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SUBJECT: Forwards Rev 11 of emergency preparedness plan, reflecting changes to Section 11.6.1, Page 11-7, Section 4.4.2.1, Page 4-26, Section 4.4.2.5, Page 4-32, Item F, Section 14.4.1, Page 14-3 & Section 6, Table A.2.

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October 2, 1991  
G02-91-177

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
REVISION 11 OF THE EMERGENCY PREPAREDNESS PLAN

Reference: Letter, RA Scarano (NRC) to GC Sorensen (SS),  
"Comments on WNP-2 Emergency Preparedness Plan  
Changes, Rev. 10", dated April 9, 1991

Per 10CFR50.54(q) we are submitting revision 11 of the Emergency Preparedness Plan. In revision 11 there are five changes that may be perceived as decreasing the effectiveness of the Emergency Plan. In taking a conservative approach to 10CFR50.54(q) they are being submitted for approval prior to implementation.

In addition, the reference letter indicated that there were two changes from revision 10 that were identified as changes that decreased the effectiveness of the Emergency Plan and were not approved prior to implementation of the revision. These items are:

1. Pages 6-1 through 6-22

Revision 10 of the Emergency Plan was not consistent with EPIP 13.1.1 as agreed to by the NRC and the Supply System and that the change may be acceptable after revision to conform to EPIP 13.1.1. This is being tracked by Open Item 50-397/EP-10-01.

Response: Revision 11 changes of the Emergency Plan are consistent with EPIP 13.1.1 which we believe closes this issue. (Also, see discussion of additional changes to Emergency Plan Section 6 under item 5, page 5.)

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2. Page 11-7, section 11.6.1

Field team deployment time of 30 minutes has effectively been deleted. This item is being tracked by Open Item 50-397/EP-10-02.

Response: In researching this issue it was learned that the original wording which described field team deployment was not clearly defined. Originally, it had been interpreted that the field team deployment time clock started from the EOF, and that the 30 minutes was based upon getting the necessary equipment and being briefed. It was later learned that NRC interpretation and the Supply System interpretation differed. Revision 10 attempted to clarify field team deployment; however it was viewed by the NRC as decreasing the effectiveness.

In the reference letter it was stated that this item should be rewritten to insure no Emergency Plan degradation has occurred. It is not our intent to decrease the effectiveness of the Emergency Plan. However, the reality is if field team personnel are not located in the Plant Support Facility during normal working hours it is not possible to meet the 30 minute deployment time.

In lieu of this, we are proposing the wording included in revision 11 for field team deployment.

It has been determined by the 10CFR50.59 evaluation process that this proposed change does not introduce an Unreviewed Safety Question or affect the health and safety of the public.

REVISION 11 CHANGES

1. Emergency Plan section 11.6.1, page 11-7.

The Emergency Plan formerly read (Revision 8):

"Deployment time to have monitoring teams in the field during normal working hours is less than thirty minutes and less than one and one-half hours for team members responding from home during off-shift hours."

Change to read:

"Field team members responding during off-shift hours will report to their emergency duty station within 60 minutes. Field team deployment time from their emergency duty station will be less than 30 minutes."

Justification:

Given the geographical location of the facility and what is possible it has been determined that the commitment as written cannot be met; therefore, a change is necessary.

The purpose for deploying field teams is to validate or backup radioactive release data from the Plant Monitoring System. These release data are used in calculating off-site doses. The calculation is conservative in that the following assumptions are made:

- No chemical reactions.
- No decay.
- Air concentrations are non-depositing.
- Dispersion is limited vertically to 1000 meters.
- There is no vertical shear of the wind direction.
- Flat earth.

These conservatisms result in actual concentration measurements being conservative by a factor of 2 to 20. Therefore, it is highly probable that the field team data would indicate lower offsite dose rates and ground deposition concentrations than originally projected. Protective Action Recommendations (PARs) which are made based on these conservative off-site dose calculations would therefore be conservative.

Changing the field team deployment time from 30 minutes anywhere on site to 30 minutes from their emergency duty station will not affect the PARs. This change will only result in clarification of deployment time. Therefore, the consequences of an accident will not be increased and the health and safety of the public is not affected.

