

GULF STATES UTILITIES COMPANY

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File Code G9.5, G9.8.6.1

Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Schwencer:

River Bend Station - Units 1 & 2
Docket Nos. 50-458/50-459

In reference to your letter dated December 16, 1982, pertaining to the River Bend Station Emergency Plan, enclosed are responses to the questions presented by your staff. The responses have been prepared in accordance with discussions held between Gulf States Utilities Company representatives and your staff on February 3, 1983. These responses either indicate revisions that will be included in a July 1983 amendment to the River Bend Station Final Safety Analysis Report or commitments and scheduled completion dates for specific information requested by the staff.

Sincerely,

J. E. Booker

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

JEB/JGC/kt

X005

QUESTION 810.2 (A.1.c)

Include in the Parish Organization Chart, Figure 13.3-14, the Office of Civil Defense.

RESPONSE

The Plan will be revised such that the Emergency Preparedness Coordinator on Figure 13.3-14 will be reflected as the Civil Defense Director.

QUESTION 810.3 (A.3)

The letter of agreement with Our Lady of the Lake Regional Medical Center does not contain details as to the service to be provided, capability for handling contaminated and/or irradiated patients on a 24 hr-per-day basis and training to be provided. The agreement letters with our Lady of the Lake Regional Medical Center, Department of Energy - Oak Ridge Operations Office and U.S. Coast Guard are approximately 2 years old and should be verified and updated.

RESPONSE

The detailed letter of agreement with Our Lady of the Lake Regional Medical Center has been finalized, and the letters from the U.S. DOE and U.S. Coast Guard have been revised. These letters will be provided in a future amendment. All letters of agreement in support of the RBS Emergency Plan will be verified every two years.

QUESTION 810.4 (A.3)

The arrangement with General Electric, dated April 5, 1982, appears to cover the start-up period of River Bend Station initial operations. The attached information letter, dated April 14, 1980, specifies that a prior written agreement will be needed to facilitate initiation of the Emergency Support Program. Provide said written agreement with General Electric.

RESPONSE

The letter of agreement for support by General Electric for plant operations will be provided during the last quarter of 1984.

QUESTION 810.5 (B.3)

Table 13.3-4 of the Plan identifies a line of succession, up to the Plant Manager, for the position of Emergency Director. However, the Plan does not identify the specific conditions for higher level utility officials assuming this function.

RESPONSE

The following note will be added to Table 13.3-4:

No person of a higher position in the organization structure than the Plant Manager will assume the role of the Emergency Director.

QUESTION 810.6 (B.3)

Clarify the line of succession for the position of Recovery Manager. Table 13.3-4 indicates the Plant Manager as next in line for the position of Recovery Manager; however, Section 13.3.4.2.1 specifies, in part, that in certain situations the Shift Supervisor assumes the functions of the Recovery Manager.

RESPONSE

The Plant Manager is not in the line of succession for the position of Recovery Manager. However, the Plant Manager will assume the function of the Recovery Manager until properly relieved by the Vice President-River Bend Nuclear Group. In their absence, the Shift Supervisor will assume the functions of the Emergency Director and Recovery Manager until properly relieved.

QUESTION 810.7 (B.5)

The Plan describes the responsibilities of the key members of the onsite emergency organization. However, the plant's normal and augmented shift organization does not conform to Reg. Guide 1.101, Rev. 2 (NUREG-0654, Table B-1). There is no capability for adding personnel at 30 minutes. The onshift staff lacks a shift technical advisor and a radiation protection technician for access control, HP coverage and personnel monitoring. The Plan should be revised to meet the guidance criteria of Table B-1 or an acceptable alternate method for carrying out the emergency functions expressed in Table B-1 should be submitted for the staff's review.

RESPONSE

a. 30 Minute Response

Meeting the 30 minute response capability criteria as suggested in NUREG-0654 (Table B-1) could impact hiring of future personnel and staffing of the emergency response organization due to restrictions on availability and desirability of housing. GSU will determine present residential patterns of response organization personnel to identify a response availability as suggested in Table B-1 of Regulatory Guide 1.101, Rev. 2 (NUREG-0654). GSU will provide the findings to the NRC staff by July 1984 and establish site specific response times.

b. Shift Technical Advisor and Radiation Protection

The Shift Technical Advisor's functions can be provided by shift personnel assigned other functions as stated in NUREG-0654, Table

B-1. The Shift Technical Advisor's functions are performed by the Shift Supervisor as indicated in Table 13.3-5 and Figures 13.3-7 through 13.3-10. An additional Radiation Protection Technician No. 3 is available on the operating shift. Health physics training is provided to the onshift Chemistry Technician to enable him to provide health physics support for access control, personnel monitoring, and general health physics coverage. The appropriate tables, figures, sections, and appendices will be revised accordingly.

QUESTION 810.8 (B.7.b)

Describe the corporate technical support provided for planning and re-entry/recovery operations.

RESPONSE

Table 13.3-5 identifies technical support personnel. All GSU technical personnel required for planning and re-entry/recovery operations are within the RBNG and are described in the Pl&A. Section 13.3.8 will be modified to include technical support from RBNG personnel located in Beaumont, Texas.

QUESTION 810.9 (B.4,5,7.c and Table B-1)

The relationship between the Recovery Manager, Emergency Operations Facility (EOF) Director and the overall emergency organization must be clarified and strengthened. The Plan is not consistent with Reg. Guide 1.101, Rev. 2 (NUREG-0654) with regard to a senior manager filling the position of EOF Director; management level interface with offsite authorities; and availability requirements of an emergency coordinator who has certain non-delegable responsibilities.

