This equipment will be installed following construction when adequate security can be provided.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/30/83

382/8308-61

-- Fire and station alarms must be installed and operational.

LP&L RESPONSE

Fire and Station Alarms are installed and operational.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.5

Implementing Document: EP-1-010/020/030/040

Schedule: Complete

382/8308-62

-- Assure that personnel in high noise areas of the owner-controlled area will be notified during an emergency.

LP&L RESPONSE

The PA System is presently being evaluated for adequacy. When this evaluation is completed, LP&L will provide an implementation schedule for any indicated corrective action.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 10/1/83

382/8308-63

-- Emergency Notification System and Health Physics Network must be operable in emergency response facilities.

LP&L RESPONSE

The operability of these networks will be tested on a regular basis per EP-3-070.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-070

Schedule: Per EP-3-070

382/8308-64

- Dedicated damage control/corrective action equipment and instruments were not in place in the Operations Support Center.

LP&L RESPONSE

Damage control/corrective action equipment will be utilized from the existing Mechanical/Electrical/I&C tool rooms located on the first floor of the Service Building, which also houses the OSC.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.9

Implementing Document:

Schedule: Complete

382/8308-67

- Provide sufficient numbers of vehicles to accommodate the maximum number of offsite monitoring teams that may be dispatched.

LP&L RESPONSE

LP&L will conduct a complete review of vehicle capabilities in order to address items 67-70 by September 1, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.4.1.1

Implementing Document: EP-2-060, 2-101

Schedule: 9/1/83

382/8308-68

- Provide adequate communications equipment for each vehicle.

LP&L RESPONSE

LP&L will conduct a complete review of vehicle capabilities in order to address items 67-70 by September 1, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.4.1.1

Implementing Document: EP-2-060, 2-101

Schedule: 9/1/83

382/8308-69

- Provide assurance that the vehicles can function off road (four-wheel drive, winch, etc.).

LP&L RESPONSE

LP&L will conduct a complete review of vehicle capabilities in order to address items 67-70 by September 1, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.4.1.1

Implementing Document: EP-2-060, 2-101

Schedule: 9/1/83

382/8308-70

- Assure that radiation monitoring instruments and supplies are protected from the weather while being transported and used.

LP&L RESPONSE

LP&L will conduct a complete review of vehicle capabilities in order to address items 67-70 by September 1, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 6.4.1.1

Implementing Document: EP-2-060, 2-101

Schedule: 9/1/83

382/8308-71

-- The following procedures must be corrected as discussed.

For ease of tracking the following sub items have been identified as 71A through 71H.

- 71A - EP-2-050, "Offsite Dose Assessment (Manual)", was incomplete. Attachment 7.5 is blank.

LP&L RESPONSE

LP&L has updated EP-2-050, Offsite Dose Assessment (Manual).

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-050

Schedule: Complete

- 71B - EP-2-051, "Offsite Dose Assessment (Computerized)", was not issued.

LP&L RESPONSE

EP-2-051, "Offsite Dose Assessment (Computerized)", is scheduled for issue 31 December, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.11

Implementing Document: EP-2-051

Schedule: 12/31/83

- 71C - EP-2-061, "Emergency Environmental Monitoring", was not issued.

LP&L RESPONSE

EP-2-061, "Emergency Environmental Monitoring", will be completed.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.4, Table 7-8

Implementing Document: EP-2-060, 2-061

Schedule: 10/1/83

- 71D - EP-1-001, "Recognition and Classification of Emergency Conditions", was incomplete. Values missing from Tables A and B.

LP&L RESPONSE

EP-1-001, Rev 1, approved 2 May, 1983 completes this item.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-1-001

Schedule: Complete

- 71E - EP-2-091, "Emergency Chemistry", was not issued.

LP&L RESPONSE

EP-2-091, "Emergency Chemistry", Revision 0 has been approved and issued May 2, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-091

Schedule: Complete

- 71F - EP-2-101, "Operational Support Center (OSC) Activation, Operation, and Deactivation", is incomplete. Attachment 7.1 was missing.

