

Docket No. 50-346

License No. NPF-3

Serial No. 719

May 27, 1981



RICHARD P. CROUSE  
Vice President  
Nuclear  
(419) 259-5221

Harold R. Denton, Director  
Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Denton:

On February 18, 1981, your staff issued a letter (NRC Generic letter 81-10) "Post TMI Requirements for the Emergency Operations Facility". This included clarification of NUREG 0737, "Clarification of TMI Action Plan Requirements", related to Item III, A.1.2, "Upgrade Emergency Support Facilities". In this response, Toledo Edison will outline our program for providing upgraded facilities that will be used to support any emergency conditions arising at the Davis-Besse Nuclear Power Station Unit 1.

Except as noted, this letter describes the extent of Toledo Edison's commitments for emergency response facilities in their fully upgraded condition. These emergency response facilities will be fully operational by October 1, 1982. These upgrades currently are being phased in to the Davis-Besse Emergency Plan. They will be evaluated and if necessary will be modified so that Toledo Edison can achieve an optimum level of response. As identified in previous submittals, the Davis-Besse Administration Building, with its emergency response area is a major addition to the facilities supporting the Toledo Edison organization, and will be put into full operation within three months. This facility houses data, communications, electrical and habitability systems that can support a centralized accident management organization. Physically this facility represents the final upgraded hardware and structure. However, the details of how it will operate may be altered based on our experience and evaluation. This optimization process is obviously applicable to the data information display details that certainly are to evolve between now and the 1982 implementation date and will continue to evolve beyond that as we determine the need.

In retrospect, Toledo Edison has aggressively pursued improvements in the emergency response area both individually and in concert with industry groups. We have repeatedly called for flexibility in facility criteria to recognize that response to emergencies is done by individually unique organizations. The sole role of facilities is to support the particular organization in an optimum manner in foreseen conditions and yet provide the

8105290209

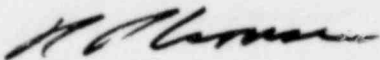
P

A046  
7/1

flexibility to handle the unexpected. Consistent with our approach, we hereby endorse the May 4, 1981 comments submitted by Chairman Stephen H. Howell of the Atomic Industrial Forum's Committee on Power Plant Design, Construction and Operation on NUREG 0696, "Functional Criteria for Emergency Response Facilities". Serious consideration and incorporation of these comments will continue to improve your published criteria.

This submittal on emergency response facilities was to be one of conceptual design information. However, as pointed out in previous submittals and meetings with you and your staff, Toledo Edison has already carried these to the implementation stage. The details attached to this letter deviate little from our previous communications.

Very truly yours,



cc:

NRC Davis-Besse Resident Inspector  
Victor Stello, Director, Office of Inspection and Enforcement  
Dan Garner, NRC Project Manager

TD 89B/1-2