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PETITION FILE PRM 50-58

(58FR 12339)



Northern States Power Company

Prairie Island Nuclear Generating Plant

1717 Wakonade Dr. East
Zweich, Minnesota 55089

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April 2, 1993

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Secretary
Attention: Docketing & Service Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Comments Concerning: VEPCO Rulemaking Petition on Emergency Planning Exercise

PINGP agrees with VEPCO's rulemaking petition to change the frequency of emergency planning exercises from annual to biennial.

The PINGP Emergency Plan commits NSP to a program of effective training, surveillance of emergency facilities and equipment, and integrated testing of emergency personnel and equipment through periodic small and large scale drills.

At least 3 small scale drills are conducted each year for health physics airborne and liquid release response, environmental sampling and emergency medical response. Annual evaluated walkthrus are conducted for post accident sampling tasks. Table top exercises or scenario response walkthrus are periodically conducted with TSC, OSC and EOF staff. A full scale drill demonstrating an integrated response is conducted annually. Each drill performance is evaluated and action items for correction or improvement are documented and tracked to resolution. Emergency preparedness training is evaluated and improvements made to maintain its effectiveness.

Emergency response equipment and facilities are kept at a high level of readiness through the employment of daily, weekly, monthly, quarterly, and annual tests and surveillances. Deficiencies are identified and corrected in a timely manner. Procedures are critiqued each time they are used for drills and training and revised as necessary. Procedures are also on a required biennial review schedule for determining their effectiveness and accuracy.

A thorough program of audits are conducted by independent auditors via the 10CFR50.54t audit process. Many person-weeks are spent annually interviewing the various emergency preparedness related government agencies, plant groups, corporate groups and investigating emergency facilities and procedures. Findings and recommendations for improvement are evaluated and tracked to resolution.

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NSP has maintained an Emergency Plan Review Committee that meets at least quarterly and is composed of representatives from the Monticello NGP, NSP corporate, and PINGP. The committee's charter is to review audits, plant events, industry events, and other emergency plan issues and determine the applicability of the lessons learned to emergency planning.

Based on plant management's commitment to emergency preparedness as described above, it is believed that biennial exercising is a sufficient frequency for determining the adequacy of a licensee's level of performance. PINGP has not had any NRC violations, deficiencies, or deviations in the last 8 years of annual exercising. It is well realized that a licensee cannot ignore emergency preparedness for 20 months and then train and fix facilities and procedures within 4 months in preparation for an exercise. Emergency preparedness' complex infrastructure demands a continual evaluation and maintenance program. Changing to biennial exercising should not lessen the high level of emergency preparedness at PINGP.

Prepared by: Mel Agen *Mel Agen*
Emergency Preparedness

Reviewed by: Don Schuelke *Don Schuelke*
General Supt Radiation Protection

Reviewed by: Mike Wadley
Plant Manager

Mike Wadley