RESPONSE

These relationships are discussed in Sections 13.3.4.2 and 13.3.4.2.1. The Recovery Manager performs the functions of the EOF Director as specified in NUREG-0654. The EOF Director, as stated in the June 1982 revision, is the individual administratively in charge of the EOF and reports to the Recovery Manager. The title of EOF Director will be changed to EOF Coordinator to avoid confusion with NUREG-0654.

QUESTION 810.10 (C.1.b)

The Plan does not address the specific Federal resources expected, including the expected arrival times at the nuclear facility site.

RESPONSE

Items 1-3 of Section 13.3.4.4.3 will be revised to read:

1. Nuclear Regulatory Commission, Office of Inspection and Enforcement-Region IV - The anticipated arrival times of NRC Region IV personnel and the NRC mobile laboratory are approximately ___*___ hours and ___*___ hours after notification, respectively.
2. Department of Energy (DOE) - The DOE in Region 2 has agreed to provide radiological assistance on request. Appendix B details the provisions of this agreement. The anticipated arrival times of DOE personnel and the DOE mobile laboratory are approximately ___*___ hours and ___*___ hours after notification, respectively.
3. United States Coast Guard - Upon notification by the Louisiana Nuclear Energy Division of any emergency requiring vessel traffic exclusion, the Captain of the Port of New Orleans, Louisiana exercises its authority to control marine traffic through the utilization of the vessel movement reporting system of the Vessel Traffic Service in New Orleans. The Vessel Traffic Service establishes radio communications with vessels in or approaching the controlled area and notifies them of the existing emergency. The U.S. Coast Guard, in its discretion,

dictates the type and degree of control consistent with the
circumstances which exist at the time of the request.

*These response times will be provided in a future FSAR amendment.

QUESTION 810.11 (C.1.c)

The Plan does not address the specific licensee, State and local resources available to support the Federal response.

RESPONSE

Section 13.3.4.4.3 will be revised by the addition of the following paragraph:

Air transportation of responding personnel and equipment can be conveniently accommodated at the Baton Rouge Metropolitan Airport - Ryan Field located approximately 20 miles southeast of River Bend Station. Office space and communication facilities are provided for NRC representatives in the Technical Support Center. Office space and communication facilities for NRC and DOE representatives are provided in the Emergency Operations Facility.

QUESTION 810.12 (C.2.b)

Section 13.3.4.4.1 of the Plan provides for the dispatch of a Gulf States Utilities (GSU) representative to the State EOC. However, the Plan does not provide for the dispatch of a GSU representative to the West Feliciana Parish EOC.

RESPONSE

Adequate facilities have been provided for a representative of each local parish government at the RBS EOF. There is no need to duplicate the interface at each EOC. GSU will dispatch a representative to the State of Louisiana EOC in Baton Rouge once it is activated. GSU will review this subject with the State of Louisiana and the five River Bend Parish governments to determine the preferred modes of operation and will reflect this mode in all appropriate plans.

QUESTION 810.13 (C.3)

Radiological laboratories, their general capabilities and expected availability are not identified.

RESPONSE

Radiological laboratories which will be available are identified in Table 13.3-9, as revised in response to Question 810.35.

QUESTION 810.14 (C.3)

The Mutual Assistance Plan, referred to in Section 13.3.4.3.2.9, is not appended to the Plan and therefore cannot be evaluated. Section 13.3.4.3.2.9 should be expanded to include the general capabilities of the support utilities and their expected availability to provide analyses services in the event of an emergency.

RESPONSE

A copy of the Mutual Assistance Plan will be included in Appendix B.

QUESTION 810.15 (E.3)

The Plan does not include a description of the content of initial emergency messages.

RESPONSE

Section 13.3.5.4.1.2 will be revised to indicate that the Initial Notification Form contains the following information:

- a. Location of incident and name and telephone number (or communications channel identification) of caller.
- b. Date/time of incident.
- c. Class of emergency.
- d. Type of actual or projected release (airborne, waterborne, surface spill) and estimated duration/impact times.
- e. Wind speed and direction.
- f. Recommended emergency actions, including protective measures for population areas affected.

QUESTION 810.16 (E.6)

The Plan does not address the administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ. The Plan does not indicate that an Early Warning System meeting the design objectives of Reg. Guide 1.101, Rev. 2 (Appendix 3 of NUREG-0654), has been or will be developed.

RESPONSE

Section 13.3.5.4.1.2.2 will be revised to state:

The Prompt Notification System for the 10-mile EPZ of RPS meets the design objectives of Regulatory Guide 1.101, Rev. 2 (Appendix 3 of NUREG-0654).

QUESTION 810.17 (E.7)

The formats for the draft messages intended for the public are not described in the Plan.

RESPONSE

Section 13.3.5.4.1.2 will be revised to state:

Draft messages for the public are included in the Louisiana Peacetime Radiological Response Plan, its River Bend Attachment, and the Mississippi Radiological Response Plan.

QUESTION 810.18 (F.1)

The communication plans do not include alternates for both ends of the communications links.

RESPONSE

Communicators and their alternates are designated in Table 13.3-5 for the River Bend Station Emergency Organization. The State and local agencies to be notified have 24-hour coverage of their communication links. Note (1) to Figure 13.3-16, will be added to indicate that the local sheriffs office dispatchers are on duty on a 24 hour-a-day basis.

QUESTION 810.19 (F.1.a and App. 3)

Provide a schedule for establishing the additional radio channels which will provide an alternate means of communication as discussed in Section 13.3.6.2.2.2 of the Plan. The primary and alternate means of communication must have dissimilar vulnerability characteristics.

RESPONSE

Gulf States Utilities is currently discussing with the state and local government officials the appropriate radio frequency which will be used as an alternate means of communication. The details of this means of communications should be completed during 1983 with procurement and installation of equipment prior to the initial full-scale exercise.

