

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

April 10, 1984

TELEPHONE
(704) 373-4531

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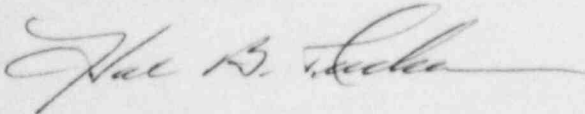
Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30303

Re: RII:GNH/JLK/RRM
50-413/83-42
50-414/83-35

Dear Mr. O'Reilly:

Please find attached a response to the deficiencies and improvement items identified in the above referenced inspection report, which summarized the results of the Emergency Preparedness Appraisal. Also included are responses to those items identified as items in incomplete areas where an appraisal could not be performed.

Very truly yours,



Hal B. Tucker

LTP/php

Attachment

cc: NRC Resident Inspector
Catawba Nuclear Station

Mr. Robert Guild, Esq.
Attorney-at-Law
P. O. Box 12097
Charleston, South Carolina 29412

Palmetto Alliance
2135½ Devine Street
Columbia, South Carolina 29205

DUKE POWER COMPANY
CATAWBA NUCLEAR STATION
RESPONSE TO EMERGENCY PREPAREDNESS
APPRAISAL/IE INSPECTION REPORT 50-413/83-42 AND 50-414/83-35

EMERGENCY PREPAREDNESS DEFICIENCIES:

Based on the results of the NRC's appraisal of the Catawba Nuclear Station Emergency Preparedness Program, conducted November 8-18, 1983, the following deficiencies were identified (references are to sections in NRC Report Nos. 413/83-42 and 414/83-35).

Item 1. Training Program Established

The licensee has not:

- Established the composition of repair/recovery teams as an integral function of the onsite emergency organization, nor developed and administered a specialized training program for the personnel who will staff such teams, with the description of said training program in the Emergency Plan (EP). (Reference 10 CFR 50, Appendix E, Part IV.F)

Response: Applicable sections of the Catawba EP will be revised to include the above mentioned item, see Rev. 4, April 1984.

- Included (or referenced) in the EP is a description of the emergency response training programs for security personnel or the Fire Brigade. (Reference 10 CFR 50, Appendix E, Part IV.F)

Response: Reference to above mentioned item to be included in Rev. 4, April 1984.

Item 2. Transportation

The licensee has not made adequate provisions to insure that 4 suitable vehicles are available for use at all times in support of the 4 ground-based Field Monitoring Teams specified in EPIP HP/0/B/1009/04. (Reference 10 CFR 50.47(b)(8))

Response: Catawba Station Directive 2.11.13, Use of Station Vehicles, has been revised to designate specific vehicles for emergency radiological use and HP/0/B/1009/04, Environmental Monitoring for Emergency Conditions, has been revised to include contingency plans for obtaining other vehicles as necessary.

Item 3. Onsite (Out-of-Plant) Surveys

The licensee has not identified the means for providing onsite (out-of-plant) survey coverage during emergencies. (Reference 10 CFR 50.47(b)(8) and (9))

Response: Catawba procedure HP/O/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to provide for onsite (out-of-plant) surveys during emergencies.

Item 4. In-Plant Radiological Surveys

The licensee has not:

- Established a procedure considering the overall responsibilities and priorities for health physics support of potential emergency activities. (Reference 10 CFR 50.47(b)(8) and (9))

Response: Catawba procedure HP/O/B/1009,09, Guidelines for Accident and Emergency Response, has been revised to serve as a controlling procedure for health physics support during emergencies.

- Provided adequate protection for emergency workers via a "buddy system" under emergency dose-rate and unstable plant conditions. (Reference 10 CFR 50.47(b)(8) and (9))

Response: Use of a "buddy system" is included in the revision to HP/O/B/1009/09, Guidelines for Accident and Emergency Response. The "buddy system" is one means of protection and must be judged as appropriate to the emergency at hand, depending on ALARA and manpower resources.

Item 5. Radiation Protection During Emergencies

The licensee's procedures do not include exposure guidelines consistent with the EPA Emergency Worker and Lifesaving Activity Protective Action Guides. (Reference 10 CFR 50.47(b)(11))

Response: Catawba procedure HP/O/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to be consistent with EPA PAG's.

