



THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

February 20, 1985
PY-CEI/NRR-0192 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
Emergency Plan OM-15A
Revision 4,
SER Outstanding Issue No. 19

Dear Mr. Denton:

Enclosed are three (3) signed originals and thirteen (13) copies of Revision 4 to the Perry Nuclear Power Plant (PNPP) Emergency Plan, CEI Report No. OM-15A. This revision incorporates the clarifications to Revision 3 which have been submitted by letters dated August 20, 1984 (PY-CEI/NRR-135L), October 28, 1984 (PY-CEI/NRR-0149L), and January 16, 1985 (PY-CEI/NRR-170L). This revision also includes the changes in the PNPP Site Organization since Revision 3, and lessons learned from the series of drills leading to our recent emergency preparedness exercise. Attached to this letter are the comments received from the County and State officials addressing the draft Appendix D of the Emergency Plan which was included in Revision 3.

The enclosed pages replace in entirety those currently in the plan. This revision is in a format designed to keep current the license application and the Emergency Plan.

We believe that the information provided in this Revision 4 to the PNPP Emergency Plan will resolve SER Outstanding Issue No. 19 dealing with onsite emergency planning for PNPP. If there are any further questions, please feel free to call.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachment/Enclosure

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe

A045
3/16
8502270162 850220
PDR ADOCK 05000440
F PDR

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of Duquesne Light Company,
Ohio Edison Company, Pennsylvania Power Company,
The Cleveland Electric Illuminating Company,
The Toledo Edison Company,
Perry Nuclear Power Plant, Units 1 & 2
Dockets Nos. 50-440; 50-441

CERTIFICATION OF SERVICE

This is to certify that a copy of Revision No. 4 to the Emergency Plan, CEI Report No. OM-15A for Perry Nuclear Power Plant, Units 1 and 2, dated February 20, 1985, has been served on the following Federal, State and Local Officials, by deposit in the United States Mail, addressed as follows:

Federal Activities Branch
U.S. Environmental Protection Agency
Region V Office
230 South Dearborn Street
Chicago, Illinois 60604

Ohio Department of Health
Attn: Radiological Health Program
Director
P.O. Box 118
Columbus, Ohio 43216

Mr. Jim Williams
Nuclear Preparedness Officer
State of Ohio Disaster Services Agency
ODSA, Adjutant General Department
2825 West Granville Road
Worthington, Ohio 43085

Honorable Laurence Logan, Mayor
Village of Perry
4203 Harper Street
Perry, Ohio 44081

Honorable Robert V. Orosz, Mayor
Village of North Perry
North Perry Village Hall
4778 Lockwood Road
North Perry Village, Ohio 44081

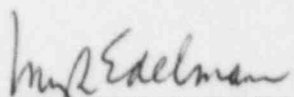
Mr. Arthur Warren, Chairman
Perry Township Board of Trustees
4169 Main Street
Perry, Ohio 44081

Mr. Dale Wedge, Director
Geauga County Disaster Service
Agency
13281 Painesville-Ravenna Road
Geauga County Safety Center
Chardon, Ohio 44024

Mr. Terry J. Lodge, Esq.
618 N. Michigan St.
Suite 105
Toledo, Ohio 43624

Mr. Michael Wheeler,
Emergency Coordinator
Ashtabula County Disaster Service
Agency
25 West Jefferson
Jefferson, Ohio 44047

Robert Retzler, Director
Lake County Disaster Service
Agency
39 Fairdale Street
Painesville, Ohio 44077



Murray R. Edelman
Vice President
Nuclear Group

Murray R. Edelman who, being duly sworn, deposed and said that (1) he is Vice President, Nuclear Group of The Cleveland Electric Illuminating Company, (2) he is duly authorized to execute and file this report on behalf of The Cleveland Electric Illuminating Company and as duly authorized agent for Duquesne Light Company, Ohio Edison Company, Pennsylvania Power Company and the Toledo Edison Company, and (3) the statements set forth therein are true and correct to the best of his knowledge, information and belief.

Murray R. Edelman

Murray R. Edelman

Sworn to and subscribed before me, this 20th day of FEBRUARY,
1985.

