

POWER AUTHORITY OF THE STATE OF NEW YORK

INDIAN POINT NO. 3 NUCLEAR POWER PLANT

P. O. BOX 215 BUCHANAN, N. Y. 10511

TELEPHONE: 914-739-8200



April 8, 1982

IP-LML-1232

Docket No. 50-286

License No. DPR-64

Mr. Ronald C. Haynes, Regional Administrator  
Office of Inspection and Enforcement  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Ave.  
King of Prussia, PA 19406

Dear Mr. Haynes:

This letter is in response to the requirements of Appendix C of your Emergency Preparedness Appraisal No. 50-286/81-05 dated November 19, 1982 and received at this office November 23, 1981.

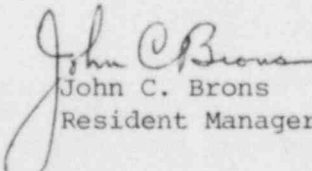
Appendix C requires the Authority to submit page changes to the Indian Point No. 3 Emergency Plan correcting each deficiency identified in Appendix C or, written justification as to why the Authority believes a revision should not be made.

Since the time of the Emergency Preparedness Appraisal, May 11-15, 1981, the Indian Point No. 3 Emergency Plan has been extensively revised. Therefore, the Authority provides in response to Appendix C, the current version of the Indian Point No. 3 Emergency Plan and, with Attachment I, Appendix C deficiencies cross-referenced to the revised Emergency Plan and Attachment II, written justification for those items not included in the revised plan.

This letter also documents the March 16, 1982 telephone conversation between Mr. Gary Snyder of your staff and Mr. Pete Kokolakis of the Authority, during which a three week extension for submitting the Authority's response to Appendix C was granted.

Should you have any further questions, please contact us.

Yours truly,

  
John C. Brons  
Resident Manager

JAS:cp

Attachments

# ATTACHMENT I

The Authority provides the following list of Appendix C Deficiencies and the Plan Section in which they have been corrected.

<u>Deficiency</u>	<u>Plan Section</u>
Pg. 3 Item: 1	Figure 5-3
2	6.2.1, 7.3
3	See Attachment II
4	5.3.1
Pg. 5 Item: 1	Table 5-2
2	Table 5-1, 5.2 and Attachment II
Pg. 6 Item: 1	7.1.1, Figure 7-1
2	Appendix A
3	See Attachment II
Pg. 7 Item: 1	4.0, Table 4-1
Pg. 8 Item: 1	Conflict corrected
2	See Attachment II
Pg. 9 Item: 3	6.5.3, 7.3
4	6.5.3
Pg. 10 Item: 1	Figure 7-2
2	7.3
3	See Attachment II
4	5.4, Appendix A
Pg. 11 Item: 1	8.5
2	See Attachment II
Pg. 12 Item: 3	7.1.c
Pg. 13 Item: 1	See Attachment II
2	Appendix F
3	8.3
Pg. 14 Item: 1	7.4.1 D.
2	6.3
3	7.4.3
4	7.4.1 H.
Pg. 15 Item: 1	6.5.3
Pg. 16 Item: 1	6.5.4

DeficiencyPlan Section

Pg. 20 Item:	1	Table 8-1
	2	8.2.2
	3	8.3
	4	Table 8-1
	5	8.2.2
	6	8.2.2
	7	8.2.2, 8.4
Pg. 21 Item:	1	8.2.1
	2	8.2.1
Pg. 22 Item:	1	Appendix G
Pg. 23 Item:	2	8.4

## ATTACHMENT II

The Authority provides the following written justification for not including certain Appendix C deficiencies in the revised Emergency Plan.

### Appendix C, Page 3, Item 3:

#### Deficiency

Agreements are required with the four local counties providing emergency response services. The agreement with the Buchanan Fire Department should be dated. The Memorandum of Understanding with Con Edison should be reviewed and updated since the current version is dated January, 1978.