Item 6. Evacuation of Owner-Controlled Areas

The Site Assembly/Evacuation procedures do not include provisions for: (1) specific dose-rate and breathing-air levels of radionuclides within the reactor facilities, for initiating site assembly and evacuation, (2) a way to establish dose-rate habitability at assembly locations, and (3) radiation surveillance at the relocation sites if the Technical Support Center is not fully activated. (Reference 10 CFR 50.47(b)(10))

- Response:
1. Catawba procedure RP/0/A/5000/10, Conducting a Site Assembly, has been revised to include specific dose-rate and breathing-air level considerations for initiating a Site Assembly/Evacuation.
 2. Catawba procedure HP/0/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to establish dose-rate habitability at assembly locations.
 3. Catawba Emergency Response personnel are activated and respond to an emergency as specified by table B-1 of NUREG-0654 Rev. 1. If the TSC was not yet fully activated, it would be due to the fact that the Emergency Response personnel had not had the specified 30/60 minutes of B-1 and therefore cannot provide surveillance at the relocation site.

Item 7. Onsite First-Aid/Rescue

The responsibilities for search and rescue are not unambiguously defined so as to specify the duties of individuals within the security organization. (Reference 10 CFR 50.47(b)(2) and 10 CFR 50, Appendix E, Paragraph IV.A)

- Response: Catawba Station Directive 3.0.7, Site Assembly/Evacuation has been revised to specify that the Security group shall have primary responsibility for Search procedures instituted to recover unaccounted for personnel. Catawba Security Guideline No. 6, Security Response to Medical Emergencies, Catawba Medical Procedure M-11, Contaminated Injury and Cat. S. D. 2.11.1, Personal Injury, have been revised to indicate that Security personnel have the primary responsibility for medical treatment/rescue of injured individuals.

Item 8. Security During Emergencies

The responsibilities of Security personnel during emergencies are not unambiguously defined, including the interfaces between Security personnel, Security and other onsite response personnel, and offsite support groups so as to assure a timely response in an emergency. (Reference 10 CFR 50.47(b)(2) and 10 CFR 50, Appendix E, Paragraph IV.A)

Response: Changes have been made to various CNS directives and procedures and proposed changes to the Catawba Security Contingency Plans are being discussed with NRC-NMSS. Listed below are these changes concerning Security responsibilities:

Section 5.4.4

Part 1

1. Cat. S.D. 2.12.1 and 2.12.2 have been revised to reduce the ambiguity in Security responsibility for fire protection.
2. Security Contingency Plans required approval by NRC-NMSS for a 10 CFR 50.54 (P) change, to be discussed.
3. Cat. S.D. 3.8.4 is being revised to state, "that the CNS Fire Brigade will be responsible for fire fighting".
4. Cat. S.D. 3.0.7 will be revised to state that Security shall be responsible for searching for unaccounted for personnel.
5. See response No. 2 above.
6. Cat. procedure HP/O/B/1009/08 has been revised to include a statement ensuring that Security will be contacted for first-aid treatment.
7. Cat. procedure RP/O/A/5000/09, Collision/Explosion directs Control Room personnel to respond to any source of an explosion or collision on-site and therefore, includes a situation involving a Security response.
8. Cat. S.D. 2.11.1, Personal Injury, has been revised to state that Security has responsibility for first-aid or medical treatment at all times.
9. Cat. Medical group procedure M-11, Handling Contaminated Injuries, has been revised to state that Security Supervision will be the one to notify the hospital of a contaminated (or uncontaminated) injury.

Part 2

1. & 2. Security procedures are in final review at this time and will be complete before Fuel Loading.

3. Cat. S.D. 3.8.4 On-Site Emergency Organization and S.D. 3.0.7 Site Assembly/Evacuation, are being revised to give guidance on the radiological protection of "essential personnel" remaining onsite following a site evacuation.
4. Cat. S.D. 2.12.2 has been approved.

Part 3

Fire Brigade Organization, Training & Responsibilities, Cat. S.D. 2.12.2, states that the Fire Brigade shall consist of the Assistant Shift Supervisor (Operations) and four Security Officers with assistance from two Nuclear Equipment Operators (Operations). The Security Shift roster designates who is a fire brigade responder and who is a medical responder by name. The Operations Shift duty list has designated two NEO's by name to assist the Fire Brigade.

Part 4

As stated before, the Security shift roster designates by name the Security Officers assigned to each shift for:

1. Armed Response Team
2. Fire Brigade
3. Medical First Responder

Security has no responsibility for Repair/Recovery. Security Supervision is responsible for assigning someone to be on the search team for unaccounted for personnel as determined by manpower constraints and the emergency situation at hand.

