

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIOS)

ACCESSION# 8112020541. DOC. DATE: 81/11/30 NOTARIZED: YES DOCKET # 05000528
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Public 05000529
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Public 05000530
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Public 05000530
 AUTH. NAME: AUTHOR AFFILIATION
 VAN BRUNT, E. E. Arizona Public Service Co.
 RECIP. NAME: RECIPIENT AFFILIATION
 TEDESCO, R. L. Assistant Director for Licensing

SUBJECT: Forwards applicant response to draft SER section re emergency plan provided in 811111 meeting w/NRC. Response addresses assignment of responsibility, onsite emergency organization & emergency classification sys.

DISTRIBUTION CODE: B029S COPIES RECEIVED: LTR [L ENCL] SIZE: 29
 TITLE: Emergency Plan Information

NOTES: Standardized Plant. 1 cy: C. Grimes 05000528
 Standardized Plant. 1 cy: C. Grimes 05000529
 Standardized Plant. 1 cy: C. Grimes 05000530

ACTION:	RECIPIENT		COPIES		RECIPIENT	COPIES	
	ID CODE/NAME		LTR	ENCL		ID CODE/NAME	LTR
	LICI BR #3 BC		1	1	KERRIGAN, J.	01	1
INTERNAL:	IEI	10	2	2	IE/DEP DIR		0
	IE/DEP/EPDB	12	1	1	IE/DEP/EPLB	06	4
	NRR/DSIV/RAB		1	1	REG. FILES	04	1
EXTERNAL:	INPO, J. STARNES		1	1	LPDR	03	1
	NSIC	05	1	1	VTIS		1
	PDRI	02	1	1			1

DEC 03 1981

MA4

LB

TOTAL NUMBER OF COPIES REQUIRED: LTR 18 ENCL 17
 17 16

ARIZONA



PUBLIC SERVICE COMPANY

STA. _____

P.O. BOX 21666 - PHOENIX, ARIZONA 85036

November 30, 1981

ANPP-19562 - EEVBJr/KWG?

Mr. R. L. Tedesco
Assistant Director for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Subject: Palo Verde Nuclear Generating Station
(PVNGS) Units 1, 2 and 3
Docket Nos. STN-50-528/529/530
File: 81-056-026; G.1.10

- Reference: (1) Letter from R. L. Tedesco to E. E. Van Brunt,
Subject: PVNGS Emergency Plan, dated Oct. 14,
1981.
- (2) Letter from E. E. Van Brunt to R. L. Tedesco,
Subject: PVNGS Emergency Plan, dated Oct. 27,
1981.
- (3) Meeting Nov. 11, 1982 with Mr. Tom McKenna of
NRC and APS personnel, Subject: PVNGS Emergency
Plan.

Dear Mr. Tedesco:

Reference (1) provided your comments on the PVNGS Emergency Plan. Reference (2) responded with our schedule for resolving the comments you provided.

November 11, 1981, a meeting was held between Mr. T. McKenna of the NRC and the various APS personnel responsible for preparing the plan. At the meeting, Mr. McKenna supplied a draft SER section and indicated our responses should address that document as opposed to Reference (1) above.

Attached are our responses to the draft SER section provided. If you have any questions, please contact me.

Very truly yours,

E. E. Van Brunt, Jr.
E. E. Van Brunt, Jr.
APS Vice President,
Nuclear Projects
ANPP Project Director

8112020641 811130
PDR ADOCK 05000528
F PDR

EEVBJr/KWG/mjb
Attachment

cc: J. Kerrigan (w/a) P. Hourihan (w/a) A. C. Gehr (w/a) T. McKenna (w/a)

3029
5/11

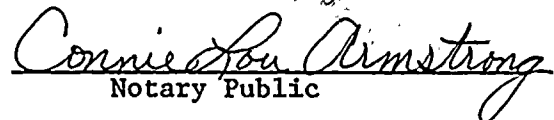


STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, John M. Allen, represent that I am Nuclear Engineering Manager of Arizona Public Service Company, that the foregoing document has been signed by me for Edwin E. Van Brunt, Jr., Vice President Nuclear Projects, on behalf of Arizona Public Service Company with full authority so to do, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.


