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April 15, 1982



U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region II - Suite 3100
101 Marietta Street, NW
Atlanta, Georgia 30303

REFERENCE:
RII: JPO
50-321/81-30
50-366/81-30

ATTENTION: Mr. James P. O'Reilly

GENTLEMEN:

In response to deficiencies identified during your appraisal of the Plant Hatch Emergency Preparedness Program, Georgia Power Company committed to take certain corrective actions documented in your letter of December 17, 1982. Attached is an item-by-item discussion of our corrective measures in these areas. Several deficiencies required revisions be made to the Plant Hatch Emergency Plan. Three copies of the revised plan have been submitted to you by letter dated March 24, 1982 in accordance with 10 CFR 50.54(q). Rather than duplicate these revisions here, the discussion of our corrective actions will refer, where appropriate, to the revised Emergency Plan.

Should you have any questions concerning our corrective actions or revisions to the Emergency Plan, our staff will be available to discuss them with you.

Very truly yours,

W. A. Widner

SCE/mb

Enclosure

xc: H. C. Nix
R. F. Rogers, III

Attachment to April 15, 1982 letter

Emergency Preparedness Corrective Actions

1. Commitment - Organization

- a. Specify, in the Emergency Plan, the onsite emergency organization of plant staff personnel for all shifts and the relationship between the emergency organization and the duties and responsibilities of the normal staff complement. This includes specifying by position or title the major tasks to be performed by the persons assigned to the functional areas of emergency activity. This action will be completed by March 1, 1982.
- b. Describe, down to the working level, the augmented emergency organization. This includes staffing of the emergency response facilities, identification by name and/or position of the plant and corporate managers and alternates who are to take charge of the emergency response facilities, and identification of contractor or other non-licensee personnel, if any, who will augment the emergency organization. This action will be completed by March 1, 1982.

Actions Taken

Section B of the Hatch Nuclear Plant (HNP) Emergency Plan discusses the emergency organization. This section was totally revised to reflect changes to and clarification of the emergency organization. These changes, including appropriate related procedure and plan changes, were approved by the Plant Review Board on February 23, 1982 and distributed during March, 1982. These Emergency Plan revisions fall into one of two general categories:

- First, the approach to emergency management and offsite support was revised. For Site or General Emergency classifications, senior management (i.e., vice presidents) will be brought to the site to directly control the emergency response as the Emergency Director. Provisions for offsite staffing of Emergency Operations Facility (EOF) functional positions, as described in the Emergency Plan, are being made. The staffing priorities are such that all site staff may be dedicated, if necessary, to inplant response efforts. Thus, in the extreme case, we would be able to completely staff EOF functions with offsite personnel in a reasonable time frame.
- Second, the revised HNP Emergency Plan goes into much more detail describing the emergency organization, functional responsibilities of emergency positions, etc. than did the version in effect at the time of your appraisal.

For specific details of our emergency response organization, please refer to Section B of the HNP Emergency Plan (March, 1982).

Emergency Preparedness Corrective Actions

2. Commitment - Training

- a. Establish an initial training and annual retraining program for all personnel with emergency response responsibilities. Each program shall include classroom training, practical exercises and, where appropriate, hands-on demonstration of each individual's ability to perform assigned emergency functions. The program shall also include examinations designed to test the individual's knowledge of assigned functional responsibilities, and established performance levels below which immediate retraining shall be required. Establishment of the training program will be completed by April 1, 1982.
- b. Implement the training program, described in Item 2.a. above, and provide accelerated initial training for members of the emergency response organization. Include in the program implementation, positive means to insure that training is maintained current and that replacement personnel are provided appropriate initial training prior to being assigned functional responsibility within the emergency organization. This program will be in progress by April 1, 1982.

Actions Taken

The overall training program for emergency preparedness was reassessed following development of the revised emergency response organization. The current training program was developed from an analysis of emergency tasks and general qualifications for each emergency position. A general description of the program can be found in Section O of the revised HNP Emergency Plan. A description of the emergency preparedness training program, defining specific changes, was completed February 19, 1982 and plant training staff began modifying training plans and procedures. Modifications of the Emergency Preparedness Training Program were addressed to four general categories:

- General Employee Training has been modified to provide more specific guidance on site evacuation procedures including frisking, security, and accountability.
- Emergency Management Training has been defined to assure levels of management, with emergency responsibilities, receive appropriate training. This training addresses: the Plant Hatch Emergency Plan; Federal, State and Local Agency response; Dose Assessment and Protective Action Guides; and Public Information. The detail and depth of instruction in these areas is tailored to the needs of each level of emergency management.