Rescue of personnel is a Security responsibility as a function of the Medical First Responder program.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS:

Based on the results of the NRC's appraisal of the Catawba Nuclear Station Emergency Preparedness Program, conducted November 8-18, 1983, the following items should be considered for improvement (references are to sections in NRC Report Nos. 413/83-42 and 414/83-35).

Item 1. Indicating in the EP and the Emergency Plan Implementing Procedures (EPIP's) the persons down to the working level in the onsite organization, by position or title and name, who are assigned the responsibility for decontamination activities.

Response: Applicable sections of the Catawba EP will be revised to include the above mentioned item, see Rev. 4, April 1984.

Item 2. Reviewing and revising Catawba Nuclear Station Directive (CNSD) 3.8.4 to assure meeting the minimum staff augmentation criteria in NUREG-0654, Section II.B, Table B-1.

Response: Catawba Station Directive 3.8.4 has been revised to meet the requirements of Table B-1 NUREG-0654, see Rev. 6, February 1984.

Item 3. Performing a study or drills to verify the ability to meet the minimum staff augmentation criteria in NUREG-0654, Section II.B, Table B-1.

Response: A study was conducted of CNS Emergency Response Organization personnel that verified the minimum staffing criteria, see Memo to File, March 07, 1984 MEB.

Item 4. Revising CNSD 3.8.4, Paragraph 7.3, to indicate that special training for certain groups in the emergency organization will be given on an annual basis.

Response: Catawba Station Directive 3.8.4 has been revised to indicate annual training for certain groups, see Rev. 6, February 1984.

Item 5. Establishing criteria for the selection and qualification of instructors.

Response: Catawba Administrative Group procedure T-6, Instructor Qualification, Support and Responsibility Requirements, specifies that a letter of qualification be written for a particular instructor. See Memo to File, March 8, 1984.

Item 6. The periodic inventory of TSC emergency equipment should include the telephone instruments stored for emergency use.

Response: Catawba procedure PT/O/B/4600/04, Periodic Verification of Emergency Supplies, has been written with an inventory of TSC telephones.

Item 7. Evaluating during an exercise the effect of the small size of the OSC on the ability of the OSC to carry out its assigned emergency response functions.

Response: Several drills were held prior to the Emergency Exercise that provided that the OSC size was sufficient to support its assigned emergency function, see Memo to File, March 7, 1984.

Item 8. Using controlled copies of procedures in emergency kits instead of the present "information" copies.

Response: Procedures in the emergency kits will be maintained as controlled distribution copies.

Item 9. Specifying parametric values for the process radiation monitor values that currently state "in alarm" when used as emergency action levels for accident classification.

Response: Process radiation monitoring setpoints are dependent upon variable factors such as background and core life and are therefore not constants that can be written into procedures. They also are used as indicators of emergency situations and not solely as Emergency Action Levels for emergency classification. We have therefore determined that our specification of "in-alarm" is appropriate for this use.

Item 10. Including the State of South Carolina's night, weekend, and holiday telephone number and the commercial telephone number for the NRC in the appropriate procedures.

Response: Catawba Emergency Procedure RP-02 through 05 have been revised to include S.C. DHEC 24 hour, weekend, and holiday telephone number and the commercial telephone number for the NRC.

Item 11. Providing training for the Field Monitoring Teams, including offsite support personnel, in the use of the Canberra-10 for field analyses of radioiodine cartridges and in site-area-specific features.

Response: Training was completed in February 1984 on the use of the Canberra-10 and site specific field monitoring for Health Physics personnel from both Catawba Nuclear Station and McGuire Nuclear Station.

Item 12. Providing sufficient equipment for all Field Monitoring Teams.

Response: Equipment for FMT's is either on hand or on order to be provided soon.

Item 13. Coordinating the Field Monitoring Team's turnover location based on existing conditions.

Response: Catawba procedure HP/O/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to include coordination of FMT turnover locations using alternate locations based on existing conditions.

Item 14. Modifying HP/O/B/1009/05 to include (1) verifying presence in the plume through beta measurements before attempting to collect an air sample, (2) locating keys to the various sample stations and gates, (3) reading the "in-flow" face of the cartridge, (4) purging the cartridge to remove some of the noble gases, and (5) verifying operability of the analytical equipment with the mock iodine source Ba-133 instead of Na-22.

