



Washington Public Power Supply System
A JOINT OPERATING AGENCY

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December 12, 1980

Mr. Brian Grimes, Director
Division of Emergency Preparedness
Office of Inspection & Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: SITING OF EMERGENCY OPERATIONS FACILITIES

- Ref: 1) Letter, Darrell G. Eisenhower to All Operating Nuclear Power Plants, "Followup Actions Resulting From the NRC Staff Reviews Regarding the Three Mile Island Unit 2 Accident", dated 9/13/79.
- 2) Letter, Darrell G. Eisenhower to All Licensees of Plants Under Construction, "Followup Actions Resulting From the NRC Staff Reviews Regarding the Three Mile Island Unit 2 Accident", dated 10/10/79.
- 3) Letter, D. B. Vassallo to All Pending Operating License Applicants, "Discussion of Lessons Learned Short Term Requirements", dated 11/9/79.
- 4) Letter, D. L. Renberger to B. J. Youngblood, "Emergency Preparedness - Near-Site Emergency Center", dated 6/16/80.
- 5) Letter, B. J. Youngblood to Neil O. Strand, "Combined Near-Site Emergency Center for WNP-1, -2 and -4", dated 8/12/80.

Dear Mr. Grimes:

I. Development of Emergency Planning Regulations

The letters of Refs. 1), 2) and 3) and the proposed rule change to 10 CFR Part 50 dated 12/19/79, identified NRC plans for requiring "near-site" Emergency Operations Facilities (EOF) for plants under construction prior to issuance of an operating license. A draft of NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants", issued in January 1980, stated that "(i) in most cases the principal operator's near-site Emergency Operation Facility (EOF) should be within one mile of the reactor." NUREG-0654, p. 44 (emphasis added).

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Thereafter, NUREG-0696, "Functional Criteria for Emergency Response Facilities", was published in July 1980. NUREG-0696 states as follows:

The location of the EOF shall be balanced between close proximity to the plant to facilitate emergency response and recovery operations and sufficient distance from the plant to enhance habitability. The EOF must be located near the reactor to provide management coordination of all emergency response resources that will be assembled near the reactor site... The EOF shall be located outside the security boundary and not further than 5 to 10 miles from the reactor with a maximum ground travel time of 20 minutes to permit periodic face-to-face communications between management personnel in the (Technical Support Center) and EOF.... Travel time shall include clearing inplant security. (NUREG-0696 at pp. 15-16 (emphasis added).)

Final emergency planning regulations were published on 8/19/80 and became effective on 11/3/80. Those regulations confirm the general requirement of a "licensee near-site emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency." 10 CFR:Part 50, Appendix E, SIV.E.8.

In order to provide further guidance on compliance with the new emergency planning regulations, the NRC Staff issued a draft revision of NUREG-0654 in October 1980. That NUREG stated that "(t)he licensee's Near-Site Emergency Operations Facility shall be located outside the security boundary not further than 5 to 10 miles from the nuclear facility site and within 20 minutes ground travel time of the Technical Support Center". NUREG-0654, at p. 47 (emphasis added).

II. WPPSS Compliance With Emergency Planning Regulations

In order to assure that EOFs for Supply System power reactors could be completed consistent with our construction and fuel load schedules, the Supply System began EOF site selection and design engineering for the sites at the Hanford Reservation (for WNP-1, WNP-2 and WNP-4) and at Satsop (for WNP-3 and WNP-5). These activities were based primarily on the proposed emergency planning regulations issued in December 1979 and the guidance provided in the first NUREG-0654.

The EOFs for these sites are to be located at a distance of 3/4 and 1-1/2 miles from the reactors. In order to meet a March 1981 commitment for submittal of site emergency plans for the Hanford Reservation, the Supply System selected a site location for the Hanford EOF consistent with existing guidance of the Staff. In Ref. 4), detailed information regarding the Hanford EOF location was submitted to the NRC Staff for review and agreement with the selection. In Ref. 5), the Staff responded

by stating that manpower constraints prevented the Staff from reviewing and concurring in the Hanford EOF plans. In effect, the Staff's reply provided the Supply System with no further guidance, and required the Supply System to proceed with the Hanford EOF plans based on guidance then available. Since that time, the Supply System has proceeded on that basis.

We understand that the Commission may be in the process of again revising the guidance document on the siting of EOFs. We understand that these revisions are likely to provide that EOFs may be sited at any distance from 0 to 15 miles from the reactor, with the qualification that EOFs located between 0 and 10 miles from the reactor must include an additional protection factor (such as dose reduction capabilities and a back-up facility). Consistent with our understanding, we assume that the Hanford EOF discussed in Ref. 4) will continue to meet the forthcoming Commission guidance on EOF siting. On that basis, the Supply System is proceeding with its EOFs based upon present regulations and Commission guidance. We believe that our EOF design and siting are consistent with our understanding of the contemplated changes in Commission guidance as well.

In any event, we assume that the Supply System will not be penalized and required to relocate the EOFs if current guidance is modified such that the present site selections are inconsistent with that revised guidance. The Supply System has relied in good faith upon current Commission guidance, and is prepared to justify technically the site selections of the EOFs and the Supply System's response capabilities in view of these selections. If this is not the case, we request a meeting with the NRC Staff as soon as possible for the purpose of discussing these matters and obtaining Staff concurrence with the location of the EOFs.

Sincerely,

SD Bouchey

Dr. G. D. Bouchey, Director
Nuclear Safety

GDB:md

cc: Mr. Harold R. Denton
Mr. Victor Stello
Mr. B. J. Youngblood
Mr. N. S. Reynolds
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