#### Response:

The four counties in the ten mile radius Emergency Planning Zone surrounding the Indian Point site provide emergency response services for their respective counties as part of their daily functions. In addition, the Emergency Response Plans and Procedures of the four counties, included in the New York State Radiological Preparedness Emergency Plan, which were submitted to FEMA for review provide assurance that appropriate emergency response services will be provided as needed. Therefore, the Authority believes that agreements with the four counties are not necessary.

A dated Letter of Agreement with the Buchanan Fire Department is provided, in the enclosed revised Emergency Plan.

Memorandums of Understanding (MOU) between the Authority and Con Edison remain in effect, as per MOU conditions, until mutually changed or terminated. Under MOU conditions, the January 1978 version of MOU #08 is considered current.

### Appendix C, Page 5, Item 2:

#### Deficiency

a) Table 5-1 should be revised to indicate that the on-shift position of Emergency Director may be provided by personnel assigned other functions (i.e., Shift Supervisor). b) The Table should also be revised to show that the positions of the individuals assigned to the functional areas of notification/communication and the EOF Emergency Director are mutually exclusive, or revise the number of personnel available for each of those functional areas. c) Also, the plan should provide a commitment to meet the minimum staffing as shown in Table B-1 of NUREG-0654, Revision 1 by June 1, 1982.

#### Response:

Table 5-1 has been revised to include parts a, b and c of the above deficiency. The minimum staffing requirements as set forth in Table B-1 of NUREG-0654, Rev. 1 have been addressed in separate correspondence to the NRC, February 8, 1982, IPN-8215 to Mr. Steven Varga. Briefly, all minimum staffing requirements have been met with the exception of an additional Reactor Operator in the Control Room. Until additional Reactor Operators are trained and licensed, during emergency conditions we will continue providing for an additional Reactor Operator, if necessary, by using Con Edison personnel.

Appendix C, Page 6, Item 3:Deficiency

Identify the status of the anticipated mutual aid agreement with the other four nuclear power plant utility companies in New York State.

Response:

Efforts for pursuing the formal mutual aid agreement between the four New York State Nuclear Power Plant utility companies have been stopped. The paragraph reflecting the anticipated formal agreement has been removed from the Plan, however, utility interaction remains active and productive through New York State Nuclear Utility Power Pool Meetings.

Appendix C, Page 8, Item 2:Deficiency

The plan should contain sample copies of the initial and follow-up emergency messages which contain the information specified in Sections E.3 and E.4 of NUREG-0654, Revision 1.

Response

Sections E.3 and E.4 of NUREG-0654, Revision 1 has been addressed within the text of the plan. Current forms for initial and follow-up emergency messages are included in the Emergency Plan Implementation Procedures Document. These forms continue to be revised, and until such time that they are at or near their final format the Power Authority does not want to include them in the Plan.

Appendix C, Page 10, Item 3Deficiency

A diverse means of communication, such as radio system, should be available between site and the primary offsite response agencies. It is not clear that such radio communications are available with the four county Emergency Operations Centers.

Response:

At present, efforts are underway to provide radio communication between Indian Point and the primary offsite response agencies. A completion date has not been established. Redundant means of communication which currently exist between site and primary offsite response agencies are as follows: a county-state hot line network, NAWAS, NRC ENS and HPN, radio communication with the New York State police, radio communication with the Con Edison System Operator in New York City, various direct line telephones, and regular dial telephones.

Appendix C, Page 11, Item 2Deficiency

The plan should contain a sample copy of the emergency preparedness information which will be provided for both the resident and transient population around the site.

Response:

Residents of the four surrounding Counties have been sent booklets on Indian Point Emergency Preparedness. At present, there are nine variations of this booklet. In light of the volume of material necessary to properly incorporate booklet content into the plan, we have outlined in Section 8.0 the types of information provided for the resident and transient population.

Appendix C, Page 13, Item 1Deficiency

The plan should provide a commitment and schedule for the permanent Emergency Response Facilities in accordance with NUREG-0696.

Response:

By letter dated December 30, 1981 (IPN-81-98), the Authority submitted a schedule for completion of the Emergency Response Facilities in accordance with NUREG-0696. Because, of the extensiveness of this schedule the Authority would like to continue to address NUREG-0696 commitments through such independent correspondence with the NRC.