- Resource:
1. Catawba procedure HP/O/B/1009/04, Environmental Monitoring under Accident Conditions, was revised 2-1-84 to clarify beta surveying.
 2. HP/O/B/1000/06, Emergency Equipment Functional Check and Inventory, has been revised to provide for the availability of keys.
 3. Catawba procedure HP/O/B/1000/02, Taking, Counting and Recording Surveys, adequately addresses reading the "in-flow" face of the cartridge.
 4. Purging of cartridges is performed at a suitable location prior to counting, should it be necessary. Catawba procedure HP/O/B/1009/04, Environmental Monitoring under Emergency Conditions, provides a method for collecting and analyzing field data.
 5. Concerning the use of Ba-133 instead of Na-22 for verifying operability, we feel that Na-22 is adequate for the several reasons listed below:
 - a. it has a suitably long half-life
 - b. has peaks on upper and lower end of the spectrum
 - c. will not interfere with I-131 detection
 - d. has negligible distortion of LLD
 - e. does not contribute to "dead time"

Item 15. Using in-plant maps to document radiological conditions.

Response: Maps will be available in the TSC and OSC to document conditions; however, of greater importance is the actual pre-planning of activities to control radiological exposure.

Item 16. Using in-plant maps showing predetermined or expected radiological conditions from the FSAR to aid in determining the most dose-saving routes.

Response: Maps will be available in the TSC and OSC to show known or expected radiological conditions; however, of greater importance is the actual pre-planning of activities to control radiological exposure.

Item 17. Specifying minimum protective-equipment requirements for monitoring support activities.

Response: Catawba procedure HP/O/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to emphasize protective clothing considerations. Minimum protective clothing specification is a function of the Radiation Work Permit (RWP) for a particular activity.

Item 18. Completing the Control Room initial dose assessment procedure.

Response: The CNS Operator Aid Computer (OAC) Dose Assessment Program (Nuclear-23) is complete and available, as is the back-up manual procedure RI/O/A/5000/11, Protective Action Recommendations Without the OAC.

Item 19. Analyzing the reliability and availability of the alternate method for determining dose rates in the reactor building.

Response: Catawba procedure HP/O/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to emphasize pre-planning of activities for high exposure jobs. The data gathered is an alternate method of protecting the public and the importance of determining the maximum dose would depend on the exposure level and exposure limitation of the individual. See Memo to File, January 23, 1984, for assumptions used in HP/O/B/1009/06, Alternative Method for Determining Dose Rate Within the Reactor Building.

Item 20. Modifying the procedures to include:

- a. A method for determining a true projected dose and comparing it to the EPA PAG's.

Response: Catawba procedure HP/0/B/1009/09, Guidelines for Accident and Emergency Response, was revised to provide guidance on projected doses and PAG's.

- b. Guidelines for determining the expected duration of a release.

Response: Catawba procedure HP/0/B/1009/09, Guidelines for Accident and Emergency Response, was revised to provide instructions for determining duration of a release.

- c. Guidelines for immediately reassessing the projected dose based on changed conditions.

Response: Catawba procedure HP/0/B/1009/09, Guidelines for Accident and Emergency Response, was revised to incorporate reassessing projected dose based on changed conditions.

Item 21. Describing the assumptions and constants used in developing the equations in HP/0/B/1009/15.

Response: Documentation of the assumptions and constants used in HP/0/B/1009/15 is available at this time. See Memo to File, 1-20-84 by G. L. Courtney.

Item 22. Localizing the responsibilities for authorizing emergency exposures.

Response: The responsibility for authorizing emergency exposures has been specified in Table K-1 to the Crisis Management Plan, Rev. 11, January 1984.

Item 23. Removing from HP/0/B/1009/09 the implication that Class 2 personnel may be subjected to emergency exposures.

Response: Catawba procedure HP/0/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to indicate that Class 2 personnel (pregnant females) may not be extended above their weekly limit.

Item 24. Making all emergency workers aware of the emergency exposure limitations.

Response: A letter was sent to all CNS personnel from the Station Health Physicist on 1-24-84 to make them aware of the emergency exposure limits.

Item 25. Making provisions for expanding the respiratory-protection supplies and equipment during emergencies to assure that an ample supply is maintained.

