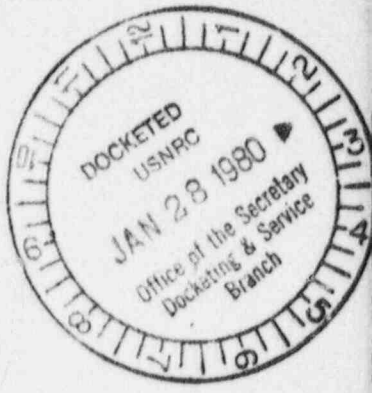
January 25, 1980



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)	

LICENSEE'S SECOND SUPPLEMENTAL RESPONSE TO EMERGENCY PLANNING CONTENTIONS

Licensee's supplemental response to the additional emergency planning filings by Newberry, UCS and Mrs. Aamodt follows.

Newberry Township TMI Steering Committee

Licensee opposes the January 11, 1980 request by Newberry Township TMI Steering Committee ("Newberry") for an extension of time within which to file emergency planning contentions on matters included in the initial version of Licensee's updated Emergency Plan and not subsequently revised by Licensee. The grounds set forth by Newberry for the requested extension rest on numerous errors in fact, and, even if true, would not constitute good cause for the late filing.

On November 2, 1979, Licensee forwarded to all intervenors copies of its updated Emergency Plan. The cover letter explained that, in view of the ongoing, nationwide review being conducted by the NRC Staff of all emergency plans, revisions to

Licensee's Plan were anticipated. Amendment No. 6 to the TMI-1 Restart Report included the revised Emergency Plan; Newberry received that material sometime in mid-December.

In its motion for an extension of time, Newberry claims that the new material appeared to supersede only sections 4 through 10 of the original Emergency Plan. That is simply inaccurate. As counsel for Newberry was informed during a December 19, 1979 telephone conversation, revisions were not confined to any particular part of the Emergency Plan. Newberry's counsel also was told that the revisions did not make changes to most sections of the Emergency Plan. This fact is confirmed by the attached excerpts from the original and revised Emergency Plan (see Exhibit A), which show that of the 13 additional contentions now advanced by Newberry, 10 relate to material unaltered by Amendment No. 6, and, therefore, in the possession of Newberry since the beginning of November.

When informed by Newberry's counsel that Newberry would seek a further extension of time within which to draft contentions on the new material, the undersigned counsel replied that additional contentions could be filed for good cause shown -- i.e., the inclusion of new material in Amendment No. 6. However, it clearly was not this counsel's understanding that this included all material in sections 4 through 10 of the Emergency Plan; in fact, counsel for Newberry was specifically informed that Licensee would oppose additional contentions on old material.

Had Licensee received a timely copy of the December 21, 1979 ex parte communication from Newberry's counsel to the Licensing Board Chairman, Newberry would have been informed immediately that no agreement for an extension of time as proposed by Newberry had been agreed to by Licensee. That Newberry's counsel did not fully comprehend the nature of Licensee's objection until January 8, 1980, is due solely to the failure of Newberry to serve Licensee with its December 21, 1979 letter. It thus appears to Licensee that the Board's January 8, 1980 ruling denying Newberry an extension of time to file additional emergency planning contentions based upon material in the original Emergency Plan is correct (see Memorandum and Order Ruling on Intervenors' Requests for Extension of Time to File Revised Emergency Planning Contentions at 5).

Nor does Newberry's January 11, 1980 filing provide the necessary showing of good cause to support its untimely filing. Except for the claim that Newberry believed Licensee had agreed to an extension of time -- which Licensee in fact had not agreed to -- Newberry's argument is that the failure of Licensee to delineate the revisions made to the Emergency Plan by Amendment No. 6 precluded Newberry from determining in the five days still available to it (i.e., between December 19 and December 24) whether the revisions affected the contentions being prepared by Newberry. Such a claim is totally unsupportable. In preparing Exhibit A to this filing, it took the undersigned counsel but a half hour to review the Newberry contentions

and on that basis compare the cited sections of the initial and revised Emergency Plan to determine whether changes which affected the contentions had been made. Why Newberry was unable to perform a similar task during the five days yet remaining to it within which to timely file is totally unexplained. Licensee therefore opposes the request by Newberry to file out of time additional contentions on material available to it since November 1979.

As Exhibit A shows, but for Newberry Contention Nos. 10, 11 and 12, all of the other Newberry contentions relate to material unchanged by Amendment No. 6. With respect to Contention Nos. 10 and 12, Licensee has no objection. Nor does Licensee object to the specific examples cited in Contention No. 11, but it does object to the vague and unsupported broadening of those examples at the end of the contention.

Union of Concerned Scientists

The operative part of UCS Contention No. 16 on emergency planning initially stated that "[s]uch planning should be based on a worst case analysis of the potential accident consequences of a core melt with breach of containment." In reviewing this contention, the Licensing Board in its First Special Prehearing Conference Order (at p. 24) ruled that "the assumption of such an unspecified Class 9 accident upon which the contention depends is too vague, of insufficient bases and

lacks nexus to the accident at TMI-2."[1/]

Concurrent with the Licensing Board's ruling, UCS purported to modify and detail this contention by adding language specifying that Licensee's Plan was "inadequate because it is not based on a weather-dependent worst case analysis of the potential consequences of a core melt with breach of containment." As noted in Licensee's January 2, 1980 Response (at pp. 6-7), the detail provided by UCS is merely that a weather-dependent analysis must be considered along with its unspecified Class 9 accident hypothesis. This addition is clearly inadequate to resolve the concerns expressed by the Licensing Board. Thus, regardless of whether the Board accepts Licensee's argument as to the preclusive effect of the Commission's Policy Statement adopting the 10-mile EPZ, UCS Contention No. 16 should be rejected since it still is too vague, without sufficient basis, and lacks the requisite nexus to the TMI-2 accident.

As to the effect of the Commission Policy Statement on the 10-mile EPZ,[2/] UCS overstates the nature of Licensee's

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1/ As UCS notes in its filing, the Licensing Board went on to state that evidence may have to be presented on the question of whether evacuation plans adequately consider the credible consequences of an accident. It is clear, however, that in context this comment was not intended to accept UCS Contention No. 16. To the contrary, the fair reading of the referenced statement is that consideration of such matters provided additional support for the Board's view that the vague and overreaching nature of UCS Contention No. 16 warranted its rejection.

2/ Since Licensee's last filing on this matter, the Environmental Protection Agency ("EPA") also has issued a Policy Statement formally adopting the 10-mile and 50-mile EPZ's. See 45 Fed. Reg. 2893 (January 15, 1980).

position. While Licensee has recognized the right of intervenors to raise emergency planning contentions notwithstanding the pendency of a rulemaking on the subject (see Licensee's Response to NRC Staff Brief on the Effect of Rulemakings Upon the Issues of the TMI-1 Suspension Proceeding at 8-9 (November 30, 1979)), Licensee believes that, with respect to the extent of EPZ's, such matters have been the subject of so much previous public comment and work by the Commission, are so central to the current rulemaking, and are so generic in nature, that as a matter of discretion the Licensing Board should refrain from litigating the issue here.[3/] Such an approach is fully

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3/ Indeed, it may be that the Commission's Policy Statement is binding on the Board, and as a matter of law the Board is precluded from litigating the adequacy of the EPZ's. UCS urges a different conclusion on the basis of Pacific Gas & Electric Co. v. FPC, 506 F.2d 33, 38 (D.C. Cir. 1974) (see UCS Reply at 5-6). However, the issue avoided by UCS is whether the Commission Policy Statement is a "general statement of policy" as that term is used in section 4(a) of the Administrative Procedure Act, 5 U.S.C. § 553(b)(A) (1976), or whether the Policy Statement constitutes a binding rulemaking.

Surprising as it may seem, the law is clear that "[t]he particular label placed upon [the action] by the Commission is not necessarily conclusive, for it is the substance of what the Commission has purported to do and has done which is decisive." Columbia Broadcasting System, Inc. v. United States, 316 U.S. 407, 416 (1942). Thus, the true nature of the Commission's Policy Statement must be determined on the basis of the procedures used by the Commission in issuing the Statement and the effect of the Statement on the NRC Staff, the Licensing Board, and Licensee. As the Supreme Court went on to note in Columbia Broadcasting (316 U.S. at 422):

> The Commission argues that since its Report characterized the regulations as announcements of policy, the order promulgating them is no more subject to review than a press release similarly announcing its policy. * * * When, as here, the regulations are avowedly adopted in the exercise of that power, couched in terms

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consonant with well-accepted Appeal Board precedent.[4/] Moreover, any litigation over the extent of the EPZ will assuredly distract attention from the site specific issue before the Board: the adequacy of Licensee's emergency preparedness.

3/ -- continued --

> of command and accompanied by an announcement of the Commission that the policy is one "which we will follow in exercising our licensing power", they must be taken by those entitled to rely upon them as what they purport to be -- an exercise of the delegated legislative power -- which, until amended, are controlling alike upon the Commission and all others whose rights may be affected by the Commission's execution of them.

If there was ever any doubt, it is now clear that the Commission may adopt binding rules so long as there is compliance with the minimum procedures specified in section 4 of the Administrative Procedure Act, 5 U.S.C. § 553 (1976). Vermont Yankee Nuclear Power Corp. v. Natural Resources Defense Council, 435 U.S. 519 (1978). With respect to the Commission's Policy Statement those procedures have been complied with. On July 17, 1979, the Commission published notice and invited comment on the EPZ issue (see 44 Fed. Reg. 41483). UCS responded to that notice, and on August 31, 1979, filed comments specifically commenting on the 10-mile EPZ. Thereafter, the Commission published its Policy Statement on October 23, 1979.

