



December 15, 1995
NRC-95-0132

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Submittal of Revisions 15 and 16 to the Fermi 2 Radiological
Emergency Response Preparedness Plan

Pursuant to 10 CFR 50.54(q), Detroit Edison hereby submits Revisions 15 and 16 to the Radiological Emergency Response Preparedness Plan.

Revision 15 deleted reference to the Control Room Closed Circuit Television system from the RERP Plan description of the Technical Support Center Facility. The change is the result of revision to the UFSAR which deleted this obsolete system.

Revision 16 is the result of the 1995 annual RERP Plan review. It includes administrative-type changes such as revising the Emergency Response Organization (ERO) to reflect changes within the Nuclear Generation and Corporate Organizations, and personnel assignments and responsibilities within the ERO. It also incorporates previously approved changes to the UFSAR into the RERP Plan (changes to communications systems, and the site wide adoption of conduct manuals which replaced administrative procedures), and editorial changes to text. Changes to reflect offsite agency changes were also included. This revision also includes the reformatting of text to a new type.

Revisions 15 and 16 to the RERP Plan have been reviewed in accordance with 10 CFR 50.54(q) and approved by the Onsite Review Organization in accordance with Technical Specification 6.5. The changes made in these revisions are described in Enclosures 1 and 2, "Effectiveness Review Documentation," and do not decrease the

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effectiveness of the plan. The Plan, including Revisions 15 and 16, continues to meet the requirements and standards of 10 CFR 50.47(b) and 10 CFR 50, Appendix E. Enclosure 3 is an uncontrolled copy of the Revision 16 pages that include page H-2 as revised under Revision 15. Revision bars mark the changes, and denote the revision 15 change on page H-2.

This information is being submitted in accordance with 10 CFR 50.4(b)(5)(ii). In addition, controlled copies of Revision 16 (including Revision 15) have been sent under separate cover to the NRC Document Control Desk, the Region III Incident Response Center, and the Site Inspector.

If you have any questions, please contact Mr. Hari O. Arora at (313) 586-4213.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

Enclosures (3)

cc: T. G. Colburn
M. J. Jordan
H. J. Miller (2 copies)
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EFFECTIVENESS REVIEW DOCUMENTATION
 RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN, REVISION 15

Document RERP Plan Revision 15		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
Sect H/Page H-2	Delete reference to closed circuit television (CCTV) from description of TSC to agree with facility description in the UFSAR as revised by LCR 95-115-UFS.	<p>UFSAR 7.8.2.9 lists CCTV as one of multiple TSC information systems. The information which may be determined with these systems is listed as items 'a' through 'i' of this section. With CCTV removed the TSC still maintains the ability to determine all of the listed information.</p> <p>10 CFR 50, App. E, Article IV.E.8 requires a TSC from which effective direction and control can be exercised. Removal of CCTV does not compromise TSC direction and control functions since the remaining information systems continue to fulfill the facility information gathering capabilities listed in the UFSAR. On this basis the change does not reduce the effectiveness of the plan, and the criteria for the program continue to be met.</p>