Response: Additional SCBA's have been acquired, some will be mounted in a designated area for emergency use and some will be maintained elsewhere. CNS has a compressor to refill bottles as well as a "cascade system" to refill bottles and other air-line and particulate masks available.

Item 26. Developing maximum dose and dose-rate guidelines for performing the upper personnel-hatch measurement, or making alternate arrangements to acquire the data.

Response: Catawba procedure HP/O/B/1009/09, Guidelines for Accident and Emergency Response, has been revised to emphasize pre-planning of activities for high exposure jobs. The data gathered is an alternate method of protecting the public and the importance of determining the maximum dose would depend on the exposure level and exposure limitation of the individual.

Item 27. Clarifying the authorization and distribution of KI.

Response: Catawba procedures HP/O/B/1009/04, 05, 07 and 16 have been revised to clarify the authorization of KI. Catawba procedure HP/O/B/1009/16, Distribution of KI Tablets During Emergencies, controls the distribution of Potassium Iodide.

Item 28. Developing a workable means for assuring the designation of the Site Evacuation Coordinator.

Response: Catawba Station Directive 3.8.4, Rev. 6, includes the pre-designation of the Site Evacuation Coordinator during normal working hours. The Emergency Coordinator has the authority to designate the Site Evacuation Coordinator during evenings, weekends and holidays.

Item 29. Modifying HP/O/B/1009/05 as follows: (1) The Section 3.1 precaution regarding high radioiodine levels should include a specific concentration value, (2) clarify what to do with the monitoring list in Section 3.3, (3) reference CNSD 3.0.7 and RP-10, (4) specify the required manpower for monitoring in Section 4.1.3, (5) include provisions for monitoring personnel to be evacuated should site dose rates or airborne radionuclide levels be significantly higher than normal background, making surveillance impractical, and (6) clarify the policy on the use of privately owned, contaminated vehicles for transport to the relocation site based upon the need for transporting all personnel.

Response:

1. Section 3.1 of HP/O/B/1009/05, Personnel/Vehicle Monitoring for Emergency Conditions, has been revised to include a specific concentration for radioiodine.
2. Section 3.3 of HP/O/B/1009/05 does not contain a reference to the "monitoring list".
3. A reference to CNSD 3.0.7 and RP-10 has been included in the revision to HP/O/B/1009/05.
4. Manpower requirement designation is a function of CNS EP Figure B-1, which meets the standards of NUREG-0654, Rev. 1, Table B-1, Minimum Staffing Requirements.
5. HP/O/B/1009/05 has been revised to expedite the evacuation of personnel should high dose rates be expected, also monitoring at the relocation sites is addressed in the revision.
6. Privately owned vehicles for transportation to relocation sites is our policy as stated in CNSD 3.0.7, Site Assembly and Evacuation. If these vehicles become contaminated, they would be immobilized and decontaminated at the site.

Item 30. Providing a reference or requirement in RP-12 that CNSD 3.8.8 be addressed to assure the radiological safety of the repair or assessment teams.

Response: Procedural step 2.1 of RP/O/B/5000/12, Control of Assessment and Repair Teams, addresses that coordination of teams be controlled by the OSC HP Supervisor and the TSC S&C Coordinator who, using HP/O/B/1009/09, shall refer to Station Directive 3.3.8.

Item 31. Including in the EP a statement that the EPIP's will be reviewed and/or revised at least annually.

Response: The latest revision to the CNS EP will include a statement that EPIP be reviewed annually.

INCOMPLETE EMERGENCY PREPAREDNESS ITEMS:

Based on the results of the NRC's appraisal of the Catawba Nuclear Station Emergency Preparedness Program, conducted November 8-18, 1983, the following areas or items within areas were found to be incomplete and could not be appraised (references are to sections in NRC Report Nos. 413/83-42 and 414/83-35):

Item 1. Training Program Established

Establish and implement training programs for (1) operator personnel in all applicable dose projection methods and (2) chemistry personnel in procedures related to the Post-Accident Sampling System (PASS).

Response: Operations' personnel shall be trained on dose projection methods and Chemistry personnel on Post-Accident Sampling as soon as the systems are complete and the procedures are approved.

Item 2. Training Program Implemented

Implement training in:

a. Emergency classification and protective action recommendations.

Response: Training has been implemented on emergency classification and protective action recommendations and will continue until all appropriate personnel have received the training.

- b. Information transmission to offsite agencies.