Given these procedures, and the mandatory nature of the Policy Statement directive to the NRC Staff, the criteria discussed in Columbia Broadcasting have been satisfied, and preclusive effects may be afforded to the Commission's Policy Statement.

4/ See, e.g., Potomac Electric Power Co. (Douglas Point Nuclear Generating Station, Units 1 & 2), ALAB-218, 8 A.E.C. 79, 85 (1974) ("consideration in adjudicatory proceedings of issues presently to be taken up by the Commission in rulemaking would be, to say the least, a wasteful duplication of effort"); Vermont Yankee Nuclear Power Corp. (Vermont Yankee Nuclear Power Station), ALAB-179, 7 A.E.C. 159, 163 (1974) ("Once that [rulemaking] proceeding was initiated, it would have been singularly inappropriate to undertake to duplicate it in an individual reactor licensing proceeding").

That following this procedure may mean, as suggested by UCS, that TMI-1 restart should be conditioned on conclusion of the rulemaking fails to provide any good reason for not adopting such a course.

Marjorie M. Aamodt

On January 15, 1980, Marjorie M. Aamodt ("Mrs. Aamodt") filed a paper which, in part, proposed a revision to Aamodt Contention No. 4. The proposed revision is clearly out of time and no adequate explanation for the delay is provided. The revision should therefore be rejected. However, since the proposed revision could be construed as further definition and support for what otherwise is a broad contention without adequate basis, Licensee offers the following comment on Aamodt Contention No. 4.

The revised contention claims that all data relating to radioactive releases during an accident should be transmitted immediately and simultaneously to Licensee's management, the NRC, the Pennsylvania Department of Environmental Resources and the Commissioners of Dauphin, York and Lancaster Counties. This revision appears to have been drafted without even a passing reference to Licensee's Emergency Plan. Section 4.7.5.2 and Figures 16, 19 and 20 of the Emergency Plan clearly indicate that radiological information is to be promptly disseminated to Licensee's management and the NRC (both of which will have representatives in the Offsite Emergency Support Center), to the Pennsylvania Department of Environmental Resources ("DER") through its Bureau of Radiation Protection ("BRP"), and from there to the Pennsylvania Emergency Management Agency ("PEMA") and the Emergency Operations Centers for the counties of Dauphin, York, Lancaster, Cumberland and Lebanon. Thus, Licensee is at a total loss to understand the basis for Aamodt Contention No. 4 and believes that it should be rejected.

With respect to the remaining emergency planning matters, Contention Nos. 3 through 6, Mrs. Aamodt has failed to revise her contentions or to indicate in any manner whether the concerns stated therein have been resolved by Licensee's updated Emergency Plan. On the basis of this failure Licensee believes that Aamodt Contention Nos. 3 through 6 should be rejected.[5/]

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: Robert E. Zahler
Robert E. Zahler

Dated: January 25, 1980

5/ Licensee notes that, with respect to CEA Contention Nos. 2(b)-(d), 3 and 4, intervenor CEA also is in default of its obligation to reassess these contentions after receipt of Licensee's updated Emergency Plan. They too should therefore be rejected.

EXHIBIT A

TMIA CONTENTION	EMERGENCY PLAN SECTION (REV. O)	EMERGENCY PLAN SECTION (REV. 1)	COMPARISON
1	3.1	4.3.1	Same
2	4.1.1	4.4.1.1	Same
3	4.1.4	4.4.1.4	Same
4	4.2.2	4.4.2.2	Same
5	5.1.1.2(a)	4.5.1.1.2(a)	Same
6	5.1.1.2(h)	4.5.1.1.2(h)	Same
7	5.1.3.1.(c)&(d)	4.5.1.3.1(c)&(d)	Same
8	5.1.3.2(f)	4.5.1.3.2(f)	Same
9	5.3.2	4.5.3.2	Same
10	-	4.5.4	New
11	5.4.1.2	4.6.4.1.2	Revised
12	-	4.6.6.1	New
13	8.0	4.8.0	Same

TMIA Contention No. 1

3.0 SUMMARY OF TMI EMERGENCY PLANNING PROGRAM

The TMI Emergency Planning Program, as defined by the Metropolitan Edison Company, consists of two separate but totally coordinated documents. The first document, this Emergency Plan, provides the means for performing advance planning and for defining specific requirements and commitments that will be implemented by other documents and procedures (eg. Administrative Procedures, Surveillance Procedures, Emergency Plan Implementing Procedures, etc.). The second document, the Emergency Plan Implementing Document, provides the detailed information and procedures that will be required to implement the TMI Emergency Plan in the event of an emergency at the TMI Nuclear Station. These two documents are briefly described below.

3.1 The Emergency Plan

The TMI Emergency Plan assures that all emergency situations, including those which involve radiation or radioactive material are handled logically and efficiently. It covers the entire spectrum of emergencies from minor, localized emergencies to major emergencies involving action by offsite emergency response agencies and organizations. The TMI Emergency Plan includes a scheme for classifying emergencies that meets the current guidance (reference 10.20) provided by the Nuclear Regulatory Commission (NRC). This classification system is described in detail in Section 4.0 below. Furthermore, this Plan incorporates specific response criteria (emergency action levels) which will be used in the assessment of emergency situations. Thus, the TMI Emergency Plan provides the overall advance planning required for the development of methods of implementation which will be included in the Implementing Document.

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4.3.1.1 In summary, the TMI Emergency Plan provides:

1. A means for classifying emergency conditions in a manner compatible with a system utilized by State and County emergency response agencies and organizations.
2. A means of reclassifying such emergency conditions should the severity increase or decrease.
3. Details of normal and emergency operating organizations.
4. General guidelines as well as specific details as to which State, County, and federal authorities and agencies and other outside organizations are available for assistance.
5. Information pertaining to the emergency facilities and equipment available both onsite and offsite.
6. Guidance for the preparation of detailed Emergency Plan Implementing Procedures.

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5. Information pertaining to the emergency facilities and equipment available both onsite and offsite.

6. Guidance for the preparation of detailed Emergency Plan Implementing Procedures.

7. Requirements, such as training, drills, reviews, and audits, which will result in a high degree of emergency preparedness and operational readiness.

8. Figures and tables which display detailed information and data such as organization charts, maps, population distributions, etc.

9 An appendix detailing specific plans and agreements pertaining to participating offsite organizations and agencies.

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9. An appendix detailing specific plans and agreements pertaining to participating offsite organizations and agencies.

TMIA Contention No. 2

4.1.1 **Unusual Event**

The least severe of the four emergency classes defined by this Plan is called an Unusual Event. For the purposes of this Plan, an Unusual Event shall be defined as the occurrence of an event or events that indicate or allow recognition of a potential degradation of the level of safety of the plant. For convenience, this class shall also include contaminated injuries of plant personnel which require offsite emergency treatment. The incident shall be classified as an Unusual Event only if the event is a minor one and no releases of radioactive material

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The emergency action levels that shall require an Unusual Event declaration include (but are not necessarily limited to) the following:

1. A reactor trip coincident with either:
   a. Total Loss of Forced Reactor Coolant Flow
   b. Total Loss of main and emergency feedwater

2. Any reactor trip followed by an unanticipated automatic ECCS actuation.

3. Reactor Building pressure $\geq$ 2.0 psig.

4. Reactor coolant total activity $\geq$ 50 uCi/ml.

5. Any unidentified Reactor Coolant System leakage $\geq$ 1 gpm or total Reactor Coolant System leakage $\geq$ 10 gpm that results in a Technical Specification required shutdown.

6. Sustained loss of all offsite power which results in a reactor trip.

7. Both Diesel Generators inoperable resulting in a Technical Specification required shutdown.

requiring offsite response or monitoring are expected. Events in this class are selected based upon a potential to degenerate to a more severe situation rather than an actual public hazard.

The emergency action levels that shall require an Unusual Event declaration include (but are not necessarily limited to) the following:

1. An automatic reactor trip coincident with either:
   a. Loss of Reactor Coolant Flow
   b. Loss of main and auxiliary feedwater
2. Any reactor trip followed by an unanticipated automatic ECCS actuation.
3. Reactor Building pressure $\geq$ 2.0 psig.
4. Reactor coolant total activity $\geq$ 50 uCi/ml.
5. Any unidentified Reactor Coolant System leakage $\geq$ 1 gpm or total Reactor Coolant System leakage $\geq$ 10 gpm that results in a Technical Specification required shutdown.
6. Sustained loss of all offsite power which results in a reactor trip.
7. Both Diesel Generators inoperable resulting in a Technical Specification required shutdown.
8. Projected river stage $\geq$ 302 ft. at the River Water Intake Structure.
9. Any earthquake of a magnitude $\geq$ .01g as indicated by the "Threshold Seismic Condition" annunciator.

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9. Any earthquake of a magnitude $\geq$ .01g as indicated by the "Threshold Seismic Condition" annunciator.
10. Transportation of a contaminated, injured individual from onsite to an offsite hospital.
11. Actual or projected hurricane force winds ($\geq$ 75 mph sustained).
12. Onsite aircraft crash outside the protected area fence and not impacting on plant structures.
13. Any near or onsite toxic or flammable gas or liquid release which affects the habitability required for normal plant operations.
14. Valid alert alarm on an effluent radiation monitor gas channel. (Monitors RM-A8, RM-A9 and RM-A5)
15. Any fire in a permanent plant structure which cannot be controlled by the Fire Brigade within 10 minutes of discovery or any fire outside plant structures requiring offsite firefighting assistance.
16. Any valid Reactor Building evacuation alarm.