John M. Allen

Sworn to before me this 30th day of NOVEMBER, 1981.


Notary Public

My Commission expires:

June 24, 1983



A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL)

Deficiency

Provide a copy of the Arizona State Emergency Plan.

Resolution

A copy of the State of Arizona/Maricopa County Fixed Nuclear Facility Offsite Emergency Response Plan will be submitted to the NRC.

Deficiency

Identify the exact boundaries of the plume EPZ based on local conditions such that local population can identify its limits (e.g. roadway, etc., if possible).

Resolution

The PVNGS Emergency Plan will be revised to include a description of the method used to establish the boundaries of the plume EPZ.

Deficiency

Discuss the onsite/offsite concept of operation to demonstrate the interfaces and coordination in the following areas:

- Protective actions decision making
- Offsite monitoring and result coordination
- Control and processing of plant evacuation
- Plant access control if plant evacuation is ordered

Resolution

The PVNGS Emergency Plan will be revised to discuss the onsite/offsite concept of operation to demonstrate the interfaces and coordination in the above areas.

Deficiency

Identify each step in the protective action decision making and implementation (e.g., siren activation/EBS message) to demonstrate 24-hour capabilities.

Resolution

The PVNGS Emergency Plan will be revised to identify each step in the protective action decision making and implementation to demonstrate 24-hour capabilities.

Deficiency

Identify who is responsible for 24-hour manpower planning and the resources to be used for this effort.

Resolution

The PVNGS Emergency Plan will be revised to identify who is responsible for 24-hour manpower planning and the resources to be used for this effort.

Deficiency

Provide agreements with all local support agencies to include ambulance and hospital support or any other group not addressed by the State plan. All agreements should be reviewed and certified current, and preferably dated within one year of anticipated license issuance.

Resolution

Copies of current letters of agreement will be provided in the PVNGS Emergency Plan prior to fuel loading of Unit 1.

B. ONSITE EMERGENCY ORGANIZATION

Deficiency

Show the relationship of the normal shift organization to the emergency functions identified in NUREG 0654, Table B-1.

Resolution

The PVNGS Emergency Plan will be revised to show the relationship of the normal shift organization to the emergency functions identified in NUREG 0654, Table B-1.

Deficiency

Specify the criteria for transfer of the responsibilities of Emergency Coordinator to the Emergency Operations Director (e.g. brief replacement).

Resolution

The PVNGS Emergency Plan will be revised to show the criteria for transfer of the responsibilities of Emergency Coordinator to the Emergency Operations Director.

Deficiency

Specify, to the working level, the normal and emergency position titles of those personnel who will perform the functions and tasks identified in NUREG 0654, Table B-1. Identify, for the normal backshift, who will act as the shift communicator. In addition, demonstrate that the 30-minute and 60-minute staffing requirements can be met or specify by shift the compensatory measures provided. Describe how the augmentation requirements will be demonstrated along with how this capability will be maintained.

Resolution

The PVNGS Emergency Plan will be revised to specify, to the working level, the normal and emergency position titles of those personnel who will perform the functions and tasks identified in NUREG 0654, Table B-1. The Emergency Plan will also identify for the normal backshift who will act as the shift communicator and describe the methods and compensatory measures used to meet the 30-minute and 60-minute staffing requirements. The Emergency Plan will also describe how the augmentation requirements will be demonstrated along with how this capability will be maintained.

Deficiency

Show the interfaces with corporate, local support (fire, medical, etc.), vendor and other offsite support on the block diagrams. In addition, discuss how and where this support will be coordinated.

Resolution

The PVNGS Emergency Plan will be revised to show the interfaces with corporate, local support (fire, medical, etc.), vendor and other offsite support on block diagrams and discuss how and where this support will be coordinated.

Deficiency

Specify the contractor support used to augment the licensee emergency response (complete Table 4.3.1).

Resolution

The PVNGS Emergency Plan will be revised to specify the contractor support used to augment the licensee emergency response.

Deficiency

Provide letters of agreement with all local, vendor, or contractor (e.g. NSSS, INPO) support that provide the information set forth in NUREG 0654, Criterion B-9.

