

SEP 14 1984

Docket No: 50-54

Union Carbide Corporation
ATTN: Mr. James J. McGovern
Business Manager, Radiochemicals
P. O. Box 324
Tuxedo, New York 10987

Gentlemen:

Subject: Emergency Preparedness Appraisal 50-54/84-03

The Nuclear Regulatory Commission is conducting a special appraisal at research and test reactors to verify that licensees have attained an adequate state of on-site emergency preparedness. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives of the appraisal at each facility are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements, but also for considering improvements in NRC requirements and guidance.

During the period of July 23-26, 1984, the NRC conducted an appraisal of the emergency preparedness program for the Union Carbide Nuclear Facility. Areas examined during this appraisal are described in the enclosed report (50-54/84-03). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, reviewed sections of the Emergency Plan, interviewed personnel and conducted walk throughs.

The findings of the emergency preparedness appraisal at the Union Carbide Nuclear Facility indicate that the emergency preparedness program is capable of providing reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Although the appraisal team did not identify any significant deficient areas with the emergency preparedness program, fourteen improvement areas have been identified in Appendix A, "Emergency Preparedness Improvement Items". Although we recognize that an explicit regulatory requirement pertaining to each item identified may not exist, you are requested to submit a written statement to this office within thirty (30) days of the date of this letter, describing the results of your consideration of each of the items. The description should include: (1) actions which have been taken; (2) actions which will be taken; and (3) a schedule for completion of actions for each item.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office,

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by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 10 CFR 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10-day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

Your cooperation with us in this matter is appreciated. Should you have any questions concerning this appraisal, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

R. BELLAMY

Jr Thomas T. Martin, Director
Division of Engineering and
Technical Programs

cc w/encl:

W. G. Ruzicka, Manager, Nuclear Operations
D. D. Grogan, Manager, Radiochemical Production
C. J. Konnerth, Manager, Health, Safety and Environmental Affairs
Public Document Room (PDR)
Local Public Document Room (LPDR)
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APPENDIX AEMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Union Carbide Nuclear Facility conducted July 23-26, 1984, the following items should be considered for improvement: (References are to Sections in the NRC Region I Inspection Report No. 50-54/84-03:

1. Identify within the emergency plan or implementing procedures as to which emergency director responsibilities cannot be delegated (See Section 1.1).
2. Provide written guidance for the Public Information Officer in regard to issuance of information in the event of an emergency (See Section 1.1).
3. Additional training is needed by members of the emergency organization as to the contents of the emergency plan and the interactions with various members of the organization (See Section 1.1).
4. Update letters of agreement with offsite emergency support organizations (See Section 1.2).
5. Obtain a letter of agreement with local ambulance services (See Section 1.2).
6. Complete initial training of all offsite support organizations and provide for periodic retraining and participation in emergency drills (See Section 1.2).
7. The emergency call list should show calls to Tuxedo and State Police in the event of a civil disturbance (See Section 2.1).
8. Provide a reliable backup communication means for notifying offsite organizations (See Section 2.1).
9. Provide a means for reliable meteorological instrumentation and designate a backup system or method for determining wind speed, wind direction and stability class (See Section 2.2).
10. Eliminate Section 7.2.3 of the emergency plan which discusses methodology for calculating whole body dose rate at the site boundary based on in-plant radiation monitor readings (See Section 2.2).
11. Provide emergency action levels within EP-02 and EP-03 for the stack monitor which will trigger notification of the Radiological Assessment Team Leader (See Section 2.2).
12. Provide a statement in each emergency procedure as appropriate which would require the Emergency Director to classify the emergency using guidance in Tables 5.1 - 5.3 of the emergency plan (See Section 2.2).

13. Provide means to control access to the site in the event of a site evacuation (See Section 2.4.1).
14. Develop a formal training/retraining program for emergency response personnel (See Section 3.1).