2. Emergency Plan section 4.4.2.1, page 4-26

This section is a description of the Technical Manager. Included in this section is a description of the staff he supervises. The Emergency Plan formerly read:

"Supervises:        Technical staff which includes expertise in the following areas:"

It was changed to read:

"Supervises:        Technical staff which may include expertise in the following areas:"

Justification:

The Emergency Plan formerly inferred that the technical staff included personnel with all the listed areas of expertise when activated; however, this may not be necessary depending on the nature of the emergency. The Technical Manager has the personnel resources available with all the expertise listed but will only call in the necessary personnel for the emergency needs. Since the personnel resources are available we believe the effectiveness is not decreased.

3. Emergency Plan section 4.4.2.5, page 4-32, item f.

Delete the responsibility of field kitchen operations from the Administrative Support Manager.

Justification:

The responsibility of providing for food deliveries is listed in item 4.4.2.5.f, which negates the need for field kitchen operations. Additionally, there is food stored in the warehouse of sufficient quantities to provide meals for plant personnel and EOF personnel during an emergency. Since the purpose of a field kitchen is to provide the Emergency Response Organization with meals and this is still accomplished, we believe the effectiveness of the Emergency Plan is not decreased.

4. Emergency Plan section 14.4.1, page 14-3.

Delete the Yakima Valley Memorial Hospital from the section.

Justification:

NUREG-0654 L.1 states "Each organization shall arrange for local and backup hospital and medical services". The Supply System has agreements with Kennewick General, Our Lady of Lourdes and Kadlec hospitals. Yakima Valley Memorial Hospital is approximately 87 miles from WNP-2. The other three hospitals are all within the Tri-Cities area. Eliminating this distant facility has little if any impact on our ability to cope with a medical emergency.

Any combination of two of these hospitals fulfills NUREG-0654 requirements for a local and backup medical facility; therefore, we believe the effectiveness of the Emergency Plan is not decreased.

5. Emergency Plan section 6, Table A.2

Delete Table A-2, Examples of Situation Based Emergency Action Levels Tables.

Justification:

Table B-1 (shown as Table A-2 in revision 11) is a generic table for Emergency Classification that exists to provide generic guidance for classification. Table A-2 in revision 10 contains plant specific examples that support Table B-1 emergency classifications. It has been determined that this level of detail in the example tables is not necessary in the Emergency Plan. Deleting the Table A-2 examples does not affect the classification process, but removes a level of detail unnecessary in the Emergency Plan. The level of detail contained in Table A-2 exists in the Emergency Classification Implementing Procedure, PPM 13.1.1, Classifying The Emergency, which is used by the Plant Emergency Director to classify emergencies.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

KLF/bk  
Attachment

cc: JB Martin - NRC RV (2)  
NS Reynolds - Winston & Strawn (w/o)  
PL Eng - NRC  
DL Williams - BPA/399 (w/o)  
NRC Site Inspector - 901A

Revision - 9/13/91

Emergency Preparedness Plan  
1990 Annual Review - Revision 11  
Synopsis of Changes

<u>Affected Pages</u>	<u>Change Action</u>
EP.-i	Add Equipment Operator section to the table of contents and renumber sections. This change is an enhancement to the Emergency Plan.
EP.-ii	Add Information Coordinators section and renumber section. This change is an enhancement to the Emergency Plan.
EP.-iii	Remove 6.4, Comparison to NUREG-0654 Examples. Editorial.
EP.-iv	Add Emergency Response Data System (ERDS) section. A 10CFR50.59 review has been completed for the addition of ERDS to other sections of the FSAR.
EP.-x	Table 16-1 title change and page number changes. Editorial
EP.-xi	Change table titles to be consistent with the Emergency Plan Figures. Editorial
EP.-xii	Change table titles to be consistent with the Emergency Plan Figures. Editorial
Figure 1-1	Change Cypress Garden School to Country Haven Academy due to a school name change. Editorial
EP. 2-1	Add definition for "Augmenting Emergency Organization", in response to Corrective Action Recommendation 88-0156. This change is an enhancement to the Emergency Plan.
EP. 2-2	-Add definition for "Essential Personnel" and "Emergency Organization" in response to Corrective Action Recommendation 88-0156. This change is an enhancement to the Emergency Plan.  -Change "significant failed fuel" in the General Emergency definition to "substantial core damage" to be consistent with PPM 13.1.1 and NUREG 0654. Editorial