Resolution

Letters of agreement with all local vendor, or contractor (e.g. NSSS, INPO) support that provide the information set forth in NUREG 0654, Criterion B-9 will be provided prior to Unit 1 fuel loading.

Deficiency

Clearly identify who has the authority and responsibility to classify events and demonstrate that this can be accomplished promptly. In addition, provide assurance that once classified that offsite officials will be notified and provided with initial protective action recommendations within 15 minutes. The fact that the Duty Officer may not be in the affected unit may delay this process.

Resolution

The PVNGS Emergency Plan will be revised to identify who has the authority and responsibility to classify events and demonstrate that this can be accomplished promptly. The Emergency Plan will also provide assurance that once classified that offsite officials will be notified within 15 minutes and provided with initial protective action recommendations for a site or general emergency.

Deficiency

Discuss the role, manning, and interface with other centers and offsite of the Satellite TSC.

Resolution

The PVNGS Emergency Plan will be revised to discuss the role, manning, and interface with other centers and offsite of the Satellite TSC.

Deficiency

Provide a priority list of the assessment, sampling, surveys, and other HP/Chemistry Technician tasks that may be required during the initial phases of an accident along with the criteria or a discussion of the conditions that will dictate when action should be taken (e.g. rapid surveys if instruments are off-scale or monitoring of evacuees, etc.).

Resolution

The PVNGS Emergency Plan will be revised to provide a priority list of the assessment, sampling, surveys, and other HP/Chemistry Technician tasks that may be required during the initial phases of an accident along with the criteria or a discussion of the conditions that will dictate when action should be taken.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

Deficiency

Specify the expected response times of various types of Federal assistance.

Resolution

The PVNGS Emergency Plan will be revised to specify the expected response times of various types of Federal assistance.

Deficiency

Specify the specific Federal points of contact for requesting various types of assistance and support this with letters of agreement.

Resolution

The PVNGS Emergency Plan will be revised to specify the specific Federal points of contact for requesting various types of assistance. This will be supported with letters of agreement prior to Unit 1 fuel loading.

Deficiency

Summarize possible resources that could be used to support Federal response in accordance with NUREG 0654, Criterion C.1.c.

Resolution

The PVNGS Emergency Plan will be revised to summarize possible resources that could be used to support Federal response in accordance with NUREG 0654, Criterion C.1.c.

Deficiency

Describe the onsite radiological laboratories, their capabilities and availability during accident conditions. In addition, describe provisions for offsite laboratory support.

Resolution

The PVNGS Emergency Plan will be revised to describe the onsite radiological laboratories, their capabilities and availability during accident conditions and will also be revised to describe provisions for offsite laboratory support.

D. EMERGENCY CLASSIFICATION SYSTEM

Deficiency

Establish Emergency Action Levels (EAL) for each initiating condition specified in Appendix 1 to NUREG 0654. The EALs should be observable (e.g, instrument readings, equipment status indications, alarm annuicators) which are both necessary and sufficient to explicitly characterize each initiating condition.

Resolution

The PVNGS Emergency Plan will be revised to contain Emergency Action Levels (EAL) for each initiating condition specified in Appendix 1 to NUREG 0654. These EALs will be based on observables (e.g., instrument readings, equipment status indicators, alarm annuicators) to the extent possible.

Deficiency

Discuss how the EALs will be integrated into control room operations in a form usable by the control room operators. Discuss the job aids to be used to allow prompt and accurate classification and how these job aids will be tested.

Resolution

The PVNGS Emergency Plan will be revised to discuss how the EALs will be integrated into control room operations in a form usable by the control room operators. The Emergency Plan will also discuss the job aids to be used to allow prompt and accurate classification and how these job aids will be tested.

E. NOTIFICATION METHODS AND PROCEDURES

Deficiency

Provide a complete description of the administrative and physical means for prompt alerting and notification of the public within the plume exposure pathway EPZ. Sufficient detail should be provided for evaluation against the criteria set forth in Appendix 3 to NUREG 0654. This must include sufficient detail to demonstrate that protective action decisions and public notification can be made in accordance with time standards specified in 10CFR Part 50, Appendix E, IV.D.3.