Emergency Preparedness Corrective Actions

2. Commitment - Training (Continued)

Actions Taken (Continued)

- Dose Assessment Training for technical staff has been developed to provide dose assessment staff with a thorough understanding of dose estimation methodology. This includes not only the mechanics of the revised dose estimate procedure (HNP-4852) but also addresses the bases, flexibility, and limitations of these procedures.
- Technical Staff Training for Radiation Emergency Team (RET) staff has been refined. Plant Hatch RET staff training has been modified to include new repair and recovery procedures (HNP-4866) and changes to the Emergency Plan. Offsite RET training has been defined for Georgia Power technical staff (Plant Vogtle and General Office) to include the Plant Hatch Emergency Plan, frisking, sampling, sample analysis and an overview of Plant Hatch systems and operation.

The emergency training program outlined above will be administered by the Training Department to assure training is maintained current and provide for necessary replacement training. In addition, we are developing a sequence of small, restricted scope exercises to highlight any additional problems and demonstrate proficiency in each of the major functional aspects of emergency response.

The initial training program has been essentially completed for Plant Hatch site staff. Initial offsite staff and management training is scheduled for completion during May, 1982 and should be complete no later than July 1, 1982. Based on the number of staff requiring training for each position and the length of the training, we estimate the total initial training effort to be 50% complete.

3. Commitment - Equipment

Provide special equipment, including shielding and sample transport container, for post-accident (high activity) containment atmosphere samples. This action will be completed by February 1, 1982.

Action Taken

An improved sampling technique, allowing for smaller diluted samples was developed and implemented by December 18, 1981. The reduced sample volume allows for transport in a lead shielded transport container.

Attachment to April 15, 1982 letter

Emergency Preparedness Corrective Actions

4 Commitment - Procedures

- a. Revise Procedures HNP-4849, HNP-4850, HNP-4851, and HNP-4852, concerning offsite dose calculations, to provide: (1) accurate methodology for determining offsite doses, (2) a technical basis for such calculations, (3) a means to modify dose projections based on sampling and analytical results, and (4) guidelines for protective action recommendations based on protective action guides for the general public.
- b. Develop a procedure for interim post-accident sampling of containment atmosphere to include use of the special equipment provided in accordance with item 3 above, precautions and limitations in the use of the procedure, analytical methods to be employed for such samples, and dosimetry and other protective equipment required.
- c. Revise Procedure HNP-4725 concerning offsite radiological monitoring to resolve significant differences in graphical and analytical solutions resulting from the use of that procedure.
- d. Develop a procedure for repair and corrective action teams to include exposure limitations for various activities within the plant, protective clothing and equipment available for use by the teams, provisions for briefing team members on plant conditions and potential hazards, and a framework for team organization.

The above procedures will be revised or developed and incorporated into the training program by March 1, 1982.

Actions Taken

- a. A review of the four plant procedures revealed HNP-4852 as the only procedure requiring revision. A new methodology for calculating offsite exposures was developed based on NRC Regulatory Guides 1.145 (August, 1979) and 1.109 (October 1977). HNP-4852 was revised (revision 2) and reissued March 1, 1982 incorporating the new methodology. The technical basis for HNP-4852 is documented and maintained onsite.

Attachment to April 15, 1982 letter

Emergency Preparedness Corrective Actions

Actions Taken (Continued)

- b. Plant procedure HNP-4831 (12/18/81) was developed in conjunction with the revised sampling technique discussed previously. Initial training in the new technique and procedure was completed by January 4, 1982.
- c. A review of plant procedure HNP-4725, to identify the calculational discrepancies was completed and the procedure revised and approved by the Plant Review Board (PRB). The new revision of HNP-4725 was issued March 1, 1982.
- d. A new procedure, HNP-4866, addressing these concerns has been developed. The procedure was approved by the PRB and issued March 1, 1982.

5. Commitment - Dose Assessment

Develop an initial dose assessment procedure, and provide training to onshift personnel who may be required to make initial offsite dose projections. Include training in initial offsite protective action recommendations when projected doses exceed the lower level protective action guides. This action will be completed by February 1, 1982.

Action Taken

A methodology based on NRC Regulatory Guides 1.145 and 1.109 (see response to procedure commitments - item a) was developed to allow rapid calculation of offsite dose estimates by control room staff. This methodology was incorporated into revision 1 of HNP-4852 (January 22, 1982). This methodology was retained in revision 2 of HNP-4852 (March 1, 1982) discussed earlier. Currently HNP-4852 contains two dose estimation techniques, one for prompt assessment by control room staff and one for a more refined dose assessment to be used by specifically trained dose assessment staff.