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Revision 11 - Change Action

- EP. 2-3            -Add definition for "nonessential personnel" in response to Corrective Action Recommendation 88-0156. This change is an enhancement to the Emergency Plan.
- EP. 2-4            -Add definitions for "Plant" and "Protected Area". This change is an enhancement to the Emergency Plan.
- EP. 2-5            -Add "from a release of radiation" to be consistent with PPM 13.1.1 and NUREG 0654. Editorial
- EP. 4-1            Add the Shift Technical Advisor to the normal plant operation organization. This change is an enhancement to the Emergency Plan.
- EP. 4-4            -Change the accountability responsibility from the PED to the OSC Director, see page 4-15, 4.4.1.12, item b. Shifting responsibilities has been determined not to decrease the effectiveness of the Emergency Plan and does not require a 10CFR50.59 review.
- EP. 4-8            -Delete the words "during back shifts" under item "b". The shift manager functions as the PED at all times, until relieved by the PED, regardless of what shift it is. This change is an enhancement to the Emergency Plan.
- EP. 4-9            Add Equipment Operators to the Essential Emergency Response Organization section. Per NUREG 0654 Equipment operators are part of the minimum staffing requirements. This change is an enhancement to the Emergency Plan.
- EP. 4-12           Add Emergency Response Data System (ERDS) to Plant/NRC Liaison responsibilities. A 10CFR50.59 review has been completed for the addition of ERDS to other sections of the FSAR.
- EP. 4-11 Thru 4-17    Renumber Essential Response Organization EP. Personnel page sequence due to addition of the Equipment Operators. Editorial
- EP. 4-15           -Item "c" contains more than one responsibility (establishing restrictive entry controls and providing emergency responders access routes and informing them of hazards), therefore, it has been separated into two by adding item "d" and relettering. Editorial



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- Change the wording in item "b" to "all onsite personnel" instead of "plant staff members" to be conservative and consistent with the change on page 4-4. All onsite members includes plant staff members therefore it was redundant to have accountability responsibilities for both the PED and the OSC Director. This change is an enhancement to the Emergency Plan.
- EP. 4-22
  - Change the wording in item "e" to "direct". REM does not "perform" offsite dose calculations but "directs" them to be done. Editorial
  - Change the word "report" in item "k" to "measurements" to more accurately describe the information obtained by outside agencies. Editorial
- EP. 4-24
  - Title changed from "Public Affairs and Communications" to "Joint Information Center". Editorial
  - Title changed from "Director of Information and Administrative Services" to Manager Communications and External Affairs". Editorial
- EP. 4-24
  - Move item "b" (Ensuring the effective operation of the Media Telephone Team and the Public Information Telephone Team), from the JIC Director responsibilities to the Information Manager's duties, page 4-39 item f. Rename "c" to "b". Shifting responsibilities has been determined not to decrease the effectiveness of the Emergency Plan and does not require a 10CFR50.59 review.
- EP. 4-26
  - Add Information Coordinators to the Augmenting Emergency response personnel. This change is an enhancement to the Emergency Plan.
- EP. 4-27
  - Change title from Technical Manager to Technical Data Center Director. This is an editorial clarification in order to avoid confusion with the corporate title of Technical Manager, and to be consistent with other emergency center titles of Director rather than Manager. No change is being made to position duties or responsibilities. Editorial

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- EP. 4-27            -Change the Technical Staff wording to indicate that the staff "may" include areas of expertise instead of indicating that it "will" include all the areas mentioned.

It is not necessary to have all the areas of expertise in the EOF at the same time, which the Plan formerly alluded to, unless the emergency needs require them. The Technical Manager can call personnel qualified in any of the area's mentioned depending on what the emergency needs are.