Resolution

The PVNGS Emergency Plan will be revised to provide a complete description of the administrative and physical means for prompt alerting and notification of the public within the plume exposure EPZ. Sufficient detail will be provided for evaluation against the criteria set forth in Appendix 3 to NUREG 0654.

Deficiency

Provide copies of the pre-arranged messages to be used to inform the public (over EBS) of their expected response that cover a range of protective measures as set forth in NUREG 0654, Criterion E.7.

Resolution

The PVNGS Emergency Plan will be revised to contain copies of the pre-arranged messages to be used by the State of Arizona and Maricopa County to inform the public of their expected response that cover a range of protective measures as set forth in NUREG 0654, Criterion E.7.

Deficiency

Revise the initial notification messages to provide for recommending protective measures based on plant status in addition to recommendations based on projected doses and not just in a down wind direction. (See Section J).

Resolution

The PVNGS Emergency Plan will be revised to contain initial notification messages which will provide for a site or general emergency recommended protective measures based on plant status in addition to recommendations based on projected doses and not just in a down wind direction.

Deficiency

- Commit to having the physical and administrative means for notification in place before fuel loading and provide a schedule to include installation completed and testing completed.

Resolution

APS will provide a letter to the NRC committing to having the physical and administrative means for notification in place before Unit 1 fuel loading and will also provide a schedule for installation and testing.

Deficiency

Specify the organizational titles and alternates for both ends of the communication links which would be involved in initiating emergency response actions, and indicate that such stations will be manned 24-hours per day.

Resolution

The PVNGS Emergency Plan will be revised to specify the organizational titles and alternates for both ends of the communication links which would be involved in initiating emergency response actions and will describe the 24-hour manning of such stations.

Deficiency

A diverse means of communication which will operate with loss of normal power such as a radio system, should be available between the site and offsite response agency responsible for initiating emergency response actions. Since those individuals responsible for protective action decision making and implementation are not identified, it is not clear that adequate backup communications have been provided.

Resolution

The PVNGS Emergency Plan will be revised to describe the means of communication available between the site and offsite response agency responsible for initiating emergency response actions, including the communication systems available during a loss of normal power.

Deficiency

Provide a further description of onsite communications in and between the emergency centers to demonstrate compliance with the requirements of NUREG 0696. In addition, describe the communications with the Satellite TSCs and alternate EOF when described.

Resolution

The PVNGS Emergency Plan will be revised to describe onsite communications in and between the emergency centers, the Satellite TSCs, and the alternate EOF assembly area to demonstrate compliance with the requirements of NUREG 0696.

Deficiency

Identify what advance arrangements have or will be made for assuring that the Palo Verde Inn will be available and will have the capability for use as the Emergency News Center.

Resolution

The PVNGS Emergency Plan will be revised to identify the advance arrangements which have been made to assure that the Palo Verde Inn will be available and have the capability for use as the Emergency News Center.

Deficiency

Provide a sample copy of the emergency preparedness information which will be provided for both the resident and transient population around the site or provide a further description to demonstrate that the information specified in NUREG 0654, Criterion G.1 will be provided. In addition, a discussion between accident conditions and why various protective actions are recommended must be included.

Resolution

The PVNGS Emergency Plan will be revised to discuss the information to be provided for both the resident and transient population around the site to demonstrate that the information specified in NUREG 0654, Criterion G.1 will be provided.

Deficiency

Describe the provisions to supply the public information in a form that will be available in a residence when needed.

Resolution

The PVNGS Emergency Plan will be revised to describe the provisions to supply the public information in a form that will be available when needed.

Deficiency

Describe the provision to reach transients to include motels (if there are any in the plume EPZ) and in construction workers at the other units. This must include posting of information.

Resolution

The PVNGS Emergency Plan will be revised to describe the provision to reach transients to include motels and construction workers at the other units.

Deficiency

- Identify the licensee spokesman at the ENC and how news media releases will be coordinated with State officials.