QUESTION 810.20 (F.1.c)

Identify the specific Federal authorities who will be notified by the emergency hotline and the onsite radio link shown in Figure 13.3-19.

RESPONSE

The onsite radio link between GSU and federal authorities will be deleted in Figure 13.3-19. Specific communications links to NRC headquarters and the Region IV office using the NRC Emergency Notification System will be indicated in revised Figure 13.3-17.

QUESTION 810.21 (F.1.e)

Describe the provision for notifying the RBS emergency organization personnel during off-normal hours.

RESPONSE

Section 13.3.6.2.1 will be revised to include an additional item:

4. Paging System - A paging system will be used for notifying the RBS emergency organization personnel during off-normal hours. This system uses regular dial telephone service to access the system and activate paging sequences. Paging can be accomplished by calling individual units, groups, or large quantities of groups by using the touch-tone dial or the telephone.

QUESTION 810.22 (F.1:f)

Describe the provision for communication by the licensee with the NRC Regional Office Emergency Operations Center (EOC), the near-site EOF and the radiological monitoring team assembly area.

RESPONSE

Provisions for communications with the NRC regional office and the rearsite EOF will be indicated on revised Figures 13.3-17 and 13.3-19 as discussed in the response to Question 810.20. The radiological monitoring team assembly area is located in the EOF.

QUESTION 810.23 (F.2)

Describe the mobile communication link to be provided for all vehicles described on page 13.3-60 of the Plan when the destination is Our Lady of the Lake Regional Medical Center in Baton Rouge, Louisiana.

RESPONSE

Section 13.3.5.5.3 will be revised to include the following:

Communications capabilities with the medical facility are available for emergency medical situations involving the transportation of individuals where an Expected Time of Arrival (ETA) or medical direction in transit is required. For these types of injuries, a radio-equipped ambulance is the means of transportation. Direct communications from the site first aid areas to the medical facilities are used in non-urgent medical injuries. In the event it is necessary to use other GSU or personal vehicles, portable radios will be provided to assure communications to Our Lady of the Lake Regional Medical Center.

QUESTION 810.24 (G.2)

Provide, as a separate package in draft form, the public information documents that will be used to educate the public.

RESPONSE

The public information brochure is under development, and a draft will be submitted for review by January 1984.

QUESTION 810.25 (G.4.a)

Clarification is needed regarding a designated spokesperson who should have access to all necessary information. Section 13.3.6.1.6 and Appendix A indicate that the Emergency News Director is the designated individual. Section 13.3.4.3.1 and Figure 13.3-11 indicate that the Communications Coordinator, under the direction of the Vice President of Public Affairs, has some responsibility regarding press releases from RBS.

RESPONSE

The Plan will be revised to indicate that the Vice president of External Affairs will be the primary designated spokesman, and the Director of Communications will be the alternate for public information issues. Further, the following terms will be changed:

- a. Emergency News Center to Emergency Communications Center.
- b. Emergency News Director to Emergency Communications Director.
- c. Communications Coordinator to Director of Communications.
- d. Vice President of Public Affairs to Vice President of External Affairs.

QUESTION 810.26 (G.4.b)

The Plan does not specify the arrangements for timely exchange of information among designated spokespersons.

RESPONSE

Section 13.3.6.1.6 will be revised to indicate:

The Emergency Communications Center serves as a joint media center for GSU and offsite response agencies. The Emergency Communications Directors or his designee is responsible for notifying and coordinating information releases in a timely manner with the Louisiana Nuclear Energy Division, the Mississippi Emergency Management Agency, the Nuclear Regulatory Commission, and local officials prior to public dissemination of statements and bulletin. Facsimile and hard copy capabilities are available to provide rapid transmission of printed material among GSU emergency response facilities and between the GSU Emergency Communications Center and offsite agencies. Press conferences are held at the Emergency Communications Center periodically to provide the media with the current status, both onsite and offsite.

QUESTION 810.27 (G.4.c)

The Plan provides for a telephone number to call to receive the latest information regarding the emergency condition as an aid in dispelling rumors. However, a coordinated arrangement for dealing with rumors is not provided for.

RESPONSE

Section 13.3.5.4.1.2.2 will be revised to include the following:

Rumor control will be coordinated by GSU personnel under the direction of the Emergency Communications Director, who will be located at the Emergency Communications Center. Information will be provided for dissemination by the Emergency Communications Center staff.

QUESTION 810.28 (G.5)

The Plan does not provide for an annual program to acquaint news media with the emergency plan, information concerning radiation, and points of contact for release of public information in an emergency.

RESPONSE

Section 13.3.5.4.1.2.2 will be revised to indicate that the program for the news media is conducted annually.

QUESTION 810.29 (H.1)

The Plan does not describe a Technical Support Center (TSC) that conforms to Reg. Guide 1.101, Rev. 2 (NUREG-0654), as clarified by Supplement 1 to NUREG-0737 (to be published).

RESPONSE

The description of the Technical Support Center is currently being prepared as a response to NRC Generic Letter 82-33 and will be incorporated into Section 13.3.6.1.1 in a future FSAR amendment.

QUESTION 810.30 (H.2)

The plan does not describe an EOF that conforms to Reg. Guide 1.101, Rev. 2 (NUREG-0654), as clarified by Supplement 1 to NUREG-0737 (to be published).

RESPONSE

The RBS EOF Conceptual Design, as presented to the Staff in January 1982, will be incorporated into a later amendment of the FSAR. This description will conform to Regulatory Guide 1.101, Rev. 2 (NUREG-0654), as clarified by Supplement 1 to NUREG-0737.

QUESTION 810.31 (H.4)

There is no discussion in the Plan of the time required to staff the centers. Reg. Guide 1.101, Rev. 2 (NUREG-0654) recommends timely staffing.