The intent of the values noted above is to provide absolute values which, if exceeded, will initiate the Unusual Event emergency class.

In addition to the requirements for declaration of this emergency class that are imposed by the emergency action levels described above, the Unusual Event class can be declared by an action statement in a specific Emergency Procedure or Alarm Response Procedure. Steps in these procedures state that an Unusual Event has occurred or is occurring and require that an Unusual Event class of emergency be declared. All Emergency Plan related actions (notification, etc.) will be carried out in parallel with the remainder of the Emergency Procedure.

Lastly, the Emergency Director shall declare an Unusual Event any time that, in his judgement, the plant status warrants such a declaration. Training shall stress the need to analyze all minor events in light of their potential for further degradation of the level of safety of the plant and not hesitate to declare this particular emergency class.

10. Transportation of a contaminated, injured individual from onsite to an offsite hospital.

11. Actual or projected hurricane force winds (≥ 75 mph sustained).

12. Onsite aircraft crash outside the protected area fence and not impacting on plant structures.

13. Any near or onsite toxic or flammable gas or liquid release which affects the habitability required for normal plant operations.

14. Valid alert alarm on an effluent radiation monitor gas channel. (Monitors RM-A8, RM-19 and RM-A5)

15. Any fire in a permanent plant structure which cannot be controlled by the Fire Brigade within 10 minutes of discovery or any fire outside plant stuctures requiring offsite firefighting assistance.

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class of emergency be declared. All Emergency Plan related actions (notification, etc.) will be carried out in parallel with the remainder of the Emergency Procedure.

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TMIA Contention No. 3

4.1.4 General Emergency

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The highest, most severe class of emergency defined by this Emergency Plan is called General Emergency. The General Emergency class will contain accidents which involve actual or imminent substantial core degradation or melting with potential for large releases of radioactive material and/or loss of Reactor Building (containment) integrity, and other accidents that have large radioactive release of radioactive material and/or loss of Reactor Building (containment) integrity, and other accidents that have large radioactive release potential such as fuel handling and waste gas system accidents.

In keeping with the philosophy adopted throughout this Plan, the emergency action levels are set at values below the EPA protective action guides so that they may be used to (1) declare the emergency, (2) notify the appropriate authorities and support groups, and (3) mobilize the applicable portions of the emergency organizations. However, this class of emergency is somewhat different in that some protective actions may be recommended upon declaration of the General Emergency, since, for this emergency class, the lower limits of the protective action guides are likely to be exceeded. The emergency action levels have been selected so that time should be available to make some confirmatory measurements in the field prior to implementation of any of the more extensive (i.e., evacuation) protective actions.

Some of the General Emergency action levels require a dose projection calculation using actual meteorology. This differs from the adverse meteorology assumptions used in the Site Emergency action levels in order to remove this built-in

substantial core degradation or melting with potential for large releases of radioactive material and/or loss of Reactor Building (containment) integrity, and other accidents that have large radioactive release potential such as fuel handling and waste gas system accidents.

In keeping with the philosophy adopted throughout this Plan, the emergency action levels are set at values below the EPA protective action guides so that they may be used to (1) declare the emergency, (2) notify the appropriate authorities and support groups, and (3) mobilize the applicable portions of the emergency organizations. However, this class of emergency is somewhat different in that some protective actions may be recommended upon declaration of the General Emergency, since, for this emergency class, the lower limits of the protective action guides are likely to be exceeded. The emergency action levels have been selected so that time should be available to make some confirmatory measurements in the field prior to implementation of any of the more extensive (i.e., evacuation) protective actions. Some of the General Emergency action levels require a dose projection calculation using actual meteorology. This differs from the adverse meteorology assumptions used in the Site Emergency action levels in order to remove this built-in conservatism and to preclude declaring a General Emergency when actual conditions do not warrant that high of classification. In those cases where radiation monitors are offscale, the calculations will use contingency dose release

conservatism and to preclude declaring a General Emergency when actual conditions do not warrant that high of an emergency classification. In those cases where radiation monitors are offscale, the calculations will use contingency dose release factors. A detailed description of the protective actions to be taken for each class of emergency will be presented in Section 4.6.0.

The emergency action levels that shall require declaration of a General Emergency include (but are not necessarily limited to) the following:

1. A projected dose rate at the exclusion area boundary from all sources of $\geq$ 100 mR/hr (gamma) using actual meteorology and Reactor Building design leakrate.

2. A projected child thyroid dose from all sources at the exclusion area boundary of $\geq$ 500 mR in one hour using actual meteorology and Reactor Building design leakrate.

3. Offsite monitoring reports of $\geq$ 100 mR/hr (gamma) at any location.

4. Reactor Building high range monitor exceeds the level for a Site Emergency with either (1) a measured Reactor Building pressure $\geq$ 55 psig or (2) a measured hydrogen concentration in the Reactor Building $\geq$ 3% by volume.

Also, the Emergency Director shall declare a General Emergency at any time that in his judgement plant conditions exist that already, or in the near term warrant the taking of some protective actions for the population-at-risk. Although the emergency action levels are set below values related to the EPA protective action guides to allow time for further assessment, it is possible that some protective actions will be required upon declaration. For a complete discussion of these actions refer to Section 4.6.0.

factors. A detailed description of the protective actions to be taken for each class of emergency will be presented in Section 6.0.

The emergency action levels that shall require declaration of a General Emergency include (but are not necessarily limited to) the following:

1. A projected dose rate at the exclusion area boundary from all sources of $\geq$ 100 mR/hr (gamma) using actual meteorology and Reactor Building design leakrate.
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TMIA Contention No. 4

4.2.2 Emergency Events

As stated in the BRP's Plan, an Emergency Event is any condition or event which has the potential to discharge significant quantities of radioactive material to the public domain. It also obviously includes actual discharge."

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For the purpose of relating the State's emergency classification system to the classification system defined in Section 4.4.1 above, a direct correlation between the BRP's Emergency Event and Met-Ed's Alert, Site Emergency, and General Emergency characterizations shall be made.

Since both the State's Emergency Event classification and Met-Ed's Site and General Emergency classification's inlcude events which have significant potential for radioactive releases, it is imperative that specific guidance for initiating protective actions be available to the "decision-making" personnel in emergency response organizations ar agencies. The State has, for planning purpoies, adopted the Environmental Protection Agency's (EPA) protective action guides (PAG's) that are specified in reference 4.10.8. It is important to mention that the projected values for dose and dose commitment given as emergency action levels for even the highest class of emergency (i.e. General Emergency) are considerably lower than the EPA PAG's discussed above. Therefore, the declaration of a General Emergency characterizations shall be made.

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Since both the State's Emergency Event classification and Met-Ed's Site and General Emergency classification's inlcude events which have significant potential for radioactive releases, it is imperative that specific guidance for initiating protective actions be available to the "decision-making" personnel in emergency response organizations and agencies. The State has, for planning purposes, adopted the Environmental Protection Agency's (EPA) protective action guides (PAG's) that are speci-

For the purpose of relating the State's emergency classification system to the classification system defined in Section 4.1 above, a direct correlation between the NRP's Emergency Event and Met-Ed's Alert, Site Emergency, and General Emergency characterizations shall be made.

Since both the State's Emergency Event classification and Met-Ed's Site and General Emergency classification's include events which have significant potential for radioactive releases, it is imperative that specific guidance for initiating protective actions be available to the "decision-making" personnel in emergency response organizations and agencies. The State has, for planning purposes, adopted the Environmental Protection Agency's (EPA) protective action guides (PAG's) that are specified in reference 10.8. It is important to mention that the projected values for dose and dose commitment given as emergency action levels for even the highest class of emergency (i.e. General Emergency) are considerably lower than the EPA PAG's discussed above. Therefore, the declaration of a General Emergency, although an extremely significant event in its own right, should not be construed to mean that the EPA PAG's have or even will be exceeded.

fied in reference 4.10.8. It is important to mention that the projected values for dose and dose commitment given as emergency action levels for even the highest class of emergency (i.e. General Emergency) are considerably lower than the EPA PAG's discussed above. Therefore, the declaration of a General Emergency, although an extremely significant event in its own right, should not be construed to mean that the EPA PAG's have or even will be exceeded.

TMIA Contention No. 5

5.1.1.

2. The Operations Department provides operators onsite on a rotating shift basis to ensure the safe and proper operation of the plant 24 hours per day, 7 days per week. In addition, personnel from other departments within the station organization are also assigned to shifts to provide additional capabilities. Requirements for minimum shift crews are specified in Section 6.2 of the Technical Specifications (reference 10.13.1), however, the typical TMI Unit 1 shift organization is shown on Figure 10. It is important to mention that the shift organization can be augmented, in the event of an emergency, with off-duty personnel within 60 minutes.

a. The Shift Supervisor, who is on duty at all times, is in the immediate onsite position of authority and

4.5.1.1.

