LILCO
LONG ISLAND LIGHTING

LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD · HICKSVILLE, NEW YORK 11801

MILLARD S. POLLOCK
VICE PRESIDENT-NUCLEAR

SNRC-877
April 21, 1983

Mr. Thomas T. Martin, Director
Division of Engineering and Technical
Inspection Programs
U.S. Nuclear Regulatory Commission, Region I
631 Park Avenue
King of Prussia, PA 19406

NRC Emergency Preparedness Appraisal 50-322/82-18
Shoreham Nuclear Power Station, Unit No. 1
Docket No. 50-322

Dear Mr Martin:

The purpose of this letter is to provide the Commission with an update regarding actions taken to satisfy the Appendix A findings of the subject Emergency Preparedness Appraisal. It is our hope that the attached information will be helpful to the Staff in planning for any follow-up activities which may be deemed necessary.

Very truly yours,

M. S. Pollock

M. S. Pollock

cc: Mr. J. Higgins
All Parties

ATTACHMENT 1

Lawrence Brenner, Esq.
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Administrative Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Daniel F. Brown, Esq
Attorney
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bernard M. Bordenick, Esq.
David A. Repka, Esq.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

James Dougherty
3045 Porter Street
Washington, D.C. 20008

Herbert H. Brown, Esq.
Lawrence Coe Lanpher, Esq.
Karla J. Letsche, Esq.
Kirkpatrick, Lockhart, Hill
Christopher & Phillips
8th Floor
1900 M Street, N.W.
Washington, D.C. 20036

Mr. Marc W. Goldsmith
Energy Research Group
4001 Totten Pond Road
Waltham, Massachusetts 02154

MHB Technical Associates
1723 Hamilton Avenue
Suite K
San Jose, California 95125

Stephen B. Latham, Esq.
Twomey, Latham & Shea
33 West Second Street
P.O. Box 398
Riverhead, New York 11901

Ralph Shapiro, Esq.
Cammer and Shapiro, P.C.
9 East 40th Street
New York, New York 10016

Matthew J. Kelly, Esq.
State of New York
Department of Public Service
Three Empire State Plaza
Albany, New York 12223

Appendix A Findings

1. Assign corporate and onsite Emergency Planning Coordinators (EPCs) on a permanent basis who shall be given direct working level responsibility and authority over all aspects of the development and maintenance of the emergency preparedness program. Revise normal organizational charts, position analysis descriptions, and other related documents to reflect the EPCs assignments and to describe the scope of their duties, authorities and reporting chains. (See Section 1.1)

Response

The permanent responsibility for Emergency Planning has been assigned to Emergency Planning Coordinator (EPC) in the Nuclear Operations Support Department (NOSD). The EPC has direct responsibility for both onsite and offsite aspects of LILCO's emergency plan. Revisions have been made to organizational charts, position analyses and other related documents to reflect the EPCs assignment and describe the scope of his duties, authority and reporting chain.

2. Design, implement and document a program to coordinate emergency prepareness activities including such things as technical information exchange, training, and site familiarization tours. Coordination on a continuous basis is needed between the site and corporate headquarters, the general public, offiste support agencies, and the news media. (See Section 1.3)

Response

A program to coordinate emergency preparedness activities has been developed in the form of a Nuclear Operations Corporate Policy. A draft currently is being circulated and the policy is expected to be approved by May 15.

3. Revise your emergency organization and Emergency Plan to:

   (a) describe all functional areas of response and emergency tasks;

   (b) provide for all response sequences;

   (c) clarify responsibilities and inter-relationships between the various organizational elements; and

   (d) provide an organizational structure within the Operational Support Center (OSC) that will meet the demands of its emergency functions. (See Section 2.1)

Response

The emergency organization, Emergency Plan, and Implementing Procedures have all been revised in at least draft form. The vast majority of the procedures, including the one outlining the emergency organization, have been approved. The Emergency Plan is in the review process. All documents will be forwarded to the NRC by May 15.

4. Demonstrate, after personnel involved are trained and qualified, that the augmentation of your emergency organization can be accomplished with the time-frames specified in NUREG-0654. (See Section 2.1)

Response

LILCO will demonstrate by the performance of a drill, including personnel notification and activation, that the augmentation of on-shift personnel can be accomplsihed within the time-frame established in the Emergency Plan. This drill will be scheduled prior to fuel load.

