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SUBJECT: Forwards Rev 12 of "Emergency Preparedness Plan for WNP-1 & WNP-2."

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December 29, 1993

GO2-93- 299

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21
SUBMITTAL OF REVISION 12 TO THE WNP-1
AND WNP-2 EMERGENCY PREPAREDNESS PLAN**

In accordance with 10CFR50, Appendix E, paragraph V, and 50.54(q), attached are two copies of the WNP-2 Emergency Preparedness Plan, Revision 12. This revision incorporates comments and critiques from recent drills, the annual emergency exercise, and comments from NRC Region V.

Revision 12 represents an entire page for page change out to previous plan revisions, and reflects the Supply System's use of a different word processing system. Specific changes within Revision 12 are indicated by change lines in the right hand margin. A Synopsis of Changes, which describes specific changes, is attached to this transmittal.

Sincerely,

J. V. Parrish (Mail Drop 1023)
Assistant Managing Director Operations

Attachment

cc: JW Clifford, NRC
BH Faulkenberry, NRC RV
NS Reynolds, Winston & Strawn
DL Williams, BPA (399)
NRC Site Inspector (927N)

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

EMERGENCY PREPAREDNESS PLAN

REVISION 12 - SYNOPSIS OF CHANGES

Affected Pages

Description of Change

All	Revision 12 to the Emergency Preparedness Plan (EPP) represents a change from the typeset of previous EPP revisions. This revision converts the entire EPP to a computerized Word Perfect format, thus the Revision 12 change affects every page. Those changes mostly represent editorial changes. Pages realigned because of the new format, or minor editorial and format changes that clarify without impacting content. When specific changes are made that go beyond minor editorial changes, they will be noted separately in this Synopsis of Changes, and denoted with a change bar in the right hand margin.
EP.1-6	Figure 1-2, Ingestion Exposure Emergency Planning Zone map 50 mile border now includes Oregon's Umatilla and Morrow Counties. This is an enhancement that does not impact EPP intents or commitments.
EP.2-1	<p>a) Adds "or Annual" to Annually definition, and changes definition to, ".... performed or executed during a period of twelve (12) months." This change was documented on Supply System SAR Change Notice Form No. 93-021. It was changed from, "....normally between two consecutive annual emergency exercises.", because annual exercises do not always occur at 12 month intervals. The change was reviewed by WNP-2 Licensing and determined not to impact present intents or commitments contained in the EPP, and is not a degradation of the Plan. The change provides a clarification for the period represented by Annually or Annual, and is a definition of annual that is within guidelines and practices of the Supply System.</p> <p>b) Adds "Response" to the title of Emergency Organization, and adds the abbreviation "(ERO)". This is an editorial change to clarify the full title being used by procedures to describe the Supply System Emergency Response Organization. It does not impact on the intents or commitments of the EPP.</p>
EP.3-3	Changes Washington State "Department of Social and Health Services (DSHS)" to "Department of Health (DOH)". This is an editorial change to reflect the correct name of the agency responsible. The change does not impact on EPP intents or commitments.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 2

Affected

Pages

Description of Change

EP.4-2

Change to Page EP.4-2 and changes are also made to every page following through EP.4-31. The change consists of Emergency Response Organization titles being shaded to make them easier to locate on the page. Also, within position primary responsibilities, the designator for listed items is changed from a lower case letter to a bullet. Use of letters may be interpreted as indicating a particular order in which the primary responsibilities are to be performed. This was not the intent, and the use of bullets indicates responsibilities may be performed in the order necessary. Both changes are editorial clarifications to the EPP format that do not impact on the intents or commitments contained in the EPP.

EP.4-10

Adds "Reentry, Recovery, or", to describe other Teams in the Operations Support Center Director Basic Emergency Function description. This change adds description of other emergency teams this Director may be responsible for, and is an enhancement to the EPP that does not impact on intents or commitments.