RESPONSE

Section 13.3.4.2.2.1 will be revised by deleting the last paragraph and adding the following:

The manpower response and timing considerations for the RBS emergency response organization are illustrated in Table 13.3-5.

Shift personnel are considered to be immediately available to respond to the emergency situation and initiate emergency response actions from the Main Control Room and the Technical Support Center (TSC). Other station personnel assigned to the emergency response positions may be offsite at the time of initiating response actions. The timing considerations identified in Table 13.3-5 reflect their anticipated reporting times.

The TSC and the Operations Support Center (OSC) are manned by designated station personnel and NRC inspectors. The Emergency Operations Facility (EOF) is manned by designated RBNG personnel and state and local officials. Staffing of the EOF and OSC will be accomplished in a time frame consistent with the survey of availability discussed in response to Question 810.7.

QUESTION 810.32 (H.5)

The Plan does not adequately describe the following monitoring systems referred to in section 13.3.6.3.1:

- Geographical phenomena monitors
- Radiological monitors
- Process monitors
- Fire and combustion products detectors

RESPONSE

Information describing the monitoring systems for geographical phenomena, radiological, process, and fire and combustion products will be delineated in Section 13.3.3.6.3.1 in a future FSAR amendment as the systems are finalized.

QUESTION 810.33

The capability to acquire offsite seismic and hydrological data is not addressed.

RESPONSE

Section 13.3.6.3.2 will be revised to indicate:

Seismic and hydrological data is available to GSU through the offices of the U.S. Army Corps of Engineers in New Orleans, Louisiana and the U.S. Geological Survey in Baton Rouge, Louisiana.

QUESTION 810.34 (H.6.b)

The Plan does not indicate if the dosimetry provided by offsite radiological monitors meet, as a minimum, the NRC Radiological Assessment Branch Technical Position for the Environmental Radiological Monitoring Program.

RESPONSE

Section 13.3.6.3.2 will be revised to indicate the following:

The Radiological Environmental TLD's and air samplers meet the NRC Radiological Assessment Branch Technical Position for Environmental Radiological Monitoring Programs.

QUESTION 810.35 (H.6.c)

Table 13.3-9 states that offsite laboratory facilities are available but fails to indicate the name and location of providers or the type of facilities (i.e., fixed or mobile) available.

RESPONSE

Table 13.3-9 will be revised under "Laboratory Facilities" to include:

- | | | |
|--|---------------|---|
| 1. River Bend Training Center | Chemistry Lab | Fully Equipped for
Chemical and
Radiological Analysis |
| 2. Louisiana Power & Light Company
Waterford 3 SES
Taft, Louisiana | " | " |
| 3. Mississippi Power & Light Company
Grand Gulf Nuclear Station
Port Gibson, Mississippi | " | " |

All are fixed facilities.

QUESTION 810.36 (H.7)

The Plan discusses onsite and offsite assessment facilities but fails to indicate if radiological monitoring equipment, for use by offsite teams, will be available at a location in the vicinity of the plant site.

RESPONSE

Section 13.3.6.3.2 will be revised to indicate the following:

Radiological monitoring equipment for use by offsite dose assessment teams is stored in the EOF, which is their assembly area.

QUESTION 810.37 (H.8)

The Plan does not adequately describe meteorological instrumentation and procedures which satisfy the criteria in Reg. Guide 1.101, Rev. 2 (Appendix 2 to NUREG-0654).

RESPONSE

Table 13.3-8 will be revised under meteorological to include the following:

		<u>Range</u>	<u>Accuracy</u>
Wind Speed Indicators(4) (Redundant set of 2)	Monitor Wind Speed	0-100 mph	±.5 mph
Wind Direction Indicator(4) (Redundant set of 2)	Monitor Wind Direction	0-340 degrees	±5°
Temperature Sensors(4) (Redundant set of 2)	Monitor Ambient Temp. and Temp. Difference Between 30 & 150 Ft. El.	0-120°F	±.9°F
Dew Point Sensors(2)	Monitor Ambient Moisture at 30 & 150 Ft. El.	-12 to 12°F (Wet Bulb Temp°)	±.9°F
Rain Gauge (1)	Monitor Rainfall Onsite		
Vertical Wind Speed Indicator(1)	Monitor Vertical Windspeed	-25 to 25mph	±.5

QUESTION 810.38 (H.9)

Portable communication equipment and cameras are not listed as being part of the OSC Emergency equipment and supplies (Appendix E). Direct reading hi-range dosimeters with a capability for recording emergency doses in the range consistent with EPA emergency worker guidelines (i.e., 75-100 Rem) should be provided.

RESPONSE

Appendix E will be revised to indicate the following equipment is also available in the Operational Support Center Emergency Kit.

<u>Description</u>	<u>Type Radiation Detected</u>	<u>Range</u>	<u>Quantity</u>
Direct reading high-range dosimeters	Gamma	0-100Rem	25
Camera (Polaroid Type)			2
Film			10 pkgs.
Walkie Talkies (or equivalent)			4

QUESTION 810.39 (H.10)

The Plan does not describe sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair.

RESPONSE

Appendix E will be revised to include the information currently provided in FSAR Table 12.5-2. Appendix E will also be revised to indicate:

Sufficient reserves of instruments and equipment are available from normal station inventories to replace instruments and equipment removed from the emergency kits for calibration or repair.

QUESTION 810.40 (H.11)

The Ambulance Emergency Kit, page E-1, should include road maps showing the direction to both hospitals providing medical support and Personnel Injury/Contamination forms.

RESPONSE

Appendix E will be revised to indicate that the ambulance emergency kit contains road maps showing the direction to both hospitals and Personnel Injury/Contamination Forms.

