

10/27/82

NINE MILE POINT NUCLEAR STATION / P.O. BOX 32 LYCOMING, NEW YORK 13093 / TELEPHONE (315) 343-2110

Mr. Ronald C. Haynes
Regional Administrator
United States Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

REF: Docket No. 50-220
License No. DPR-63

Dear Mr. Haynes:

In accordance with the milestones referenced in your July 23, 1982 letter, please find attached for your review and comment objectives for our proposed October 27, 1982 Small Scale Exercise.

Furthermore, please be advised that as a result of our current reactor recirculation safe-end and piping replacement outage, we are in the process of pursuing a deferral of the above referenced exercise until completion of the outage. This request was discussed during a telephone conversation between Mr. D. Matthews of the NRR Emergency Preparedness Program Office and Mr. B. Wolken of our staff on August 5, 1982.

Should you require additional information or clarification relative to the matters above, please contact my office at your earliest convenience.

Sincerely,

Thomas E. Lempges

Thomas E. Lempges
Vice President -
Nuclear Generation

mtm
Attachments

xc: B. Grimes, USNRC

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1982 NRC OBSERVED SMALL SCALE EMERGENCY EXERCISE
NINE MILE POINT NUCLEAR STATION

OBJECTIVES AND GENERAL GUIDELINES

A. SCOPE AND PURPOSES

This document provides guidance for the conduct of the 1982 Nuclear Regulatory Commission (NRC) observed small scale radiological emergency exercise at the Nine Mile Point Nuclear Station Unit #1 (NMPNS). It shall be used by NMPNS and by all participating State and local agencies.

The scope of this exercise, with some exceptions, will endeavor to demonstrate by actual performance a number of primary emergency preparedness functions. At no time will the exercise be permitted to interfere with the safe operation of NMPNS and the Station management may, at their discretion, suspend the exercise for any period of time necessary to ensure this goal. This exercise will include limited participation by the State of New York and the County of Oswego and appropriate notification to the Nine Mile Point Nuclear Station Unit II Construction Site and the James A. FitzPatrick Nuclear Power Plant.

The purpose of this small scale exercise is to:

1. Provide the NRC the opportunity to evaluate the capabilities of the NMPNS to react and respond to a simulated radiological emergency.
2. Provide training and experience in emergency plan implementing procedures by using actual and simulated activities during the exercise.
3. Provide NMPNS, New York State and Oswego County an evaluation of the activities during the exercise to determine where improvements or changes may be needed in emergency response planning and/or training.

B. EXERCISE OBJECTIVES

1. Radiological Emergency Preparedness Plans
 - a. Evaluate the adequacy and capability of implementation of the New York State, Oswego County and the NMPNS radiological emergency plans.
 - b. Demonstrate the emergency response capabilities of NMPNS and the limited response to be provided by State and County agencies.
2. Notification Procedures
 - a. Demonstrate the ability of NMPNS staff to classify actual or potential emergencies in accordance with NMPNS Emergency Plan Implementation Procedures as to
 - * Notification of Unusual Event,
 - * Alert Emergency
 - * Site Area Emergency
 - * General Emergency

- b. Demonstrate the capability of NMPNS to notify the State, local and Federal levels of government in accordance with Federal guidance and established protocols.
- c. Demonstrate the capability to communicate technical information among NMPNS, NRC, the State and Oswego County.
- d. Demonstrate the capability of the State, Oswego County and NMPNS to notify and activate appropriate emergency response personnel.

3. Emergency Communications

- a. Demonstrate the NMPNS communication capabilities among the Control Room, Technical Support Center (TSC), Emergency Operations Facility (EOF), Operations Support Center (OSC) and the Emergency News Center (ENC), and the ability to maintain communications with the Federal Government.
- b. Demonstrate emergency communications capability among Oswego County, the State and NMPNS including the Radiological Emergency Communications System (RECS-hot line).
- c. Demonstrate the adequacy of NMPNS communications to:
 - 1. Transmit instructions to activate essential staff.
 - 2. Disseminate essential information to assisting agencies.
- d. Demonstrate the ability of NMPNS to coordinate, control and deploy radiological monitoring teams via the field communications system.

