

**Detroit
Edison**

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EF2-72034
December 17, 1984

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission

Dear Mr. Youngblood:

Reference: (1) Fermi-2
NRC Docket No. 50-341

Subject: Response to Section 13.3 of Supplement 4 to Safety
Evaluation Report (NUREG-0798)

Subsequent to Detroit Edison's review of SSER 4 and conversations with Mr. F. Kantor (NRR-EPB), the following clarifications concerning the Fermi-2 emergency response program are provided for your review.

1) SSER 4, Section 13.3.2.2

"In response, the applicant indicated in Section B.1.2 of Revision 2 to the Fermi-2 emergency plan that it intends to comply with the 30-minute and 60-minute augmentation criteria of Table B-1 of NUREG-0654 as a goal in staffing the emergency response facilities."

Edison Response:

Section B.1.2 (Page B-2) of the Fermi-2 RERP Plan will be revised in Revision 4 to more clearly delineate Edison's commitment to the goal of 30 and 60 minute augmentation criteria of NUREG-0654. Attachment 1 reflects the planned revision which will read:

"During off hours under normal conditions, key positions (as listed in Table B-1) can be staffed within 30 minutes the majority of the time. There may be some cases, however, where up to 60 minutes may be required."

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2) SSER 4, Section 13.3.2.5

"We find that the applicant has coordinated planning efforts with offsite authorities and while it appears that the capability exists for these authorities to make prompt protective action decision to protect the public, we conclude that this item is confirmatory pending further clarification from the applicant regarding the County's response procedures."

Edison Response:

Attachment 2 provides an excerpt from the Monroe County Nuclear Facility Procedures, Appendix 1, that reflects the requested clarification.

3) SSER 4, Section 13.3.2.10

"Based on our review of EP-545, and on the applicant's commitment to revise the emergency plan to indicate that PAR's are based on plant conditions as well as dose estimates, the staff finds that this item has been resolved. We will confirm the applicants implementation of this item in a future supplement to the SER."

Edison Response:

The Fermi-2 RERP Plan will be revised to reflect that protective action recommendations will be based on "...meteorological conditions, projected potential or actual offsite doses, and/or plant conditions...". Attachment 3 reflects the planned revision of Appendix J of the RERP Plan to incorporate this clarification.

4) Issue: Lake Breeze

Edison Response:

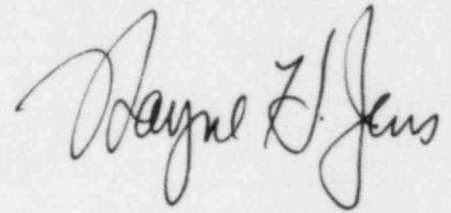
RERP Implementing Procedures EP-544, "Meteorological Data Assessment", and EP-545, "Protective Action Recommendation Guidelines", will be revised to include criteria for the occurrence of a lake breeze (e.g. April through October; daylight hours; A, B, or C stability class; and wind direction from 57 through 168 degrees) and the associated protective action recommendations should one occur during an emergency at Fermi-2.

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The above clarifications should support the resolution of items pending from SSER 4 and recent conversations with the reviewer, Mr. Kantor.

Please direct any questions to Mr. O. K. Earle at (313) 586-4211.

Sincerely,

A handwritten signature in dark ink, appearing to read "Wayne Z. Jones". The signature is fluid and cursive, with the first name "Wayne" and last name "Jones" clearly distinguishable.

cc: Mr. P. M. Byron*
Mr. F. Kantor*
Mr. M. D. Lynch*
USNRC, Document Control Desk
Washington, D. C. 20555

* With attachments

ATTACHMENT 1

emergency classification. Nuclear Operations provides the majority of the personnel required to staff the organization. Additional Detroit Edison personnel are called upon to provide specific expertise as necessary (e.g., meteorologists).

During an emergency, the Emergency Response Organization is located in the Control Room and the three Emergency Response Facilities (ERFs) described in Section H: Operational Support Center (OSC), Technical Support Center (TSC), and Emergency Operations Facility (EOF). Responsibilities in the Control Room and TSC are assigned by the Emergency Director and in the EOF by the EOF Coordinator. The Emergency Officer has overall management responsibility for the Emergency Response Organization and for all assignments in the organization.

The Emergency Response Organization is predefined by the Supervisor, Radiological Emergency Response Preparedness (RERP). Alternate assignments to various positions are specified to provide timely, unambiguous staffing. Table B-1 shows the minimum staffing for the Fermi 2 Emergency Response Organization according to functional area, ERF, and emergency classification. Table B-1 reflects Detroit Edison's intent to achieve the 30-minute and 60-minute augmentation times indicated in NUREG-0654/FEMA-REP-1 Table B-1 and in NUREG 0737 as a desirable goal for staffing the ERFs.

The key functional areas in Table B-1 of this section can be staffed within 30 minutes of the emergency classification during during normal working hours. This is possible because the majority of the key positions are staffed by personnel on-site, that is, either in the plant or at the Nuclear Operations Center (NOC). ^{**} ~~During off hours, on the average, 60 minutes is required for staffing of key emergency response positions.~~ RERP Implementing Procedure EP-291 puts all key TSC and OSC personnel on standby at the Unusual Event classification and key EOF personnel on standby at the Alert classification. Should the emergency

** Change

During off hours under normal conditions, key ~~key~~ positions (as listed in Table B-1) can be staffed within 30 minutes the majority of the time. There may be some cases, however, where up to 60 minutes may be required.