Joseph C. Szwejkowski

JOSEPH C. SZWEJKOWSKI
Notary Public, State of Ohio - Cuyahoga Cty.
My Commission Expires July 14, 1986



ALBERT E. STEWART
Director

March 26, 1984

County of Lake

OFFICE OF

DISASTER SERVICES AGENCY

39 FAIRDALE STREET
PAINESVILLE, OHIO 44077



Phone (216) 352-6281
Ext. 361

The Cleveland Electric Illuminating Company
P. O. Box 97
Perry, OH 44081

Attention: Mrs. Jan Dugan

Dear Mrs. Dugan:

Having reviewed the Evacuation Time Study for the Perry Nuclear Power Plant as proposed by HMM Associates.

I offer the following comments:

Section 1

- 1.2 The Perry Nuclear Power Plant, hereafter to be referred to as PNPP is located the Village of North Perry, a political subdivision within Lake County, Ohio. The plant site is located along the southern shores of Lake Erie. A site vicinity map for the plant is included as Figure 1.1.

The Plume Exposure Pathway Emergency Planning Zone hereafter referred to as the EPZ is the geographic area surrounding...

Figure 1.2

Suggests solid outer boundry line to show EPZ.

Section 2

- 2.3 Third paragraph, suggest - it is assumed that the permanent population sector will evacuate from their places of residence and that all households having more than one vehicle will use only one vehicle.

Fourth paragraph suggests - additional explanation is needed by reviewer, does the plan assume this position or does it specifically warrant it?

- 2.5 While NETVAC has been used in previous hearings with success. Has it's findings been proven in actual situations?

Section 3

- 3.4 Table 3.1 Are their twenty-three (23) households in the City of Mentor, within the EPZ?
- 3.8 First paragraph - Should not County be changed to Counties?
- 3.11 Is Figure 3.3 through 3.5 consistent with Warning Maps being developed and other criteria?
- 3.14 Table 3.2 As a matter of comment only, where are these Medical/Jail Facilities? Sub-area (E) Headlands State Park, has on certain Holidays in the past, saw as many as 60,000 to 80,000 transients.

Section 4

Table 4.1 Reviewer feels it is wise to remove Lakeland Community College from Primary Reception Center. The JPIC is located here, other Lake County locations can absorb the load.

- 4.19 Figure 4.3 Check width of Roadway?

Section 5

5.2 Initial Notification

The land portion of the EPZ surrounding the Perry Nuclear Power Plant will have an Outdoor Siren Notification System, with Public Address capabilities that surpass requirements and recommendations yet remaining consistent with NUREG-0654/FEMA-REP-1 Appendix 3 guidelines. This system will be used by County officials to Alert and Disperse Emergency Information to the population, i.e., Evacuate, Shelter in place, Turn-on their radios and television sets for additional information, all clear. Pursuant to NUREG-0654 guidance, notification messages will commence on the designated television and EBS stations prior to the activation of the Siren/Public Address System.

Within fifteen (15) minutes the population, within the EPZ of the plant, will have been given an informational or instructional message regarding the emergency.

- 5.2 Second paragraph - I sure would hope so.
- 5.3 Very conservative estimates.
- 5.4 Permanent Population, second paragraph - Suggests removal of (and local) emergency preparedness officials.
Transient Population, Suggest removal of (and local) emergency preparedness officials. Discussions with County emergency preparedness officials.
- 5.5 Suggests removal of (and local) emergency preparedness Officials. Discussion with County emergency preparedness officials.

5.8 The Priority Treatment

ERP denotes traffic support at all intersections.

Section 6

6.20 Suggest word change - Remove manual and add Physical Traffic.

Section 7

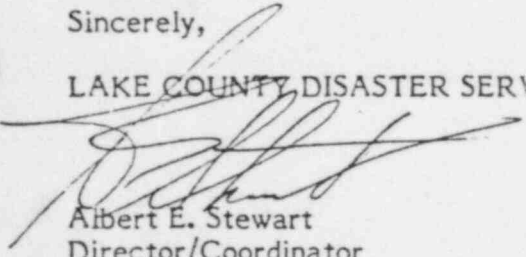
7.1 While I do not agree with this approach, let it stand if it has been successful in other hearings.

