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Nuclear Operations

February 11, 1994
Refer to: RC-94-0032

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
RADIATION EMERGENCY PLAN SUBMITTAL
REVISION 33 (REM 4000)

In compliance with 10 CFR 50.54(q), South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, herein submits effected pages for Revision 33 to the Radiation Emergency Plan. The changes contained in this revision were reviewed and found not to decrease the effectiveness of the Radiation Emergency Plan.

In addition to the upgrades initiated by organizational and editorial changes, this revision incorporates the new guidance contained in EPA-400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," which became effective on January 1, 1994. A summary of the changes by page number is enclosed with the revision.

Please note that with implementation of EPA-400-R-92-001 the Emergency Action Levels (EALs) expressed in dose rate are now expressed in terms of Total Effective Dose Equivalent (TEDE) and Committed Dose Equivalent (CDE).

Should there be any questions, please contact Mr. C. J. McKinney at (803) 345-4723.

Very truly yours,

John L. Skolds

cjm
Attachment

c: (w/o attachment)
K. J. White
S. D. Ebner (w/2 attachments)
NRC Resident Inspector
File (810.10-1)

H. L. O'Quinn
NSRC
RTS (REM 4000)
Central File System

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NUCLEAR EXCELLENCE - A SUMMER TRADITION!

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NUCLEAR OPERATIONS

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SAP-139
ATTACHMENT IV
PAGE 1 OF 3
REVISION 16

PROCEDURE DEVELOPMENT FORM - A

I. DATE: <u>2/4/94</u> PROC. # <u>EP-100</u> REV. # <u>33</u> CHG. <u> </u> COMM. # <u> </u>	
TITLE: <u>Radiation Emergency Plan</u>	
NEW PROC <u> </u> CHANGE <u> </u> PERMANENT <u> </u>	SAFETY RELATED <u>✓</u>
REVISION <u>✓</u> RESTRICTED <u> </u> FROM <u> </u> TO <u> </u>	QUALITY RELATED <u> </u>
NON-SAFETY RELATED <u> </u>	
II. DESCRIPTION: <u>See attached list of changes</u>	
REASON FOR CHANGE: <u>See attached list of changes</u>	
C.M. Counts Originator	
III. WILL THIS REVISION/CHANGE/NEW PROCEDURE:	
1. Result in significant increased personnel radiation exposure? (ALARA review)	* YES <u> </u> NO <u>✓</u> N/A <u> </u>
2. Result in a release of effluents to the Environment?	<u> </u> <u>✓</u> <u> </u>
3. Degrade the effectiveness of the Radiation Emergency Plan?	<u> </u> <u>✓</u> <u> </u>
4. Degrade the safeguards effectiveness, of the Physical Security, Safeguards Contingency or Training and Qualification Plans?	<u> </u> <u> </u> <u>✓</u>
* If any question 1 through 4 is answered "YES", refer to appropriate section of procedure for direction.	
REQUIRED REVIEW AND COMMENT: <u>2/7/94</u>	
<input checked="" type="checkbox"/> OPS <input type="checkbox"/> NL&OE <input type="checkbox"/> CHS <input checked="" type="checkbox"/> MGMNPO <input type="checkbox"/> MNTS <input type="checkbox"/> PRS <input checked="" type="checkbox"/> HPS <input checked="" type="checkbox"/> GMES <input type="checkbox"/> QA <input checked="" type="checkbox"/> NPS <input type="checkbox"/> MNT <input checked="" type="checkbox"/> GMNSE <input type="checkbox"/> QC <input type="checkbox"/> TS <input checked="" type="checkbox"/> GMSS <input checked="" type="checkbox"/> ROR (R. Myers)	<u>X.D. Ivey</u> Discipline Supervisor <u>2/4/94</u> Date
IV. 10CFR50.59 SCREENING REVIEW/SAFETY EVALUATION	
<input type="checkbox"/> REQUIRED <input checked="" type="checkbox"/> EXEMPT <input type="checkbox"/> PSRC SUPPORTING DOCUMENT: <u> </u>	
Discipline Supervisor concurrence <u>2/4/94</u>	
V. TEMPORARY APPROVAL:	
QUALIFIED REVIEWER <u> </u> DATE <u> </u>	QA REVIEW <u> </u> DATE <u> </u>
TELECON BY <u> </u>	TELECON BY <u> </u>
SHIFT SUPERVISOR <u> </u> DATE <u> </u>	FINAL APPROVAL REQUIRED BY: DATE <u> </u>
VI. DISCIPLINE SUPERVISOR FINAL REVIEW:	VII. P/CAP ACCEPTABLE?
TRAINING REQUIRED? YES <u> </u> NO <u>✓</u>	C. YES <u> </u> NO <u> </u> NL&OE <u> </u> Date <u> </u>
IF YES, PRIOR TO PROCEDURE IMPLEMENTATION? YES <u> </u> NO <u> </u>	N. YES <u> </u> NO <u> </u> RESP. MGR <u> </u> Date <u> </u>
P/CAP AFFECTED? YES <u> </u> NO <u>✓</u>	VIII. FINAL QA REVIEW (As Applicable)
COMMENTS RESOLVED: <u>R. Schwarf</u> <u>2/8/94</u> Date	<u>NA</u> QA Concurrence <u> </u> Date <u> </u>
Discipline Supervisor	IX. APPROVAL AUTHORITY:
	<u>Ray D. Ivey</u> <u>2/5/94</u> Date
	Approval Concurrence
X. PSRC REVIEW:	
A. REVIEWED BY: <u>Ray D. Ivey</u> <u>2/5/94</u> Date	B. PSRC COMMENTS RESOLVED:
PSRC Chairman	Responsible Manager <u> </u> Date <u> </u>
COMMENTS: YES <u> </u> NO <u>✓</u>	PSRC Chairman <u> </u> Date <u> </u>