5. Complete the development of the training program to include the:

   (a) Designation of an individual to coordinate emergency preparedness training;

   (b) Development of written instructor qualifications;

   (c) Development of pass/fail performance criteria for written tests used to qualify emergency personnel;

   (d) Revision of lesson plans to specify performance objectives consistent with your implementing procedures;

   (e) Development of lesson plans and training courses for: personnel monitoring/decontamination, inplant surveys, post-accident sampling, repair and corrective actions, radwaste operations, and general employee training.

   (f) Complete training of all emergency response personnel in existing emergency related equipment and procedures; and

   (g) Retrain at least 25 percent of all emergency response personnel in new emergency related equipment and procedures. Such personnel shall be selected so as to provide trained individuals in all functional areas of emergency response.

(h) Complete retraining of all emergency response personnel in new emergency related equipment and procedures. (See Sections 3.1 and 3.2)

Response

(a) Completed - The responsibility for emergency preparedness training has been assigned to the Shoreham Nuclear Power Station Training Supervsior.

(b) Completed - Emergency Plan Training Manual has been modified to reference the SNPS training administration manual which addresses instructor qualifications.

(c) Completed - An overall grade of 70% was selected as the minimum passing criteria. All individuals with overall grades of less than 70% were identified and evaluated on a case by case basis for relevancy of assigned lesson. Lessons that were not relevant to an individual's job were withdrawn from the grading process. However, an overall grade of 70% is required in all relevant areas.

(d) All classroom lesson materials are being revised to reflect revisions in implementing procedures. They include student learning/performance objectives consistent with the use of these procedures. This effort is 70% complete.

(e) Development of lesson materials to support training in these topics is about 70% complete.

(f) Training to existing procedures is complete.

(g)& (h) Continuing re-qualification training commenced on March 28. A complete initial qualification course will be presented for replacement personnel during the last half of May. It is expected that 50% of the Emergency Reponse Organization will be fully trained in the use of facilities and current implementing procedures by May 27. The continuing Emergency Preparedness Training Program will assure 100% qualification is achieved prior to reaching a power level of 5%.

6. Complete installation and operational testing of meterological equipment, radiation and non-radiation monitors, and the plant process computer needed in the control room to support emergency classification, assessment and response functions (See Sections 4.1.1.1, 4.2.1.2 and 4.2.1.3)

Response

All control room instrumentation will be complete prior to fuel load. Any minor exceptions will be identified on the Master Punch List. Process computer preoperational test results is expected to be submitted to the Joint Test Group (JTG)

Response (Cont'd.)

for approval by May 9. Radiation monitoring system pre-operational test results are being reviewed by the JTG and is expected to be approved by May 1. Meterological system testing is complete, approved and the system has been turned over to the plant staff.

7. Complete installation of instrumentation in the Technical Support Center needed to provide data for support of operations. (See Section 4.1.1.2)

Response

Line printers and CRTs have been installed in the TSC and are functional. Preoperational tests of the TSC data from the process computer are complete and approved. Minor exceptions to field instruments are outstanding and are being worked on. Preoperational tests of the RMS are complete and being reviewed by the JTG. They should be approved by May 1. A revision to the dose software program is scheduled to be implemented by June 1.

8. Complete the installation and assure the operability of facilities and equipment incorporating the guidance of NUREG-0737 for the following:

   (a) sampling and analysis of post-accident primary coolant (See Section 4.1.1.5);

   (b) sampling and analysis of the post-accident containment atmosphere (See Section 4.1.1.6);

   (c) sampling and analysis of post-accident gas and particulate effluent (See Section 4.1.1.7); and

   (d) the transfer storage, sampling and analysis of post-accident liquid wastes. (See Section 4.1.1.8)

Response

(a) Preoperational test results have been approved by the JTG for the HVAC system to support habitability. The post accident sampling system is nearing completion of initial checkout and system flushing. Estimated approval of the preoperational test results is June 15.

(b) See answer to (a).

(c) Preoperational test results are currently under review by the JTG and are expected to be approved by May 1.

Response (Cont'd.)

(d) The necessary equipment is in place. Training and procedure development is ongoing.

9. Provide a permanent, onsite, back-up capability for performing chemical and radiochemical analysis during emergenecy situations. (See Section 4.1.1.9)

Response

We have the capability to obtain grab samples in order to perform the required analyses at offsite facilities. In addition, we have onsite back-up capability as described in SNRC-780.