2. The Operations Department provides operators onsite on a rotating shift basis to ensure the safe and proper operation of the plant 24 hours per day, 7 days per week. In addition, personnel from other departments within the station organization are also assigned to shifts to provide additional capabilities. Requirements for minimum shift crews are specified in Section 6.2 of the Technical Specifications (reference 4.10.13.1), however, the typical TMI Unit 1 shift organization is shown on Figure 10. It is important to mention that the shift organization can be augmented, in the event of an emergency, with off-duty personnel within 60 minutes.

a. The Shift Supervisor, who is on duty at all times, is in the immediate onsite position of authority and responsibility for the safe and proper operation of the plant. The Shift Supervisor will be responsible for the initial evaluation of any abnormal or emergency situation and for directing the appropriate response. If it is determined that an emergency exists, those responsibilities assigned to the Emergency Director will be assumed by the Shift Supervisor. Under such circumstances, the Shift Supervisor will initiate appropriate actions, implement proper procedures, notify appropriate offsite emergency response organizations and agencies (i.e. Dauphin County, PEMA, NRC) and the Duty Section Superintendent, and retain such responsibilities until relieved as the Emergency Director. The Shift Supervisor shall, during normal and emergency operations, maintain control over plant operations as the senior

responsibility for the safe and proper operation of the plant. The Shift Supervisor will be responsible for the initial evaluation of any abnormal or emergency situation and for directing the appropriate response. If it is determined that an emergency exists, those responsibilities assigned to the Emergency Director will be assumed by the Shift Supervisor. Under such circumstances, the Shift Supervisor will initiate appropriate actions, implement proper procedures, notify appropriate offsite emergency response organizations and agencies (i.e. Dauphin County, PEMA, NRC) and the Duty Section Superintendent, and retain such responsibilities until relieved as the Emergency Director. The Shift Supervisor shall, during normal and emergency operations, maintain control over plant operations as the senior licensed operator unless he is properly relieved by another member of the TMI Nuclear Station staff who holds a valid Senior Operator license. In addition, the Shift Supervisor shall maintain control over the conduct of operations and personnel in the Control Room.

licensed operator unless he is properly relieved by another member of the TMI Nuclear Station staff who holds a valid Senior Operator license. In addition, the Shift Supervisor shall maintain control over the conduct of operations and personnel in the Control Room.

TMIA Contention No. 6

5.1.1.2.

h. The Site Security Force provides, on a round-the-clock basis, security services (e.g. access control, surveillance, response, etc.) in accordance with the Security Plan and procedures.

4.5.1.1.2.

h. The Site Security Force provides, on a round-the-clock basis, security services (e.g. access control, surveillance, response, etc.) in accordance with the Security Plan and procedures.

TMIA Contention No. 7

5.1.3.

Additional information regarding the onsite emergency organization is provided below:

1. Direction and Coordination

The Vice President of Nuclear Operations has overall responsibility for site administration as well as for directing and coordinating the activities at TMI to ensure that it functions in a safe, reliable and efficient manner. He or his designated alternate, shall maintain these responsibilities in an emergency situation by assuming the position of Emergency Support Director.

The Unit 1 Superintendent is responsible to the Vice President of Nuclear Operations for the safe, reliable, and efficient operation of the plant in conformance with the Operating License. He, or his designated alternate, shall maintain these responsibilities in an emergency situation.

As mentioned in subsection 5.1.1 2.a above, the Shift Supervisor will, in the event an emergency exists, assume

4. 5.1.3.

Additional information regarding the onsite emergency organization is provided below:

1. Direction and Coordination

The Vice President of Met-Ed has overall responsibility for site administration as well as for directing and coordinating the activities at TMI to ensure that it functions in a safe, reliable and efficient manner. He or his designated alternate, shall maintain these responsibilities in an emergency situation by assuming the position of Emergency Support Director.

the responsibilities of the Emergency Director. In addition, he will notify the Duty Section Superintendent, who will relieve the Shift Supervisor of Emergency Director responsibilities upon his arrival in the Control Room.

The Emergency Director, following notification of an existing or potential emergency, will respond to the emergency as described in Section 6.1 below. The Emergency Director will be responsible for final assessments of emergency situations, especially where the emergency presents a real or potential hazard to offsite persons or property. Regardless of existing plans, the judgement of the Emergency Director will be extremely important in assessing emergency situations and in taking appropriate protective and corrective actions. As such, he will implement the TMI Emergency Plan through the use of specific Emergency Plan Implementing Procedures, activate necessary and/or required portions of the emergency organization and, as appropriate:

c. Provide liaison and communications with the County, State, and Federal governments, and ensure that notification and reports to these agencies are made in a timely manner.

The Manager Unit 1 is responsible to the Vice President of Met-Ed for the safe, reliable, and efficient operation of the plant in conformance with the Operating License. He, or his designated alternate, shall maintain these responsibilities in an emergency situation.

As mentioned in subsection 4.5.1.1 2.a above, the Shift Supervisor will, in the event an emergency exists, assume the responsibilities of the Emergency Director. Until such time as personnel can be recalled to staff the emergency organization (Figure 12), the Shift Supervisor will assign members of the shift organization to cary out prioritized actions as described in Section 4.6.1.2. In addition, he will notify the Duty Section Superintendent, who will relieve the Shift Supervisor of Emergency Director responsibilities upon his arrival in the Control Room. In case the Shift Supervisor is unavailable or becomes incapacited for any reason, the Shift Foreman has the authority to assume the position of Emergency Director until properly relieved by the Duty Section Superintendent.

The Emergency Director, following notification of an existing or potential emergency, will respond to the emergency as described in Section 4.6.1 below. The Emergency Director will be responsible for final assessments of emergency situations, especially where the emergency presents a real or potential hazard to offsite persons or property. Regardless of existing plans, the judgement of the Emergency Director will be extremely important in assessing emergency situations and in taking appropriate protective and corrective actions. As such, he will implement the TMI Emergency Plan through the use of specific Emergency Plan Implementing Procedures, activate necessary and/or required portions of the emergency organization and, as appropriate:

c. Provide liaison and communications with the County, State, and Federal governments, and ensure that notification and reports to these agencies are made in a timely manner.
d. Communicate with the offsite emergency support organization.

d. Communicate with the offsite emergency support organization.

TMIA Contention No. 8

5.1.3.2.

f. Firefighting

Specific personnel on each shift (Shift Fire Brigade) are trained in firefighting to ensure such capability will be available 24 hours per day, 7 days per week. The Fire Brigade, under the direction of the Shift Supervisor or another individual designated by him, shall respond to all fire alarms and report to the location of the fire with assigned equipment. During the normal work week, additional qualified firefighting personnel will, as necessary, be obtained from the normal onsite organization. Assistance will be requested from local fire departments as deemed necessary by the Shift Supervisor.

4.5.1.3.2.

f. Firefighting

Specific personnel on each shift (Shift Fire Brigade) are trained in firefighting to ensure such capability will be available 24 hours per day, 7 days per week. The Fire Brigade, under the direction of the Shift Supervisor or another individual designated by him, shall respond to all fire alarms and report to the location of the fire with assigned equipment. During the normal work week, additional qualified firefighting personnel will, as necessary, be obtained from the normal onsite organization. Assistance will be requested from local fire departments as deemed necessary by the Shift Supervisor.

TMIA Contention No. 9

5.3.2 County Agencies

Section 7 of the State Council of Civil Defense Act of 1951 states that "Each political subdivision of this State is hereby authorized and directed to establish a local organization for civil defense in accordance with the State Civil Defense plan and program. Each local organization for civil defense shall have a Director who shall be appointed by the Governor upon the recommendation of the executive officer or governing body of the political subdivision. The Director shall be responsible for the organization, administration and operation of such local organization for civil defense, subject to the direction and control of such executive officer or governing body." Therefore, each County and Local Civil Defense Director in the State is responsible for establishing a civil defense organization within their respective jurisdiction, devel-

5.3.2 County Agencies

Section 7 of the State Council of Civil Defense Act of 1951 states that "Each political subdivision of this State is hereby authorized and directed to establish a local organization for civil defense in accordance with the State Civil Defense plan and program. Each local organization for civil defense shall have a Director who shall be appointed by the Governor upon the recommendation of the executive officer or governing body of the political subdivision. The Director shall be responsible for the organization, administration and operation of such local organization for civil defense, subject to the direction and control of such executive officer or governing body." Therefore, each County and Local Civil Defense Director in the State is responsible for establishing a civil defense organization within their respective jurisdiction, developing plans and preparing for emergency operations in conformity with the State's with the State's Disaster Operations Plan and the State Council of Civil Defense Act of 1951.

With respect to the 10 mile EPZ, the 5 counties identified below have prepared emergency plans that are coordinated not only with the State's Disaster Operations Plan but with the TMI Emergency Plan as well. Local government plans are either included directly with their respective County's plan or are maintained as separate, but coordinated documents.

1. Dauphin County

The Dauphin County Action and Response Plan for Emergency Personnel and Citizens was prepared by the Dauphin County Office of Emergency Preparedness. This plan is attached as Appendix E.

To provide adequate response capability, the County Emergency Operations Center is the location of the County dispatch for police, fire, and rescue services and is manned by a dispatcher 24 hours per day, 7 days per week.

2. York County

The York County Evacuation Plan for the Three Mile Island Nuclear Power Plant, attached to this Plan as Appendix F, was prepared under direction of the County Commissioners and the County Civil Defense Director.

The York County Emergency Operations Center is the location of the County dispatcher for police, fire, and rescue services and is manned by a dispatcher on a 24 hour per day, 7 day per week basis.

oping plans and preparing for emergency operations in conformity with the State's Disaster Operations Plan and the State Council of Civil Defense Act of 1951.

With respect to the Emergency Planning Zone, the 5 counties identified below have prepared emergency plans that are coordinated not only with the State's Disaster Operations Plan but with the TMI Emergency Plan as well. Local government plans are either included directly with their respective County's plan or are maintained as separate, but coordinated documents.

1. Dauphin County

   The Dauphin County Action and Response Plan for Emergency Personnel and Citizens was prepared by the Dauphin County Office of Emergency Preparedness. This plan is attached as Appendix E.