Revision 3 - February 1984
Revision 3A - August 1984

64. Scenario - The hypothetical situation, from start to finish, in an exercise which is the theme or basis upon which the action or play of the exercise unfolds.
65. Sheltering - Action taken by the public to take advantage of the protection against radiation exposure afforded by remaining indoors, away from doors and windows, during and following the passage of the radioactive plume. All doors and windows should be closed and ventilation systems turned off.
66. Site Area Emergency - The third emergency classification level declared by the utility when an incident at a nuclear power plant threatens the uncontrolled release of radiation into the immediate area of the plant.
67. Stand-by - Organizations or personnel are placed at a state of readiness. Personnel should be able to respond but can remain at work, home or wherever as long as they can easily be reached by telephone or radio. Personnel placed on stand-by should review their plans, responsibilities and procedures.
68. Thermoluminescent Dosimeters - A small device used to measure nuclear radiation, utilizing physical properties of the particular crystal of which it is made.
70. Transportation Staging Area - A designated location from which transportation resources are coordinated and/or dispatched.
71. Unmet Needs - Capabilities and/or resources required to support emergency operations but neither available to or provided for by Monroe County. Pre-determined unmet needs will be reported to the State in advance and emergency-specific unmet needs will be reported to the State upon recognition.
72. Unusual Event, Notification of - The first level of emergency classification, indicating potential degradation of plant safety levels.

V. CONCEPT OF OPERATIONS

A. Implementing Procedures

1. The Chairperson of the Monroe County Board of Commissioners (Chief Executive) is responsible for implementing the necessary protective actions and for directing the disaster relief forces in the County. In the event of a nuclear incident where off-site releases have occurred resulting in a local emergency or there is the imminent threat thereof, he will declare a State of Emergency, thereby fully activating the Monroe County Emergency Operations Plan. This is likely to occur only under the Site Area Emergency or General Emergency classes of incidents (refer

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inspection using the badge exchange system. Either method provides for accountability of all individuals within 30 minutes of the start of an evacuation and continuously thereafter for all individuals remaining onsite. Accountability is performed by Nuclear Security in accordance with RERP Implementing Procedure EP-205-30.

The accountability of persons at the Visitors' and Training Centers is the responsibility of the guides who are escorting each group. Persons leaving the NOC and Fermi 1 are accounted for by their work supervisors. Assembled groups report to the senior person at each location.

J.3 RADIATION PROTECTION EQUIPMENT

Adequate supplies of radiation protection equipment are maintained for persons remaining in or entering the Protected Area or the Emergency Response Facilities. This emergency equipment is listed in Health Physics Procedure 69.000.25 maintained and inspected per RERP Administrative Procedure EPA-5 and Health Physics Procedure 69.000.25.

The Medical Department maintains adequate amounts of potassium iodide (KI), with the appropriate shelf life, to support the On-Site Emergency Response Organization for emergency situations at Fermi-2. The Emergency Director is responsible for recommending, authorizing the use of KI by Detroit Edison personnel upon the authorization of the Detroit Edison Medical Director or delegate. Use and distribution of KI is outlined in Health Physics Procedure 69.000.11. Protective clothing and respiratory protection equipment are used as indicated by the Emergency Director (or delegate).

J.4 PROTECTIVE ACTIONS

~~In a nuclear emergency, an estimate is made of the radiation dose that affected population groups may potentially receive. The dose estimate is called the projected potential or projected actual dose. A protective action is taken to avoid or reduce the effects of this projected~~

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~~dose. The Protective Action Guideline (PAG) is a predetermined level of projected dose to individuals in the population that warrants taking protective action.~~

~~RERP Plan Implementing Procedure EP-545 is a guide for the Emergency Response Organization for recommending protective actions to State and local off-site emergency response agencies. Prompt notification of emergency situations at Fermi-2 is made to Federal, State, and local agencies in accordance with Section D of the RERP Plan and RERP Implementing Procedure EP-290.~~

All such recommended actions taken off-site to protect the health and safety of the general public are the responsibility of the State of Michigan in conjunction with Federal and local emergency response agencies.

The Michigan Emergency Preparedness Plan (MEPP), the Monroe and Wayne Counties Emergency Operations Plans and the Brownstown Township Plan describe the provisions to implement protective measures for the plume exposure pathway EPZ for State and local emergency response personnel and the public. Provisions include the following:

- o Maps showing evacuation routes, evacuation areas, relocation centers, and shelter areas.
- o Maps showing the population distribution around the nuclear facility.
- o Methods for notifying all segments of the transient and resident population.
- o Means for protecting institutionalized or confined individuals whose mobility may be impaired.

*CHANGES TO ATTACHMENT 3

During an emergency at Fermi-2, it may be necessary to make protective action recommendations to Local and State offsite Emergency Response Organizations for the protection of the health and safety of the public. RERP Implementing Procedure EP-545 is a guide for the Detroit Edison Emergency Response Organization to formulate protective action recommendations. These recommendations are based on meteorological conditions, projected potential or actual offsite doses, and/or plant conditions such as fuel clad failure or core melt that indicate release of radioactivity may occur. These recommendations are based on pre-determined levels of projected offsite dose or plant status that warrant taking protective actions.

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