This change is being submitted in accordance with 10CFR50.54.g for NRC approval prior to implementation because it may be viewed as decreasing the effectiveness of the Emergency Plan.

- EP. 4-33            Delete reference of field kitchen operation under Administrative Support Manager duties (item f).

Providing for food deliveries is still a responsibility of the Administrative Support Manager and therefore, negates the need for field kitchen operations.

This change is being submitted in accordance with 10CFR50.54.g for NRC approval prior to implementation because it may be viewed as decreasing the effectiveness of the Emergency Plan.

- EP. 4-35            Change wording to "forward" versus "transmit through word processing" (item b). Editorial

- EP. 4-38            -Change the wording in the Managing Director's Representatives' responsibilities item "a" to, "promote public confidence", versus "maintain public confidence". Editorial  
-Change the wording in the Managing Director's Representatives' responsibilities item "c" to, "attend as necessary", versus "appear at". Editorial

- EP. 4-39            Add item f responsibility to Information Manager to "Ensure the effective operation of the Media Telephone Team and the Public Information Telephone Team (when activated)". This change is an enhancement to the Emergency Plan.

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EP. 4-41            -Title changed in item b from News Manager to News Release Editor. Editorial  
                  -4.4.3.5 Item "b. Make efforts to correct misinformation distributed to the public" is redundant to item "c. Alert the Information Manager when misinformation to the public has been discovered so a response can be prepared and issued". Delete item "b" and reletter. Editorial

Figure 4.3        -Add Information Coordinator blocks to the SSDC, SDC, TDC, MUDAC, OACC, OSC, TSC, and the Control Room. This change is an enhancement to the Emergency Plan.  
                  -Add Licensing Manager block indicating the position reporting to the recovery manager. This change is an enhancement to the Emergency Plan.  
                  -Typo for News Release Edition (Editor) Editorial  
                  -Add a News Coordination Team block to Headquarters. This change is an enhancement to the Emergency Plan.

EP. 5-6            Change revision number at bottom of page. The change was made in revision 10 to the page, but the page footer did not get updated. Editorial

EP. 6-1            -Wording change consistent with deleting Table A.2 examples. It has previously been agreed during a meeting between Don Larson and NRC on July 1, 1991 that these example tables could be removed.

This change is being submitted in accordance with 10CFR50.54.g for NRC approval prior to implementation because it may be viewed as decreasing the effectiveness of the Emergency Plan.

-Table B.1 has been changed to Table A.2. Editorial

EP. 6-2            -Changes consistent with Table A.1, A.2, and B.1 editorial changes. Editorial  
                  -Add "certain" to the sentence describing symptomatic conditions that the GDS system will display the appropriate emergency classification for.  
                  GDS does not display "all" the symptomatic conditions.



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- EP. 6-6            -Adds "NA" to blocks as substitute for "-".  
                    (Editorial)  
                    -Move footnote from bottom of chart and puts  
                    it under title. (Editorial)
- The following changes are a result of  
                    technical review revisions to EPIP 13.1.1  
                    which have previously been approved and a  
                    10CFR50.59 review has been completed.
- Change setpoint for UE for reactor pressure  
                    to GE 1150 psig.    -Change SAE for drywell  
                    pressure to GT PSP.    -Change SAE of GT 52 ft.  
                    setpoint to GT 51 ft.    for Suppression Pool  
                    Water Level.  
                    -Change SAE descriptor of Pressure Suppression  
                    Pressure Limit (PSPL) to read Pressure  
                    Suppression Pressure (PSP).
- EP. 6-7 Thru      Delete A.2 example tables. It has previously  
EP. 6-14            been agreed during a meeting between Don  
                    Larson and NRC on July 1, 1991 that these  
                    example tables could be removed. This change  
                    is being submitted in accordance with  
                    10CFR50.54.g for NRC approval prior to  
                    implementation because it may be viewed as  
                    decreasing the effectiveness of the Emergency  
                    Plan.
- EP. 6-7            Change Table B.1 to Table A.2 to be consistent  
                    with EPIP 13.1.1. Editorial
- EP. 6-16 Thru      Delete Table's 6-1 thru 6-4. These tables are  
EP. 6-19            specific to Table A-2 examples which are being  
                    deleted in this revision.
- EP. 6-20 Thru      Delete the notes to Table's 6-1 thru 6-4.  
EP. 6-22            Editorial
- EP. 7-4            Changes and expands the content of "Followup  
                    Messages" to be consistent with NUREG-0654.  
                    This change is an enhancement to the Emergency  
                    Plan.
- EP. 7-5            Continuation of "Followup Message" information  
                    from Page 7-4. Editorial
- EP. 8-7            Add description of the Emergency Response Data  
                    System. A 10CFR50.59 review has been completed  
                    for the addition of ERDS to other sections of  
                    the FSAR.