Resolution

The PVNGS Emergency Plan will be revised to identify the licensee spokesman at the ENC and how news media releases will be coordinated with State officials.

H. EMERGENCY FACILITIES AND EQUIPMENT

Deficiency

Provide sufficient detail to demonstrate that the EOF and TSC are in compliance with the requirements of NUREG 0696. Further describe the concept of operations for the Satellite TSC and how it will be integrated into the site response. Also describe the provisions for an alternate EOF (AEOF) in accordance with NUREG 0696 to include provisions for its activation if primary EOF cannot perform its functions. This transfer to the AEOF must be possible without interruption of command and control.

Resolution

The PVNGS Emergency Plan will be revised to provide sufficient detail to demonstrate that the EOF and TSC are in compliance with the requirements of NUREG 0696. The Emergency Plan will also further describe the concept of operations for the Satellite TSC and how it will be integrated into the site response. The Emergency Plan will discuss the acceptability of and provisions for an alternate EOF assembly area in accordance with the October 16, 1981 memorandum for all Operating Reactor and Licensing Branch Chiefs, Division of Licensing, Office of Nuclear Reactor Regulation from Steve L. Ramos, Chief, Emergency Preparedness Development Branch, Division of Emergency Preparedness, Office of Inspection and Enforcement on the subject of: Modification of the Location and Habitability Criteria for Emergency Operations Facilities.

Deficiency

Provide for activation of the TSC within 30 minutes and describe timing and criteria for activation and flow of responsibility for the EOF. Describe who will report to these facilities and demonstrate the flow of responsibility/functions in accordance with NUREG 0696.

Resolution

The PVNGS Emergency Plan will be revised to describe the activation of the TSC within 30 minutes and the timing and criteria for activation and flow of responsibility for the EOF. The Emergency Plan will also describe who will report to these facilities and demonstrate the flow of responsibility/function in accordance with NUREG 0696.

Deficiency

Provide a complete description in the plan of the meteorological measurement system for evaluation against the criteria set forth in Appendix 2 of NUREG 0654, and schedule for meeting the milestones specified in Annex 1 to that appendix.

Resolution

The PVNGS Emergency Plan will be revised to provide a description of the meteorological measurement system. A detailed description of the meteorological measurement system for evaluation against the criteria set forth in Appendix 2 of NUREG 0654 and a schedule for meeting the milestones specified in Annex 1 to that appendix will be provided in a separate submittal to the NRC.

Deficiency

Identify the onsite radiological and process monitoring systems in accordance with Criteria H.5a and b of NUREG 0654. The monitors identified would include those used for obtaining Emergency Action Levels for the appropriate initiating conditions listed in Appendix 1 to NUREG 0654. Include instrument identification, readout location, and range.

Resolution

The PVNGS Emergency Plan will be revised to identify the onsite radiological and process monitoring systems in accordance with Criteria H.5.a and b of NUREG 0654.

Deficiency

Provide sufficient information to establish that the offsite dosimetry will meet the requirements of the NRC Radiological Assessment Branch Technical Position for the Environmental Radiological Monitoring Program and include the location of the TLD stations.

Resolution

The PVNGS Emergency Plan will be revised to provide sufficient information to establish that the offsite dosimetry will meet the requirements of the NRC Radiological Assessment Branch Technical Position for the Environmental Radiological Monitoring Program and include the location of the TLD stations.

Deficiency

Describe the kits to be provided at each center and their use to demonstrate that sufficient supplies to perform the protective functions (i.e. corrective tools, protective equipment) are available.

Resolution

The PVNGS Emergency Plan will be revised to describe the kits to be provided at each center and their use to demonstrate that sufficient supplies to perform the protective functions are available.

I. ACCIDENT ASSESSMENT

Deficiency

Since the EALs were not specific it could not be determined if NUREG 0654, Criterion I.1 was met.

Resolution

The PVNGS Emergency Plan will be revised to provide sufficiently detailed EALs to meet NUREG 0654, Criterion I.1.