QUESTION 810.41 (H.12)

The plan implies that the EOF is responsible for receipt and analysis of field monitoring data and coordination of sample media but is not specific on these points. There is not indication in the plan regarding which facility will be responsible for EOF functions before the EOF is operational. The Plan appears to be ambiguous as to who interprets the offsite radiological data; the Health Physicist (Section 13.3.4.2.2.3 and Appendix A) or the Radiation Protection Supervisor (Section 13.3.6.1.5.2).

RESPONSE

Sections 13.3.4.2.2.3, 13.3.6.1.5.2,--and Appendix A will be revised to indicate that the Health Physicist is responsible for interpretation of the offsite radiological data.

QUESTION 810.42 (I.2)

The Plan fails to address in-plant iodine monitoring capability.

RESPONSE

Section 13.3.2.1 will be revised to indicate that there are portable facilities for iodine monitoring.

QUESTION 810.43 (I.3.a)

Figures 13.3-25 and 13.3-26 of the Plan show the relationship between the containment monitor readings and activity in containment at some point in time following the release of activity into the containment. The Plan does not, however, address the relationship between the radiation monitor readings and the activity released to the environment from the other potential release points included in Table 13.3-3 of the Plan.

RESPONSE

Section 13.3.5.2 will be revised to indicate:

The Digital Radiation Monitoring System (DRMS) provides information that can be used to determine the source terms of an unplanned radioactive release. It is used to correlate the activity levels in an effluent stream along with system flow rates to determine the release rates in Ci/sec. Using the determined release rates for the appropriate meteorological stability class, radiation exposure rates can be estimated for various distances from the containment (both onsite and offsite). Manual methods of calculation are also available to accomplish offsite dose projections. In addition, contamination levels can be determined from field samples.

QUESTION 810.44 (I.5)

The Plan does not indicate if provision has been made for access to meteorological information by the EOF, TSC, control room and an offsite NRC Center.

RESPONSE

Section 13.3.5.2 will be revised to indicate that meteorological information is accessed via computer CRTs by the TSC and EOF. This information is available in the Main Control Room via direct instrumentation. Communication links to the NRC (as illustrated in revised Figure 13.3-17) are available to relay information to the NRC from any of the above centers.

QUESTION 810,45 (I.8)

The applicant did not specifically address this criterion in the Plan. Methods, equipment and expertise were mentioned. The ability to make rapid field assessments and activation, notification means, team composition, transportation and estimated deployment times were not discussed.

RESPONSE

Section 13.3.4.2.2.3 will be amended as follows:

The team composition includes four offsite Radiation Protection Surveyors who are health physics trained technicians. Field assessment is performed by these technicians using the equipment specified in Table 13.3-8. The particulate filter and charcoal cartridge are transported to the EOF to be analyzed using a multi-channel analyzer. The team is notified using appropriate Emergency Implementing Procedures. The offsite emergency response teams have dedicated vehicles which contain the equipment as indicated in Table 13.3-8 and are radio-equipped for communications back to the EOF. In addition, portable radios are available for use by the offsite emergency response teams. Deployment times for the offsite teams range from 45 minutes to 1 hour and 30 minutes.

Question 810.46 (I.9)

The capability to measure radioiodine concentrations in the air within the plume EPZ as low as 10^{-7} uCi/cc under field conditions was not discussed in the Plan.

RESPONSE

Table 13.3-8 and Appendix E equipment lists for OSC and EOF will be revised to include the following:

Multi Channel Analyzer	measures radioiodine concentrations
w/silver ziolite cartridges	down to 5×10^{-9} uCi/cc

QUESTION 810.47 (I.10)

The Plan does not address the means established for relating various measured parameters to dose rates for key isotopes and gross activity measurements (i.e., those given in NUREG-0654, Table 3, page 18).

RESPONSE

Section 13.3.5.2 will be amended at a later date to identify specific parameters of the RBS Digital Radiation Monitoring System (DRMS).

Graphic displays will be listed including dose rates for key isotopes and gross activity measurements.

QUESTION 810.48 (J.1)

The time required to warn or notify onsite personnel is not given.

RESPONSE

Section 13.3.5.4.1.1.1 will be revised to indicate the following

Notification of onsite personnel, both internal and external, will be accomplished immediately upon classification of or escalation/de-escalation of an accident via plant PA system.

QUESTION 810.49 (J.1.b and c)

Actions by or responsibility for visitors and contractor construction personnel are not addressed.

RESPONSE

Section 13.3.5.4.1.1.2 will be revised to indicate that:

At the announcement of any plant emergency, escorts shall return escorted visitors to the Primary Access Point for exit processing. Unescorted visitors or contractor/construction personnel are trained in their required actions prior to being granted unescorted access.

QUESTION 810.50 (J.1.d)

The Plan does not discuss the means or time required to warn or advise individuals who may be in the owner controlled areas but outside the protected area.

RESPONSE

Section 13.3.5.4.1.1.1 will be revised to include the following:

GSU security vehicles, assigned to external patrol and equipped with public address systems, will patrol the owner controlled area to advise of necessary protective measures to be taken by persons within the owner controlled area. This action will be taken immediately upon notification by the Emergency Director.

QUESTION 810.51 (J.2)

Transportation (e.g., company owned, private) for evacuation of onsite individuals is not discussed. The Plan ~~does~~ not make provision for alternate offsite evacuation locations in the event of inclement weather, high traffic density and specific radiological conditions.