   To provide adequate response capability, the County Emergency Operations Center is the location of the County dispatch for police, fire, and rescue services and is manned by a dispatcher 24 hours per day, 7 days per week.

2. York County

   The York County Evacuation Plan for the Three Mile Island Nuclear Power Plant, attached to this Plan as Appendix F, was prepared under direction of the County Commissioners and the County Civil Defense Director.

3. Lancaster County

   The Lancaster County Emergency Evacuation Plan was prepared by the County Emergency Management Agency under the direction of the Lancaster County Commissioners. This plan is attached to this document as Appendix G.

   The Lancaster County Emergency Mangement Agency has made provisions for 24 hours per day, 7 day per week emergency response coverage.

4. Cumberland County

   The Cumberland County Evacuation Plan 79-1 (For Response to a Nuclear Incident at Three Mile Island Nuclear Station) was prepared under the direction of the Cumberland County Commissioners and Director of Emergency Preparedness. A copy of this plan is attached as Appendix H.

   The Cumberland County Emergency Operations Center is the location of the County dispatcher for police, fire, and rescue services and is manned by a dispatcher on a 24 hour per day, 7 day per week basis.

5. Lebanon County

   The Lebanon County Emergency Operations Plan, a copy of which is attached as Appendix I, was prepared by the Cumberland County Emergency Management Agency and approved by the County Commissioners.

The York County Emergency Operations Center is the location of the County dispatcher for police, fire, and rescue services and is manned by a dispatcher on a 24 hour per day, 7 day per week basis.

3. Lancaster County

The Lancaster County Emergency Evacuation Plan was prepared by the County Emergency Management Agency under the direction of the Lancaster County Commissioners. This plan is attached to this document as Appendix G.

The Lancaster County Emergency Management Agency has made provisions for 24 hours per day, 7 day per week emergency response coverage.

4. Cumberland County

The Cumberland County Evacuation Plan 79-1 (For Response to a Nuclear Incident at Three Mile Island Nuclear Station) was prepared under the direction of the Cumberland County Commissioners and Director of Emergency Preparedness. A copy of this plan is attached as Appendix H.

The Cumberland County Emergency Operations Center is the location of the County dispatcher for police, fire, and rescue services and is manned by a dispatcher on a 24 hour per day, 7 day per week basis.

5. Lebanon County

The Lebanon County Emergency Operations Plan, a copy of which

is attached as Appendix I, was prepared by the Cumberland County Emergency Management Agency and approved by the County Commissioners.

TMIA Contention No. 10

4.5.4 Training of State, County and Local Governments

The Pennsylvania Emergency Management Agency (PEMA), in accordance with Annex E of the Disaster Operations Plan, will conduct and participate in annual training exercises that involve State, county and local government agencies and consist of (1) scenario development, (2) reviewing Radiation Emergency Response Plans, procedures, and response capabilities, (3) testing of communications, radiological monitoring instrumentation and warning systems, and (4) critique of the exercises. PEMA also provides a comprehensive series of courses consisting of home study, seminars/workshops, and formal training programs on subjects such as basic Civil Defense, basic health physics, operation of radiological survey instrumentation, emergency management, and county coordinator development courses and conferences. These programs are utilized to provide state emergency monitoring teams with the necessary skills to perform their functions, to provide new County Civil Defense Directors/Coordinators with the necessary knowledge to implement radiation emergency response plans and procedures, and to instruct local government officials, their staffs, and other key personnel in emergency preparedness planning.

TMIA Contention No. 11

6.4.1.

2. Offsite Areas

The responsibility for actions to protect persons in offsite areas rests with the Commonwealth of Pennsyl-

4.6.4.1.

2. Offsite Areas

The responsibility for actions to protect persons in offsite areas rests with the Commonwealth of Pennsylvania and is described in detail in Annex E (attached as Appendix B) to the Commonwealth of Pennsylvania Disaster Operations Plan and implemented in conjunction with several additional county emergency plans.

The Department of Environmental Resources Bureau of Radiation Protection (BRP) is the specific agency responsible for evaluating information from the plant staff and all other sources and recommending to PEMA that protective actions be taken. The BRP has a number of protective action options such as evacuation, sheltering and thyroid prophylaxis. The most appropriate protective action for a particular situation will depend on the magnitude of the release, duration of the release, wind speed, wind direction, time of day and transportation constraints. In the case of a General Emergency, circumstances may indicate the immediate need to initiate some precautionary protective action. This judgment is the responsibility of the BRP and should be based on an evaluation of the current plant conditions, dose projections relative to the PAG's and expected subsequent plant operations/evaluations. Examples of such precautionary measures are (1) immediate sheltering within a certain radial distance from the plant, (2) evacuation within a certain radial distance from the plant, (3) evacuation of a certain sector based on wind speed and direction, etc.

Met-Ed, through the TMI Emergency Director shall remain ready throughout an emergency to provide protective action recommendations to State officials (see also Assessment Actions, Section 4.6.2). The means to warn or advise persons involved is designated a responsibility of the "Risk County" in Annex E of the State's Disaster Operations Plan.

Annex E also designates the "Risk County" as responsible for the preparation and dissemination of information material on protective actions to the general public.

vania and is described in detail in Annex E (attached as Appendix D) to the Commonwealth of Pennsylvania Disaster Operations Plan and implemented in conjunction with several additional county emergency plans. Met-Ed, through the TMI Emergency Director shall remain ready throughout an emergency to provide protective action recommendations to State officials (see also Assessment Actions, Section 6.2). The means to warn or advise persons involved in designated a responsibility of the "Risk county" in Annex E of the State's Disaster Operations Plan.

Annex E also designates the "Risk county" as responsible for the preparation and dissemination of information material on protective actions to the general public.

TMIA Contention No. 12

4.6.6 Early Warning and Information for Transient Areas

4.6.6.1 Early Warning

Early warning and instructions to the population at risk are accomplished by the PEMA and its affected county emergency management organizations. Prompt notification by the licensee is the vital first link in this process and is described in Sections 4.4.1, 4.6.0, 4.6.1, 4.6.1.2 2.b and 4.7.5.

Once Commonwealth of Pennsylvania authorities have been notified, several methods to warn the population-at-risk can be utilized. The method used will depend on the severity of the situation. The methods available are:

2. Siren Alert System - The counties can selectively activate warning sirens.

5. Vehicles with loudspeakers can be dispatched to broadcast warning messages.

Additional information concerning warning capability is detailed in Annex I to the State Disaster Operations Plan. This is included in Appendix D.

(Several additional equipment options are currently being evaluated for purchase and installation which would enhance the licensee, state and county early warning capability.)

TMIA Contention No. 13

8.0 MAINTAINING EMERGENCY PREPAREDNESS

Metropolitan Edison Company will maintain, as two separate documents, this Emergency Plan and the Emergency Plan Implementing Document. It is intended that this Plan, although considered as part of the Three Mile Island Nuclear Station Unit 1 Final Safety Analysis Report (FSAR), will be maintained as a separate document as suggested by the guidance provided in reference 10.4.

Efforts will be made to assure continuous emergency preparedness and operational readiness among Met-Ed personnel and the offsite response agencies and organizations. The Met-Ed Vice President of Nuclear Operations has been assigned overall responsibility for emergency planning related to the TMI Nuclear Station. This responsibility includes not only the TMI Emergency Plan and Implementing Document but also includes its interrelationship with State, federal, and county plans; agreement letters; corporate policy and plans; and other related plans, programs, and procedures. To assist the Vice President of Nuclear Operation in meeting his assigned responsibilities, an Emergency Planning Coordinator has been designated. The specific responsibilities delegated to the individual assigned as the Emergency Planning Coordinator are described in the following subsections and in particular, subsection 8.1.3.

8.1 Organizational Preparedness

8.1.1 Training

All personnel at the Three Mile Island Nuclear Station will take part in a formal training program under the direction of the Manager, Training. In general, this training program provides for the indoctrination of Met-Ed/GPU employees and contractors

4.8.0 MAINTAINING EMERGENCY PREPAREDNESS

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Efforts will be made to assure continuous emergency preparedness and operational readiness among Met-Ed personnel and the offsite response agencies and organizations. The Vice President Met-Ed has been assigned overall responsibility for emergency planning related to the TMI Nuclear Station. This responsibility includes not only the TMI Emergency Plan and Implementing Document but also includes its interrelationship with State, federal, and county plans; agreement letters, corporate policy and plans; and other related plans, programs, and procedures. To assist the Vice President Met-Ed in meeting his assigned responsibilities, an Emergency Planning Coordinator has been designated. The specific responsibilities delegated to the individual assigned as the Emergency Planning Coordinator are described in the following subsections and in particular, subsection 4.8.1.3.

4.8.1 Organizational Preparedness

4.8.1.1 Training

All personnel at the Three Mile Island Nuclear Station will take part in a formal training program under the direction of the Manager, Training. In general, this training program provides for the indoctrination of Met-Ed/GPU employees and contractors in addition to providing specialized training for licensed operators, health physics/radiation protection personnel, and personnel assigned specific responsibilities in the emergency organization.

The Manager of Training is responsible for ensuring that personnel in each department receive the appropriate training. He may delegate specialty training responsibilities to personnel qualified to perform such training. The training program for the TMI Nuclear Station with regards to the TMI Emergency Plan will include the following:

1. All Three Mile Island staff personnel, except personnel in the Operations Department, are required to attend the General Employee Training Program at least once per calendar year. In addition, the prompt indoctrination of new employees and contractor personnel is provided for in the Health Physics Training Program which they are required to attend prior to receiving the privilege of unescorted access onsite. With

in addition to providing specialized training for licensed operators, health physics/radiation protection personnel, and personnel assigned specific responsibilities in the emergency organization.