Deficiency

Provide sufficient detail to enable evaluation against NUREG 0737, Items II.B.3, II.F.1 and III.D.3.3 as they relate to emergency response. Discuss how these results will be used in dose projections, corrective action determination, and how these tasks will be performed and integrated into the total response. This should include response times and criteria for performing training and drills. This must include the relationship of coolant sample results to core conditions.

Resolution

The PVNGS Emergency Plan will be revised to provide sufficient detail to enable evaluation against NUREG 0737, Items II.B.3, II.F.1 and III.D.3.3 as they relate to emergency response. The Emergency Plan also will discuss how these results will be used in dose projections, corrective action determination and how these tasks will be performed and integrated into the total response.

Deficiency

Establish a method for relating source term to offsite dose based on containment leakage. This should include plots which show the containment radiation monitor reading vs. time following an accident for incidents involving release of gap activity and release of fuel inventory. In addition, use these as part of the EALs.

Resolution

The PVNGS Emergency Plan will be revised to provide a method of relating source term to offsite doses based on containment leakage.

Deficiency

Provide the basis for the models used to relate radioiodine and noble gas concentration to dose and to relate monitor reading to release rate (e.g. how was change in mix as a function of time considered). In addition, describe transport code used.

Resolution

The PVNGS Emergency Plan will be revised to describe the basis for the models used to relate radioiodine and noble gas concentration to dose and to relate monitor reading to release rate.

Deficiency

Provide a method for determining containment radiation levels (i.e. with hand held instruments) if the monitor is offscale or inoperable.

Resolution

The PVNGS Emergency Plan will be revised to describe a method available for determining containment radiation levels if the monitor is offscale or inoperable.

Deficiency

Include in the plan the table/nomograms etc. used to relate effluent monitor reading to offsite doses under various conditions.

Resolution

The PVNGS Emergency Plan will be revised to contain a method which may be used to relate effluent monitor readings to offsite doses under various conditions.

Deficiency

Describe the provision for field monitoring to provide the information required by NUREG 0654, Criteria I.7 and I.8.

Resolution

The PVNGS Emergency Plan will be revised to describe the provision for field monitoring to provide the information required by NUREG 0654, Criteria I.7 and I.8.

Deficiency

Further describe the means to confirm the actual release mix if the instruments are offscale (Part 100 assumptions) to include provisions for a rapid field survey.

Resolution

The PVNGS Emergency Plan will be revised to further describe the means to confirm the actual release mix if the instruments are offscale (Part 100 assumptions) to include provisions for a rapid field survey.

Deficiency

Specify the location of the backup means of dose projection (e.g. TSC, etc.).

Resolution

The PVNGS Emergency Plan will be revised to specify the location of the backup means of dose projection.

J. PROTECTIVE RESPONSE

Deficiency

Discuss notification and accountability of the construction workers on the other units. In addition, discuss notification of any population in the other owner controlled areas.

Resolution

The PVNGS Emergency Plan will be revised to discuss notification and accountability of the construction workers on the other units and population in other owner controlled areas.

Deficiency

Provide for site evacuation signs and maps.

Resolution

The PVNGS Emergency Plan will be revised to discuss provisions for site evacuation signs and maps.

Deficiency

Provide in the plan maps showing the evacuation routes to be used by the site including the construction workers on the other units.

Resolution

The PVNGS Emergency Plan will be revised to include maps showing the evacuation routes to be used by the site including the construction workers on the other units.

Deficiency

Discuss distribution of KI for all onsite emergency workers and specify the criteria for its use and who has the authority to issue it.

Resolution

The PVNGS Emergency Plan will be revised to discuss distribution of KI for all onsite emergency workers and specify the criteria for its use and who has the authority to issue it.

Deficiency

Provide a mechanism for recommending protective actions based on plant (core/containment) conditions and take into consideration offsite conditions that may influence the choice of the most effective protective action (e.g. evacuation

time of the construction workers) and the uses of the key-hole approach (i.e., not limited to only the down wind direction). This must include recommending evacuation for two miles around the site and five miles down wind under core melt conditions and sheltering for all General Emergencies. This mechanism must be reviewed by local officials.

Resolution

The PVNGS Emergency Plan will be revised to provide a mechanism for recommending protective actions based on plant conditions and taking into consideration offsite conditions that may influence the choice of the most effective protective action and the uses of the key-hole approach.

