

JUN 21 1985

Memorandum For: LeMoine J. Cunningham, Chief, Section 2
Operating Reactor Programs Branch, IE

From: Frank A. Wenslawski, Chief
Emergency Preparedness and Radiological Protection Branch,
RV

Subject: Proposed Emergency Preparedness (EP) Preoperational
Procedures

A May 8, 1985 memorandum from James G. Partlow, subject as above, transmitted a series of eight (8) draft EP PREOP for our comments. Attached are our comments as requested by the May 8 memorandum.

Region V strongly believes that the EP inspection program should be similar to the other IE inspection programs. The proposed creation of several procedures using the standard format to address the items to be covered during the preoperational inspection effort is a significant improvement over the previous single procedure (TI 2513/55). Based on our review of these draft procedures, it appears that the items to be inspected during the preoperational EP inspection program can be adequately addressed by using Procedures 82103 through 82108. We also support an initial inspection visit as envisioned by Procedure 82101. These seven (7) procedures would appear to represent a preoperation inspection program that is both adequate and similar to the health physics/radiation protection preoperational program which is its nearest counterpart.

We cannot support the inclusion of Procedure 82102 in the preoperational EP inspection program. Procedure 82102 is a duplicate of material covered by the other seven procedures and, thus, is unnecessary. In addition it appears to set a basis for a team appraisal (inspection) which is a departure from the normal inspection programs. The Region should determine whether it is better to accomplish the established inspection program with an inspector(s) making several visits or a team making one visit. Based on our experience it is less efficient, and not that much more effective, to perform the preoperational EP inspection program using a team of inspectors (and contractors) for a single visit.

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In reviewing the various procedures we noted that each one had an extensive listing of references. These references include those generated during the period shortly after TMI-2 when the upgraded emergency preparedness program was still in the developmental stages. We suggest that the listing of references be reduced to those that currently address the items to be inspected.

Region V has essentially completed the preoperational EP inspection program at all of our sites. We have a few items (i.e. EP training and the satellite TSC) at Palo Verde Units 2 and 3 still to be addressed. There is only a slight possibility that WNP-3 will be completed which would require a preoperational inspection. Thus, we do not see a need for these procedures for several years.

If you have any questions about our comments please contact Ray Fish (FTS 463-3761) of my staff.

Original signed by
F. A. Wenslawski

Frank A. Wenslawski, Chief
Emergency Preparedness and
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Attachment:
As stated

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ATTACHMENT

Comments On Draft EP Preoperational Procedures

Procedure 82101

1. Page 2, Item 03.01, line 5

Place a comma after "onsite" and remove the word "or".

2. Page 2, Item 03.01

Add a sentence to address the onsite and corporate organizations that are responsible for administering the EP program.

3. Page 3, Item 03.07, lines 1, 2 and 3

The first sentence is not clear and it is very difficult to try and guess what should be inspected (how many organizations?).

4. Page 3, Item 03.08, line 4 of 2nd paragraph

Insert a sentence noting that the adequacy of the abnormal occurrence and emergency operating procedures (EOPs) is performed under IE Procedure 42452. With respect to these two types of procedures, EP should only be checking to make sure they reference the appropriate EP implementing procedure(s).

Procedure 82103

1. Page 1, Item 02.02.b, lines 1 and 2

Insert "or positions" after "personnel" and replace "assigned" with "identified".

2. Page 2, Item 02.04.a

This item should also cover subsequent changes to the emergency plan and related implementing procedures.

3. Page 2, Item 02.05

This new item should address the corporate and onsite organizations that are responsible for the emergency planning program and its implementation. This item should also cover management support of the EP program. It may be appropriate to place this item higher in the listing. Guidance on this subject will also need to be inserted into the Inspection Guidance Section.

