

Official

JAN 28 1985

Mississippi Power and Light Company
ATTN: Mr. J. B. Richard
Senior Vice President, Nuclear
P. O. Box 23054
Jackson, MS 39205

Gentlemen:

SUBJECT: EMERGENCY PLAN DEFICIENCIES - GRAND GULF NUCLEAR STATION
DOCKET NO. 50-416

We have completed the review of Revisions 8 and 9 of the Grand Gulf Radiological Emergency Plan (REP).

Our review indicates that certain changes are not consistent with the provisions of 10 CFR 50.54(q), 10 CFR 50.47(b), 10 CFR 50 Appendix E, and Section II of NUREG-0654. The inconsistencies in plan changes are specified in the enclosure.

To preclude a violation of regulatory requirements, you must not continue to implement the changes deemed inconsistent. Please modify your Plan to correct those pages necessary to maintain Plan continuity. We request that these corrections be provided to us within 45 days of the date of this letter.

Our review of Revisions 8 and 9 to the Grand Gulf Radiological Emergency Plan indicates that, with the exception of the changes noted in the enclosure, the provided changes continue to meet the provisions of 10 CFR 50.47(b), 10 CFR 50, Appendix E, and the specific criteria in Section II of NUREG-0654.

Sincerely,

Original Signed by
Roger D. Walker /for

John A. Olshinski, Director
Division of Reactor Projects

Enclosure:
Plan Deficiencies

cc w/encl:
J. E. Cross, General Manager
R. T. Lally, Manager of Quality
Middle South Energy, Inc.
R. B. McGehee, Esquire
Wise, Carter, Child, Steen and
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ENCLOSURE

Revision 8 - This change included deletion of a separate recovery organization. The Revision now states in part, "Recovery after an emergency condition will be handled by the Onsite and Offsite Emergency Organizations". The Onsite and Offsite Emergency Organizations are described in Section 5 of the Plan, including the position/title, authority and responsibilities of individuals filling key positions in emergencies. Authority and responsibilities of these individuals in a recovery situation are not included, however. Failure to provide for this is inconsistent with the specific planning criteria in Section II.M.2 of NUREG-0654, which states in part, that "Each licensee plan shall contain the position/title, authority and responsibility of individuals who will fill key positions in the facility recovery organization".

Revision 8 - This change revised the Plan to state in part, that, "... In the event of an ongoing release which makes decontamination near the site impossible or impracticable, evacuating non-emergency personnel will be routed to the evacuation/decontamination centers established by the state/local governments." Since no coordination was done with state/local governments by the licensee on this matter, this change is inconsistent with NUREG-0654, Section II, Criteria J.2, J.3 and J.4.

Revision 9 - This change deleted a reference to the capability of displaying plant status conditions in the TSC from Section 7.2.2. Such a change is inconsistent with NUREG-0654, Section II, Criterion N.1, which states in part, "Each licensee shall establish a Technical Support Center in accordance with NUREG-0696, Revision 1." NUREG-0696, Revision 1, Section 2.8, Instrumentation, Data System Equipment, and Power Supplies states in part, "Equipment shall be provided to gather, store, and display data needed in the TSC to analyze plant conditions.

Revision 9 - This change revised the statement that Grand Gulf Nuclear Station may provide assistance in the Training of the county/parish emergency organization personnel, with the addition of the phrase, "If requested to do so." This change is inconsistent with NUREG-0654, Section II, Criterion O.4.g, which states in part, "Each organization shall establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans. The specialized initial training and periodic retraining programs shall be provided in the following categories: ...

- g. Local support services personnel including Civil Defense/Emergency Service Personnel."