EP.4-11

a) Adds "Shift Manager" in the 4.3.1.13 Reports To section along with Operations Support Center Director. This was necessary to clarify that under certain conditions the Shift Manager may also direct Plant Emergency Team activities. Because the Plant Emergency Team may be activated and directed before the Operations Support Center (OSC) is activated, or it may be necessary for the Shift Manager to retain control of the team so that plant systems manipulations can be performed, even after the OSC is activated. This is an administrative change to reflect operational control of an activated Plant Emergency Team. It does not impact on intents, commitments, or duties performed by the Plant Emergency Team.

b) Changes Team Leader under 4.3.1.13 from "Shift Support Supervisor" to "Designated personnel according to team objective." This change was necessary because some Plant Emergency Team (PTL) functions do not require Shift Support Supervisor direction. First Aid and Fire Brigade operations are directed by qualified Equipment Operators at the scene. The Shift Support Supervisor may not be required for such functions, and if plant systems were affected, could offer direction by phone or radio. Our procedural requirements ensure persons designated to act as PET Leaders met qualification requirements of the particular function the team is performing. Changing the title of PET Leader to a designated person instead of identifying a single position allows for flexibility which the emergency circumstances make necessary. EPP intents are not impacted because a PET Leader is still provided for.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 3

Affected

Pages

Description of Changes

c) Adds sentence to 4.3.1.13 Basic Emergency Function, which reads, "The Team may also perform plant systems manipulation tasks to mitigate consequences of an accident." This description clarifies that the Plant Emergency Team can perform other functions subsequent to or in conjunction with emergency functions. The description implied that it was necessary to redesignate the Plant Emergency Team as a Reentry/Recovery Team in order for plant systems manipulation tasks to be performed. In fact, if the Plant Emergency Team has qualified members who can perform systems manipulation activities, then redesignating the team is an unnecessary impediment. This is considered an administrative change that clarifies the Plant Emergency Team functions without impacting EPP intents or commitments. The team is normally dispatched to perform emergency medical or fire functions, but if there are circumstances that require them to perform systems manipulation tasks as well, they would, so long as it didn't interfere with emergency tasks. This was understood, and the EPP change merely states that flexibility exists.

Fig. 4-2

a) Reformats and renames certain Administrative Position Titles within the block diagram figure for "Normal WNP-2 Operating Organization" that were authorized by Change Amendment 113 to Supply System Technical Specification No. 6.5.1.2. This change was submitted for review and received approval for change by the NRC. The change to the EPP reflects the prior approval for those changes and does not impact on the intents or commitments contained in the EPP.

b) Changes the symbol for the "Control Room Supervisor" and the Shift Technical Advisor" from "On shift at all Times" to "On shift as required." This change was submitted on SAR Change Notice Form NO. 92-077. It was determined that this change may be perceived as a degradation of the EPP, and notice of the change was furnished to the NRC by Letter No. G02-92-245. The NRC has taken the matter under review and it is submitted as a proposed change by Revision 12 to the EPP. It is understood that the Supply System considers this change action to be necessary, and a change that is consistent with staffing requirements prescribed by Technical Specification Table 6.2.2-1. However, the change is still subject to NRC decision on its potential degradation of the EPP. It is represented in the revision, but may be withdrawn if it does not receive NRC approval. If NRC approval is not received, an immediate deviation to the EPP will be issued.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 4

Affected

Pages

Description of Change

EP.5-2

a) Adds last sentence to 5.3.1, "The agreement for this service will be administered by the Supply System Manager for Health, Safety, and Fire Protection." This identifies the Supply System entity responsible for maintaining the agreement and is an enhancement to the EPP that does not impact intents or commitments.

b) Under 5.3.2, changes name of "Kadlec Hospital" to "Kadlec Medical Center". This is an editorial change that does not impact EPP intents.

c) Under 5.3.2, adds sentence in two places that refers to maintenance of agreement for service being contained in Appendix 4 of the EPP. This is an editorial enhancement that does not impact EPP intents.

EP.5-3

a) Under 5.3.4, 5.4.1, and 5.4.2, adds sentence that refers to maintenance of agreements for service being contained in Appendix 4 of the EPP. This is editorial enhancement that does not impact EPP intents.

b) Under 5.3.4 and 5.4.2, changes name from "Advanced Nuclear Fuels Corporation" to "Siemens Nuclear Power Corporation". This is an editorial change that reflects the change in company name only. There is no impact on EPP intents or commitments.