4. Emergency Response Facilities

- a. Demonstrate the adequacy of the staffing and setting-up as appropriate of emergency response facilities as well as demonstrating the adequacy of space and habitability for management of radiological emergency at:
 - NMPNS Control Room (CR)
 - NMPNS Technical Support Center (TSC)
 - NMPNS Operational Support Center (OSC)
 - NMPNS Emergency Operations Facility (EOF)
 - State Emergency Operations Center (EOC) (limited participation)
 - Oswego County EOC (Limited participation)
 - Special News Center
- b. Demonstrate the adequacy of internal communications in the NMPNS Emergency Response Facilities including the use of status boards, charts, maps, diagrams or other displays.

4. Emergency Response Facilities (Cont'd.)

- c. Evaluate the adequacy and competency of State, Oswego County and NMPNS staff to operate the emergency response facilities.
- d. Evaluate the adequacy of access control and security for emergency response facilities.

5. Direction and Control

- a. Demonstrate the ability of key emergency personnel at NMPNS to initiate and coordinate timely and effective decisions with respect to a radiological emergency and clearly demonstrate "who is in charge".
- b. Demonstrate that there is effective organizational control (direction and control) and integrated radiological emergency response including deployment of field monitors, receipt and analysis of field data among the licensee, State and Oswego County for evaluation and verification.
- c. Demonstrate the capability of elected or appointed officials in implementing appropriate radiological emergency response actions.

6. Public Information

- a. Demonstrate the adequacy of the operation of and interaction among the State, Oswego County and NMPC public information programs.
- b. Demonstrate the activation and manning of the Emergency News Center by utility, State and Oswego County public information personnel and provide for periodic public information releases and rumor control.
- c. Demonstrate that the offsite authorities and the licensee can effectively provide information to the media in the event of an accident.

7. Accident Assessment and Evaluation

- a. Demonstrate the activation, operations and reporting procedures of NMPNS onsite and offsite monitoring teams. Field monitoring teams will be provided with simulated data at assigned times and specific locations consistent with the simulated release from the plant.
- b. Demonstrate the ability of NMPNS, Oswego County and the State to receive and assess radiological data from licensee field teams in accordance with their respective radiological emergency plans.

7. Accident Assessment and Evaluation (Cont'd.)

- c. Demonstrate the ability of NMPNS, the State and Oswego County to calculate dose projections, compare projections to the Protective Action Guide (PAGs) and determine appropriate protective actions.

8. Protective Response

- a. Demonstrate the capability of NMPNS, State and Oswego County emergency response organizations to make decisions and to implement appropriate protective action response options. The response options include sheltering and evacuation (simulated) of onsite and offsite areas, and informing the public on the development of the accident (simulated).

9. Radiological Exposure Control

- a. Demonstrate the decision process for limiting exposure of emergency workers.
- b. Evaluate the capability of NMPC emergency response personnel to implement access control procedures.
- c. Demonstrate the capability of emergency personnel for keeping records of individuals radiation exposures.

10. Medical Support

- a. Demonstrate the initial treatment of an injured worker with contamination at NMPNS and simulated transport to and subsequent treatment at a hospital.

11. Reentry and Recovery

- a. Demonstrate the capability of emergency personnel to identify requirements, assess and implement procedures for reentry.
- b. Demonstrate the capability of emergency personnel to identify requirements, programs and policies governing damage assessment and recovery.

C. INTENT OF THE EXERCISE SCENARIO

The licensee (Niagara Mohawk Power Corp.), New York State and Oswego County plan a small scale exercise of their respective emergency plans for both the site and offsite support agencies on October 27, 1982. In order to minimize the impact on scheduling and agendas, the exercise scenario will be completed in a time frame of approximately a routine working day.

The exercise is intended to demonstrate many, but not necessarily all, of the NMPNS capabilities to respond to a wide range of emergency conditions. This scenario is designed to activate the NMPNS Emergency Plan

C. INTENT OF THE EXERCISE SCENARIO (Cont'd.)

through its various action levels. Although this scenario accurately simulates operating events, it is not intended to assess all of the operators diagnostic capabilities, but rather provides sequences which demonstrate the operators ability to respond to events and initiate appropriate emergency procedures which will result in the exercising of both onsite and offsite emergency plans and procedures. Free play is encouraged and the controllers will interfere only if operator/player action prematurely terminates the exercise or excessively deviates from the drill schedule.

