

RELATED CORRESPONDENCE
DOCKETED
USNRC

March 25, 1985

'85 MAR 27 A9:07

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CLEVELAND ELECTRIC ILLUMINATING
COMPANY, ET AL,

(Perry Nuclear Power Plant,
Units 1 and 2)

)
)
)
)
)
)

Docket No. 50-440 OL
50-441 OL

TESTIMONY OF DONALD J. PERROTTI
REGARDING EMERGENCY PLAN ISSUES

Q1. Please state your name and place of employment.

A1. My name is Donald J. Perrotti. I am employed by the Nuclear Regulatory Commission, in the Office of Inspection and Enforcement, Division of Emergency Preparedness and Engineering Response. I am responsible for the review and assessment of the onsite emergency plan concerning the Perry Nuclear Power Plant. My professional qualifications are attached.

Q2. Please state the purpose of your testimony.

A2. The purpose of my testimony is to address those emergency plan contentions admitted for hearing in this proceeding which in whole or part, assert deficiencies in the onsite emergency plans. Those contentions are designated A, J and CC.

8503280526 850325
PDR ADOCK 05000440
G PDR

D-507

3. Contention A:

Evacuation time estimates have not been reviewed by State or local organizations.

Q3. What information do you have concerning review of the Applicants' evacuation time estimate (ETE) study by state and local organizations?

A3. Appendix D to the PNPP emergency plan, Revision 3, entitled "Evacuation Time Estimates For Areas Near The Perry Nuclear Power Plant", March 1984, states:

"HMM Associates would like to acknowledge all those people and agencies who assisted in the preparation of this report. We feel that the quality and completeness of the report has been enhanced through their consistent effort. Specifically, the Geauga, Lake and Ashtabula County Disaster Services Agencies (DSA's) as well as the County Sheriff's Departments all provided ongoing assistance in our search for accurate and complete input data. Other agencies which contributed positively to our effort include the Lake County Planning Commission, the Mentor and Painesville Area and Ashtabula County Chambers of Commerce, and the Ohio State Highway Patrol", (PNPP emergency plan, Appendix D, p.vi).

The Applicants, in correspondence dated April 28, 1984, specified that the ETE study was currently being reviewed with State and local officials and a letter of concurrence is expected from each. On February 20, 1985, the Applicants submitted comments on the ETE from the Disaster Services Agencies of the State of Ohio and Lake and Geauga Counties and the Ashtabula County Emergency Management Agency. The staff will request that the Applicants review the comments of the local and State officials and consider incorporating the comments as appropriate into the ETE study.

Q4. Have the Applicants complied with NUREG-0654 guidance in regard to obtaining local officials' comments on the ETE?

A4. Yes. The staff finds the Applicants' response satisfactory.

Q5. Explain the requirement for comments by county engineers and provision of cost estimates.

A5. NUREG-0654 guidance calls for review of the ETE study by the principal organizations (State and local) involved in emergency response for the site and comments resulting from such review be included with the study. The guidance does not specify the individuals or offices within these organizations that should perform the review nor are cost estimates required. The intent of the guidance is to have knowledgeable State and local officials review the ETEs to ensure that they are reasonable for the site in question and furnish comments resulting from the review. As indicated in the responses above, we find that the Applicants have satisfactorily complied with the guidance in NUREG-0654 regarding review of the ETE study by State and local organizations.

Contention J:

Emergency action level indicators are incomplete in Applicants' emergency plan.

Q6. Explain your view of the Applicants' EAL indicators.

A6. Revision 4 to the PNPP emergency plan, submitted by the Applicants on

February 20, 1985, supplied the information (indicators) that was missing in the earlier version of the plan and the Applicants' emergency classification and action level scheme is now complete. Based on the staff's review to date of the Applicants' emergency classification and action level scheme, I conclude that the Applicants' emergency plan provides an adequate planning basis for an acceptable state of emergency preparedness with regard to the emergency classification system planning standard of 10 CFR 50.47 (b)(4) and NUREG-0654. The specific EALs submitted by the Applicants on February 20, 1985 are currently under review by the staff for conformance with the example initiating condition guidance of NUREG-0654, Appendix 1. The applicant will be required to correct any remaining identified discrepancies prior to licensing.

Contention CC:

The resolution items set forth by the staff in its Safety Evaluation Report, NUREG-0887, Supp. 4 (February 1984) pp. 13-1 to 13-22, are uncorrected deficiencies in the emergency plans.

