

March 15, 1996

FOR: The Commissioners
 FROM: James M. Taylor /s/
 Executive Director for Operations
 SUBJECT: RELOCATION OF EMERGENCY OPERATIONS FACILITY FOR SUSQUEHANNA STEAM ELECTRIC STATION

PURPOSE:

To request Commission approval for proposed relocation of the emergency operations facility (EOF) to serve the Susquehanna Steam Electric Station (SSES).

CATEGORY:

This paper covers a minor policy issue.

ISSUE:

Whether the EOF for SSES can be located 22 miles from the site rather than between 10 to 20 miles as specified by the Commission.

BACKGROUND:

On November 22, 1982, the Commission approved NUREG-0737, Supplement 1, which was subsequently promulgated in Generic Letter 82-33 dated December 17, 1982. Table 1 of NUREG-0737, Supplement 1, describes two options for locating the EOF. Option 1 provides for an EOF which meets radiological habitability requirements and is located within 10 miles of the site and a backup EOF that has no radiological habitability features and is located between 10 and 20 miles from the site. The existing SSES EOF conforms to this option. Option 2 provides for a single EOF that has no habitability features and is located between 10 and 20 miles from the site. The proposed EOF conforms to Option 2, except for its 22-mile distance from the plant.

In the Staff Requirements Memorandum M830302B, dated March 3, 1983, the Commission directed the staff to refer all exemption requests concerning location and habitability of EOFs to the Commission for a decision. This direction was reconfirmed in a memorandum from the Secretary, dated April 30, 1987 ([Attachment 1](#)).

DISCUSSION:

In a letter dated April 12, 1995, the Pennsylvania Power and Light Company (PP&L) proposed a revision to the SSES Radiological Emergency Response Plan that addressed the relocation of the SSES EOF ([Attachment 2](#)). During a meeting on May 16, 1995, at the NRC Regional I office in King of Prussia, Pennsylvania, PP&L provided additional information concerning the relocation of the EOF and other Emergency Plan changes for the SSES ([Attachment 3](#) contains this meeting summary). Also, during a meeting with the Office of Nuclear Reactor Regulation on August 29, 1995, PP&L provided additional information pertaining to the activation time for the proposed EOF for the SSES ([Attachment 4](#) contains this meeting summary). In a letter dated September 18, 1995, PP&L gave a summary of the effects of the installation of the Plant Integrated Computer System (PICSY) on emergency planning data requirements for Unit 1 and Unit 2 ([Attachment 5](#)). By letter dated October 2, 1995, PP&L submitted a revision to the letter dated April 12, 1995, revising the time to activate the proposed EOF ([Attachment 6](#)).

The current EOF is located approximately 2,500 feet southwest of the control structure. The SSES is required to have a backup EOF in accordance with the guidance in Table 1 of Supplement 1 to NUREG-0737 which specifies that the backup EOF should be between 10 and 20 miles from the site.

The current backup EOF is located at the PP&L Hazleton Service Center auditorium in Hazleton, Pennsylvania, which is approximately 13 air miles (22 miles driving distance) southeast of the SSES. Guidance in NUREG-0696 recommends that sites with an EOF within the 20-mile EPZ have a backup EOF located within 10 to 20 miles of the TSC for habitability concerns. On the basis that the proposed EOF will be located outside of the Emergency Planning Zone (EPZ), which eliminates the radiological habitability concerns of the current near site EOF, PP&L proposes to discontinue using the backup EOF if the new EOF location is approved.

The proposed new location for the EOF is PP&L's Northeast Division Headquarters, located approximately 3 miles east of Wilkes-Barre, Pennsylvania. As stated by PP&L in its letter of April 12, 1995, the relocation of the EOF to PP&L's Northeast Division Headquarters is closer to the Corporate Headquarters in Allentown, Pennsylvania, thereby improving the response time of the EOF staff traveling from the Corporate Headquarters to activate the proposed EOF. The response time of the corporate staff traveling to the proposed EOF location is 75 minutes, approximately 30 minutes less than to the existing EOF. On October 24, 1995, PP&L demonstrated that the proposed EOF could be activated within 90 minutes (75 minutes transportation time and 15 minutes activation time) after the declaration of a Site Area Emergency (SAE).