4. Page 2, Item 03.01.a

By title this Section addresses the onsite emergency organization. However, the initial paragraph in "a.3" discusses the management and administration of the emergency preparedness program. Thus, the specific guidance in 03.01.a is not limited to the onsite emergency organization. The guidance not related specifically to the onsite emergency organization should be removed and placed where it is appropriate (see previous comment).

5. Page 2, Item 03.01.a, line 7

Modify sentence beginning on this line to read as follows: "By discussion with appropriate management and staff assure the utility resolves the differences between the actual organization and the Emergency Plan and implementing procedures."

6. Page 2, Item 03.01.a.3(a)

From line 2 remove the words "onsite, and". On line 3 replace the semicolon with a parentheses and close the parentheses at the end of the sentence. On lines 5 and 6 remove the word "particular."

7. Page 3, Item 03.01.a.3(g)

This item should be eliminated because it is covered in Procedure 82105 (03.01.2, page 2).

8. Page 3, Item 03.01.a.3(h)

Rewrite to address the responsibility for notifications (initial and follow-up) being assigned.

9. Page 3, Items 03.01.a.3 (i), (j), (k), (l) and (m)

Based on the title of 03.01.a, these items should be written so that the inspector makes sure someone (or position) has been assigned the responsibility for the item.

10. Page 4, Items 03.01.a.3 (n) and (o)

Both of these belong somewhere else (see comment no. 3 for this procedure).

11. Page 4, Item 03.01.a.5

The last two sentences should be reworked to address responsibilities assigned to the Emergency Coordinator and the identification of those that can't be delegated.

12. Page 4, Item 03.01.a.7

This belongs with the new 02.05 (see comment no. 3 for this procedure.

13. Page 5, Item 03.02.a, 3rd sentence of 1st paragraph

Remove this "Oral agreements" sentence and replace it with the following: "When the support is required by law, the emergency plan/implementing procedures should specifically reference the law that requires the described support." This is suggested because oral agreements can be legally binding.

14. Page 5, Items 03.02.a.1 and 2

These should be expanded to address the situation where a written agreement will not be given (e.g. NRC and FEMA response). Also, the State and local governments emergency plans may be considered to be the agreement.

15. Page 5, Item 03.02.b, line 4

After the word "personnel" insert the words "or positions." Also, on the next line replace the word "assigned" with "identified."

16. Page 6, Item 03.03

As presently written, this item doesn't appear to address the situation where a contract with an outside contractor is issued for the audit required by 10 CFR 50.54(t). There should be an inquiry regarding which parts of QA Manual would apply under these circumstances.

17. Page 6, Item 03.03.e

This new item should address the system used to assure that deficiencies, weaknesses and improvement items identified during drills and exercises are considered and the action(s) taken on such items is documented (loop closed).

18. Page 6, Item 03.05

A new section should be developed to address the comment made in the third and tenth comments for this procedure. This comment may also impact Item 03.04 of this procedure.

Procedure 82104

1. Page 1, Items 02.01.d

As presently written this subject belongs in Procedure 82108, Protective Response. This item should address the habitability requirements for the TSC and, if applicable, the EOF.

2. Page 3, Item 03.01 EOF

Remove the words "and 9(c)" from line nine because 9(c) concerns communications which is covered in Procedure 82105.

3. Page 4, Item 03.01.b

On line eight insert the words "TSC, OSC or" immediately before the first "EOF". At the end of this same line replace the words "the EOF" with "these activation and implementation".

4. Page 5, Item 03.01.b.1

Insert "Objectives or" before the first word (specification).

5. Page 5, Item 03.01.c.1

On line 2 change Rev. 2 to Rev. 3 because new facilities will likely be held to Rev. 3. If some facilities might be held to Rev. 2, then both revisions will need to be mentioned. Also this statement should make note that meteorology (a RG 1.97 item) is covered by Procedure 80721.

6. Page 5, Item 03.01.c.4

On line 2 replace the word "records" with "documentation" because this better describes the listed items that follow.

