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MURRAY R. EDELMAN
VICE PRESIDENT
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October 29, 1984
PY-CEI/NRR-0149 L

Mr. Harold R. Denton
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Clarifications to Revision 3
Submittal of the Emergency
Plan OM-15A

Dear Mr. Denton:

The third revision of the Emergency Plan for Perry Nuclear Power Plant (PNPP) which was submitted on April 28, 1984 included changes which resulted from the NRC review comments as outlined in Safety Evaluation Report (SER) Supplement 4, Section 13. Additional clarification is provided on several of the items related to the SER review comments. The necessary clarifications are individually addressed in the attachments to this letter. Those clarifications which include changes to the Emergency Plan will be incorporated into Revision 4 of the Plan, which is scheduled for issuance in January 1985. The attachments follow the format of the SER to facilitate review and resolution in a future SER supplement.

It is expected that this information should close Outstanding Issue 19 dealing with onsite emergency planning for PNPP. Please contact us if there are any questions.

Very truly yours,

A. Kaplan for M. Edelman

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

cc: J. Silberg, Esq.
J. Stefano
J. Grobe

A045
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13.3.2.1

Revisions will be made as follows to indicate the interface and provisions for coordination with the Commonwealth of Pennsylvania on ingestion pathway control measures.

Add new section:

"2.5.2.6 Pennsylvania Emergency Management Agency (PEMA), Commonwealth of Pennsylvania Disaster Operations Plan, Annex E, "Fixed Nuclear Facility Incidents."

Add to Section 3.2.1

"Coordination with the Pennsylvania Emergency Management Agency for ingestion pathway control measures is also provided by the State of Ohio."

Add to Section 6.4.5

"Interface with the Pennsylvania Emergency Management Agency for ingestion pathway exposure control measures is provided by the State of Ohio."

13.3.2.2 (1)
13.3.2.9 (1)

The following changes will be made in Revision 4 to address staff augmentation in the area of radiation monitoring:

Section 5.2.2.2 Item 3
"3. Radiation Monitoring Teams"

Section 5.2.2.4, Page 5-9, Paragraph 1
"Radiation Monitoring Teams (RMTs) are composed of two members. The RMT Leader is a trained member of the Radiation Protection Section. The RMT Helper may be any RMT trained individual of the permanently assigned PNPP staff. The number of teams responding is dependent on the emergency classification. For an Alert, two (2) Radiation Monitoring Teams will respond to perform monitoring; for a Site Area or General Emergency, three (3) teams will respond. Additional teams may be organized as the situation warrants. RMTs will obtain radio equipped, four-wheel-drive vehicles from Security. RMTs are equipped to perform direct radiation measurements, airborne radioactivity sampling and measurement, and environmental sample collection."

Section 5.2.3 Page 5-11 Paragraph 5
"Radiation Monitoring Teams (RMTs), during the initial phase, will consist of qualified RMT personnel available and equipped in the Operations Support Center (OSC), and under the direction of the Shift Supervisor. During the interim phase, two (2) RMTs will assemble and will be under the direction of the Radiation Protection Coordinator in the Technical Support Center (TSC). During the final phase, three (3) RMTs will assemble and be under the direction of the Offsite Radiation Advisor."

Table 5-1 page 5-22
PNPP Emergency Response Organization functions and Shift Staff Augmentation Plan (see next page).

TABLE 5-1 (Cont.)

MAJOR FUNCTIONAL AREA	MAJOR TASKS	POSITION TITLE OR EXPERTISE (FROM NUREG 0654 TABLE B-1)	ON SHIFT MIN. NO./TITLE (LOCATION)	GOALS FOR ADDITION 30 MIN TITLE (LOCATION)	GOALS FOR ADDITION 60 MIN TITLE (LOCATION)
	Onsite (out of plant) and Offsite Surveys			2 Rad. Prot. Tech (OSC) 2 I&C Tech. (OSC)	1 Rad. Prot. Tech. 1 I&C Tech. (OSC/EOF)
	In Plant Surveys	HP Technicians	HP Tech (3)	1 HP Tech. (HPSR)	1 HP Tech. (HPSR)
	Chemistry/Radio-chemistry	Rad/Chem Tech.	1 Chem. Tech.		1 Chem. Tech. (Chem Lab)
Plant System Engineering, Repair & Corrective Actions	Technical Support	Shift Tech. Adv.	1 Shift Tech. Advisor	1 Tech. Sec. GS(TSC)	1 ND&A GSE (TSC)
		Core/Thermal Hydraulics		NL&FM 1 Nuclear Eng (TSC)	
		Electrical			1 ND&A Elect. Eng. (TSC)
		Mechanical			1 Tech. Sec. Mech Eng (TSC)
	Repair and Corrective Actions	Mech. Maint.	1 Perry Plant Operator (4)		1 Maint. Supv. (Elec) (OSC)
		RW Operator	1 Radwaste Tech.		
		Elec. Maint.	1 Perry Plant Operator (4)	1 Maint. Supv. (Mech) (OSC)	1 Maint. Gen. Supv. (OSC)
		Instrument & Control (I&C) Tech.	1 I&C Tech. (2)		1 I&C Unit Supv. (TSC)

13.3.2.3 (2)

The last paragraph of Section 7.3.9 will be revised as follows to clarify the laboratory facilities available in the EOF:

"Should it become necessary, there is space available in the decontamination room and whole body counting room of the Emergency Operations Facility to relocate the equipment provided in the back up counting room of the Technical Support Center to analyze samples obtained by the Radiation Monitoring Teams."