RESPONSE

Three alternates for assembly offsite are identified in Section 13.3.5.4.1.1.3. This section will be revised to indicate that onsite individuals proceed via private vehicle to one of the designated assembly locations dependent on the weather conditions, traffic density or specific radiological conditions.—

QUESTION 810.52 (J.4)

The Plan does not indicate that onsite non-essential personnel will be evacuated in the event of a Site Area or General Emergency. The criteria for a Plant Evacuation and Protected Area Evacuation (i.e., radiation levels that exceed 2 mrem/hr above background), as discussed in Section 13.3.5.4.1.1.3, appear to be the same. The Plan does not specify the location of the decontamination station for evacuated non-essential personnel.

RESPONSE

Sections 13.3.5.4.1.1.3, 13.3.5.4.1.1.4, and 13.3.5.4.1.1.5 are currently being revised to clarify the distinction between the types of evacuations. A figure will be included to describe the different areas within the site boundary.

A paragraph will be added at the end of Section 13.3.5.4.1.1.5 describing the decontamination facilities located at the EOF and Energy Center for evacuated, non-essential personnel.

QUESTION 810.53 (J.5)

The Plan states that accountability will be accomplished within 30 minutes after an evacuation. The Plan does not indicate if initial accountability can be done within 30 minutes after declaration of an emergency and continuously thereafter.

RESPONSE

Section 13.3.4.2.2.8 will be revised as follows:

- a. The Security Access Control System has the capability of tracking persons within the Protected Area and on command can provide the necessary data for personnel accountability within 30 minutes of an emergency declaration and continuously thereafter. This system is utilized at the onset of an emergency.
- b. Security accounts for all personnel if evacuated through the PAP or the alternate point at the Railroad Gate. If the PAP and the alternative point have to be evacuated, an accountability point is established in the River Bend Training Center. A computer terminal, printer, and card reader are available at that site. Badges collected in assembly areas are transported to that location for accountability. In assembly areas, persons without their badge have their name recorded and that information is relayed to the terminal operator who enters the information to account for the individual.

- c. The present second paragraph of Section 13.3.4.2.2.8 will be transferred to Section 13.3.5.4.1.1.3 as it relates to evacuation of non-essential personnel.

QUESTION 810.54 (J.6.c)

Identify the EIP that covers the storage and distribution of KI and the criteria for use by emergency workers.

RESPONSE

1-EIP-24 will be added to Appendix F to cover this subject.

QUESTION 810.55 (J.7)

Explain the use of Table 13.3-14, Whole Body Dose Guidance Chart and Table 13.3-15, Thyroid Dose Guidance Chart, in recommending protective actions to offsite authorities. It is not clear what "projected dose (item 13)", "shelter dose (item 15)", et al refer to.

RESPONSE

Tables 13.3-14 and 13.3-15 will be revised to eliminate item numbers. Section 13.3.5.2 will be revised to indicate that the criteria provided in Tables 13.3-14 and 13.3-15 are used to determine the appropriate Protective Actions.

QUESTION 810.56 (J.8, Appendix 4)

An estimate for a 360 degree evacuation of the 10 mile EPZ, consideration of individuals without autos and consideration of the presence or absence of transients is not included in the Evacuation Time Estimates in Appendix D to the Plan. The Transportation Map on page 25 of Appendix D to the Plan is poorly drawn/reproduced. The zones on the map cannot be correlated with those referenced in Table 1 of Appendix D,

RESPONSE

Appendix D is currently under revision and will be included in a future FSAR amendment. The revised Evacuation Time Estimate is being developed in accordance with Appendix 4 to NUREG-0654.

Question 810.57 (J.10.a)

Figure 13.3-24 showing the location of radiological monitoring and sampling points does not include sector/zone designators.

RESPONSE

Figure 13.3-24 will be revised to include sector and zone designators.

QUESTION 810.58 (J.10.b)

The intent of the map on page 24 of Appendix D to the Plan is not clear. The map would be more useful if the population densities, currently listed in Table 2, were also added.

RESPONSE

Appendix D is currently under revision and will be included in a future FSAR amendment. The revised Evacuation Time Estimate is being developed in accordance with Appendix 4 to NUREG-0654.

QUESTION 810.59 (K.1.c, e, f, g)

The Plan does not describe onsite exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides (EPA 520/1-75/001) for performing assessment actions; personnel decontamination; providing ambulance service; and providing medical treatment.

RESPONSE

Section 13.3.5.5.1 and Table 13.3-10 address allowable exposures in excess of 10CFR20 limits which are consistent with EPA 520/1-75/001.

QUESTION 810.60 (K.2)

It is not clear in the Plan if an onsite radiation protection program for use during emergencies has been established or if advance procedures have been worked out so decisions can be made concerning the relative risks of exposure in excess of 10CFR Part 20 limits. The Plan in Section 13.3.5.5.1 discusses "accidental" exposure in excess of 10 CFR Part 20 limits. This appears to indicate a procedural deficiency in the control of radiation exposure to emergency workers.

RESPONSE

Revise Section 13.3.5.5.1 as follows:

Exposure records are maintained for all station personnel, including temporary and contract workers. This information is used in determining emergency team assignments. Responding emergency teams obtain the personnel monitoring devices required for the area. TLD's are available in the emergency equipment storage areas and at the access control point to the controlled access area. A 24-hour capability exists to determine the doses received by emergency workers. TLD readers are located in the Services Building-Radiation Protection Area and in the EOF. TLD's are processed at intervals determined by the Radiation Protection Supervisor. Self-reading pencil dosimeters and/or alarming dosimeters will also be used by persons entering high radiation areas during an emergency. KI will be available to emergency workers. It will be issued as authorized by the Emergency Director based on the recommendation of the Radiation Protection Supervisor. The decision to receive an exposure to radiation in excess of 10CFR20 limits for lifesaving or

accident mitigating purposes is made by the individual but must be authorized by the Emergency Director upon recommendation of the Radiation Protection Supervisor. The exposure limits for the above purposes are detailed in Table 13.3-10. Radiation Protection Exposure Control Procedures provide exposure guidelines to expedite decision-making in an accident situation. These procedures also assure that the individual is informed of the relative risk involved with excessive radiation exposure. The Emergency Director, at the recommendation of the Radiation Protection Supervisor, authorizes any planned exposure, or is made aware of an accidental exposure in excess of 10CFR20 limits.