EP.5-4

a) Under 5.4.4, adds "...and environmental sample analytical services." to the services provided by the Teledyne Corporation, and adds sentence that refers to maintenance of a services contract by the Supply System's Radiological Environmental Monitoring Programs group. This is an editorial enhancement to the EPP that does not impact intents or commitments.

b) Under 5.4.5, adds "Technical Data Center Director" to replace "Technical Manager." This reflects the actual title of the Emergency Center individual that is responsible for the interface. The Technical Manager describes a title for a normal operations Supply System position that does not have that responsibility under emergency conditions. This is an clarification change to identify the correct title for the emergency position. The change does not impact on the intents or commitments of the EPP.

c) Under 5.4.5, adds sentence to identify the specific Work Release Order Contract that would be used to obtain emergency services from the contractor. This is an enhancement to the EPP that does not impact EPP intents or commitments.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 5

Affected
Pages

Description of Change

- EP.5-5 Under 5.4.7 and 5.4.8, sentence is added which refers to the location of agreements being maintained for the services described by the sections. **This is an enhancement to the EPP that does not impact intents or commitments.**
- EP.5-6 a) Under 5.5.2, "Six counties" is changed to "four counties". The previous language of six implies there are a total of eight counties because the language following says, "...in addition to Benton and Franklin Counties." There is only an actual total of six counties, and this language change is intended to clarify the statement. **This is an editorial change being made for clarity that has no impact on EPP intents or commitments.**
- b) Also, under 5.5.2, reference is added that identifies and adds the two counties in Oregon, as well as the Oregon Department of Energy. **This addition is an acknowledgement for certain Oregon locations lying within the EPP 50 Mile Ingestion Exposure Emergency Planning Zone. Reference to Oregon locations and the State agency responsible for Emergency Planning was not previously stated in the EPP. This is an enhancement to EPP intents and commitments.**
- EP.5-8 Language is changed under 5.6.2 that acknowledges Oregon's Morrow and Umatilla counties being within the EPP 50 Mile Ingestion Exposure Planning Zone, and the contract with the State of Oregon for maintaining an emergency preparedness program in support of the EPP. **This is an addition to the EPP that is an enhancement.**
- EP.5-10 Under the 5.7.2 list of assistance which can be requested via the Department of Energy, the specific names of contractors providing the service is removed and the generic name of "Emergency Decontamination Center staff" or "Hanford contractor" is being inserted. Contractor names may change depending on periodic contract award so a generic term is now being used rather than a specific contractor name so that a change in contractor does not require EPP revision. **This change does not impact EPP intents or commitments because services provided or coordinated by the Department of Energy - Richland Operations to the Supply System by agreement will continue. Removal of specific contractor names in this section has no impact on the agreements for services that are provided for in Appendix 4.**

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 6

Affected

Pages

Description of Changes

EP.5-11

Language is changed in Section 5.7.4 to now describe the Coast Guard authority for establishing a "Safety Zone" on the Columbia River in order to control public access during emergency events. The previous language implied river "Closure", and that term exceeds the authority that the Coast Guard would have in such situations. This language change results from changes that were made by the Coast Guard in their agreement with the Supply System for providing this service. This does not constitute a degradation of the plan because the intent and commitment to control public access to that portion of the Columbia River which lies in the Emergency Planning Zone is still provided for, and is maintained by written agreement. The change is language clarification and does not impact EPP intents or commitments.

EP.7-5

Deletes reference to the Crisis Management Center (CMC). Action to delete the Supply System's CMC was initiated on SAR Change Notice Form No. 92-060. This change was reviewed by Plant Operations Committee (POC) meeting 93-26 and approved. It was also determined that deletion of the CMC was not a degradation of the EPP because the center was not used for decision making or coordinating activities during declared emergencies. Rather, it was used to provide an information briefing location for senior management personnel. This action was considered non-consequential to emergency operations because the center does not impact existing EPP implementing procedure activities. Deletion of the CMC does not impact EPP intents or commitments to emergency operations, and notification was provided to the NRC by Letter No. G02-93-195 that it was the Supply System's intent to conduct operations without the CMC pending submittal of this revision to the EPP.