13.3.2.6 (1)

To clarify backup communications capabilities at PNPP, Section 7.2.2 of the PNPP Emergency Plan will be revised as follows:

"7.2.2 EMERGENCY COMMUNICATIONS

The various communications systems described in Section 7.2.1 provide reliable and redundant means for communicating between areas throughout the PNPP. To enhance the reliability of communications with offsite areas, agencies and authorities, various dedicated leased telephone lines with a direct ring capability are employed. In the event that one or more of the dedicated line networks are inoperative the Private Branch Exchange (PBX) and Off-Premise Exchange (OPX) systems will provide back-up means of communications both within PNPP and between PNPP and all state/local governmental authorities with primary responsibilities during an emergency. A block diagram of the emergency communications network is provided in Figure 7-6."

13.3.2.10 (1)

The first paragraph of Section 6.4.1 will be revised as follows:

"In the event of a Site Area or General Emergency, site personnel will be instructed to begin personnel accountability. This notification will be performed essentially immediately using the Public Address and Exclusion Area Paging Systems described in Section 7.2.1. To accomplish personnel accountability with 30 minutes, all personnel without an emergency response function will be directed to exit the site areas via normal exit routes and exit procedures."

13.3.2.4 (3)
13.3.2.10

The following changes will be made in Revision 4 of the PNPP Emergency Plan to clarify the use of protective actions based on the potential for releases of radioactive material.

"Section 4.1.4, page 4-4
While the EALs identified for a General Emergency indicate that time should be available to provide confirmative assessments prior to implementation of extensive protective actions, the Emergency Plan Implementing Instructions (EPI's) provide that upon declaration of a General Emergency, the Emergency Coordinator will recommend, as a precautionary measure, shelter for the general public within 2 miles of the plant and in at least 3 downwind sectors to 5 miles. Also, protective actions based on the potential for releases of radioactive material will be recommended as follows (see Figure 4-1 for directions on using curves):

Indication	Protective Actions
1. Above Curve 4	-360 degree shelter to 2 miles
	-Precautionary shelter in at least 3 downwind sectors to 5 miles
2. Above Curve 3	-360 degree evacuation to 2 miles
	-360 degree shelter between 2 and 3 miles
	-Shelter in at least 3 downwind sectors between 3 and 5 miles
3. Above Curve 2	-360 degree evacuation to 2 miles
	-Evacuation in at least 3 downwind sectors between 2 and 5 miles
	-Shelter between 2 and 3 miles in unaffected areas
4. Above Curve 1	-360 degree evacuation to 3 miles
	-Evacuation in at least 3 downwind sectors between 3 and 5 miles
	-Shelter between 3 and 4 miles in unaffected areas

The above protective action recommendations assume that conditions listed in Table 4-1 for a General Emergency have been met or exceeded. As noted above, assessment activities as described in the EPI's will continue to determine if additional protective actions should be recommended."

Section 6.4.3 on page 6-11:

Indication	Protective Actions
1. Above Curve 4	-360 degree shelter to 2 miles
	-Precautionary shelter in at least 3 downwind sectors to 5 miles
2. Above Curve 3	-360 degree evacuation to 2 miles
	-360 degree shelter between 2 and 3 miles
	-Shelter in at least 3 downwind sectors between 3 and 5 miles
3. Above Curve 2	-360 degree evacution to 2 miles
	-Evacuation in at least 3 downwind sectors between 2 and 5 miles
	-Shelter between 2 and 3 miles in unaffected areas
4. Above Curve 1	-360 degree evacuation to 3 miles
	-Evacuation in at least 3 downwind sectors between 3 and 5 miles
	-Shelter between 3 and 4 miles in unaffected areas

13.3.2.14 (1)

Section 8.5.4.1 of the Emergency Plan will be revised as follows:

"1. A major exercise appropriate to a Site Area or General Emergency will be conducted within one year prior to issuance of a full power operating license and annually thereafter in accordance with federal regulations to include conducting exercises under varying weather conditions.

2. The degree of participation by state and local agencies will be in accordance with Federal Regulations. Each exercise will include testing of the Prompt Alerting System.

3. Delete

4. (Renumber as #3, otherwise no change)"

Note that this change includes changes committed to in the August 20, 1984 letter from M. R. Edelman to H. R. Denton letter PY-CEI/NRR-0135L.

13.3.2.16 (1)

The following will be added to the end of Section 8.2:

"The PNPP Operational Quality Assurance Program describes the management controls that exist to provide documentation and correction of deficient areas and incorporation of these corrections into the Emergency Preparedness Program."