Deficiency

Provide evacuation time estimates in the plan and integrate them into the protective action decision making mechanism.

Resolution

The PVNGS Emergency Plan will be revised to provide evacuation time estimates and integrate them into the protective action decision making mechanism.

Deficiency

Provide readable maps that supply the information specified in NUREG 0654, Criteria 10 a, b, and c.

Resolution

The PVNGS Emergency Plan will be revised to contain readable maps that supply the information specified in NUREG 0654, Criteria 10 a, b, and c.

Deficiency

Provide an estimate of the protection afforded by local structures including the other unit construction sites and integrate this into the protective action recommendation mechanism.

Resolution

The PVNGS Emergency Plan will be revised to provide an estimate of the protection afforded by local structures including the other unit construction sites and integrate this into the protective action recommendation mechanism.

Deficiency

Provide the criteria for immediate evacuation of the site to an offsite monitoring point that includes plant (core/containment) conditions. Discuss how evacuation will be directed to the offsite monitoring point. Discuss the traffic control

impact of monitoring plant personnel at this location and the provisions for evacuation even further from the site if conditions warrant.

Resolution

The PVNGS Emergency Plan will be revised to provide the criteria for immediate evacuation of the site to an offsite monitoring point including criteria based on plant conditions. The Emergency Plan will also discuss how evacuation will be directed to the offsite monitoring point, traffic control impact at this location, and provisions for evacuation even further from the site if conditions warrant.

Deficiency

Discuss the provision for prompt determination/confirmation of onsite doses. This must include the criteria for conducting monitoring.

Resolution

The PVNGS Emergency Plan will be revised to discuss the provision for prompt determination/confirmation of onsite doses including the criteria for conducting monitoring.

Deficiency

Provide an estimate for adverse weather (if appropriate) and for the population segment that may require transportation.

Resolution

The PVNGS Emergency Plan will be revised to provide an estimate for adverse weather and for the population segment that may require transportation.

Deficiency

Provide a further description of protective equipment stored onsite to demonstrate there is sufficient respiratory protection and instruments to support response functions such as repair, corrective actions, monitoring, movement between centers, and re-entry.

Resolution

The PVNGS Emergency Plan will be revised to describe protective equipment stored onsite to demonstrate there is sufficient respiratory protection and instruments to support response functions.

K. RADIOLOGICAL EXPOSURE CONTROL

Deficiency

Describe how the onsite emergency radiation protection program will differ from the normal program (e.g. use of high range instruments, automatic use of respiratory protection, high range dosimeters and frequent reading, emergency RWPs, etc.). In addition, discuss the provisions to be used to reduce the risk associated with emergency operations such as briefing and practice runs at other units (if time permits). Also, discuss how the emergency radiation protection procedures will be implemented. Identify, who on the backshift, authorizes exceeding 10CFR20 limits.

Resolution

The PVNGS Emergency Plan will be revised to describe how the onsite emergency radiation protection program will differ from the normal program. The Emergency Plan will also discuss the provisions to be used to reduce the risk associated with emergency operations and how the emergency radiation protection procedures will be implemented and identify who on the backshift will authorize exceeding 10CFR20 limits.

Deficiency

Describe the job TLD system and its utilization during emergencies including location of readers, provisions for backup, and record keeping if the RE&M system is lost.

Resolution

The PVNGS Emergency Plan will be revised to describe the job TLD system and its utilization during emergencies including location of readers, provisions for backup, and record keeping if the RE&M system is lost.

Deficiency

Provide a description for decontamination of relocated onsite personnel in accordance with Criterion K.7 of NUREG 0654.

Resolution

The PVNGS Emergency Plan will be revised to provide a description for decontamination of relocated onsite personnel in accordance with Criterion K.7 of NUREG 0654.

Deficiency

Provide a discussion of onsite contamination control measures relating to drinking water and food supplies.

Resolution

The PVNGS Emergency Plan will be revised to provide a discussion of onsite contamination control measures relating to drinking water and food supplies.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

Deficiency

Discuss the arrangements for a backup hospital with the capability for long term treatment of contaminated individuals.

