UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 101 MARIETTA STREET, N.W. ATLANTA, GEORGIA 30323

Official

JAN 17 1992

MEMORANDUM FOR: William 1

William H. Rankin, Chief

Emergency Preparedness Section

FROM:

SUBJECT:

James L. Kreh, Radiation Specialist Emergency Preparedness Section

Emergency

REVIEW OF REVISION 11 TO EMERGENCY PLAN FOR

CRYSTAL RIVER UNIT 3 DOCKET NO. 50-302

I. BACKGROUND

By transmittal letter dated July 23, 1991, Florida Power Corporation submitted Revision 11 (dated July 12, 1991) to the Radiological Emergency Response Plan for the Crystal River Unit 3 Nuclear Power Plant. Notwithstanding the fact that this submittal encompassed all pages in the Plan, only a few changes were made. These were primarily administrative in nature, and included changes in titles and reporting status in the normal corporate organization. Certain changes were found to be of a substantive nature and were reviewed for their impact on the effectiveness of the Plan and/or their potential safety significance. Only these substantive changes are discussed in Section II below; all other changes in the subject revision were determined to be nonsubstantive and without impact on the effectiveness of the Plan.

II. EVALUATION OF SUBSTANTIVE CHANGES

Table 14.1 (page 14-8)

This table, entitled "Guidelines for Recommended Protective Actions for Gaseous Plume Exposure," was revised to revert to an approach that was similar to that used in Revision 9 of the Plan. According to the licensee, the Revision 10 version of the protective action recommendation (PAR) guidelines was found to be confusing for Operations personnel. The specific changes were as follows:

Under Plant Conditions, Item 4 (viz., significant radioactivity in containment but no projected containment failure and no release underway), the PAR for 2-5 miles was changed from "Evacuate Downwind Sectors and Shelter Remaining Sectors" to "Evacuate 360°."

- Under Offsite Dose Estima****. Items 5, 6, and 7, the statement "Dose to the population is projected to be" was changed to "Dose at the 0.83 mile site boundary is projected to be."
- Under Offsite Dose Estimates, Item 6, the PAR for 2-5 miles was changed from "Shelter Downwind Sectors" to "Evacuate Downwind Sectors and Shelter Remaining Sectors."
- The uble-asterisk footnote was changed to remove the guidance regarding the use of the projected dose for the distance listed in the PAR columns. This guidance was replaced by an explanation that the PARs are initial recommendations based on projected doses at the 0.83 mile site boundary.

Comment: All of the changes listed above either clearly increased the conservatism of the licensee's PAR scheme or improved the user-friendliness of Table 14.1. These clinges do not decrease the effectiveness of the Plan.

III. SUMMARY AND CONCLUSION

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Based upon review of the subject revision, the undersigned determined that all of the changes therein were consistent with the provisions of 10 CFR 50.54(q), 10 CFR 50.47(b), Appendix E to 10 CFR Part 50, and Section II of NUREG-0654. The letter to the licensee will convey this finding.

James L. Kreh