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

JAN 16 1992

MEMORANDUM FOR: William H. Rankin, Chief
Emergency Preparedness Section

FROM: Alphonsa Gooden, Radiation Specialist
Emergency Preparedness Section

SUBJECT: PLANT FARLEY EMERGENCY PLAN REVIEW, REVISION 19, DOCKET NOS. 50-348 AND 50-364

I. BACKGROUND

The licensee submitted Revision 19 to the Farley Plan dated August 16, 1991. The majority of the changes were administrative in nature and will not be discussed below as substantive changes. Examples in this category were: APCo Nuclear Generation Corporate Office was replaced with Southern Nuclear Operating Company (abbreviated SNC); title changes; change in procedure title and/or number; and various sections of the Emergency Plan were re-written for clarification and grammatical improvements.

II. SUBSTANTIVE CHANGES

A. Section III. Emergency Facilities and Equipment

Page 45, Section B.12, Telecopier

This section was revised to reflect the additional telecopier locations. Previously, telecopier locations were limited to the TSC and EOF. The revision reflect telecopiers are located at the TSC, EOF, EOC, Alabama Radiation Control Division, GEMA, Houston County Emergency Management Agency and Early County Emergency Management Agency.

Comment: This change involving additional communications capability with various offsite locations is considered an increase in Plan effectiveness.

B. Section IV. Assessment Actions and Protective Measures

1. Page 63, Section A.1.b.10) Notification of Unusual Event

This section involving an EAL was reworded. The previous EAL stated, Hazards experienced onsite or within one mile of the site boundary which could affect plant operations, such as:

a) Aircraft crash,
b) Explosion or fire,
c) Release of toxic gas,
d) Release of flammable gas

The revised EAL reads, Hazards experienced onsite or within one mile of the site boundary which could affect plant operations, such as:

a) Aircraft crash,
b) Explosion,
c) Fire affecting a safety related or a non-safety related nuclear processing system,
d) Fire or explosion affecting safe shutdown capability,
e) Release of toxic gas,
f) Release of flammable gas

Comment: This change appears to provide clarification and guidance in determining if a fire or explosion affects the plant operations. This change is considered a Plan improvement in event classification resulting in an increase in the effectiveness of the Plan.

2. Page 66, Section A.2.b.8) Alert

The EAL addressing loss of any function needed for plant cold shutdown was revised to provide clarification. The previous EAL stated, Loss of both trains of:

a) Auxiliary feedwater (Modes 1-3) or
b) RHR (all modes), or
c) CCW (Modes 1-4), or
d) Service water (Modes 1-4)

The revised EAL reads, Loss of:

a) All auxiliary feedwater (Modes 1-3), or
b) Both trains of RHR (all modes), or
c) Both trains of CCW (Modes 1-4), or
d) Both trains of service water (Modes 1-4)

Comment: The reworded conditions appear to continue and meet the intent of item 10 from NUREG-0654, Appendix 1, regarding complete loss of any function needed for plant cold shutdown. Therefore, this change is a Plan revision that neither increase nor diminish the effectiveness of the Plan.

3. Page 72, Section A.3.c.3) Site Area Emergency

Additional wording was added to this section regarding protective action recommendations. Previously, under actions in response to a Site Area Emergency, no reference was made to providing protective action recommendations to State authorities.

Comment: The addition of this information to ensure that PARs are provided to States following the declaration of a Site Area Emergency, is considered a Plan improvement item that enhances the effectiveness of the Plan.

4. Page 74 Section A.4.c.2) General Emergency

Under response to a General Emergency, the protective action recommendation to "shelter" was changed to "evacuate."

Comment: This change is considered a Plan update to ensure consistency with federal guidance and NRC guidance as presented in NUREG/BR-0150, Vol. 1, Rev. 1 for PARs during severe reactor accidents. Plan effectiveness is not affected by the aforementioned change.

5. Page 79, Section C.1.c Contamination and Exposure Control Measures

Under levels of permissible radioactive contamination for personnel and equipment, contamination levels were changed. Previously, the levels of permissible radioactive contamination for personnel and equipment inside the radiation controlled area (RCA) during an emergency was 1000 dpm/scan beta-gamma and 5000 dpm/100 cm^2 beta-gamma. The revised levels are <5000 dpm/100 cm^2 personnel; and for equipment, ND GMT/100 cm^2 (smearable) and <.25 mr/hr (fixed).

Comment: The reviewer liscussed the above change with both licensee personnel and NRC Region II FRP personnel (R. Shortridge) onsite during the period January 7-9, 1992. Based on the discussions and review, this change appears to be merely a Plan update to reflect NRC guidance promulgated in an IE Circular (81-07) issued May 14, 1981. Consequently, this change has no impact on Plan effectiveness.

6. Page 80-81, Section C.2.b, Response

Section involving protective actions to be recommended to State authorities following event classification was revised. For General Emergency, PARs were changed from shelter, to evacuate zone A (two mile radius) and five miles downwind zone B, and shelter the remainder of plume EPZ and locate and evacuate hot spots. PARs for the Site Area and Alert classification were changed to be based on plant conditions or projected dose at the discretion of the Emergency Director (ED).

Comment: This change is considered a Plan improvement and update to ensure consistency with federal guidance and NUREG/BR-0150, Vol. 1, Rev. 1 for PARs following severe reactor accidents.

C. Section V. Activation of Emergency Organization

Page 88, Section C, Offsite Corporate Organization Activation

The third paragraph was revised to reflect a change from activate the EOF "to complete the setup of the EOF". The previous wording indicated that, upon arrival at the plant site, the Recovery Manager and other members of the offsite corporate organization (eg. Dose Assessment Director, Administrative Support Director, etc.) activate the EOF and assume the functions described in Section II of the Plan. The revision indicates: upon arrival at the plant site, the Recovery Manager.... complete the setup of the EOF and assume the functions described in Section II of the Plan.

Comment: The reviewer discussed the referenced change on January 8, 1992, with a member of the licensee's staff (Tony Livingston). According to the licensee contact, this change was made for clarification to reflect activity following the arrival of corporate office personnel which includes: a) request for plant staff to augment various positions as needed, b) check-list implementation; and c) review of conditions and incident status. The aforementioned items according to the licensee are considered setup items and must be completed prior to facility activation. The reviewer evaluated this change and determined that in light of current efforts by Region II, NRR, and Farley to revise the activation time (four hours) this change will not affect Plan effectiveness.

III. SUMMARY AND CONCLUSION

Based on the review of Revision 19 to the Farley Emergency Plan, the reviewer has determined that the changes were consistent with the provisions of 10CFR 50.54(q), 10CFR 50.47(b), 10CFR 50, Appendix E, and NUREG-0654. The letter to the licensee should reflect this.

Alphonsa Gooden

Alphonsa Gooden

cc: C. Banks