EP.7-6

a) Under Unusual Event column, "N" for notify is added for the U.S. Coast Guard and Federal Emergency Management Agency. This additional notification category for the two agencies means they will receive notification of all Emergency Action Levels, and is a more conservative action that constitutes an enhancement of EPP intents and commitments.

b) The name of "ANF Corp" is changed to read "Siemens Corp". This is a corporate name change only and does not impact on EPP intents or commitments.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 7

Affected

Pages

Description of Changes

EP.7-7

Under Unusual Event column, "N" for notify is removed from the Institute of Nuclear Power Operations and American Nuclear Insurers. This change was submitted on SAR Change Notice Form No. 92-037. It was reviewed by the Plant Licensing Organization and determined not to impact EPP intents and commitments, nor does it constitute a degradation of the plan. Both the Institute of Nuclear Power Operations and American Nuclear Insurers were being notified at the Unusual Event category for information purposes only. Neither agency has any EPP support function or responsibility that can occur at the Unusual Event Emergency Action Level. Also, both of the agencies had requested in written procedures they provide the Supply System to describe their response capabilities to emergencies, that they want to be contacted only when Supply System Emergency Action Levels of Alert or higher are reached. Because neither agency has functions that impact Unusual Event actions, removal from notification does not constitute a degradation for EPP intents or commitments.

Table 8-1

Deletes reference to the Crisis Management Center in this table and also in Table 8-2 for the reasons stated above in the Page 7-3 description of change. Deletion of this center does not impact EPP intents or commitments.

EP.10-10

a) Deletes reference to the Crisis Management Center (CMC) for the same reasons stated in Page EP.7-5 above. However, language which was contained in the section deleting CMC operations (Section 10.4.1) which that describe the general functions of the Headquarters Complex, are retained in this EPP revision. Deletion of the CMC does not impact EPP intents or commitments for the reasons stated in the Page EP.7-5 Description of Change above. Retaining language from the omitted section that is found to still apply to Headquarters Complex functions is an enhancement to the EPP.

b) Section numbering changes made to compensate for deletion of the CMC (previously listed as Section 10.4.1) are made for the remaining Section 10 emergency center areas. This is an editorial change that does not impact EPP intents or commitments.

EP.10-22

Figure 10-11, reference to the Crisis Management Center (CMD) is deleted from the figure for the same reasons stated in Page EP.7-5 above. Deletion of the CMC from this figure does not impact EPP intents or commitments.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 8

Affected

Pages

Description of Changes

- EP.11-5 Under Section 11.6.2, language that changes the Supply System description of Aerial Monitoring is made. This change was submitted on SAR Change Notice Form No. 93-072 and was reviewed at POC 93-49. It was determined that the change did not impact EPP intents, nor was it a degradation of the plan because there is no requirement for the licensee to provide aerial monitoring services. The language change clarifies the State's obligation to provide aerial monitoring services, or request the assistance of federal support available for such monitoring. This change does not impact EPP intents or commitments nor constitute a degradation because no licensee requirement exists to provide aerial monitoring services. Provisions to provide aerial monitoring assistance to the State were provided previously in the EPP due to the isolated location of the plant. However, it is no longer necessary due to the capability for rapid response by the federal aerial monitoring services. The EPP change clarifies State responsibilities to provide such services and is an editorial change that does not impact EPP intents or commitments.
- EP.11-6 Under Section 11.6.4, language is changed to describe how particulate samples for radioiodine concentrations are now obtained by analyzing filters and cartridges with portable count rate meters instead of the portable multi-channel analyzers that were previously listed. This change describes how a different type of equipment and process is now used to obtain particulate results committed to in the EPP. The change does not degrade or lessen our ability for obtaining particulate results, so there is no impact on the intents or commitments represented in the EPP.
- EP.12-4 The table for industrial employment in the Ten-Mile Emergency Planning Zone is changed to reflect results of a 1993 survey update. The change in population figures are offered for planning purposes and the 1993 survey results are not significant enough to require changes to EPP intents or commitments.
- EP.13.6 Language is changed in Section 13.8 from "...for the crew of the Sheriff's boat performing river evacuation.", to read, "...when needed by offsite emergency workers." This change expands the scope of intent for the section in order to acknowledge the Supply System obligation to provide any needed personnel monitoring, dosimetry, and decontamination for all offsite emergency workers, rather than just the Sheriff's boat crew. This change is an enhancement to EPP intents and commitments.