NOTE: The response to this question includes the answers to Questions 810.61, 810.62, and 810.77

QUESTION 810.61 (K.3.a)

The Plan does not indicate if there is 24 hour per day capability to determine the radiation doses received by emergency workers.

RESPONSE

See response to QUESTION 810.60.

QUESTION 810.62 (K.3.b)

The Plan does not indicate if provision has been made to process personnel dosimeters at frequent intervals. It is not clear if the statement, "exposure records are maintained for all station personnel" (Section 13.3.5.5.1), applies only to company employees or to all emergency workers regardless of company or organization affiliation.

RESPONSE

See response to QUESTION 810.60.

QUESTION 810.63 (K.5.a)

The controls for radioactive contamination of personnel discussed in Section 13.3.5.4.3.1.a of the Plan appear to be criteria for controlling surface contamination in areas outside of the controlled areas. Specify the action levels for determining the need for decontamination of emergency workers.

RESPONSE

Section 13.3.5.4.3.1.a will be revised to indicate:

The limit for personnel contamination is 100 dpm beta/gamma and 50 dpm alpha. Personnel who have become contaminated will be decontaminated to levels below these limits. If an individual cannot be decontaminated below these limits without damaging the skin, the Radiation Protection Foreman or Radiation Protection Supervisor shall determine what action is to be taken.

QUESTION 810.64 (K.5.b)

The Plan does not address the means for radioactive waste disposal during an emergency.

RESPONSE

Section 13.3.5.5.2 will be revised to indicate:

Radwaste will be handled in the Radwaste Building by following normal procedures. If decontamination is done at the EOF, the waste will be contained for later disposal in the plant's liquid radwaste facility. Solid radwaste will be bagged and handled under the direction of the Health Physicist.

QUESTION 810.65

The Plan does not adequately describe the criteria for permitting return to normal use.

RESPONSE

Criteria for the return of areas to normal use as outlined in ANSI 13.12 (Draft) are currently under review and will be incorporated in a later FSAR amendment.

QUESTION 810.66 (K.7)

The capability for decontamination of relocated onsite personnel, including provisions for extra clothing and decontaminants for removal of radioiodine from the skin is not addressed.

RESPONSE

Section 13.3.5.5.2 will be revised to include the following:

Facilities for decontaminating personnel evacuated from the plant site area are located at the EOF. An inventory of decontamination supplies and equipment, personnel monitoring equipment, and extra clothing is maintained at this facility (See Appendix E).

QUESTION 810.67 (L.4)

The conditions under which GSU vehicles, other than the company ambulance, or personal vehicles may be used to transport affected personnel as described on page 13.3-60 of the Plan should be amplified, or reference to an implementing procedure that covers this area should be included in the text.

RESPONSE

Section 13.3.5.5.3 will be revised to indicate that the company ambulance is the primary means of transportation of affected personnel, and other GSU vehicles and personal vehicles are used as back-up means of transportation.

QUESTION 810.68 (M.3)

The Plan does not explicitly specify the means for informing members of the response organization that a recovery organization is to be initiated, and of any changes in the organizational structure that may occur.

RESPONSE

Section 13.3.8 will be revised to include the following:

The transition to recovery organization can only be effected after plant conditions are stable and the probability of any adverse affect on the general public or damage to the plant has been substantially reduced. The Recovery Manager has the responsibility to determine when the emergency situation is stable and the entry into the recovery phase can be effected. Guidelines for determining when the emergency situation can be considered stable and the recovery organization can be established (if necessary) are as follows:

- a. The reactor systems are in stable configuration with adequate core cooling.
- b. In-plant radiation levels are stable or decreasing with time.
- c. The release of radioactive material to the environment is controlled, and there is no significant potential for additional uncontrolled releases.
- d. Fire, flooding, or similiar emergencies are under control.

Following a determination that the emergency situation is stable and the emergency conditions no longer exist, the Recovery Manager will notify and obtain the concurrence of the NRC and Emergency Director prior to disbanding the emergency organization. The Recovery Manager is responsible to assure that all emergency actions are complete and closed out or that the recovery organization is available with adequate staffing and definition of responsibilities to continue the performance of those actions. All emergency and support organizations, including the LNED, LOEP, MEMA, MHSP, and the five RB Parish EOCs, if activated, shall be notified of the termination of the emergency and/or the initiation of the recovery organization in the same manner as was used in the initial notification. In the event that, upon determination of the emergency condition, the plant is in its pre-emergency condition and capable of routine operations within its technical specifications, the Recovery Manager in concert with the Emergency Director may effect the transition to the normal operating organization in the manner previously described.

QUESTION 810.69 (N.2e[2])

Explain the use of the operators in the annual radiation protection drills involving the analysis of inplant liquid samples as discussed in Section 13.3.7.1.2.3.5.b.

RESPONSE

RBS does not use operators in the collection or analysis of inplant liquid samples. This responsibility belongs to the Chemistry Section. Trained/qualified chemistry technicians collect and analyze inplant fluid samples in accordance with approved station procedures. Section 13.3.7.1.2.3.5.b will be revised to clarify this responsibility.

QUESTION 810.70 (0.4.g)

The Plan does not address the specialized training/orientation program to be provided for local Civil Defense/Emergency Services personnel.

RESPONSE

Section 13.3.7.1.1.3 will be revised to clarify that the local civil defense personnel are included.