7. Page 6, Item 03.01.c.5.(e)

Include a reference to Procedure 83526 which covers emergency kits.

8. Page 7, Item 03.01.d

Rewrite this to conform to suggested change made in the first comment of this procedure.

9. Page 10, Item 03.03

Rewrite the second sentence as follows.

"Focus on the capacity to accommodate the number of people expected, direct radiation and airborne exposure control, accessibility of protective equipment and supplies and emergency lighting."

Procedure 82105

1. Page 3, Item 03.01.a.2

On the second line of the second paragraph remove the word "onsite" because in almost all cases the EOFs are not onsite.

2. Page 3, Item 03.01.b.2

On line 2 replace the word "documentation," with "means" because we don't want to limit ourselves to actual observation or seeing something in writing as the only way to confirm this item.

3. Page 4, Item 03.01.c

Add a statement that FEMA has the initial and continuing responsibility for evaluating the adequacy of the system.

4. Page 4, Item 03.01.d

Add "brochures" to the last sentence.

5. Page 5, Item 03.02.a.1.(b)

On line 2 insert the word "onshift" before the word "operating". Also, remove the last four words because EOPs will not be relevant to the notification process.

6. Page 5, Item 03.02.a.3

Add a reference to the notifications (1 hour and 4 hour) required by 10 CFR 50.72.

7. Page 5, Item 03.02.a.4

Insert the words "and follow-up" between "initial" and "emergency".

8. Page 6, Item 03.02.d

This item should be changed to reviewing the licensee's documentation or program for confirming that identified positions/persons can be reached (proper telephone number) and in a timely manner. The NRC's observing of this process is accomplished when we inspect the EP exercises. If it is felt that this current requirement should remain, it should be limited to onsite or licensee personnel only. Making unannounced notification checks to State and local government personnel will likely cause trouble because these governmental groups don't appreciate such use of these dedicated telephones.

Procedure 82106

1. Page 2, Item 03.01

On line four of the initial paragraph insert the word "support" after the word "emergency".

2. Page 2, Item 03.01.a

On line four insert the words "for emergency preparedness training" after the word "responsibilities".

3. Page 3, Item 03.01.c.2

On line 3 insert ",site access (security) during an emergency" between the words "site" and "and".

4. Page 3, Item 03.01.c.3

A sentence should be added noting that the licensee may not have the primary responsibility for training State and local agencies personnel. The licensee may only be providing supplemental training.

5. Page 3, Item 03.01.c.6

A new item should be added to address the retraining program.

6. Page 4, Item 03.02.a.1

After the word "conducted" add the words "or specifically scheduled".

7. Page 4, Item 03.02.a.5

This wording should be reduced to the following.

"Applicant and non-applicant emergency response personnel who need access to the site during an emergency understand the security requirements when an emergency condition exists."

As presently written, the words "material access area" in line 10 should not have been included because they don't apply to a reactor facility.

8. Page 4, Item 03.02.b

On line 4 insert the words "and verbal response." at the end of the first sentence. Also, the second sentence should be changed to the following.

"Discussion of the scope and nature of the walk-throughs with appropriate plant management before they are conducted is essential."

9. Page 5, Item 03.02.b.1(a)

At the end of the seventh line change the requirement to "10 CFR 50.47(b)(4)" because 50.47(b)(2) does not apply to the matter of emergency event classification and EALs.

10. Page 6, Item 03.03.a

On the second line the requirement 50.47(a)(2) should be changed to 50.47(b)(14).

11. Page 6, Item 03.03.a.3

This item should be rewritten. In Region V the licensees' security plans do not provide for any waiver of access controls except in a real emergency situation. Therefore, this guidance on security should consist

of checking with Regional Security Personnel to ascertain the security provisions related to drills and then confirming what is permitted during the drills.