VCSNS RADIATION EMERGENCY PLAN
REVISION 33
LIST OF EFFECTIVE CHANGES

CHANGE	REASON
Page 4 (Section 1.1.20) Add "Total Effective Dose Equivalent" and "Committed Dose Equivalent to the Thyroid"	Clarify terminology to reflect 10 CFR 20 revision.
Page 5 (Section 1.1.24) Add "Total Effective Dose Equivalent" and Committed Dose Equivalent to the Thyroid"	Same reason as page 4 change.
Page 7 (Section 2.3) Add "Total Effective Dose Equivalent" and Committed Dose Equivalent to the Thyroid"	Same reason as page 4 change.
Page 10 (Section 2.5.2) Change "Bureau to Radiological Health" to Department of Health and Environmental Control"	Title change to reflect state agency reorganization
Page 19, Figure 2-8 Change "Bureau to Radiological Health" to Department of Health and Environmental Control"	Same reason as page 10 change.
Page 20, (Section 3.0) Change sentence describing at what emergency classification emergency facilities are activated to include Alert.	To correct an oversight from a previous revision.
Page 32, Table 4-1 Change Steam Generator Wide Range Level to less than 10 percent	Consistency with EOP-015
Page 37, Table 4-1 Change Initiating Condition and Detection Method for Site Area Emergency and General Emergency Emergency Action Levels due to Radiological Effluent.	EPA-400 implementation.
Page 41, Table 4-1 Change Initiating Condition and Detection method for Site Area Emergency due to Natural Phenomenon	Provide clarification.
Page 47 Revise responsibilities of Manager, Nuclear Protection Services	SBU reorganization

VCSNS RADIATION EMERGENCY PLAN
REVISION 33
LIST OF EFFECTIVE CHANGES

CHANGE	REASON
Page 52 Remove the Radiological Assessment Supervisor's responsibility for performing dose assessments.	Dose assessments will be performed initially by the Count Room Specialist on shift and then will be transferred to the EOF.
Page 56 Clarification of section 5.3.2(d)	Provide more definitive words on responsibility
Page 57 Change title of alternate.	SBU reorganization.
Page 58 Change titles.	SBU reorganization.
Page 59 (Section 5.3.7) Redefined who fills General Services Coordinator and primary alternate positions.	Reorganization with SCE&G
Page 62 (Section 5.5.1) Change "Bureau of Radiological Health" to "Department of Health and Environmental Control"	DHEC reorganization
Page 75 (Table 5-3) Change reporting of "Estimate of Projected Offsite Dose" and added projection time.	EPA-400 implementation.
Page 81 Change titles.	SBU reorganization.
Page 82 Change titles.	SBU reorganization.
Page 89 (Section 6.4.2.(a)) Changed EPP-019 to EPP-103	Reorganization of EPP's
Page 90 (Section 6.4.2.(b), (c) & (d). Changed EPP-019 to EPP-103	Reorganization of EPP's
Page 92 (Section 6.5.1) Revised and reworded to reflect appropriate doses for Emergency Personnel Exposure	EPA-400 implementation
Changed EPP-019 to EPP-103.	Reorganization of EPP's.

VCSNS RADIATION EMERGENCY PLAN
REVISION 33
LIST OF EFFECTIVE CHANGES

CHANGE	REASON
Page 94 (Table 6-1) Revised and reworded to reflect appropriate doses for recommended protection actions.	EPA-400 implementation
Page 95 Delete non-participating outside fire departments.	Oversight on last revision.
Pages 96-100 Delete reference to Bureau of Radiological Health (BRH) and replace with DHEC	DHEC reorganization
Page 101 Revise General Emergency Protective Action Recommendations	EPA-400 implementation
Page 118 (Section 7.6.6) Change "Bureau of Radiological Health" to "Department of Health and Environmental Control"	DHEC reorganization
Remove "DAMS" and "overlay"	New Dose Assessment methodology
Page 121 (Section 7.6.9) Reword to reflect basis of PAG's	EPA-400 implementation
Page 138 Typo in Section 8.1.1(i)	
Page 143 (Section 8.1.3) Change off-hours drills and exercise scheduling guidance.	To be consistent with NUREG-0654
Change Emergency Services Supervisor to Emergency Services Coordinator	SBU reorganization
Page 146 (Section 8.3) Change Emergency Services Supervisor to Emergency Services Coordinator	SBU reorganization
Appendix A (Page 13A.A-1) Change revision date	Typo
Appendix A (Page 13A.A-5) Add EPP-026	New procedure
Appendix C Change BRH to DHEC	DHEC reorganization
Add "or Security Files."	Reflect storage of LLEA agreements.