10. Ensure that provisions have been made at assembly/reassembly areas for radiological assessment and protection of personnel remaining onsite during severe accident conditions. In addition, make provisions for transportation of personnel to offsite locations suitable to protect them from inclement weather and for which provisions have been made for radiological protection, personnel monitoring and decontamination. (See Section 4.1.2.1)

Response

Portable area radiation monitors will be installed in assembly/reassembly areas. Furthermore, Emergency Preparedness Implementing Procedures (EPIP) specify that health physics personnel will be dispatched to onsite assembly areas to perform airborne activity surveys on a routine basis. Radiological parameters for determining the suitability of assembly area environs are specified in the EPIPs.

Transportation of individuals to offsite locations will be provided by private and company vehicles as specified in the EPIPs.

Provisions to protect site evacuees from inclement weather at offsite assembly areas are as follows:

- Wildwood Substation - a trailer is to be used for personnel decontamination at this location. Trailer specifications have been determined and the purchase order has been processed. Delivery is expected May 1.

- The LILCO Port Jefferson Station and Riverhead Operations Base are designated as offsite assembly/reassembly areas. Adequate shelter will be available at these facilities for site evacuees.

Severe weather conditions such as floods, hurricanes or tornados, and their impact on site personnel, is addressed in EPIPs.

Personnel monitoring and decontamination of site evacuees are addressed in the EPIPs. The procurement and distribution of necessary equipment for these functions is progressing in a satisfactory manner.

11. C plete medical treatment facilities and provide equipment and supplies necessary to ensure that such facilities will be able to perform their intended functions during emergencies. (See Section 4.1.2.2)

Response

The existing First Aid Station which services the construction forces will be used until the permanent first aid station in the Office and Service Building Annex is completed. Provisions will be made for minor first aid in the decontamination facility.

12. Place decontamination equipment, instrumentation, supplies and decontamination procedures in those locations where personnel would be decontaminated during emergencies, and provide a method for handling a number of contaminated individuals. (See Section 4.1.2.3)

Response

Decontamination during emergencies is performed in either the onsite personnel decontamination facility or the offsite decontamination facility at Wildwood Substation. The onsite facility is complete, and the required equipment, instrumentation, supplies and procedures are in place. The offsite facility is on order, and should be installed by May 1. The normal health physics decontamination procedure has been revised to include the handling of a number of contaminated individuals.

13. Specify facilities in the vicinity of the site which will be used for expanded support in the event of a continued large scale response to an emergency situation. Incorporate a description of such facilities in the Emergency Plan (See Section 4.1.3)

Response

Support facilities within the Extended Protected Area, planned to be used during routine plant outages by contractor personnel, have been designated as expanded support facilities in the event of a prolonged emergency.

14. Provide dedicated instruments and supplies in accordance with Procedure SP 69.062.01 and ensure that they are operational and readily available for emergency use. (See Section 4.2.1.1)

Response

Procedure SP 69.062.01 has been revised and transferred to EPIPs. Approximately 95% of all required equipment is in place. All remaining equipment has been purchased and is either onsite awaiting calibration or scheduled to be delivered shortly. It is expected that all required equipment will be in place, calibrated, and operational by June 1.

15. Complete the installation and calibration of meterological instrument readouts in the Emergency Response Facilities needed to perform dose assessment functions during accidents. (See Section 4.2.1.4)

Response

Installation and testing of these facilities is complete, and they have been turned over to the plant staff.

16. Complete the respiratory protection program needed to support emergency response activities (e.g., fitting and testing of respirators); provide respiratory protection for persons expected to remain onsite during site and general emergencies; and provide for the continuous availability of air for self contained breathing apparatus. (See Section 4.2.2.1)

Response

Personnel respiratory protection devices have been received. The respiratory fit testing booth is fully assembled and operational onsite. Health Physics personnel are currently undergoing training on operation and maintenance of the booth. A plant procedure has been approved by ROC and was issued. Plant Staff personnel requiring the use of respiratory equipment shall be fitted and tested by May 30.

A cascade cylinder recharge system has been ordered to meet the requirement for capability of continuously supplying air for self contained breathing apparatus cylinders.

17. Provide protective clothing at the locations necessary to support emergency response functions consistent with the types and levels of radioactive contamination expected during accidents. (See Section 4.2.2.2)

Response

Protective clothing has been received onsite and has been placed in appropriate Emergency Response Facilities.