Response: Training on information transmission has been completed.

Item 3. Control Room

- a. Provide the Control Room with approved copies of all emergency plan implementing procedures including EOP's, AP's, and the RP.

Response: Emergency Response Procedures (RP's) have been provided to the Control Room in the Emergency Plan Implementing Procedures Manual. The Emergency Operating Procedures (EOP's) and Abnormal Procedures (AP's) will be available prior to Fuel Loading.

- b. Complete installation of communications equipment.

Response: The majority of the required communications equipment has been installed in the Control Room, except for the Emergency Notification System (ENS) phone which will be supplied by the NRC.

- c. Upon installation of all Control Room communications equipment and the issuance of all approved emergency plan implementing procedures, complete the training of Control Room personnel in the use of the communications equipment and the procedures.

Response: Training on procedures is currently being done and will be complete by Fuel Loading. Training on all communications equipment will be complete when the remainder of the equipment is installed.

Item 4. Technical Support Center

- a. Complete the installation and testing of the TSC emergency ventilation process radiation monitor.

Response: The TSC ventilation process radiological monitoring equipment is in place and testing will be complete prior to Fuel Loading.

- b. Complete the installation and testing of the TSC communications system.

Response: The TSC communications systems are complete except for the ENS and the Federal Telephone System (FTS) both of which will be supplied by the NRC.

Item 5. Medical Treatment Facilities

This entire area will be reviewed during a future inspection.

Response: The Contaminated First Aid Room in the Auxiliary Service Building is complete except for some minor problems which shall be corrected soon. The Medical and Radiological Supplies necessary are being kept in the room now.

Item 6. Decontamination Facilities

This entire area will be reviewed during a future inspection.

Response: The Decontamination Facility in the Auxiliary Service Building is complete except for some minor items which shall be completed soon. Decontamination supplies are on hand in the room now.

Item 7. Emergency Kits and Survey Instrumentation

This entire area will be reviewed during a future inspection.

Response: All station emergency kits are complete at this time, with the exception of the Field Monitoring Team kits.

Item 8. Area and Process Radiation Monitors

- a. Complete the installation, calibration, and preoperational tests of the area radiation and process monitors including the appropriate identification of same in the Control Room.

Response: The Area and Process Radiation Monitoring System shall be operational and calibrated (Unit #1) prior to Fuel Loading.

- b. Complete the high-range containment and steam-line monitor installations, calibrations, and preoperational tests.

Response: The Containment High Range Radiation Monitor will be a part of the Area Radiation Monitoring System to be operational by Fuel Load, the Steam Line Monitor will be installed and operational by Fuel Load.

- c. Establish a technical basis for the alarm settings of ARM's, high-range containment and steam-line monitors for Site Area and General Emergencies.

Response: The technical basis for alarm settings of radiation monitors for high-range containment and steam-line monitors is contained in Catawba procedure HP/0/B/1000/10.

- d. Establish the posting of the EAL's for Site Area and General Emergencies on or near the containment, steam-line and other area radiation monitor readouts that are used as backups for the containment monitors.

Response: The posting of Emergency Action Levels (EAL's) for emergency classes will be considered.

Item 9. Non-Radiation Process Monitors

This entire area will be reviewed during a future inspection.

Response: All systems required by Technical Specifications for entry into Mode Six (6) operation shall be operable prior to Fuel Loading.

Item 10. Meteorological Instrumentation

- a. Install, make operational, and calibrate the meteorological tower sensors and the remaining required equipment, including connections to the Control Room recorders.

Response: The Catawba meteorological system (EEB) will be operational and calibrated prior to Fuel Loading.

- b. Ensure that the NOAA radio is installed and operational in the Control Room.

Response: The NOAA Weather radio is on hand and will be installed prior to Fuel Loading.

- c. Establish a program to verify that data availability goals are met.

Response: Catawba Instrument Procedures (IP's) are written to test and calibrate instrumentation such as the EEB system and will be available for use prior to Fuel Loading.

- d. Ensure that the equipment is installed and operational, procedures are issued and implemented, and personnel are trained in the transfer of data from the OAC system to the VAX system.

Response: The EEB system will be complete and operational by Fuel Loading, procedures will be developed and personnel will receive training as appropriate.

Item 11. Respiratory Protection

This entire area will be reviewed during a future inspection.

Response: The Respiratory Protection Program will be complete prior to Fuel Loading.