Currently, an interim EOF staff, composed of site personnel, reports to the EOF at an Alert classification to prepare the facility should activation become necessary. By letter dated December 1, 1995 ([Attachment 7](#)), PP&L stated that it does not plan to use an interim staff to ensure that the proposed EOF is operationally ready. The proposed EOF will be kept in a state of operational readiness with minimal set up required. In addition, as part of the EOF staff, three persons in close proximity to the facility arrive before the Allentown staff and provide additional assurance that the proposed EOF is operationally ready.

The proposed EOF will be staffed at an Alert classification. The proposed EOF will be activated by the permanent staff within 90 minutes after the declaration of an SAE. After facility activation, the EOF staff receives a turnover briefing from the Technical Support Center (TSC) staff. The proposed EOF is approximately 35 minutes by automobile from the plant and approximately 75 minutes by automobile from Allentown. To meet the staffing guidelines of NUREG-0696, PP&L has committed to have the permanent EOF staff report to the EOF at the declaration of an Alert. For events that are immediately classified at the SAE level or higher, the licensee intends to activate the TSC and EOF as rapidly as possible. The TSC would assume management of the emergency from the control room within one hour. The EOF staff would activate the EOF within 90 minutes after the declaration of an SAE or higher level emergency.

PP&L has been implementing the PICSY project at the SSES along with the relocation of the EOF. The PICSY project will combine the Safety Parameter Display System (SPDS) computer, the Plant Computer System computer, the Remote Data Analysis System (RDAS) computer and the Emergency Response Data System (ERDS) computer into one integrated computer system. The PICSY for Unit 2 has been completely installed, and, therefore, can provide the proposed EOF with data from the SPDS, Plant Computer System, RDAS, and ERDS. However, the SPDS for Unit 1 will not be available in the proposed EOF until the PICSY is installed on this unit. Installation of the PICSY for Unit 1 is scheduled to be completed by the end of the fourth quarter of 1996. Until then, the SPDS for Unit 1 will be available in the TSC and the Emergency Data System will be available in the proposed EOF.

To compensate for not having the SPDS displays available for Unit 1 in the proposed EOF, SSES will assign a person to the SPDS terminal in the TSC should an Alert be declared. This person's only function will be to transmit the SPDS data to the proposed EOF by telephone or facsimile. PP&L states that the data available in the proposed EOF will meet the regulations for accident assessment and the protective action recommendation requirements.

The NRC staff observed an activation drill for the proposed EOF on October 24, 1995. During this drill, PP&L successfully demonstrated that the proposed EOF could be activated within 90 minutes. On the basis of PP&L's submittal, additional information provided during the subsequent meetings, and the successful activation of the proposed EOF within 90 minutes, the NRC staff recommends approval of PP&L's revision of the SSES Radiological Emergency Response Plan. Relocation of the EOF two miles beyond the 10 to 20 mile distance is included in this plan revision.

By letter dated March 29, 1995 ([Attachment 8](#)), Charles P. Wynn of the Pennsylvania Emergency Management Agency (PEMA), stated that PP&L's "commitment to provide a facility equal to, or better than, your current EOF is an excellent basis for our continued cooperation in assuring the health and safety of the citizens of Pennsylvania."

By letter dated February 27, 1995 ([Attachment 9](#)), the Columbia County Department of Environmental Safety indicated its knowledge of PP&L's submittal to the NRC requesting approval for the relocation of the SSES's EOF to Wilkes-Barre, Pennsylvania. Also, by letter dated February 27, 1995 ([Attachment 10](#)), the Luzerne County Emergency Management Agency indicated its knowledge of PP&L's submittal to the NRC requesting approval for the relocation of the SSES's EOF to Wilkes-Barre, Pennsylvania.

The Federal Emergency Management Agency has reviewed the documentation for PP&L's proposal to relocate the SSES's EOF and, by letter ([Attachment 11](#)), indicated that it has no objections.

CONCLUSION:

The staff concludes that the proposed EOF meets the guidance in Table 1 of NUREG-0737, Supplement 1, with the exception that it is located 2 miles beyond the 10- to 20-mile distance established by the guidance. Despite this exception, the staff believes the proposed EOF and location are acceptable.

RECOMMENDATION:

Unless directed otherwise by the Commission, the staff intends to approve within 10 days of the date of this paper the proposed relocation of the SSES EOF to PP&L's Northeast Division Headquarters in Wilkes-Barre, Pennsylvania.

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[Attachments](#): As Stated