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SHIELDS L. DALTROFF
VICE PRESIDENT
ELECTRIC PRODUCTION

September 26, 1984

Re: Docket Nos. 50-352
50-353

Dr. Thomas E. Murley
Region I
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Limerick Generating Station
Units 1 & 2 Emergency Plan Revision

Reference: Appraisal No. 50-352/84-18
Letter dated August 14, 1984
T. T. Martin to J. S. Kemper

Gentlemen:

Enclosed are draft page changes to incorporate plan changes as discussed in Emergency Preparedness Appraisal 50-352/84-18-10 and 50-352/84-18-32. These changes will be incorporated as indicated in the revision scheduled for October 1984.

In response to 50-353/84-18-04, Philadelphia Electric has designated the Technical Engineer as the secondary alternate for the Emergency Director. This plan change will be reflected in the plan changes addressed in 50-352/84-18-03.

A045
1/1

If you have any questions regarding this, please contact us.

Very truly yours,

Original signed by
W. T. DALTROFF

Attachment

cc: Site Inspector-Limerick Generating Station

See Attached Service List

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

cc: Judge Lawrence Brenner
Judge Peter A. Morris
Judge Richard F. Cole
Judge Christine N. Kohl
Judge Gary J. Edles
Judge Reginald L. Gotchy
Troy B. Conner, Jr., Esq.
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Atomic Safety & Licensing Appeal Board
Atomic Safety & Licensing Board Panel
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James Wiggins
Timothy R. S. Campbell

8.0 MAINTAINING EMERGENCY PREPAREDNESS

Personnel and equipment shall be maintained in a state of preparedness to ensure that the provisions of this Emergency Plan and implementing procedures can be accomplished in emergency conditions. This section describes the means to achieve and maintain this preparedness and the means to maintain this Emergency Plan and implementing procedures.

Personnel are assigned, in this Emergency Plan, to emergency organization positions in a manner to benefit from their previous experience and training and from the expertise needed in their normal responsibilities. Therefore, qualification to assume an emergency organization position is met by virtue of holding the designated position in the Corporate or plant staff organization and by completion of the training required by Table 8-1.

8.1 ORGANIZATIONAL PREPAREDNESS

8.1.1 TRAINING

The objectives of training are:

a) To familiarize personnel with the contents and manner of implementation of the Emergency Plan and the implementing procedures;

b) To train personnel with respect to the performance of the specific duties assigned to them in the Emergency Plan and in applicable implementing procedures;

c) To keep personnel informed of any changes in the Emergency Plan and the implementing procedures; and

d) To maintain a high degree of preparedness at all levels of the Emergency Plan response organization.

To accomplish these objectives, the initial training and periodic retraining described in Table 8-1 shall be performed. Many emergency response positions filled by corporate support personnel use the same individuals for both Limerick and Peach Bottom Atomic Power Station. In such cases, training credit for tasks and functions which are common to both plants may be coordinated. Functions which are unique to Limerick will be covered in coordinated programs or specific sessions for Limerick will be used. Training and qualification for job positions, such as Licensed Operator, Chemistry Technician, and Health Physics Technician, ~~and General Employee Training~~ are recognized as a base upon which the specific Emergency Plan training described in Table 8-1 may be built. Practical training

and hands-on demonstration of required skills are parts of the training and qualifications for job positions. Where such skills are used in both routine and emergency functions, skill demonstrations are not covered in Table 8-1.

Insert (1)

Training of local support service personnel (ambulance, physicians, and fire company) who may enter the site to perform emergency tasks is provided by Philadelphia Electric Company. This training is also described in Table 8-1.

8.1.2 DRILLS AND EXERCISES

Emergency drills and exercises have the following objectives:

a) To test the adequacy of the effectiveness, timing, and content of implementing procedures and methods;

b) To test emergency equipment and communication networks including the public notification system;

c) To ensure that the emergency organization personnel are familiar with their duties and responsibilities.

Drills and exercises will be conducted as realistically as is reasonably possible. Preplanned descriptions or scenarios for drills and exercises will be prepared to define the objectives and methods and to form a basis for evaluating adequacy of performance. Scenarios will identify the simulated events, describe the expected response by the emergency organization including a sequence of events or timing if applicable, and provide for observer(s). Advance material, information, or training to be provided to official observers and evaluators will be noted. Scenarios may be developed in such a manner as to accomplish more than one periodic requirement. For example, an annual emergency exercise scenario may include a simulated radiation/ medical casualty and, therefore, fulfill two exercise/drill provisions. Scenarios for annual exercises are submitted to NRC for review of adequacy of scenario and expected response.