EPP REV. 12 - SYNOPSIS OF CHANGES PAGE 9

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Pages

Description of Changes

EP.16-3

The format of Table 16-1 is changed for "Essential Emergency Organization Positions". The new table lists the Supply System Emergency Organization position along side the NuReg-0654 Table B-1 staffing requirement that the Supply System position fulfills. **This format change is an enhancement to the previous Table 16-1 and does not impact EPP intents or commitments.**

EP.D-1

The Appendix 4, Agreement Letters section is changed and the attached copies of listed agreements are no longer part of the section. More and more annual revisions were being made and this was making it difficult to keep the attachments in alignment. The guidance in NuReg-0654 for agreements with outside agencies does not require copies be maintained as part of licensee plans. NuReg-0654 does direct that licensees update agreements as needed, then review and certify them to be current on an annual basis. The Appendix 4 change includes language that outlines the Supply System commitment for performing such annual review, and identifies the file and contract number where documentation of agreements and their annual review may be found. **Removal of copies of Supply System agreements from the EPP is not a degradation. The EPP intent and commitment to outside agency agreements remains. Only the manner of file maintenance is affected by the change.**



WASHINGTON PUBLIC POWER

SUPPLY SYSTEM

INTEROFFICE MEMORANDUM

Rev. 2/26/94 J/S

DATE: December 28, 1993

TO: Distribution

FROM: J. H. Swailes, Plant Manager, WNP-2 (927M) *CO Smith*

SUBJECT: WNP-2 PLANT PROCEDURES MANUAL - VOLUME 13
CANCELLATION PACKAGE NO. 93-317

REFERENCE: PPM *1.2.4

The following Procedure(s) have been cancelled and are to be removed from your controlled copy of Volume 13 Plant Procedures Manuals as they are no longer needed.

<u>Procedure</u>	<u>Rev.</u>	<u>Title</u>
13.9.6	8	Field Lab Analysis of Environmental Air Samples
13.9.7	7	Aerial Monitoring

To verify removal of the subject cancelled procedure(s), please sign, date and return this receipt to SCOTT W. TAYLOR, MD 927A within TEN (10) WORKING DAYS from the date of this IOM.

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87

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EMERGENCY PREPAREDNESS PLAN

Revision 13:

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

EMERGENCY PREPAREDNESS PLAN

REVISION 13 - SYNOPSIS OF CHANGES

**Affected
Pages**

Description of Changes

HP-4-33

Changes the symbol for "Control Room Supervisor" and "Shift Technical Advisor" blocks in Figure 4-2 from "On shift as required" to "On shift at all times". This change was submitted on SAR Change Notice Form No. 94-025, and approved by the Plant Operations Committee (POC) in meeting 94-11.1 on March 18, 1994. This change was necessary to eliminate an unapproved reduction in the effectiveness of Revision 12 of the Plan.

HP-16-3

Removes the asterisk indicating "On shift as required" for Table 16-1, "WNP-2 Position Equivalent" blocks of "Control Room Supervisor" and "Shift Technical Advisor". This change was submitted on SAR Change Notice Form No. 94-025, and approved by the Plant Operations Committee (POC) in meeting 94-11.1 on March 18, 1994. This change was necessary to eliminate an unapproved reduction in the effectiveness of Revision 12 of the Plan, and to bring Table 16-1 into agreement with Figure 4-2.

It should be noted that a request to align the Emergency Preparedness Plan with other Licensing Basis Documents is still outstanding, and that the Emergency Preparedness Plan is undergoing NRC evaluation.