EFFECTIVENESS REVIEW DOCUMENTATION
 RADIOLOGICAL EMERGENCY RESPONSE PREPAREDNESS PLAN, REVISION 16

Document		
RERP Plan Revision 16		
Listed below is each change by section and page, the reason for the change, and the basis for concluding that the revised plan or program continues to satisfy the criteria for that plan or program.		
Section/Page	Change	Basis
A.1/A-1 A.2/A-1,2,3 B.1.1/B-1 B(table B-1)/B-4 G/G-2 H.1.3/H-3 H(table H-1)/H-9 H(table H-6)/H-14 I.1/I-1 I.3.1.1/I-3 I.3.1.1.1a/I-4 K.1.1/K-1 K(table K-1)/K-5 M.1M-2 N.2.1/N-1 O.1/O-1 Appendix 5/5-2,7,8,10	clarifications, title changes and grammatical corrections	Editorial changes which constitute no change in content or intent of the RERP Plan. These changes have no impact on regulatory requirements of 10 CFR 50.47 and 10 CFR 50, Appendix E. Therefore the effectiveness of the Plan is not reduced and the planning standard continues to be met.
A.2/A-1,2	Added "State of Emergency" to time the provisions of Act 390 are invoked by the Governor of the State of Michigan and time when the state emergency plan is activated.	10 CFR 50, App. E, A.8 requires identification of state officials responsible for ordering offsite activities. This change more accurately addresses this requirement by including all times when this responsibility would be invoked. Therefore the effectiveness of the plan is not reduced and the planning standards continue to be met.

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Figure A-3/A-9,10 Figure A-4/A-11 Figure A-5/A-12 Figure A-6/A-13	Updated tables showing assignment of Emergency responsibilities within the State of Michigan (A-3), Monroe County (A-4), and Wayne County (A-5) to reflect most current organization of government, and updated table (A-6) to show relationships between EOCs and include the Federal Radiological Monitoring and Assessment center.	10 CFR 50, App. E, IV.A.7 requires identification of, and expected assistance from appropriate state and local agencies with responsibilities for coping with emergencies. The plan as changed accurately reflects the assignment of emergency responsibilities within the state, county and federal agencies. Therefore the effectiveness of the plan is not reduced and the planning standard continues to be met.
B (Table B-2)/B-5 through B-14 M.2/M-5 M (Figure M-1)/M-7	Updated listing of Nuclear Generation Organization positions to reflect new personnel assigned to the ERO and changes in Nuclear Generation positions. These are organizational changes that do not change any regulatory staffing requirements.	10 CFR 50, Appendix E, IV.A.2 requires a description of ERO including plant staff emergency assignments. This update reflects current staffing and continues to meet the requirement. On this basis, the effectiveness of the RERP Plan is not reduced, and the planning standard continues to be met.

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F.1.2/ F-2 F.3/F-5 F(Figure F-2)/F-7	Reflect removal of direct ring telephone circuit from EOF to General Offices (GO) and designated facsimile machine from GO. These changes represent a scaling back of the General Office Employees Communication Center (GOECC) function.	The GOECC was intended as a vehicle for communicating emergency status to non-Fermi 2 Detroit Edison employees. There is no regulatory requirement for such a function in 10 CFR 50.47 or Appendix E, and such communications are not necessary to implement the objectives of the RERP Plan. On this basis, the effectiveness of the RERP Plan is not reduced, and the planning standard continues to be met.

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<p>F (Figure F-1)/F-6 F (Figure F-3)/F-8</p>	<p>Update Emergency Communications Network drawing to incorporate LCR-95-008-UFS, and add Figure F-3 "Personnel in charge of Communications Links at Fermi 2, Monroe County, Wayne County, and the State of Michigan" to identify personnel in charge at each end of the communications links</p>	<p>10 CFR 50, App. E.9, requires that personnel in charge and their backup at each end of the communications links be identified, and that the backup and primary means of communications be identified. Figure F-1 illustrates the interface of the telephone systems between the ERO facilities and offsite. This change was previously approved for the UFSAR by LCR 95-115-UFS. The addition of Figure F-3 more effectively identifies communications links. The changes represent no reduction in the effectiveness of the plan, and the planning standard continues to be met.</p>
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H.3.2/H-7	Deleted references to the State of Michigan mobile laboratory.	10 CFR 50, Appendix E, IV.E.2 requires adequate equipment for determining the magnitude of and continuously assessing the impact of the release of radioactive materials to the environment. Available laboratories with adequate equipment and supplies continue to meet 10CFR50 requirements and are presently described in the plan. Therefore the change does not reduce the effectiveness of the plan and the planning standard continues to be met.
Table H-3/H-11 Table H-5/H-13	Updated I.D. numbers and locations to match revised Central Components (CECO) database information.	10 CFR 50, Appendix E, IV.E.2 requires equipment for determining the magnitude of and continuously assessing the impact of the release of radioactive materials to the environment. Tables H-3 and H-5 have been updated with the CECO database locations and panel ID numbers, to more accurately identify detectors. The actual location and instrumentation has not changed, therefore the change does not reduce the effectiveness of the plan and the planning standard continues to be met.

