**GE Nuclear Energy** 

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February 24, 1992

Attention: Document Control Desk

References: 1) License R-33, Docket 50-73. 2) VNC Radiological Emergency Plan; October, 1981 (As Revised).

Gentlemen:

The General Electric Company submitted at the request of the NRC an emergency plan for the Vallecitos Nuclear Center (VNC) reactor facilities in October, 1981. As the NRC had also requested that a Radiological Emergency Plan be submitted for VNC facilities operated under License SNM-960 (Docket 70-754), VNC chose to essentially generate a single plan Therefore, although GE submitted separate documents to NRR and NMSS, both plans were site-wide in scope. A single set of emergency procedures served to implement both documents.

NMSS has since determined that License SNM-960 activities have decreased to the point at which the Radiological Contingency Plan was no longer required and, at GE's request, eliminated the contingency plan from License SNM-960 (Locember, 1990).

GE has revised the VNC Radiologic? Emergency blan to eliminate descriptions and requirements which apply to or were required for non-reactor lacilities. The revised plan applies specifically to VNC reactor facilities only.

The revised plan is enclosed for your review. Changes in the plan are designated by vertical lines in the right-hand margin. A list of the changes along with a brief description of each is also enclosed. The revised plan continues to meet all of the NRR requirements for a research reactor emergency plan.

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If you have any questions concerning this submittal, please contact me on (510) 862-4330. Thank you.

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Sincerely,

G. E. Cunningham Senior Licensing Engineer

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Enclosures

cc: Non-Power Reacture, Decommissioning, and Environmental Project Directorate USNRC; Washington, D.C. Attention: M. M. Mendonca T. S. Michaels

> USNRC, Regi. i V Walnut Creek, CA

- 1. Adds "Reactor Facilities".
- 2. Adds latest revision date.
- 3.-8. Updates pagination. (Note: There is no change #5.)
- 9. Limits plan to reactor facilities; recognizes the conclusions of Section 14.8 of NUREG-1069 (i.e., no significant off-site effects from postulated NTR accidents).
- 10. Limits plan to reactor facilities.
- 11.-12. Lists all reactor facilities. Site facility descriptions are moved to new Sections 1.1 and 1.2.
- 13. Changes "General Electric" to "GE".
- 14. Adds description of GETR facilities.
- 15. Adds descriptions of VBWR and EVESR facilities.
- 16. Simplifies Building 102 description.
- 17. Simplifies Building 104 description.
- 18. Updates Building 106 description.
- 19. Simplifies Building 349 description.
- 20. Changes "General Electric" to "GE"; defines site boundary (see Section 1.26 of the Technical Specifications, License R-33).
- 21. Change in normal working hours.
- 22. Definition expanded to include personnel responsible for assuring that actions are performed as well as those performing the action.
- 23. Addicional definitions for clarification.
- 24.-26. Changes terminology from VNC site general to reactor specific.
- 27. Drops term "at VNC".
- 28.-30. Changes building emergency coordinator and team to singular reflecting the change of the plan from total site to reactor specific; Supervisor, Facilities Maintenance, to Manager, Facilities Maintenance.

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- 31. Simplified for clarity.
- 32. "VNC" changed to "reactor facilities".
- 33. "VNC" changed to "the site".
- 34. The succession list previously referred to applies to other site facilities rather than to the NTR specifically. Accordingly, it has been dropped.
- 35.-36. Changes "site emergency plans" to "emergency plan".
- 37. Changes "site emergency plans" to "emergency plan"; eliminates the position of "VNC Communications Representative".
- 38. "VNC personnel" has been changed to "personnel".
- 39. The phrase "off-site and on-site" has been dropped. See change "9".
- 40. "emergency plans" made singular.
- 41.-42. Changes eliminate references to other VNC facilities.
- 42.a. Clarifies limitations to on-site fire fighting capacity.
- 43. Describes the function of the assembly leader for the reactor facilities.
- 44. The security guards are responsible for controlling site areas during all hours for reactor facilities.
- 45. For reactor facilities the security guards "operate" rather than "command" the emergency communications center.
- 46. "...a BET" to "...the BET". Revised plan applies only to one building and, therefore, one BET.
- 47. "Area Manager" to "Facility Manager". Consistent with License R-33 terminology.
- 48. Responsibility shifted from the Senior Licensing Engineer to the EOC, formerly the alternate.
- 49. Add the California Department of Forestry and Fire Protection (CDF).
- 50. The CDF is not always the first response as the local fire station is not continuously manned.

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- 51. Old sections 3.2.6, 3.2.7, and 3.2.8 described county, state, and federal response to off-site effects of an incident. As no incident can have such effects, the sections were eliminated.
- 52. Establishes the use of ANSI/ANS Standard 15.16-1982 for characterizing emergencies.
- 53. Clarifies that the "General Emergency" level cannot be reached.
- 54. Renumbering.
- 55. List of possible scenarios revised to reflect NTR only rather than the VNC site.
- 56. See Item 9.
- 57. Renumbering
- 58. See Item 9.
- S9. See Item 55.
- 60. See Items 9., 54., 55.
- 61. Renumbering.
- 62. See Item 9.
- 63. Clarifies that a "General Emergency" cannot occur; eliminates non-NTR terms such as "Area Manager".
- 64. Notification list has been revised to reflect NTR facilities rather than the entire VNC site.
- 65. See Item 64.
- 66. Updates footnote to match text.
- 67. See Item 64.
- 68. Eliminates "General Emergency".
- 69. Footnote updated to match text.
- 70. Section revised to apply only to reactor facilities rather than the entire VNC site; operations boundaries are defined.

71. See Item 70.

72. Editorial.

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73.	Eliminates "or areas", i.e., the VNC site.
74.	"at VNC" eliminated.
75.	No significant dose to off-site personnel is expected. See Item 9.
76.	Revise to make section reactor specific rather than VNC site general.
77.	"General Electric" to "GE".
78.	At reactor facilities only the "all-call" system is used.
79.	The option of portable FM transceiver radios has been added.
80.	Editorial to eliminate areas other than reactors.
81.	No off-site assessments are necessary. See Item 9.
82.	Revised to be reactor specific.
83.	Editorial.
84.	Revised to be reactor specific.
85.	"some" to "many", which is the case for the reactors.
86,	Editorial ("controlled" added).
87.	Revised to eliminate references to other VNC facilities.
88.	"General Electric" to "GE".
89.	"communications" added (editorial).
90.	"radios" added (editorial).
91.	"on site" eliminated.
92.	Editorial; clarification.
93.	Editorial; "safety-related" changed to "necessary".

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94.	Specifies personnel who initiate investigations.
95.	Editorial; State regulations do not apply to reactors.
56.	"on site" eliminated to make reactor specific.
97.	See Item 96.
98.	See Item 96.
99.	Revised to eliminate other site areas.
100.	See Item 99.
101.	Describes instrument calibration schedule and eliminates the reference to License SNM-960.