A1-6 What are we talking about, Madison Village, Madison Township, North Madison?

A2-2 Again, reference is made to North Madison, there is no legal status for this assumption, it is Madison Township.

Sincerely,

LAKE COUNTY DISASTER SERVICES AGENCY



Albert E. Stewart
Director/Coordinator

mb



D
S
A

County of Geauga

13281 PAINESVILLE-RAVENNA ROAD • GEAUGA COUNTY SAFETY CENTER
CHARDON, OHIO 44024

DISASTER SERVICES AGENCY

PHONE (216) 285-2222, EXT. 603

March 26, 1984

DIRECTOR
DALE B. WEDGE

DEPUTY DIRECTOR
RONNIE N. EGING

Jan Dugan
10 Center Road R225
Perry, Ohio 44081

Ref: Comments on Time Evacuation Study

Dear Jan:

Page 4-1: In all areas where it states that this is based on discussions with County and local law enforcement and emergency preparedness officials, I would like to state that we only had one meeting with HMM. At that meeting we only discussed what routes would most likely be used for an evacuation and problems with weather. This produced an addition of Old 44 (North Street - Ravenna Road). No other information was discussed with these consultants.

Page 4-4: On southbound exits I do not understand 534 south to Route 166 west to Geauga County Reception Centers. It would seem that once on Route 166, they would go to Route 528 and then south to the Middlefield Reception Centers. The Chardon Reception Centers are primarily used for evacuees from Lake County.

Page 5-1: I do not find any portion of the plan that defines the various weather conditions. During our meeting with HMM, we indicated the problems in Thompson with severe winter weather. We would like to have a better understanding of what they are basing their estimates on. We can see a change in the estimates of time.

Since working on the plan we have found special groups in Thompson that should be addressed. We have found two (2) campsites, a group home and a day-care center for which we have written SOPs.

I find no other problems in Sections 4, 5, 6 and 7.

Sincerely yours,

Dale B. Wedge
Director

DEW/pl

ADSAAA/B/5



COUNTY OF ASHTABULA

EMERGENCY MANAGEMENT AGENCY

25 West Jefferson Street

Jefferson, Ohio 44047

(216) 576-9090, 576-9148

Mike Wheeler
Emergency
Management
Coordinator

January 23, 1985

Jan Dugan
Emergency Planning Unit TV 1
Perry Nuclear Power Plant
PO Box 97
Perry, Ohio 44081

Dear Jan,

This letter is to inform you that after reviewing the Evacuation Time Study for the Perry Nuclear Power Plant with the Sheriff's Department it meets with our approval.

Sincerely,

K. Michael Wheeler, Coordinator
Ashtabula County Emergency Management Agency

KMW/jf

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2825 WEST GRANVILLE ROAD
WORTHINGTON, OHIO 43085-2712
DISASTER SERVICES AGENCY

AGOH-DS-NOO

January 29, 1985

Ms. Jan Dugan
Cleveland Electric Illuminating Co.
Perry Nuclear Power Plant
P.O. Box 97
Perry, OH 44081

Dear Ms. Dugan:

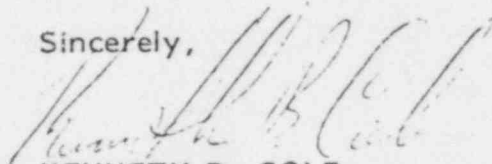
My staff has reviewed the "Evacuation Time Estimates for Areas Near the Perry Nuclear Power Plant" (March 1984), prepared for CEI by HMM Associates.

The study is sound and should become an individual resource document. The concerns we did identify do not affect the overall integrity of the study. However, we would appreciate your comments or further explanation on the following items:

- Page 2-2, Paragraph 1, Line 5: What are the site-specific characteristics of the PNPP EPZ?
- Page 2-3, Paragraph 6: What is the source of the assumption that snowstorms would reduce roadway capacity by 30 percent during winter conditions? This figure seems low, particularly for the "snowbelt" counties.

Thank you for your time in resolving our questions. If our concerns need further clarification, please do not hesitate to contact me or the response supervisor, Larry Grove, at (614) 889-7157.

Sincerely,



KENNETH B. COLE
Nuclear Operations Officer