The Manager of Training is responsible for ensuring that personnel in each department receive the appropriate training. He may delegate specialty training responsibilities to personnel qualified to perform such training. The training program for the TMI Nuclear Station with regards to the TMI Emergency Plan will include the following:

1. All Three Mile Island staff personnel, except personnel in the Operations Department, are required to attend the General Employee Training Program at least once per calendar year. In addition, the prompt indoctrination of new employees and contractor personnel is provided for in the Health Physics Training Program which they are required to attend prior to receiving the privilege of unescorted access onsite. With regards to emergency planning, the objectives of these programs are to:
   a. Familiarize personnel with the scope, applicability, and implementation of the TMI Emergency Plan and Implementing Document.
   b. Teach the general duties and responsibilities assigned to all TMI personnel.
   c. Keep personnel informed of any changes in the TMI Emergency Plan and/or the Implementing Document.
   d. Maintain a high degree of preparedness at all levels of the TMI Nuclear Station organization.

regards to emergency planning, the objectives of these programs are to:

   a. Familiarize personnel with the scope, applicability, and implementation of the TMI Emergency Plan and Implementing Document.
   b. Teach the general duties and responsibilities assigned to all TMI personnel.
   c. Keep personnel informed of any changes in the TMI Emergency Plan and/or the Implementing Document.
   d. Maintain a high degree of preparedness at all levels of the TMI Nuclear Station organization.

To meet these objectives, each TMI Nuclear Station employee and unescourted contractor personnel will receive, as a minimum, the following instruction:

   a. Orientation in the content of the TMI Emergency Plan and the Implementing Document.
   b. Orientation in the implementation and operation of the TMI Emergency Plan, including the assignment of duties and responsibilities, location of emergency centers and assembly facilities, and the location of emergency equipment and supplies, where applicable.
   c. Orientation in individual employee responsibilities with regard to the use of emergency facilities and equipment, familiarization with station alarms and personnel response, and the use of general station communications systems.
   d. Orientation in instructions and requirements associated with personnel accountability, evacuation, and exposure criteria.
   e. Orientation in radiation protection with emphasis on the principles and use of protective clothing, equipment, and personnel dosimetry.

2. Personnel assigned to the Met-Ed emergency organization with specific Emergency Plan duties and responsibilities shall receive specialized training for their respective assignments. Table 12 delineates which personnel will receive specialized training, the type of training, and the minimum required frequency of such training.

To meet these objectives, each TMI Nuclear Station employee and unescourted contractor personnel will receive, as a minimum, the following instruction:

a. Orientation in the content of the TMI Emergency Plan and the Implementing Document.

b. Orientation in the implementation and operation of the TMI Emergency Plan, including the assignment of duties and responsibilities, location of emergency centers and assembly facilities, and the location of emergency equipment and supplies, where applicable.

c. Orientation in individual employee responsibilities with regard to the use of emergency facilities and equipment, familiarization with station alarms and personnel response, and the use of general station communications systems.

d. Orientation in instructions and requirements associated with personnel accountability, evacuation, and exposure criteria.

e. Orientation in radiation protection with emphasis on the principles and use of protective clothing, equipment, and personnel dosimetry.

2. Personnel assigned to the Met-Ed emergency organization with specific Emergency Plan duties and responsibilities shall receive specialized training for their respective assignments. Table 12 delineates which personnel will receive specialized training.

3. The Pennsylvania Emergency Management Agency (PEMA), develops, conducts, coordinates, and promotes a training program throughout the State and assists the counties in developing training policy for disaster operational readiness. The county and local Civil Defense Directors are responsible for planning and conducting disaster preparedness training of respective emergency response personnel. Met-Ed will work closely with PEMA and the county and local Civil Defense Directors in coordinating training programs. In addition, orientation and training of State and county agencies and personnel involved in TMI emergency planning efforts will be made available by Met-Ed.

a. The civil defense organizations listed below will be invited, on at least an annual basis, to participate in a training program at the TMI Nuclear Station. The program will relate the importance of effective planning for emergency situations and interfaces between the "licensee's" emergency organizations and the offsite (i.e. State, county, and federal) emergency organizations. The program will also include a review of the TMI Emergency Plan and Implementing Document with particular emphasis given to the classification of emergencies; reporting requirements; assessment, protective, and corrective actions; and communications networks.

(1) Pennsylvania Emergency Management Agency
(2) Dauphin County Civil Defense
(3) York County Civil Defense
(4) Lancaster County Civil Defense
(5) Cumberland County Civil Defense
(6) Lebanon County Civil Defense

b. At least annually, the State Bureau of Radiation Protection will be invited to participate in a training program at the TMI Nuclear Station. The program will, as does the program for the civil defense organizations, relate the importance of effective planning for emergency situations, the interface between the "licensee's" emergency organizations and the offsite (i.e. State, county, and federal) emergency organizations. The program will include a review of the TMI Emergency Plan and Implementing Document with particular emphasis given to the classification of emergencies; reporting requirements; assessment, protective, and corrective actions; and communications networks. In addition,

the type of training, and the minimum required frequency of such training.

3. The Pennsylvania Emergency Management Agency (PEMA) develops, conducts, coordinates, and promotes a training program throughout the State and assists the counties in developing training policy for disaster operational readiness. The county and local Civil Defense Directors are responsible for planning and conducting disaster preparedness training of respective emergency response personnel. Met-Ed will work closely with PEMA and the county and local Civil Defense Directors in coordinating training programs. In addition, orientation and training of State and county agencies and personnel involved in TMI emergency planning efforts will be made available by Met-Ed.

a. The civil defense organizations listed below will be invited, on at least an annual basis, to participate in a training program at the TMI Nuclear Station. The program will relate the importance of effective planning for emergency situations and interfaces between the "licensee's" emergency organizations and the offsite (i.e. State, county, and federal) emergency organizations. The program will also include a review of the TMI Emergency Plan and Implementing Document with particular emphasis given to the classification of emergencies; reporting requirements; assessment, protective, and corrective actions, and communications networks.

specific training on dose calculations/projections, protective action guides, and reportable information will also be provided.

c. The State Police will, on at least an annual basis, be invited to participate in a training program that will include a review of the applicable parts of the TMI Emergency Plan and Implementing Document with emphasis on the classification of emergencies, communications, and specific areas of responsibility.

4. Met-Ed will also provide orientation and training to local services support organizations as specified in respective letters of agreement and as required to ensure a high state of emergency preparedness and response capability between these organizations and the TMI Nuclear Station emergency organization. The local services support organizations and personnel who may provide onsite emergency assistance will be encouraged to become familiar with the TMI Nuclear Station (including the physical plant layout) and key station personnel, and will be invited to attend Emergency Plan orientation and training courses conducted by or for Met-Ed It is anticipated that such training will be provided on at least an annual basis and will be made available to the appropriate personnel of the following organizations and certain specified individuals.

a. Middletown Police Department

The Middletown Police Department will be invited to participate in a training program that will include a review of the applicable parts of the TMI Emergency Plan and Implementing Document with emphasis on the classification of emergencies, communications, and specific areas of emergencies, communications, and specific areas of responsibility.

b. Fire Companies

The local fire and rescue companies will be invited to participate in a training program that will, as a minimum, include the following topics:

(1) Interface with the Site Security Force during emergencies.
(2) Basic health physics indoctrination and training.

and communications networks.

(1) Pennsylvania Emergency Management Agency

(2) Dauphin County Civil Defense

(3) York County Civil Defense

(4) Lancaster County Civil Defense

(5) Cumberland County Civil Defense

(6) Lebanon County Civil Defense

b. At least annually, the State Bureau of Radiation Protection will be invited to participate in a training program at the TMI Nuclear Station. The program will, as does the program for the civil defense organizations, relate the importance of effective planning for emergency situations, the interface between the "licensee's" emergency organizations and the offsite (i.e. State, county, and federal) emergency organizations. The program will include a review of the TMI Emergency Plan and Implementing Document with particular emphasis given to the classification of emergencies; reporting requirements; assessment, protective, and corrective actions; and communications networks. In addition, specific training on dose calculations/projections, protective action guides, and reportable information will also be provided.

c. The State Police will, on at least an annual basis, be invited to participate in a training program that will include a review of the applicable parts of the TMI

(3) TMI Nuclear Station facility layout.
(4) Onsite fire protection system equipment (permanent and portable).
(5) Differences between onsite firefighting equipment and fire company supplied equipment.
(6) Communications systems.
(7) Review of applicable parts of the TMI Emergency Plan and Implementing Document.
(8) The onsite emergency organization with specific emphasis on the interface between the TMI Fire Brigade and Fire Company personnel.

c. Hershey Medical Center, Local Physicians, and Fire Company (listed above) Ambulance Services

The local medical support organizations and personnel will also be invited to participate in a training program that will, as a minimum and as applicable, include the following topics:

(1) Interface with the Site Security Force during emergencies.
(2) Basic health physics indoctrination and training
(3) TMI Nuclear Station facility layout
(4) Onsite medical treatment facilities, equipment, and supplies
(5) Communications systems
(6) The onsite emergency organization with specific emphasis on the interface between the TMI First Aid and Rescue Team(s), the local medical support personnel, and Radiation Management Corporation.
(7) Radiological aspects of emergency medical treatment.
(8) TMI Nuclear Station procedures for decontamination.
(9) Hershey Medical Center radiation emergency procedures.