18. Complete the installation and operational testing of communications and notifications systems described in the Emergency Plan Implementing Procedures. In the event that restrictions continue to be imposed by local authorities, an alternative measure will be proposed by LILCO and agreed to by the NRC. (See Section 4.2.3)

Response

All the necessary sirens and tone alert radios have been installed. Our contingency plan, in the event that Suffolk County does not participate, would allow the Prompt Notification System (PNS) to be activated by LILCO personnel at the direction of a governmental body other than the County. Specifically, in the event that predetermined conditions take place that call for the activation of the PNS, site personnel would be dispatched to the encoder location. Upon the direction of that governmental body, the PNS would be activiated by LILCO as follows:

1. WALK would be notified to begin broadcasting the Emergency Broadcast System Message.

2. The sirens located within the 10-mile Emergency Planning Zone would be activated.

We are in the process of preparing a detailed procedure for this contigency plan.

The Emergency Plan utilizes the plant paging system to notify plant personnel of an emergency. In order to take into account I&E Bulletin No. 79-18, an automatic volume override will be installed in select areas of the plant as outlined in SNRC-834. This modification has been made on four speakers on Elevation 8 in the reactor building and two speakers in the fire pump house. Two speakers in the diesel generator rooms will be modified prior to fuel load.

Surveys of audibility under approximate operating conditions will also be conducted during the power ascension test period. Any such areas identified as in need of modifications will be so modified. By necessity, this works needs to be done after

fuel load when the plant noise levels are high enough to allow a meaningful survey. The NRC Resident Inspector, Mr. Higgins, is being kept advised of the details of this program.

19. Review Emergency Plan Implementing Procedures and make revisions to:

    (a) Clarify required actions and the duties and responsibilities of personnel performing these actions;

    (b) Correct ambiguities, inconsistencies, omissions, errors, wordy discussions, unnecessary references, lists of contents, and other extraneous materials which do not help the users to perform their duties during emergencies;

    (c) Provide specific cross-references to other procedures in the action steps needed to further detail and clarify actions;

    (d) Include lines of command, communications, and information flow necessary to perform emergency tasks and response actions; and

    (e) Ensure that emergency response tasks are coordinated between the appropriate elements of the emergency organization and are consistent with the organizational structures. (See Section 5.1)

Response

The Emergency Preparedness Implementing Procedures have been revised to specifically address this finding. All procedures have been clarified and simplified. Specific cross references to other procedures have been included. Lines of command and communications are identified, and all tasks have been coordinated between all elements of the emergency organization. Approximately 82% (51 of 62) of the Emergency Preparedness Implementing Procedures have been approved to date, the balance should be approved in the next three weeks.

20. Provide Emergency Plan Implementing Procedures and other procedures needed to implement the Emergency Plan, including the following:

    (a) In-plant surveys during emergencies;

    (b) Repair and corrective actions during emergencies;

    (c) Security during emergencies;

(d) Radiation protection during emergencies;

(e) Drills and exercises;

(f) Sampling and analysis of post-accident liquid wastes;

(g) Sampling and analysis of primary coolant during accidents;

(h) Sampling and analysis of containment air during accidents;

(i) Sampling and analysis of stack effluents during accidents;

(j) Calibration procedures for the above, when pertinent;

(k) Alarm response procedures; and

(l) Emergency operations procedures. (See Section 5.1)

Response

Items (a) through (e) have been completed and approved. For Items (f) through (i), all sampling procedures have been approved. Draft procedures for Items (f) and (i) have been distributed to plant staff for comment. Procedures for Items (g) and (h) are in the initial draft stage. All of these procedures are expected to be approved by May 1.

Regarding Item (j), calibration procedures remain constrained by start-up testing of the systems themselves. The alarm response procedures (Item (k)) and the emergency operations procedures (Item (l)) are being prepared and in review respectively. They should be approved and issued by June 1.

21. Prepare and distribute public information material regarding the actions to be taken by individuals within the Emergency Planning Zone. (See Section 5.4.7)

Response

In accordance with the January 14, 1983 letter from Mr. R. C. Haynes, resolution of this finding will not be required for operation up to 5% power. It is noted that a LILCO newsletter, "Keeping Current", is being provided to the residents within the 10 mile EPZ on a monthly basis. The first newsletter was published by January 10. A draft public information brochure has been prepared and will be finalized once an offsite plan is finalized.