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<p>I.3.1.1.2/I-6</p>	<p>Changed the Emergency Response Information System (ERIS) dose assessment description to indicate the values from the stack effluent monitors, Containment High Range Radiation Monitors, and the meteorological computer are automatically gathered by the system vice "hard wired" and deleted dose projections as stored information. These changes are clarifications only to more accurately describe ERIS dose assessment features.</p>	<p>10 CFR 50, Appendix E, IV.E.2 requires equipment for determining the magnitude of and for continuously assessing the impact of the release of radioactive materials to the environment. The change more accurately describes these capabilities and continues to meet the requirements. Further, these clarifications reflect no change to the ERIS dose assessment software. On this basis, this change does not reduce the effectiveness of the RERP Plan and the planning standard continues to be met.</p>
<p>J.2/J-2</p>	<p>Changed method of emergency notification to the Fermi Information Center, GTOC, TAC, NOC, and Fermi 1 to HiCom. These facilities, outside the Protected Area, have HiCom capabilities and do not require announcements via telephone</p>	<p>10 CFR 50, Appendix E, IV. C requires the entire spectrum of emergency conditions that involve the alerting or activating of progressively larger segments of the total emergency organization shall be described. This change clarifies onsite alerting capabilities to various onsite facilities and continues to meet the requirements. Therefore, this change constitutes no reduction in the effectiveness of the RERP Plan and the planning standard continues to be met.</p>

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Table B-2/B-6 J.3/J-3 K.1.1/K-1	Changed the responsible authority for Potassium Iodide (KI) distribution from the Detroit Edison Medical Staff Physician to the Emergency Director. This change, as advised by Corporate Health and Safety Services, gives the Emergency Director the authority to distribute non-prescription strength KI without receiving prior authorization from a Detroit Edison Corporate Physician.	10 CFR 50, Appendix E, IV. A. 2a requires a description of the onsite emergency response organization with a detailed description of authorities, responsibilities, and duties of individuals who will take charge during an emergency. This change describing the new responsibility of Emergency Directors to authorize use of KI continues to meet the requirements. On this basis, this is not a reduction in the effectiveness of the RERP Plan and the planning standard continues to be met.

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K.2/K-2	Changes made throughout entire section to clarify dosimetry issuance and record keeping, update administrative procedural changes, and include the capability to assess internal dose.	10 CFR 20.2106 states the requirements for maintaining records of doses received by all individuals as required pursuant to 20.1502, and records of doses received during planned special exposures, accidents, and emergency conditions. These changes, clarifying the Radiation Protection dosimetry program, continue to meet the requirements. Further, these changes do not affect the capabilities for controlling radiation exposure for both routine and emergency workers. On this basis, this change constitutes no reduction in the effectiveness of the RERP Plan and the planning standard continues to be met.

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Appendix 3/3-3, 4 Appendix 4/4-3	Revised the list of procedures and procedural references due to changes in procedure identification as part of the site implementation of manuals from administrative procedures.	10 CFR 50, Appendix E. V requires implementing procedures be established for the emergency plan. There is no requirement for the procedures to be listed in the Plan. The changes reflect a more accurate listing of procedures for inclusion in the plan. This change has no impact on regulatory requirements of 10 CFR 50.47 and 10 CFR 50, Appendix E. Therefore the effectiveness of the Plan is not reduced and the planning standard continues to be met.

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ENCLOSURE 3 TO

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RERP PLAN, REVISION 16 (INCLUDING REVISION 15)