4.8.1.2 Drills and Exercises

Periodic drills and exercises will be conducted in order to test the state of emergency preparedness. The prime objective of this form of training is to verify the emergency preparedness of all participating personnel, organizations, and agencies. Each drill or exercise will be conducted to: (1) ensure that the participants are familiar with their respective duties and responsibilities, (2) verify the adequacy of the TMI Emergency Plan and the methods used in the Emergency Plan Implementing Procedures, (3) test communications networks and systems, (4) check the availability of emergency supplies and equipment, and (5) verify the operability of emergency equipment.

The Emergency Planning Coordinator will be responsible for the planning, scheduling, and coordinating of all emergency

Emergency Plan and Implementing Document with emphasis on the classification of emergencies, communications, and specific areas of responsibility.

4. Met-Ed will also provide orientation and training to local services support organizations as specified in respective letters of agreement and as required to ensure a high state of emergency preparedness and response capability between these organizations and the TMI Nuclear Station emergency organization. The local services support organizations and personnel who may provide onsite emergency assistance will be encouraged to become familiar with the TMI Nuclear Station (including the physical plant layout) and key station personnel, and will be invited to attend Emergency Plan orientation and training courses conducted by or for Met-Ed It is anticipated that such training will be provided on at least an annual basis and will be made available to the appropriate personnel of the following organizations and certain specified individuals.

a. Middletown Police Department

The Middletown Police Department will be invited to participate in a training program that will include a review of the applicable parts of the TMI Emergency Plan and Implementing Document with emphasis on the classification of emergencies, communications, and specific areas of emergencies, communications, and specific areas of responsibility.

planning related drills and exercises. The Manager of Training will assist the Emergency Planning Coordinator in carrying out these responsibilities, however, all drills and exercises are subject to the approval of the Unit 1 Superintendent. In addition the Vice President Met-Ed shall approve the annual Radiation Emergency Drill.

When a major drill or exercise is to be conducted, the Emergency Planning Coordinator will:

1. Assign personnel to prepare a scenario.
2. Coordinate efforts with other participating emergency personnel, organizations, and agencies.
3. Obtain the approval of the Unit 1 Superintendent, and (for the annual Radiation Emergency Drill) the Vice President Met-Ed.
4. Schedule a date for drill execution and assign observers.
5. Critique the results of the drill.
6. Assign personnel to correct any deficiencies.
7. Ensure that deficiencies are corrected.
8. Prepare and submit documentation to the Training Department for recordkeeping.

Scheduled drills and exercises will be held involving appropriate offsite as well as onsite emergency personnel, organizations, and agencies. These drills and excercises will be conducted, simulating as closely as possible, actual emergency conditions and may be scheduled such that one or more drills or excercises can be conducted simultaneously. Drill scenarios can and will be prepared that involve participation of several emergency teams and all or specific parts of the onsite and offsite emergency organizations including varying degrees of participation of State, county, and federal agencies and organizations and local services support personnel and organizations. The Emergency Planning Coordinator will normally notify the offsite emergency response organizations and agencies at least thirty days in advance of the the scheduled date of the drill or exercise.

Recommendations for revisions to the TMI Emergency Plan and/or the Implementing Document and/or the upgrading of emergency equipment and supplies as a result of a drill or exercise shall be forwarded to the Emergency Planning Coordinator by observers or participants. The Emergency Planning Coordinator will submit such recommendations to the Unit 1 Superintendent for review. Recommended changes that are approved by the Unit 1 Superintendent shall be incorporated into the Emergency Planning Program under the direction of the Emergency Planning Coorinator Records will be maintained on each drill listed below. Major

b. Fire Companies

The local fire and rescue companies will be invited to participate in a training program that will, as a minimum, include the following topics:

(1) Interface with the Site Security Force during emergencies.

(2) Basic health physics indoctrination and training.

(3) TMI Nuclear Station facility layout.

(4) Onsite fire protection system equipment (permanent and portable).

(5) Differences between onsite firefighting equipment and fire company supplied equipment.

(6) Communications systems.

(7) Review of applicable parts of the TMI Emergency Plan and Implementing Document.

(8) The onsite emergency organization with specific emphasis on the interface between the TMI Fire Brigade and Fire Company personnel.

c. Hershey Medical Center, Local Physicians, and Fire Company (listed above) Ambulance Services

The local medical support organizations and personnel will also be invited to participate in a training program that will, as a minimum and as applicable, include the following topics:

drills and exercises will be conducted as described below:

1. Medical Emergency Drill

a. At least one drill per calender year shall be conducted. The drill will involve the participation of some, if not all, of the local medical support personnel and organizations (e.g., physician, ambulance service, hospital, etc.), and will involve cases of radiation overexposure and/or contaminated personnel and/or contaminated/injured personnel.

2. Fire Emergency Drill

a. At least one drill per calendar quarter shall be conducted.

b. At least one drill in the calendar year shall involve the participation of at least one, if not all of the local fire departments.

3. Repair and Damage Control Drill

a. At least one drill per calender year shall be conducted to exercise the Emergency Repair Team.

4. Communications Links Test

a. At least once per calendar quarter, the communication links used for notification (i.e. TMI Control Room to Dauphin County Civil Defense, Pennsylvania Emergency Management Agency, the NRC, the Emergency Director and Emergency Support Director, etc.) shall be tested.

5. Radiation Emergency Drill

a. A major drill appropriate to a Site or General Emergency shall be conducted at least once per calendar year.

b. Conduct of the drill shall provide for the coordination with and participation of offsite emergency response personnel, organizations, and agencies including those of State and county governments.

(1) About once every five years a joint exercise appropriate to a Site or General Emergency that involves federal, State, and county emergency response personnel, organizations,

(1) Interface with the Site Security Force during emergencies.

(2) Basic health physics indoctrination and training

(3) TMI Nuclear Station facility layout

(4) Onsite medical treatment facilities, equipment, and supplies

(5) Communications systems

(6) The onsite emergency organization with specific emphasis on the interface between the TMI First Aid and Rescue Team(s), the local medical support personnel, and Radiation Management Corporation.

(7) Radiological aspects of emergency medical treatment.

(8) TMI Nuclear Station procedures for decontamination.

(9) Hershey Medical Center radiation emergency procedures.

8.1.2 Drills and Exercises

Periodic drills and exercises will be conducted in order to test the state of emergency preparedness. The prime objective of this form of training is to verify the emergency preparedness of all participating personnel, organizations, and agencies. Each drill or exercise will be conducted to: (1) ensure that the participants are familiar with their respective duties and responsibilities, (2) verify the adequacy of the TMI Emergency Plan and the methods used in the Emergency Plan Implementing Procedures, (3) test communications networks and systems, (4) check the availability of emergency supplies and equipment, and (5) verify the operability of emergency equipment.

and agencies will be conducted. The scope of the exercise will test as much of the emergency plans (i.e., Met-Ed/TMI, State, and counties) as is reasonably achievable. The degree of public participation in this exercise shall be determined by the appropriate State agencies.

4.8.1.3 Emergency Planning Coordinator

A member of the TMI Nuclear Station staff will be designated as the Emergency Planning Coordinator. His responsibilities shall include, but not necessarily be limited to:

1. Ensuring the coordination of the TMI Emergency Plan with the:
   a. State plans (reference 4.10.22 and 4.10.23)
   b. County plans (reference 4.10.24 through 4.10.28)
   c. TMI Security Plan
   d. Met-Ed Emergency Communications Plan
2. Ensuring that the information, data, and procedures detailed in the Emergency Plan Implementing Document are consistent with the evidence provided in the TMI Emergency Plan.
3. Ensuring that the Emergency Plan Implementing Procedures are coordinated and interface properly with other procedures (e.g. Administrative Procedures, Security Procedures, Health Physics Procedures, and Training Procedures, etc.).
4. Assisting the Manager of Training in coordinating and/or providing emergency planning related specialty training.
5. Coordinating emergency planning related drills and exercises as described in subsection 4.8.1.2 above.
6. Coordinating the review and updating of the TMI Emergency Plan and Implementing Document as described in Section 4.8.2 below.
7. Ensuring the maintenance and inventory of emergency equipment and supplies as described in Section 4.8.3 below.
8. Maintaining himself current with respect to changes in federal regulations and guidance that impact emergency planning activities.

The Emergency Planning Coordinator will be responsible for the planning, scheduling, and coordinating of all emergency planning related drills and exercises. The Manager of Training will assist the Emergency Planning Coordinator in carrying out these responsibilities, however, all drills and exercises are subject to the approval of the Unit 1 Superintendent. In addition the Vice President of Nuclear Operations shall approve the annual Radiation Emergency Drill.

When a major drill or exercise is to be conducted, the Emergency Planning Coordinator will:

1. Assign personnel to prepare a scenario.
2. Coordinate efforts with other participating emergency personnel, organizations, and agencies.
3. Obtain the approval of the Unit 1 Superintendent, and (for the annual Radiation Emergency Drill) the Vice President of Nuclear Operations.
4. Schedule a date for drill execution and assign observers.
5. Critique the results of the drill.
6. Assign personnel to correct any deficiencies.
7. Ensure that deficiencies are corrected.
8. Prepare and submit documentation to the Training Department for recordkeeping.

Scheduled drills and exercises will be held involving appropriate offsite as well as onsite emergency personnel, organizations, and agencies. These drills and exercises will be

4.8.2 Review and Updating of the Emergency Plan and Implementing Document

The TMI Emergency Plan, including appended letters of agreement and plans of offsite organizations and agencies, will be reviewed and updated on at least an annual basis.

