

APR 21 1982

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Docket No. 70-36

C-E Power Systems
Combustion Engineering, Inc.
ATTN: Mr. H. E. Eskridge
Route 21-A
Hematite, Missouri 63047

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Dear Mr. Eskridge:

We have completed our review of the radiological contingency plan that you submitted on January 27, 1982. Our review has revealed several needed changes in content and format in the information submitted. Those are described in the enclosure.

You are requested to send us additional information concerning these matters by May 31, 1982. Please submit the indicated information as properly numbered replacement or additional pages suitable for insertion into your plan. The information should be prepared in accordance with the "Standard Format and Content for Radiological Contingency Plans for Fuel Cycle and Materials Facilities," which was enclosed with our February 11, 1981 Order.

Sincerely,

Original Signed by
Ralph G. Page

R. G. Page, Chief
Uranium Fuel Licensing Branch
Division of Fuel Cycle and
Material Safety, NRC

Enclosure: As stated

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*See Previous Concurrence Sheet

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Staff comments from initial review of Radiological Contingency Plan submitted January 27, 1982, for Combustion Engineering, Inc., Hematite facility.

General

The submittal fails to follow the guidance of the Standard Format in both content and form. Even though strict adherence to the Standard Format is not necessary, the information requirements given in the Format must be included. The following specific comments are provided to aid in preparing a contingency plan that is acceptable to the staff.

Section 1.2 Site and Facility Description

The text refers to Figure 2.-. The figures are labeled Figure 1.-. The figures and the text should agree.

A site plan or aerial photograph of about a 1-mile radius is to be provided showing the location of population centers, the location of facilities that could present potential evacuation problems, primary routes for access of emergency equipment or evacuation, the location of any emergency facilities as well as other sites of potential emergency significance.

Topographic features should be included on the appropriate figures in sufficient detail to illustrate the presented information. All maps should have an appropriate scale legend and indication of direction.

Facility descriptions required for this section with respect to information also required in Chapter 2 may be referenced in that Chapter. This includes discussion of design criteria with respect to equipment, systems, and facilities important to controlling/containing radioactive materials during normal operations as well as alarm and monitoring instrumentation.

The labeled exhaust stack locations in Figure 1-6 should be related to the stack identification on page 1-13 as well as to the origin of the radioactive material, i.e., equipment area or processes involved.

Assurances should be included that criticality detectors will not saturate and will continue to provide an alarm function at the maximum dose rates anticipated.

A description of the gaseous effluent monitors and associated alarms should be provided for release points where potential releases could cause doses in excess of the PAG's.

Administrative procedures for inoperable alarms should be described.

Alarm setpoints for the UF6 detection system should be specified.

Section 2.1.3 Support Systems

Potential accidents on the neighboring Missouri-Pacific railroad should be addressed.

A description of the expected performance of confinement barriers and systems should be provided sufficient to demonstrate the maintenance of confinement of radioactive materials under accident conditions. The expected performance of ventilation and effluent treatment systems should be included.

A description of the expected performances of systems and structures when subjected to fire or explosion should be provided in sufficient detail to assure the adequacy of those structures, fire detectors, alarms, sprinklers, hose stations, etc.

Section 2.1.4 Control Operations

Performance goals should be specified for assuring continued proper performance of plant engineered systems important to safety through monitoring, auditing, and appropriate maintenance operations. The mentioned ALARA goals do not adequately provide the requested information.

Section 2.2.2 Alarm Systems and Release Prevention Capability

A description of effluent monitors and associated alarms should be provided. Alarmed monitors are needed where effluents released from plant accidents could cause doses to approach the PAG's.

Section 2.2.4 Demonstration of Accommodation of Abnormal Conditions by Control Operations

A description of the safety assurance program provided to assure proper performance of plant equipment in the case of an accident should be included.

Section 3.1 Classification System

The procedures for notifying offsite agencies are required to reflect the classification scheme described in the Standard Format, i.e., Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency. Consequently, the NRC requires the identical classification scheme in order to be consistent with these notification procedures. The classification scheme must be changed accordingly and the hypothesized accidents redistributed to reflect the changed categories.

Provisions for escalating the emergency classification should be included.

Section 3.2 Classification Scheme

The classification scheme must be as described as for Section 3.1. Implementing procedures for each class of emergency should be included.

The procedures shall include reporting requirements and notification times as described in the Standard Format.

Section 3.3 Range of Postulated Accidents

The hypothesized accidents must be associated with particular emergency classes described in Sections 3.1 and 3.2.

Section 4.3 Offsite Assistance to Facility

Letters of agreement describing the arrangements reached with each support group should be provided.

Section 5.1 Activation of Radiological Contingency Response Organization

Communication steps must be keyed to the classification system described in the Standard Format.

Section 5.2 Assessment Actions

The procedural steps in gathering the data needed for proper analysis should be provided.

The methods and parameters for calculating dose and atmospheric dispersion are to be provided.

Section 5.4 Protective Actions

Radiological monitoring and decontamination of evacuees should be discussed.

Criteria for return to normal use should be specified.

Section 5.5 Decontamination of Personnel

Specific action levels for determining the need for personnel decontamination should be provided.

Section 6.3.1 Onsite Systems and Equipment

Normal chemical process control monitors are related to emergency conditions if they are designed to indicate abnormal situations and provide an alarm or system protection function and should be described in that context.