

Official

To: Nina Jones

AUG 05 1982

50-261A

MEMORANDUM FOR: Marvin V. Sinkule, Chief, Operational Support Section
 FROM: George R. Jenkins, Chief, Emergency Preparedness Section
 SUBJECT: COMMENTS ON CP&L RESPONSE, JULY 28, 1982, to SALP REPORT

CP&L Letter, Item 3 - CP&L refers to "tremendous progress in the areas of ... Emergency Training...." In fact, training was one of two emergency preparedness deficiencies identified during the EP Appraisal at H.B. Robinson in February 1982, and addressed in Confirmation of Action letter to CP&L dated February 22, 1982!

CP&L Comments regarding Robinson, Item 10 - All licensees have had to devote a large amount of management attention and resources of emergency preparedness over the past 2-3 years. CP&L's contention that they have been "extremely aggressive and responsive...and continually leading the industry in compliance and fulfilling regulatory commitments and requirements" is not supported by the results of our appraisals/inspections. CP&L refers with apparent pride to the H. B. Robinson full-scale exercise; in fact, that exercise resulted in NRC identification of several emergency preparedness deficiencies which were addressed in Confirmation of Action letter dated March 31, 1981! In view of the above, I do not consider the statement that "improvement in emergency preparedness was achieved in 1981" to be a "considerable understatement."

CP&L Comments on Brunswick, Item 10 - I am not aware of what aspects of the Brunswick emergency preparedness program are being used as a model by other utilities. I disagree with CP&L's belief that the rating in the EP area should be Category 1. Our assessment was based on the 8/81 exercise, which was good, and the 10/81 appraisal, where two emergency preparedness deficiencies were identified. As a related comment, it appears that Brunswick has not yet taken aggressive and assertive actions to install post-accident sampling systems. Finally, INPO's Brunswick Evaluation Report, enclosed with CP&L's letter, does not appear to support CP&L's position.

George R. Jenkins

cc: J. P. Stohr
W. E. Cline

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