The TMI Generation Group Technical Support Staff is responsible for auditing, at least once every two years, the TMI Emergency Plan to verify compliance with the TMI Operational Quality Assurance Plan, the Fire Protection Program Plan, internal rules and procedures, federal regulations, and operating license provisions. In addition, the Emergency Planning Coordinator will by virtue of his involvement with the TMI Emergency Planning Program, provide an ongoing review. Personnel performing reviews or audits of the TMI Emergency Plan and/or Implementing Document shall take into account Corporate policy, State policy and plans, county plans, and the various agreements and understanding with federal, State, county, and local support agencies and organizations.

As previously mentioned, the TMI Emergency Plan is considered a part of the TMI Nuclear Station Unit 1 FSAR. As such, revisions to the Plan shall be administratively controlled by utilizing existing methods which are used in making ammendments to the FSAR.

The TMI Emergency Plan Implementing Document will be incorporated into the TMI Nuclear Station procedures program. As such, the Implementing Document will be prepared, reviewed, approved, controlled, distributed, and revised in accordance with TMI Nuclear Station Administrative Procedures. Document holders (e.g. Met-Ed; State, county, and federal agencies; etc.) will receive revisions to the Emergency Plan Implementing Document in a controlled manner as they are issued. In addition, Part 1 of the Implementing Document will provide guidance to document holders on how to make comments and recommendations concerning the Emergency Planning Program to Metropolitan Edison Company.

The Emergency Planning Coordinator is responsible for coordinating the periodic reviews and audits of the TMI Emergency Plan and Implementing Document. In addition, the Emergency Planning Coordinator shall, through letters, meetings, seminars, or other means available, ensure that all elements of the total emergency organization (e.g. Met-Ed, State, federal, county, etc.) are informed of the TMI Emergency Plan, the Implementing Document and revisions thereto.

Results of each annual review and update will be reported to the Vice President Met-Ed.

4.8.3 Maintenance and Inventory of Emergency Equipment and Supplies

The Emergency Planning Coordinator is responsible for planning and scheduling the quarterly inventory and inspection of designated emergency equipment and supplies. He will assign personnel to perform these activities.

conducted, simulating as closely as possible, actual emergency conditions and may be scheduled such that one or more drills or excercises can be conducted simultaneously. Drill scenarios can and will be prepared that involve participation of several emergency teams and all or specific parts of the onsite and offsite emergency organizations including varying degrees of participation of State, county, and federal agencies and organizations and local services support personnel and organizations. The Emergency Planning Coordinator will normally notify the offsite emergency response organizations and agencies at least thirty days in advance of the the scheduled date of the drill or exercise.

Recommendations for revisions to the TMI Emergency Plan and/or the Implementing Document and/or the upgrading of emergency equipment and supplies as a result of a drill or exercise shall be forwarded to the Emergency Planning Coordinator by observers or participants. The Emergency Planning Coordinator will submit such recommendations to the Unit 1 Superintendent for review. Recommended changes that are approved by the Unit 1 Superintendent shall be incorporated into the Emergency Planning Program under the direction of the Emergency Planning Coorinator Records will be maintained on each drill listed below. Major drills and exercises will be conducted as described below:

1. Medical Emergency Drill

   a. At least one drill per calender year shall be conducted. The drill will involve the participation of some, if not all, of the local medical support personnel

Designated emergency equipment and supplies and their storage locations will be listed in the Emergency Plan Implementing Document. Such equipment and supplies will be maintained in accordance with approved TMI Nuclear Station procedures. Equipment, supplies, and parts having shelf-lives will be checked and replaced as necessary.

Any deficiencez found during the inventory and inspection will be either cleared immediately or documented for corrective action. A report of each inventory and inspection, including documented deficiencies, will be prepared and submitted to the Emergency Planning Coordinator. The Emergency Planning Coordinator will assign personnel responsible for correcting deficiencies and shall ensure that identified deficiencies are corrected in a reasonable period of time.

and organizations (e.g., physician, ambulance service, hospital, etc.), and will involve cases of radiation overexposure and/or contaminated personnel and/or contaminated/injured personnel.

2. Fire Emergency Drill

   a. At least one drill per calendar quarter shall be conducted.

   b. At least one drill in the calendar year shall involve the participation of at least one, if not all of the local fire departments.

3. Repair and Damage Control Drill

   a. At least one drill per calendar year shall be conducted to exercise the Emergency Repair Team.

4. Communications Links Test

   a. At least once per calendar quarter, the communication links used for notification (i.e. TMI Control Room to Dauphin County Civil Defense, Pennsylvania Emergency Management Agency, the NRC, the Emergency Director and Emergency Support Director, etc.) shall be tested.

5. Radiation Emergency Drill

   a. A major drill appropriate to a Site or General Emergency shall be conducted at least once per calendar year.

   b. Conduct of the drill shall provide for the coordination with and participation of offsite emergency response personnel, organizations, and agencies

including those of State and county governments.

(1) About once every five years a joint exercise appropriate to a Site or General Emergency that involves federal, State, and county emergency response personnel, organizations, and agencies will be conducted. The scope of the exercise will test as much of the emergency plans (i.e., Met-Ed/TMI, State, and counties) as is reasonably achievable. The degree of public participation in this exercise shall be determined by the appropriate State agencies.

8.1.3 Emergency Planning Coordinator

A member of the TMI Nuclear Station staff will be designated as the Emergency Planning Coordinator. His responsibilities shall include, but not necessarily be limited to:

1. Ensuring the coordination of the TMI Emergency Plan with the:
   a. State plans (reference 10.22 and 10.23)
   b. County plans (reference 10.24 through 10.28)
   c. TMI Security Plan
   d. Met-Ed Emergency Communications Plan
2. Ensuring that the information, data, and procedures detailed in the Emergency Plan Implementing Document are consistent with the evidence provided in the TMI Emergency Plan.
3. Ensuring that the Emergency Plan Implementing Procedures are coordinated and interface properly with other procedures

3. Ensuring that the Emergency Plan Implementing Procedures are coordinated and interface properly with other procedures (e.g. Administrative Procedures, Security Procedures, Health Physics Procedures, and Training Procedures, etc.).

4. Assisting the Manager of Training in coordinating and/or providing emergency planning related specialty training.

5. Coordinating emergency planning related drills and exercises as described in subsection 8.1.2 above.

6. Coordinating the review and updating of the TMI Emergency Plan and Implementing Document as described in Section 8.2 below.

7. Ensuring the maintenance and inventory of emergency equipment and supplies as described in Section 8.3 below.

8. Maintaining himself current with respect to changes in federal regulations and guidance that impact emergency planning activities.

8.2 Review and Updating of the Emergency Plan and Implementing Document

The TMI Emergency Plan, including appended letters of agreement and plans of offsite organizations and agencies, will be reviewed and updated on at least an annual basis.

The TMI Generation Group Technical Support Staff is responsible for auditing, at least once every two years, the TMI Emergency Plan to verify compliance with the TMI Operational Quality Assurance Plan, the Fire Protection Program Plan, internal rules and procedures, federal regulations, and

operating license provisions. In addition, the Emergency Planning Coordinator will by virtue of his involvement with the TMI Emergency Planning Program, provide an ongoing review. Personnel performing reviews or audits of the TMI Emergency Plan and/or Implementing Document shall take into account Corporate policy, State policy and plans, county plans, and the various agreements and understanding with federal, State, County, and local support agencies and organizations.

As previously mentioned, the TMI Emergency Plan is considered a part of the TMI Nuclear Station Unit 1 FSAR. As such, revisions to the Plan shall be administratively controlled by utilizing existing methods which are used in making ammendments to the FSAR.

The TMI Emergency Plan Implementing Document will be incorporated into the TMI Nuclear Station procedures program. As such, the Implementing Document will be prepared, reviewed, approved, controlled, distributed, and revised in accordance with TMI Nuclear Station Administrative Procedures. Document holders (e.g. Met-Ed; State, county, and federal agencies; etc.) will receive revisions to the Emergency Plan Implementing Document in a controlled manner as they are issued. In addition, Part I of the Implementing Document will provide guidance to document holders on how to make comments and recommendations concerning the Emergency Planning Program to Metropolitan Edison Company.

The Emergency Planning Coordinator is responsible for coordinating the periodic reviews and audits of the TMI Emergency Plan and Implementing Document. In addition, the Emergency Planning Coordinator shall;

through letters, meetings, seminars, or other means available; ensure that all elements of the total emergency organization (e.g. Met-Ed, State, federal, county, etc.) are informed of the TMI Emergency Plan and amendments thereto; and the Implementing Document and revisions thereto.

Results of each annual review and update will be reported to the Vice President of Nuclear Operations.

8.3 Maintenance and Inventory of Emergency Equipment and Supplies

The Emergency Planning Coordinator is responsible for planning and scheduling the quarterly inventory and inspection of designated emergency equipment and supplies. He will assign personnel to perform these activities.

Designated emergency equipment and supplies and their storage locations will be listed in the Emergency Plan Implementing Document. Such equipment and supplies will be maintained in accordance with approved TMI Nuclear Station procedures. Equipment, supplies, and parts having shelf-lives will be checked and replaced as necessary.

Any deficiences found during the inventory and inspection will be either cleared immediately or documented for corrective action. A report of each inventory and inspection, including documented deficiencies, will be prepared and submitted to the Emergency Planning Coordinator. The Emergency Planning Coordinator will assign personnel responsible for correcting deficiencies and shall ensure that identified deficiencies are corrected in a reasonable period of time.

January 25, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Second Supplemental Response to Emergency Planning Contentions", were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 25th day of January, 1980.

Robert E. Zahler

Dated: January 25, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY	)	Docket No. 50-289
	)	(Restart)
(Three Mile Island Nuclear Station, Unit No. 1)	)	
	)	

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