LP&L RESPONSE

EP-2-101, "Operational Support Center (OSC) Activation, Operation and Deactivation", Attachment 7.1 Revision 2, has been incorporated, approved and issued May 2, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-101

Schedule: Complete

- 71G - EP-2-120, "Natural Emergencies", was incomplete. Attachment 7.1 was missing. Steps 5.2.2 and 5.3.2.4 refer to unidentified procedures.

LP&L RESPONSE

LP&L will review EP-2-120 and revise as necessary.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-120

Schedule: 10/1/83

- 71H - EP-2-103, "Emergency Team Assignments", was incomplete. The telephone number for the St. Charles Ambulance Service was missing on Attachment 7.2.

LP&L RESPONSE

EP-2-130, "Emergency Team Assignments", Revision 1, Change 1, has been approved and issued March 18, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-130

Schedule: Complete

- 71I - EP-3-001, "Emergency Plan Abstract", was not issued.

LP&L RESPONSE

EP-3-001, Emergency Plan Abstract, is removed as a procedure from the Emergency Plan Implementing Document. All references to the Emergency Plan Abstract have been removed from Implementing Document index and Plant Operations Manual.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

- 71J - EP-3-010, "Emergency Plan Training", was not issued.

LP&L RESPONSE

EP-3-010, Emergency Plan Training, is removed as a procedure from the Emergency Plan Implementing Document. All Emergency Planning Training criteria are fulfilled by PMD-TR-003, "Emergency Planning Training".

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete

- 71K - EP-3-020, "Emergency Preparedness Drills and Exercises", was not issued.

LP&L RESPONSE

EP-3-020, "Emergency Preparedness Drills and Exercise", Revision 0, has been approved and issued May 5, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-020

Schedule: Complete

- 71L - EP-3-050, "Emergency Response Call List", was not issued.

LP&L RESPONSE

EP-3-050, "Emergency Response Call List", Revision 0, has been approved and issued May 2, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-3-050

Schedule: Complete

382/8308-85

- Develop and approve a procedure for taking primary coolant samples under accident conditions, including a description of personnel protection, necessary equipment, sampling steps, and transportation of the sample to the analysis station.

LP&L RESPONSE

This procedure will be developed and approved by September 1, 1983.

CE-3-900, Operation of the Post Accident Sampling System

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-86

- Finalize procedures for primary coolant sample analysis, including the designation of the person(s) responsible for this analysis.

LP&L RESPONSE

These procedures will be completed and approved by September 1, 1983.

CE-3-902, Post Accident Boron Analysis  
CE-3-903, Post Accident Gamma Spectroscopic Analysis  
CE-3-904, Post Accident Hydrogen Analysis

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-87

- Finalize agreements with offsite contractors for sample analysis.

LP&L RESPONSE

Agreements are presently in place with Oak Ridge National Laboratory and other utilities through the Mutual Assistance Plan. Shipping and analysis details will be finalized by December 30, 1983.

Plan/Procedure Cross Reference:

Emergency Plan: Appendix C

Implementing Document:

Schedule: 12/30/83

382/8308-88

- Develop and approve a procedure for taking containment air samples under accident conditions, including a description of personnel protection, necessary equipment, sampling steps, and transportation of the sample to the analysis station.

LP&L RESPONSE

This procedure will be developed and approved by September 1, 1983.

CE-3-901, Post Accident Sampling of Containment Atmosphere

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-89

- Develop and approve procedures for containment air sample analysis, including the designation of the person(s) responsible for this analysis.

LP&L RESPONSE

These procedures will be developed and approved by September 1, 1983.

CE-3-903, Post Accident Gamma Spectroscopic Analysis

CE-3-904, Post Accident Hydrogen Analysis

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-90

- Develop and approve procedures for sampling stack effluents, including the designation of the person(s) responsible for this sampling.

LP&L RESPONSE

This procedure will be developed and approved by December 1, 1983.

CE-3-906, Post Accident Stack Effluent Sampling

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/1/83

382/8308-91

- Develop and approve procedures for analyzing stack effluent samples, including the designation of the person(s) responsible for this analysis.

LP&L RESPONSE

This procedure will be developed and approved by September 1, 1983.

CE-3-903, Post Accident Gamma Spectroscopic Analysis

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-92

- Develop and approve procedures for sampling liquid effluents under accident conditions, including the designation of the person(s) responsible for this sampling.