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- EP. 8-8 Thru      Changes due to "wrap around". Editorial  
EP. 8-9
- EP. 8-10 Thru    Page number changes only. Editorial  
EP. 8-14
- EP. 8-14                Adds page to detail telephone capabilities for Joint Information Center and Crisis Management Center which was inadvertently deleted from a previous revision. This change is an enhancement to the Emergency Plan.
- EP. 10-1              -Add the First Aid and Personnel Decontamination Facility and Headquarters Communication Center to the Introduction of Section 10, Emergency Facilities and Equipment. This change is an enhancement to the Emergency Plan.
- Change the title Headquarters Facility to Headquarters Complex to be consistent with the Emergency Plan section 10.4. Editorial
- EP. 10-13            Add information related to Figure 10-9. Without this information figure 10-9 is not useful. Figure 10-9 is a figure of Total whole body exposure inside the EOF vs. shield thickness for various core melt accidents. The wall thickness and the type of plant must be known for a correlation to be made. This change is an enhancement to the Emergency Plan.
- EP. 11-6              -Add "and/or ground deposition" to cover ground deposition as well as exposure rates. Editorial
- Add "and/or emergency generator" to more accurately indicate the power supplies for the dose projection system. Editorial
- EP. 11-7              Delete as written field team deployment description and insert "Team members responding during off-shift hours will report to their emergency duty station within 60 minutes. Deployment time to have monitoring teams in the field from their emergency duty station will be less than 30 minutes".
- This change may be viewed as decreasing the effectiveness of the Emergency Plan by the NRC. A 10CFR50.59 review has been completed which has determined that the health and safety of the public is not jeopardized. This change will be submitted to the NRC for prior



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approval in accordance with 10CFR50.54.q.

Given the geographical location of the facility and what is possible it has been determined that the commitment as written cannot be met, therefore, it is necessary to change.

Field team deployment time is not taken into account in the accident analysis section of the FSAR.

The purpose for deploying field teams is to validate or backup radioactive release data from the Plant Monitoring System. This release data is used in calculating off-site doses. The calculation is conservative in that the following assumptions are made:

- no chemical reactions,
- no decay,
- air concentrations are non-depositing,
- dispersion is limited vertically to 1000 meters
- there is no vertical shear of the wind direction.
- flat earth,

These conservatism's result in actual concentration measurements being conservative by a factor of 2 to 20, therefore, it is highly probable that the field team data would indicate lower offsite dose rates and ground deposition concentrations than originally projected. Protective Action Recommendations (PAR's) which are made based on these conservative off-site dose calculations would therefore be conservative.

Changing the field team deployment time from 30 minutes anywhere on site to 30 minutes will not affect the PAR. This change will only result in clarification of deployment time. Therefore, the consequences of an accident will not be increased and the health and safety of the public is not jeopardized.

- |             |  |
|-------------|--|
| Figure 11-1 | Change Cypress Garden School to Country Haven Academy. Editorial |
| Figure 11-2 | Change Cypress Garden School to Country Haven Academy. Editorial |
| EP. 12-4    | Break long run-on sentence into two sentences. Editorial         |



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Figure 12-3      Change Cypress Garden School to Country Haven Academy. Editorial

EP. 12-14      Added page numbers to the tables. Editorial  
Thru EP.12-18

EP.13-4      Change contamination limits of alpha from 100 dpm per 100 square cm. to 20 dpm per 100 square cm. due to a plant contamination limit change. Editorial

EP. 14-3      Delete reference to Yakima Valley Memorial Hospital as being a backup to the three Tri-Cities hospitals.