Item 12. General Content and Format of Procedures

Complete all abnormal procedures (AP's), emergency operations procedures (EOP's) and Emergency Plan Implementing Procedures (EPIP's).

Response: Catawba Operations Group are developing AP's and EOP's by the Westinghouse Owner's Group Guidelines and the EPIP's will be developed by Catawba Station Directive 4.2.1.

Item 13. Emergency, Alarm, and Abnormal Occurrence Procedures

Issue approved versions of EOP's (01 and 03) and AP's (11, 17, 18, 19, and 20).

Response: All EOP's and AP's will be approved and available prior to Fuel Loading.

Item 14. Implementing Instructions

Issue all EPIP's in final, approved versions and train facility personnel in the use of these procedures.

Response: Most of Catawba Emergency Plan Implementing Procedures (EPIP's) are complete, approved and training has been done for appropriate personnel. The remainder will be complete by Fuel Loading.

Item 15. Assessment Actions

This entire area will be reviewed during a future inspection.

Response: Procedures needed for emergency situation assessment have been developed except for a few that will be developed and approved soon. Training and drills have been or will be provided to the appropriate personnel.

Item 16. Dose Projection

Complete the development of the computer software for the Class A dose assessment model and make it available for the use of dose assessment personnel.

Response: The Catawba Class A computer model for offsite dose assessment is complete and will be available for use pending the availability of station meteorological instrumentation, prior to Fuel Loading.

Item 17. Review, Revision, and Distribution

- a. Implementation of the licensee's program for an annual review and/or revision of the EP and EPIP's as provided for in PT/O/B/4600/07.

Response: Implementation of PT/O/B/4600/07, Review of Emergency Plan and Procedures, will be by Fuel Loading.

- b. Implementation of the licensee's program for verification on the phone numbers listed in the EPIP's as required by procedure PT/O/B/4600/05.

Response: PT/O/B/4600/05, Coordination of Communications, is implemented at this time.

Item 18. General Public

- a. Disseminating the emergency plan booklets to the general population and other specified groups.

Response: The Catawba EP brochure has been distributed to the general population and has been installed in various other locations for the public and transients.

- b. Placing emergency signs at boat docks and other applicable locations.

Response: Signs containing emergency instructions at boat docks and other recreational areas will be complete by Fuel Loading.

Item 19. Walk-through Observations

This entire area will be reviewed during a future inspection.

Response: Training and practice drills have been completed to prepare CNS Emergency Response personnel for walk-through observations.

NPR IMPLEMENTATION - FINAL CHECKLIST

NPR CP - _____ Rev. _____ Assigned By (Initial/Date) _____ SRC Date _____

Verbal NPR

Design Approval Date _____
CNS Mgr. Approval Date _____
Work Request No. NSM _____
Work Request Issue Date _____
Work Request Returned Date _____

General Office NPR

CNS Approval Date _____
Design Returned Date _____
Action Taken (Status) _____
Memo to NPR Station Contact (if required)
Issue Date _____
Returned Date _____

V. NPR Package Submittals

@ Detailed Design & Verbal Approval

Copy to Approver(s) _____
Copy to Robert Morgan _____

@ Work Request Submittal

Copy to Planning _____
Requires Typed Pencil Requisition _____
Copy to Operational Control Group _____
Copy to Performance Group _____

@ Completion of Work

Copy to Construction _____
(as noted by Sta. Coord.)
Copy to Training Supervisor _____
(w/cover letter)
Copy to Al Franklin _____
(w/cover letter)
Copy to Bill Graves _____
(w/cover letter)
Copy to Jimmy Cox _____
(w/cover letter)
Copy to Gerald Smith _____
(w/cover letter)
Copy to Document Control _____
(w/cover letter)
Copy to Chuck Jensen _____
(w/cover letter)
Copy to Robert Sharpe _____
(w/cover letter-only if FSAR Rev. Req'd)
Copy to Ron Clemmer _____
Copy to Margaret Draus _____
Copy to Originator _____
Copy to Don Rogers _____
Copy to NPR File _____

G.O. NPR Package Submittals

Copy to: Al Franklin
Bill Graves
Jimmy Cox
Gerald Smith
Chuck Jensen
(w/cover letter) _____
Copy to: Ron Clemmer _____
Copy to: Margaret Draus _____
Copy to: Originator _____
Copy to: Don Rogers _____
Copy to: NPR File _____