12. Page 6, Item 03.03.a.4

Remove the words within the parentheses (lines 3-7) because Planning Standard and Criteria II N of NUREG-0654 does not describe any drill that would include evacuation. Evacuations are part of EP exercises that are covered by Procedure 82301.

13. Page 7, Item 03.03.a.5

Replace the wording with the following.

"Organizational interfaces, including coordination between onsite and offsite support organizations."

For the most part drills involve a single onsite organization and other onsite organization support is minimal.

14. Page 7, Item 03.03.a.6

Add words in a parentheses showing this may be part of an EP exercise.

15. Page 7, Item 03.03.b

A sentence should be added noting that some drill requirements may be satisfied by the initial EP exercise required by IV.F.1 of Appendix E (Part 50).

16. Page 7, Item 03.03.c

On line one remove the words "audit reports". Audit reports are covered by Procedure 82103.

Procedure 82107

1. Page 1, Item 02.01.d

Add a sentence stating that the technical evaluation of the adequacy of the Abnormal Occurrence and Emergency Operating Procedures is performed under Procedure 42452.

2. Page 2, Item 02.02.a

On line 2, after the word "systems" insert "(including computer software)."

3. Page 2, Item 03.01.b

On line three insert the words "critical function" immediately before the word "instrument". EP is not responsible for all of the RG 1.97 instrumentation, just the critical function measurements that are to be available in the TSC and EOF.

4. Page 3, Item 03.02.a.1(a)

On line one replace the word "dose" with the word "accident" because what follows appears to be related to the latter and not the former.

5. Page 3, Item 03.02.a.1.a(3)

This statement should also address computer software that may be kept on discs, tape or in the computer memory.

6. Page 4, Item 03.02.a.2

On line two remove the word "manual" because it makes the statement too restrictive. There are backup capabilities other than just manual that would satisfy the need.

7. Pages 3 and 4, Item 03.02.a

This item is not well organized, particularly with respect to the guidance for satisfying 02.02.a. Discussions of items pertaining to accident assessment and dose assessment are intermingled and it is difficult to address each as a separate subject which they are.

8. Page 5, Item 03.02.c

Add a sentence referring to the inspection effort performed in 82105-02.01.e.

Procedure 82108

1. Page 2, Item 03.01.a

If Procedure XXXXX is really 82105, then the subject of initiating onsite protective actions is not addressed because 82105 only discusses the means of communicating and content of messages.

2. Page 2, Item 03.01.b

Include a statement that the procedure for authorizing exposures in excess of Part 20 (particularly those permitted for saving life and equipment) should address such items as volunteering for the exposure, using older persons if possible and discussing the effects of the expected exposure with the individual(s) prior to receiving the exposure.

3. Page 2, Item 03.01.c

Modify wording to also cover situations where the accountability procedure(s) may not be associated with the security organization.

4. Pages 2 and 3, Item 03.01.e

The initial paragraph should state that the NRC is responsible for the medical support for onsite personnel that is provided by offsite organizations (ambulance and hospital). FEMA is responsible for medical provisions for care of the general public and offsite personnel.

5. Page 3, Item 03.01.e.4

Remove the first eight (8) words. The NRC is responsible for inspecting the offsite medical treatment facilities to the extent that they are used to support the applicant/licensee. FEMA will not evaluate the offsite medical treatment facilities on the basis of the types of injuries that may be experienced onsite.

6. Page 3, Item 03.01.f

On line seven replace the word "all" with "nonessential".

7. Page 4, Item 03.02

On the third line of the first paragraph, "Item IV.D" should be Item IV. B".

8. Page 4, Item 03.02.a

After the last word (instrumentation) of the paragraph add the words "and technical knowledge".

9. Page 4, Item 03.02.a.1

On the first line replace "which exclude" with "excluding".

10. Page 4, Item 03.02.a.2.(a)

On line two remove the words "by containment vessel melt-through". Containment failure is the important fact not how the containment failed. Also, on line four the word "is" should be replaced with "may be".