This change is being submitted in accordance with 10CFR50.54.g for NRC approval prior to implementation because it may be viewed as decreasing the effectiveness of the Emergency Plan, however, since the change is consistent with the requirements of NUREG-0654 we feel that the effectiveness of the Emergency Plan is not decreased.

NUREG 0654 L.1 states that "Each organization shall arrange for local and backup hospital and medical services" and the Kennewick General, Our Lady of Lourdes and Kadalec Hospitals fulfill this requirement.

EP. 15-3      Delete the words "definition of" and replace with "the requirements of". The State and County do not define reentry conditions which the sentence implies. Editorial

EP. 16-2      -Add paragraph (Section 16.2.1) referencing NUREG 0654 requirements and WNP-2 Emergency Response Organization. This change is an enhancement to the Emergency Plan.

-Deletes reference (Section 16.4) to First Aid training being administered at three year intervals. Recertification of First Responders occurs every third year, but Supply System First Aid Program training is administered annually. This change is an enhancement to the Emergency Plan.

EP. 16-4      Reformat of Essential Emergency Organization  
thru 16-6      Position table, and addition of matrix to show

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what positions are meeting NUREG-0654 requirements. This change is an enhancement to the Emergency Plan.

17-7 Add "facilitative " to better describe the critique sessions. Editorial

Appendix 2 All Editorial

B-1 thru B-5 Changes in this EPIP to E-Plan cross reference are due to changes in procedure titles, procedures that have been deleted, and being more specific referencing to E-Plan sections.

Appendix 4 All Editorial

D-1 1. Update date of Memorandum Of Understanding (MOU) between the Supply System and Our Lady of Lourdes Hospital.

2. Update date of MOU between the Supply System and Kennewick General Hospital.

3. Update date of MOU between the Supply System and KADLEC Hospital.

4. Update date of MOU between the Supply System and DOE/HEHF.

5. Update date of MOU between the Supply System and Washington State, Emergency Preparedness and Response.

6. Update date of MOU between the Supply System and Department of Energy, Richland Operation Office-Emergency Preparedness and Response.

D-2 7. Update date of MOU between U. S. Department of Energy, Richland Operation Office, the Supply System, Benton and Franklin Counties Washington and the Thirteenth Coast Guard District.

8. Update date of MOU between the Supply System and Benton and Franklin Counties (Emergency Response).

9. Update date of MOU between the Supply System and INPO.

10. Update date of MOU between Advanced Nuclear Fuels and the Supply System.

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11. Update date of MOU between the Supply  
System and FEMA.

-Adds note to indicate that dates on original MOU may not match the dates on pages D-1 and D-2. If there have been no changes to the MOU, then the date in parenthesis represents when the MOU was last used acknowledged by the parties to the MOU.

D-3 thru  
D-58

Paginate all MOU pages and insert updated MOU's

Appendix 5

All Editorial

E-1 thru  
E-49  
E-1

Paginate entire section

Change the title from "Excerpts from NUREG-0654 Cross-Reference to The Emergency Plan, to "NUREG-0654 Cross-Reference"

E-3

Change reference to be consistent with the change in adding the Equipment Operators to the Emergency Organization Section.

E-5

Add section 16 table 16-1 to the NUREG Table B-1 cross reference.

E-6

Change reference from 4.3.1.14 to 4.3.1.15 to reflect Page EP. 4-17 change.

E-12

Drops reference to 6.4 in accordance with Page EP. 6-5 change.

E-14

Add references to items not previously referenced.

E-15

Add references to items not previously referenced.

E-16

Add references to include section 9.

E-23

Add references to items not previously referenced, and delete reference to 6.4.

E-26

Drop references to 6.4 in accordance with Page EP. 6-5 change.

E-39

Add references to items not previously referenced, and update previous references.