Records of exercises and drills, including dates, times, places, and participants as appropriate, shall be developed and maintained. Critiques of exercises and drills will be held and written evaluations will be prepared. Federal and State observers or evaluators will be invited to critiques of exercises in which they participated as observers or evaluators. As indicated by evaluation, weak areas in training, procedures, or equipment will be identified in the written evaluation.

Attachment

Insert No. 1

General Employee Training (GET) provides annual training for those persons needing unescorted plant access and covers: fire prevention/protection; fire and medical emergencies; evacuations.

TABLE 8-1 (Page 1 of 9)

INITIAL TRAINING AND PERIODIC RETRAINING (1)

PERSONNEL CATEGORY/POSITIONS	INITIAL TRAINING AND PERIODIC RETRAINING
1. Directors of plant emergency organization: Interim Emergency Director and Emergency Director Station Superintendent Assistant Station Superintendent Shift Superintendents Shift Supervisors (Federal, State and County emergency management coordinators are invited to attend	Initial Training: Instruction in scope, organization, responsibilities, and functions of this Emergency Plan and associated implementing procedures. Command authority, emergency classification, and communication/notification methods are emphazised. Annual Retraining: Review of areas covered by initial training with emphasis on changes in the Emergency Plan and associated implementing procedures since the previous training period.
2. Personnel responsible for assessment activities and plant technical support: Station Superintendent Assistant Station Superintendent Engineer-Operations Engineer-Technical Senior Chemist Senior Health Physicist Applied Health Physicist Support Health Physicist Shift Superintendents Shift Supervisors Shift Technical Advisors	Initial Training: In addition to the topics listed under Initial Training for Item 1 above, initial training will emphasize the instruments and implementing procedures used for projecting radiological consequences. Activation of the various emergency centers and control of radiation survey teams are included. Annual Retraining: Review of areas covered by initial training with emphasis on changes in the Emergency Plan, associated implementing procedures, and equipment associated with assessment since last training period.

Attachment

TABLE 8-1 (Cont'd)

PERSONNEL CATEGORY/POSITIONS	INITIAL TRAINING AND PERIODIC RETRAINING
13. Chemistry Sampling and Analysis Team: Senior Chemist Assigned Chemistry Tech's Assigned Plant Staff members	Initial Training: Activation and notification. Sampling and analysis equipment and procedures. Anticipated results under emergency conditions. Annual Retraining: Same as Initial Training with emphasis on equipment and associated procedure changes since the last training period.
14. Operations Support Center Coordinator: Assigned Plant Staff members Shift personnel	Initial and Annual Training: Activation and purpose of the OSC. Communications and record-keeping. Associated implementing procedures.
15. Dose Assessment Team Senior Health Physicist Support Health Physicist Physicist, Dosimetry and Bioassay Physicist, Radioactive Materials and Radwaste Shipping Physicist, Respiratory Protection and Radwaste Clothing Administration Physicist, Special Projects Dosimetry, Techincal Assistant	Initial Training and Annual Training Training with emphasis on equipment and procedures used for projecting radiological consequences.

(1) all personnel requiring unescorted access to LGS will have General Employee Training (GET) which covers: fire prevention/protection; fire and medical emergencies; evacuations

in the Technical Support Center or in a temporary facility such as a trailer.

b) Training. In-coming support personnel would be given indoctrination in topics such as plant layout, security, access limitations, dosimetry requirements, and other areas related to their support functions.

c) Dosimetry. Dosimetry appropriate for the individual's support function would be issued and applicable records initiated to control exposures. Statements of exposure history would be requested.

d) Security. Authorized support personnel would be issued passes or other identification to identify escort requirements or access limitations, such as access only to the Technical Support Center or to the plant.

e) Facilities for medical aid, sample preparation and analysis, instrumentation calibration and repair, food preparation, and sanitary facilities are designated as shown in Figure 7-1.

7.1.6 PECo Headquarters Emergency Support Center

The PECo Headquarters Emergency Support Center (HESC) located at the Philadelphia Electric Company offices at 2301 Market Street in Philadelphia. Corporate support personnel (see Section 5.0) report here when activated. The main support activities are controlled from a single floor in the building with additional personnel reporting to locations throughout the building. This center has a map of the Limerick area to enable tracking and evaluation of off-site radiological consequences. Communications with Limerick and the EOF, and access to as-built drawings, P&ID's, and plant procedures enable technical evaluation of problems by engineering personnel. The HESC is under the direction of the Emergency Support Officer and is activated at a Site or General Emergency.

7.1.7 Emergency News Center

The Emergency News Center (ENC) is located in the Philadelphia Electric Company offices in Philadelphia. The Emergency News Center will have the equipment, facilities, and documents to accommodate the media and for conducting press conferences. The Emergency News Center has communications links with the EOF and HESC. The ENC is activated at a Site or General Emergency.

at the discretion of the Emergency Director and Corporate Communications at an Alert