Resolution

The PVNGS Emergency Plan will be revised to discuss the arrangements for a backup hospital with the capability for long term treatment of contaminated individuals.

Deficiency

Provide letters of agreement in accordance with NUREG 0654, Criteria B.9.

Resolution

Letters of agreement for medical support in accordance with NUREG 0654, Criteria B.9 will be provided prior to Unit 1 fuel loading.

M. RECOVERY AND RE-ENTRY PLANNING AND POST-ACCIDENT OPERATIONS

Deficiency

Describe the provisions for re-entry if a site evacuation is required to relieve Control Room crews, etc. This must include where these personnel will obtain necessary instruments and protective equipment.

Resolution

The PVNGS Emergency Plan will be revised to describe the provisions for re-entry if a site evacuation is required including where personnel will obtain necessary instruments and protective equipment.

Deficiency

Specify the criteria for down grading the level of emergency and the decision making process.

Resolution

The PVNGS Emergency Plan will be revised to specify the criteria for down grading the level of emergency and the decision making process.

Deficiency

Specify how all parties will be informed that the "Recovery" phase has been entered.

Resolution

The PVNGS Emergency Plan will be revised to specify how all parties will be informed that the "Recovery" phase has been entered.

Deficiency

Describe the provisions for estimating total population dose.

Resolution

The PVNGS Emergency Plan will be revised to describe the provisions for estimating total population dose.

N. EXERCISES AND DRILLS

Deficiency

Communications with the NRC shall be tested monthly in accordance with Paragraph E.9.d of Appendix E to 10CFR Part 50.

Resolution

The PVNGS Emergency Plan will be revised to provide for monthly testing of communications with the NRC in accordance with Paragraph E.9.d of Appendix E to 10CFR Part 50.

Deficiency

Discuss the mix of structured and less structured aspects of the program which will allow free play for decision making during drills and exercises.

Resolution

The PVNGS Emergency Plan will be revised to discuss the mix of structured and less structured aspects of the program which will allow free play for decision making during drills and exercises.

Deficiency

Provide licensee observers and critiques following exercises and evaluation of their comments.

Resolution

The PVNGS Emergency Plan will be revised to discuss provisions for licensee observers and critiques following exercises and evaluation of their comments.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

Deficiency

Indicate that those officials responsible for offsite protective action decision making will receive training on protective measures and their relationship to plant conditions.

Resolution

The PVNGS Emergency Plan will be revised to describe how those officials responsible for offsite protective action decision making will receive training on protective measures and their relationship to plant conditions.

Deficiency

Confirm that all personnel who perform emergency functions, duties or tasks will receive annual training.

Resolution

The PVNGS Emergency Plan will be revised to describe how all personnel who perform emergency functions, duties or tasks will receive annual training.

Deficiency

Specify that each person who is assigned a non-trivial emergency task that is not part of their normal duties will annually demonstrate their ability to perform these tasks during a practical exercise.

Resolution

The PVNGS Emergency Plan will be revised to describe how each person who is assigned a non-trivial emergency task that is not part of their normal duties will annually demonstrate their ability to perform these tasks during a practical exercise.

Deficiency

Describe how the training program will be documented (e.g. lesson plans, etc.).

Resolution

The PVNGS Emergency Plan will be revised to describe how the training program will be documented.

P. RESPONSIBILITY FOR THE PLANNING EFFORT:

DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS

Deficiency

Supply a listing of the procedures required to implement the plan in accordance with the NUREG 0654, Criteria P.7.

Resolution

The PVNGS Emergency Plan will be revised to include a listing of the procedures required to implement the plan in accordance with the NUREG 0654, Criteria P.7.

Deficiency

Discuss the provision for training the individuals responsible for the emergency planning effort.

Resolution

THE PVNGS Emergency Plan will be revised to discuss the provision for training the individuals responsible for the emergency planning effort.

Deficiency

Provide identification of an onsite individual with responsibility for emergency planning.

Resolution

The PVNGS Emergency Plan will be revised to provide identification of an onsite individual with responsibility for emergency planning..