- Q7. Explain the status of Applicants' emergency plan.
- A7. After SSER 4 was issued, the Applicants continued to upgrade emergency response planning and issued Revision 3 to the PNPP emergency plan by correspondence dated April 28, 1984. In addition, submittals dated August 20, 1984, October 29, 1984, and January 16, 1985, provided additional clarification and commitments. The above submittals were reviewed and

evaluated and the staff's findings were presented in SSER 5 issued in February 1985. On February 20, 1985, the Applicants submitted Revision 4 to the PNPP emergency plan in response to SSER 5 and the staff's request for additional clarification of certain planning items. The review and evaluation of the adequacy of the PNPP emergency plan (through Revision 3) and the Applicants' information and commitments provided by correspondence referenced above has been completed. All unresolved items noted in SSER 4 pp. 13-1 to 13-22 have been resolved by Revision 3 to the PNPP emergency plan or by letters of commitment. The staff is currently reviewing and evaluating Revision 4 to the PNPP emergency plan in order to confirm that the Applicants have complied with the commitments identified in SSER 5.

Q8. Please provide your conclusions regarding the adequacy of the Applicants' emergency plan.

A8. Based on my review of the PNPP emergency plan, Revision 3, I conclude that the contentions raised by the Intervenor concerning the onsite emergency plan for PNPP have been adequately addressed by the Applicants. Further, I conclude that the PNPP emergency plan provides an adequate planning basis for an acceptable state of onsite emergency preparedness in conformance with the requirements of 10 CFR 50, and Appendix E thereto. As indicated above, the specific EAL indicators are under staff review for conformance with the example initiating conditions guidance of NUREG-0654, Appendix 1, and Revision 4 to the plan is being reviewed to ensure that the Applicants have complied with previously made commitments.

DONALD J. PERROTTI
OFFICE OF INSPECTION AND ENFORCEMENT
STATEMENT OF PROFESSIONAL QUALIFICATIONS

I am employed as an Emergency Preparedness Specialist in the Emergency Preparedness Branch, Division of Emergency Preparedness and Engineering Response, Office of Inspection and Enforcement, U.S. Nuclear Regulatory Commission. I have responsibility for the review and evaluation of radiological emergency plans submitted by reactor applicants and licensees to assure that proposed plans meet the regulatory requirements and guidance of the Commission. I also function as a Team Leader and Team Member on Emergency Preparedness Appraisal Teams engaged in the onsite inspection of the implementation phase of licensee emergency programs. I observe nuclear power plant emergency drills and exercises involving State and local government response agencies and participate in inter-agency critiques. I served as the staff's expert witness for onsite emergency planning during the evidentiary hearing for the Waterford 3 operating license.

From December 1976 to October 1980 I was employed at the NRC's Region II Office of Inspection and Enforcement in Atlanta, Georgia. I was the lead inspector for Region II emergency planning inspections at nuclear power reactors and fuel facilities. My responsibilities included planning, conducting and documenting inspections of licensees' emergency plans and procedures, emergency facilities and equipment, emergency training, tests and drills, and coordination with offsite support agencies. From April 1977 to August 1978, I assisted my immediate supervisor who served as Chairman of the Federal Regional Advisory Committee (RAC) in the review of State Radiological Emergency Plans. During October 1978 I assisted in the review and approval of emergency plans for two

nuclear fuel facilities. During the period of March - August, 1979, I participated in the Commission's coverage of environmental monitoring programs at Three Mile Island, where I served as Emergency Monitoring Team Leader; in that capacity, I was responsible for coordination with State and Federal agencies engaged in measurement and evaluation of environmental radioactivity levels in the vicinity of the TMI nuclear plant.

From 1973, to 1976, I was employed at Florida Power and Light Company's Turkey Point Nuclear Power Plant, as Health Physics instructor. My duties included radiation safety training of plant personnel (general employees and technicians), special project reports such as providing background material for management comment on proposed changes to the Code of Federal Regulations, and maintaining radiation exposure records for plant personnel.

From 1953 to 1973, I served in the United States Army. As a member of the U.S. Army Engineer Reactors Group during the period 1961 - 1973, I performed a variety of jobs with varying degrees of responsibility as rank and experience were gained. Among my more responsible jobs were shift health physics technician at the PM-3A Naval nuclear power plant in McMurdo, Antarctica (1965-1966), Senior Health Physics/Process Chemistry instructor at Ft. Belvoir, Virginia (1966-1972), and Project Officer for the SM-1 Army nuclear power plant (1972-1973).

I received an Associate of Arts Degree from the New York State Regents, Albany, NY, in 1973. In addition, I attended Army service schools including Special Nuclear Weapons Disposal and the 52-week Nuclear Power Plant Operators course. I have completed the following U.S. Public Health Service courses:

- Basic Radiological Health
- Radionuclide Analysis by Gamma Spectroscopy
- Environmental Radiation Surveillance
- Analysis of Radionuclides in Water
- Occupational Radiation Protection
- Chemical Analysis for Water Quality
- Statistical Methods - Quality Control in the Laboratory
- Operational Aspects of Radiation Surveillance
- Reactor Hazards Evaluation

I attended the "Radiological Emergency Response Operations" course at the Nevada Test Site and the "Planning for Nuclear Emergencies" course at Harvard University.

I have successfully completed the NRC's Pressurized Water Reactor Technology and the Boiling Water Reactor Technology courses.

I am and have been a member of the Health Physics Society since 1974.