In order to provide an adequate planning basis for the exercise relative to off-site doses and radiological assessment, adverse meteorology was developed and will be utilized since actual meteorology may lead to projected radiological doses below established Protective Action Guides (PAGs), and therefore, impede the accomplishment of stated objectives.

D. CONCEPT OF OPERATIONS AND CONTROL OF THE EXERCISE

The licensee will supply official Controllers/Observers for locations where an emergency response is being demonstrated for the exercise. Prior to the exercise, the controllers and observers will be provided with the appropriate locations, maps, time periods, guidelines and an observer evaluation checklist for their exercise assignments.

The exercise initiating events will be controlled by the lead controller at the NMPNS. Simulated initiating events will consist of two types of information: (1) information and data provided to Control Room personnel by the Lead Controller, (2) onsite and offsite dose rate data (simulated gamma and iodine dose rate measurements) provided to the site monitoring teams by controllers/observers.

The lead controller will have the responsibility to control and coordinate the time sequence of initiating events to ensure an orderly flow of exercise events. All other actions during the exercise will occur through a free play response as the licensee, and to a limited extent, State and County participants respond to the initiating events.

As the initiating events are provided to the NMPNS staff, they will determine the nature of the emergency and implement appropriate Station emergency response procedures. These procedures include a determination of the emergency classification in accordance with the NMPNS Emergency Plan. After the emergency classification has been determined, the appropriate Federal, State and local authorities will be notified in accordance with the NMPNS emergency response procedures.

Upon notification of the simulated accident at the NMPNS, the State and Oswego County will simulate their initial notifications in accordance with their emergency plans and procedures. State and local personnel and facilities will be activated based on the initial accident classification provided by the site and their limited scope of participation, and confirmed by direct communication between appropriate agencies and the NMPNS.

D. CONCEPT OF OPERATIONS AND CONTROL OF THE EXERCISE (Cont'd.)

The simulated accident will continue to develop based on data and information provided to the Control Room personnel by the Lead Controller. As the situation develops, information will be forwarded to New York State and the county assessment teams. These agencies will analyze and act on the information as they would in a real emergency.

Where information would normally be confirmed via an independent source (such as the National Weather Service for weather data), the confirmation data will be obtained. If the confirmation data conflicts with simulation data provided by the site, the simulation data will be utilized for accident assessment purposes. If any inconsistencies are noted in the initiating events, these inconsistencies should be questioned by the accident assessment teams as they would be in a real emergency.

Certain inconsistencies (such as plume width, release duration, technical reason for the simulated release, etc.) may be intentional and required due to the nature of simulating an accident that has never occurred and the requirement to provide an exercise basis which tests the site, State and local capabilities to the maximum extent feasible in a limited time frame. If an inconsistency is known or determined to be intentional, then the accident assessment group will note the inconsistency and ignore it. The Lead Controller shall have the authority to resolve or explain any inconsistencies or problems that may occur during the exercise.

With the exception of the aforementioned potential inconsistencies, the internal operation of the site, State and local command centers shall be identical with their intended operation in a real emergency.

E. PUBLIC INFORMATION AND AWARENESS

Prior to the exercise, the public within the affected area will be informed of the impending conduct of a radiological emergency exercise through joint press releases. The Niagara Mohawk Power Corporation, New York State and Oswego County will develop coordinated press releases. Agencies should make every effort to prevent the public from being misinformed about the nature of the exercise.

F. MAINTAINING EMERGENCY READINESS

During the performance of an exercise the ability to recognize a real emergency, terminate the exercise, and respond to the new situation must be maintained. Therefore, the exercise scenario and actions of participants shall not include any actions which degrade the condition of systems, equipment or supplies, or affect the detection, assessment or response capability to radiological or other emergencies.

Actions taken by the participants shall also avoid actually reducing plant or public safety. The potential for creating real radiological or other emergencies shall be specifically avoided.