

July 23, 1986

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MEMORANDUM FOR: John G. Davis, Director
Office of Nuclear Material Safety and Safeguards

FROM: James M. Taylor, Director
Office of Inspection and Enforcement

SUBJECT: STAFF RESPONSES TO THE RECOMMENDATIONS MADE BY THE
SEQUOYAH FUELS LESSONS LEARNED GROUP (NUREG-1198)

The Office of Inspection and Enforcement concurs with the proposed staff responses to the recommendations made by the Sequoyah Fuels Lessons Learned Group provided that the following changes are made in those responses:

Reference 17

We believed that licensees should be required annually to test communications with offsite response groups. Also, we suggest deleting the paragraph about possible FEMA involvement and the development of a possible "... licensee hostage situation." This subject will be considered in the planned further emergency preparedness rulemaking.

Reference 18

The proposed response states that the staff agrees with the recommendation that licensees with radiological contingency plans should be required to establish a designated Emergency Operations Center (EOC) and a second alternate EOC offsite, or in another onsite location which is unlikely to be impacted by the incident. Since this requirement would apply to a variety of licensees including some 10 CFR 30 byproduct licensees, the proposed requirement may not be justified in all cases. Therefore, we recommend changing the statement to say that the staff agrees "to consider the intent" of this recommendation in its emergency preparedness rulemaking (see marked up enclosure).

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John G. Davis

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Reference 50

IE has changed slightly the wording of its response to this recommendation as marked on the enclosure.

Original Signed By:
James M. Taylor

James M. Taylor, Director
Office of Inspection and Enforcement.

Enclosure:
As stated

Distribution

DCS

SMPB reading

DI reading

L. Cobb, IE

R. Spessard, IE

J. Partlow, IE

J. Taylor, IE

E. Jordan, IE

S. Schwartz, IE

OFC	: C: SMPB: IE	: DD: DI: IE	: D: DI: IE	: D: IE	: IE: DD/DEPER:
NAME	: L. Cobb	: R. Spessard	: J. Partlow	: J. Taylor	: S. Schwartz
DATE	: 7/11/86sc	: 7/14/86	: 7/21/86	: 7/21/86	: 7/ /86

Handwritten notes:
- Above table: 13-3-86
- Below table: XG has been

STAFF RESPONSES TO THE SEQUOYAH ACCIDENT LESSONS LEARNED GROUP RECOMMENDATIONS "NUREG-1198"

SECTION: 3.1.4. RECOMMENDATION #1 (Ref: 18)

Consider requiring a designated Emergency Operations Center (EOC) on site and an alternate EOC either off site or in another onsite location which is unlikely to be impacted by the incident. The EOC and alternate EOC should contain adequate communications capability and accommodations to provide for coordination of the onsite emergency response activities and notifications and coordination with offsite supporting organizations. The EOC or alternate EOC should be accessible 24 hours a day.

Discussion:

To consider the intent of

The staff agrees ~~with~~ this recommendation and will address it in the proposed emergency preparedness rulemaking for fuel cycle and other radioactive material licensees.

Sequoyah Fuels has designated an onsite Emergency Operations Center which contains adequate communications and accommodations for direction and control of the onsite emergency response effort. An offsite Emergency Operations Center has been acquired to support an onsite emergency response activity. Both centers are capable of providing notifications and coordination with offsite supporting organizations and accessible 24 hours a day.

This recommendation applies to all fuel cycle and materials licensees that have a radiological contingency plan.

Approach:

The staff will incorporate this recommendation into the proposed regulation. Other regulatory documents will be revised as appropriate following issuance of the final rule.

The staff are reviewing the contingency plans of other licensees to determine their agreement with this recommendation. Those found to not be in agreement will be requested to consider this recommendation in updating their contingency plan.

Schedule:

The proposed rule will be issued in early 1987.

The update of other licensee contingency plans will be completed by 3/31/87.

Resource Requirements:

1/2 man year

Impacts of Reprogramming Resource:

None

STAFF RESPONSES TO THE SEQUOYAH ACCIDENT LESSONS LEARNED GROUP RECOMMENDATIONS
"NUREG-1198"

SECTION: 8.2. RECOMMENDATION #1 (Ref: 50)

Consideration should be given to having the IE Emergency Preparedness Branch review radiological contingency plans for nonreactor facilities. The use of this group could make available the expertise developed in reviewing reactor plans, and could enhance communications with the NRC Operations Center personnel.

Discussion:

This recommendation was discussed between IE and NMSS, and although NMSS agreed that it was a good recommendation for the reasons stated in the recommendation, IE felt that they did not have either the resources or the expertise to assume this activity. Acceptance of this recommendation will be held in abeyance pending further discussions between the Directors of IE and NMSS.

Emergency

*IE and
fuel-cycle E.P*