QUESTION 810.71 (0.5)

The specialized training program described in Section 13.3.7.1.1.2 of the Plan does not include training for chemistry personnel, including use of the post accident sampling system under simulated accident conditions.

RESPONSE

Section 13.3.7.1.1.2 will be revised to include the following:

Chemistry technicians receive comprehensive training in the procedures used for collecting samples using the Post Accident Sampling System, handling those samples to minimize personnel exposure, and analyzing the liquid and gas samples. This training is conducted at least annually.

QUESTION 810.72 (P.3)

Section 13.3.7 and Figure 13.3-5 of the Plan are inconsistent with regard to individuals assigned to emergency planning positions.

RESPONSE

The Plan will be revised to indicate that the "Manager-Technical Programs" is the "Manager-Engineering, Nuclear Fuels and Licensing."

QUESTION 810.73 (P.7)

Appendix F contains a listing of Emergency Implementing Procedures (EIPs); however, the listing does not include the section(s) of the Plan to be implemented by each procedure. (P.7)

RESPONSE

A cross reference between the RBS Emergency Plan and the Emergency Implementing Procedures will be completed and submitted for review once the procedures are completed.

QUESTION 810.74

Several subsections of the Plan appear to be redundant and should be incorporated into the appropriate section.

RESPONSE

The Plan will be reviewed to eliminate unnecessary redundancy.

QUESTION 810.75

The Plan format (FSAR) is difficult to follow and work with and should be changed to the more familiar format that is currently being used and accepted by the general industry. The graphics (tables, figures, etc.) should be placed near or in the text where they are referenced. See Section I.J of NUREG-0654 for guidance.

RESPONSE

A review of the RBS Emergency Plan against other plans developed by the general industry indicates that the only differences are that the numbers 13.3 referencing the FSAR section and the placement of the tables and figures. The numbering scheme and placement of the tables and figures are consistent with the remainder of the FSAR, in which the Emergency Plan is included in accordance with 10CFR50.34. The tables and figures are located to avoid duplication and to facilitate rapid location.

QUESTION 810.76

The Medical Emergency Plan/Procedures for Our Lady of the Lake Regional Medical Center should be established and appended to the Plan.

RESPONSE

The Medical Assistance Plan (MAP) for Our Lady of the Lake Regional Medical Center will be developed and procedures written by January, 1984. The Medical Assistance Plan will be listed as a support plan in Appendix C to the RBS Emergency Plan in a future FSAR amendment.

QUESTION 810.77

There should be only one individual (or designee) assigned the responsibility for approving emergency radiation doses during an accident. Section 13.3.5.5.1 indicates that the Emergency Director or Radiation Protection Supervisor will authorize radiation exposures in excess of 10CFR20 limits and Section 13.3.6.5 of the Plan specifies that radioprotective drugs (KI) will not be used unless authorized by the Health Physicist. Section 13.3.6.5 and Table 13.3-11 of the Plan are inconsistent with regard to the individual who directs the use of KI.

RESPONSE

See response to QUESTION 810.60. —

QUESTION 810.78

The guidelines discussed in Section 13.3.8, Recovery, should include the aspect of a stabilized reactor system.

RESPONSE

See response to Question 810.58.

QUESTION 810.79

The statement at the top of page 13.3-80 implies that reentry into radiation areas during initial phases of an emergency is done without Radiation Protection coverage.

RESPONSE

Section 13.3.8 will be revised to delete the discussion for substitution for a Radiation Work Permit with escort with a Radiation Protection Technician. In addition, the following information will be added:

Continuous coverage by Radiation Protection personnel may be waived provided that personnel are adequately instructed in the specific radiological hazard associated with the work to be performed and that personnel entering the area are specifically trained in radiation monitoring techniques. All initial re-entries into affected areas during an emergency will be provided continuous Radiation Protection coverage.

QUESTION 810.80

The listing of radiological monitors in Table 13.3-8 should include typical monitor ranges and alarm points.

RESPONSE

Table 13.3-8 is currently under revision and will be included in a later FSAR amendment. The revised table will include information appropriate to describe parameters for each particular monitor.

QUESTION 810.81

A plan and/or implementing procedures to be used by the GSU general office emergency organization, referred to in Section 13.3.4.3.1 of the Plan, should be established and submitted for review.

RESPONSE

Section 13.3.4.3.1 will be revised to delineate the response from the GSU general office in Beaumont as a supportive one for financial and logistical assistance and for management of effects on the GSU system from an emergency at RBS. The statements concerning emergency management direction will be deleted since there is no corporate organization established specifically for a response to an emergency at RBS. The general office organization is designed to handle a wide range of situations affecting GSU as a whole. Therefore, it is not necessary to develop a specific plan and procedures for the GSU general office.

QUESTION 810.82

Figure 13.3-17 indicates that the HPN, which is a dedicated phone link between NRC Headquarters and Region IV, also serves as a link to State agencies. Additionally, the ENS link from the RBS site to the NRC Region IV office is not shown.

RESPONSE

Figure 13.3-17 will be revised by adding the ENS link from the RBS site to the Region IV office. The HPN will be identified separately from the Emergency Hotline (Dedicated Telephone) to the State agencies.

QUESTION 810.83

The emergency kits listed in Appendix E should contain high range direct-reading pocket dosimeters with a range consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides (i.e., 75-100 Rem).

RESPONSE

The Emergency Kit listings in Appendix E will be revised to include 25 high-range (0-100R) direct-reading pocket dosimeters (gamma detecting) in each of the following: Main Control Room, Ambulance, EOF, TSC, and OSC.

QUESTIONS 810.84 through 810.111

The EAL Table is under revision and will be included in a later amendment to the FSAR.

Comments as submitted by the NRC will be incorporated into the revision or their exclusion will be justified.