



Omaha Public Power District

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November 3, 1982
LIC-82-359

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: Docket No. 50-285

Dear Mr. Eisenhut:

Fort Calhoun Station
Emergency Preparedness Program

Generic Letter 82-17, dated October 1, 1982, identified an apparent inconsistency between the requirements of 10 CFR 50.54(t) and the Standard Technical Specifications regarding reviews/audits of Emergency Preparedness Programs. The District has reviewed the requirements of 10 CFR 50.54(t) and has compared them with the present review/audit provisions in the Fort Calhoun Station Technical Specifications (TS) and Radiological Emergency Response Plan (RERP). The subject Code of Federal Regulations (CFR) section states "... the licensee shall provide for a review of its emergency preparedness program at least every twelve months by persons who have no direct responsibility for implementation of the emergency preparedness program." RERP Section P.2.2, "Audits of the Emergency Plan", Part 2.2.2 (a copy is attached) requires that this annual independent review be conducted and also details that all reporting and retention requirements of 10 CFR 50.54(t) for this review are fulfilled.

The Combustion Engineering Standard Technical Specifications (STS) do indeed stipulate that an independent "audit" of a plant's emergency preparedness program be conducted every 24 months. Fort Calhoun Station TS Section 5.5.2.8(e) requires the Safety Audit and Review Committee to ensure that an independent audit of the RERP and Implementing Procedures is completed at least once every two years. Thus, the Fort Calhoun Station TS's presently meet the intent of the STS.

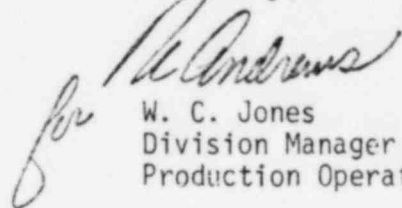
The District interprets the terms "audit" and "review" as utilized in the STS and 10 CFR, respectively, as differing in definition and scope. Generic Letter 82-17 utilizes these two terms interchangeably

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and as a result concludes that a plant's TS's should require Emergency Preparedness Program audits every twelve months. By the District's interpretation of these terms, the Fort Calhoun Station presently has in place controls which fulfill the independent "audit" and "review" requirements as defined in their applicable source documents and, as such, no TS changes are necessary for the Fort Calhoun Station.

Sincerely,


W. C. Jones
Division Manager
Production Operations

WCJ/TLP:jmm

cc: LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

P - RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION (Continued)

2.0 Review and Update of the Emergency Plan (Continued)

2.2 Audits of the Emergency Plan

2.2.1 Safety Audit and Review Committee Audit

The Safety Audit and Review Committee (SARC) will conduct an audit of the Emergency Plan biennially, independent of the PRC review. The audit shall be conducted as outlined in EPT-9. The audit shall include the Radiological Emergency Response Plan, implementing procedures and practices, training, readiness testing, and equipment availability and operability. The results of this audit shall be documented and distributed as specified in Technical Specifications 5.5.2.10.c.

2.2.2 Independent Review

The Emergency Plan will be reviewed on an annual basis by an independent organization. The Emergency Coordinator will be responsible for assuring that this review is performed. The review shall be conducted as outlined in EPT-9. The review will include the Radiological Emergency Response Plan, the implementing procedures and practices, training, readiness testing, equipment availability and operability, and interfaces with state and local governments. Results of this audit will be documented, reported to the appropriate plant and corporate management, as well as any involved federal, state and local organizations. The results of this audit shall be retained for a minimum of five (5) years.

2.3 Update of Emergency Telephone Numbers

Emergency telephone numbers will be updated on a quarterly basis, in accordance with Emergency Preparedness Test #5 (EPT-5), "Update of Emergency Telephone Numbers." Any changes in phone numbers or organizations will be documented and a revision to the Radiological Emergency Response Plan will be generated.

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