LP&L RESPONSE

This procedure will be developed and approved by December 1, 1983.

CE-3-907, Post Accident Liquid Effluent Sampling

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 12/1/83

382/8308-93

- Develop and approve procedures for analyzing liquid effluent samples, including the designation of the person(s) responsible for this analysis.

LP&L RESPONSE

This procedure will be developed and approved by September 1, 1983.

CE-3-903, Post Accident Gamma Spectroscopic Analysis

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 9/1/83

382/8308-94

- EP-2-061, "Emergency Environmental Monitoring", must be completed and incorporated into the Emergency Procedures.

LP&L RESPONSE

EP-2-061 will be completed.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.4.4, Table 7-8

Implementing Document: EP-2-060, 2-061

Schedule: 10/1/83

382/8308-96

- Develop additional onsite protective measures to reflect when personnel may evacuate specified areas or buildings.

LP&L RESPONSE

EP-2-031, EP-2-101, EP-2-102 will be revised, as appropriate, to reflect when personnel should evacuate specified areas or buildings.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-031, 2-101, 2-102

Schedule: 10/1/83

382/8308-97

- Provide and verify that an adequate public address system exists such that all personnel within the owner-controlled area can be given verbal instructions as reflected in the Plan and procedures or provide an acceptable alternate method of notifying personnel.

LP&L RESPONSE

The PA System is presently being evaluated for adequacy. When this evaluation is completed LP&L will provide an implementation schedule for any indicated corrective actions.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: 10/1/83

382/8308-98

- Identify by title or functional group the Control Point Watch.

LP&L RESPONSE

This item will be addressed with appropriate changes to EP-2-070, EP-2-071 and EP-2-081.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-070, 2-071, 2-081

Schedule: 10/1/83

382/8308-114

- Distribution of the public information brochure and other emergency informational material to residents within the 10-mile EPZ.

LP&L RESPONSE

LP&L is awaiting the Atomic Safety & Licensing Appeal Board decision on this item which may include further recommendations on the content of the brochure.

Plan/Procedure Cross Reference:

Emergency Plan: Section 8.2

Implementing Document:

Schedule: Prior to Fuel Load

382/8308-115

- Dissemination of emergency information to the transient population.

LP&L RESPONSE

See response to 382/8308-114

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: See 382/8308-114

382/8308-116

- Successful operational testing of the siren warning system.

LP&L RESPONSE

The siren systems in both parishes were tested on 3/26/83. St. Charles Parish sirens were retested on 6/16/83. Modifications were made to the systems in both parishes by moving sirens and adding two sirens in each parish. Operational retesting will take place after the additional sirens are installed. Sirens were sound-level tested during April and May. The final report will be issued to NRC and FEMA after operational retesting is complete.

Plan/Procedure Cross Reference:

Emergency Plan: Section 7.5.4

Implementing Document:

Schedule: 10/1/83

382/8308-118

- The control room operators and Nuclear Operations Supervisor-Shift Supervisor must demonstrate the ability to utilize the radiation monitoring instrumentation for the detection and assessment of emergency conditions.

LP&L RESPONSE

The demonstration of the operators ability to utilize the radiation monitoring instrumentation is included in the cold license training program.

Additionally Dose Assessment and EAL training is being provided to all licensed operators.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Ongoing

382/8308-120

- Radiological monitor displays must be installed in order to determine if the shift supervisor can recognize the appropriate monitor to read and can use the data correctly.

LP&L RESPONSE

See response to 382/8308-47

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: See 382/8308-47

382/8308-121

- Assure that all pertinent individuals are adequately trained to perform the initial dose assessment procedure.

LP&L RESPONSE

All personnel assigned positions which require them to perform initial dose assessment have received either the initial training or the refresher training, as appropriate.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document: EP-2-050

Schedule: Complete

382/8308-122

- Maps and overlays must be available in the control room.

LP&L RESPONSE

Maps and overlays are installed in the Control Room. This activity was completed 23 May, 1983.

Plan/Procedure Cross Reference:

Emergency Plan:

Implementing Document:

Schedule: Complete