



**LOUISIANA**  
**POWER & LIGHT**

142 DELARONDE STREET • P.O. BOX 6008  
NEW ORLEANS, LOUISIANA 70174-6008 • (504) 366-2345

July 28, 1983

W3P83-2494  
3-A45.08

Director of Nuclear Reactor Regulation  
Attention: Mr. G. W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

SUBJECT: Docket No. 50-382

REFERENCE: Your letter dated June 27, 1983

Dear Sir:

Enclosed in response to the above referenced correspondence is LP&L's reply to the questions your staff has raised.

The NRC will be kept informed of our progress in the above mentioned areas through contact with Region IV and headquarters staff.

If you have any questions, please do not hesitate to call.

Yours very truly,

F. J. Drummond  
Manager Engineering & Technical Services

FJD/RJP/sm

Enclosure

cc: E. L. Blake, W. M. Stevenson, J. Wilson, J. T. Collins, G. L. Constable,  
G. Groesch

✓3029  
1/1

LOUISIANA POWER & LIGHT COMPANY

RESPONSE TO NRC LETTER DATED JUNE 27, 1983

1. The improvement items on page 7 of the LP&L evaluation do not specifically address the aspect of sheltered assembly as indicated in item 2 on page 6 of the evaluation. Assembly areas discussed in the Waterford 3 Emergency Plan are in an open parking lot. The evaluation also did not address accountability of all onsite personnel. Accountability was identified as an incomplete area during the EPIA. Please provide this information.

LP&L Response:

We are presently developing Revision 5 of the Waterford 3 Emergency Plan. Specifically, section 6.6 "Protective Actions" will be revised to incorporate the concept of sheltering as a protective measure. This concept will also be reflected in Implementing Procedure EP-2-071 "Site Evacuation". Additionally, EP-2-190 "Personnel Accountability" which addresses accounting for all onsite personnel has been developed and submitted to NRC for staff review.

Revision 5 of the Waterford 3 Emergency Plan and Revision 3 to EP-2-071 "Site Evacuation" is scheduled to be submitted for staff review by October 14, 1983.

2. Agreement letters with industries (for updating toxic chemical inventories), discussed in SSER 2, Section 2.2.1, have not been submitted to the emergency planning staff for review and evaluation.

LP&L Response:

Such letters have been requested from the 12 industries within 5 miles of Waterford 3 which may have toxic chemical inventories. These industries are those listed in Table 2.2-3 of the Waterford 3 FSAR, with the exception of: LP&L's Little Gypsy SES and Waterford 1 & 2 SES which do not produce toxic chemicals; Argus Chemical which is a subsidiary of the Witco Chemical Company and is covered by the Witco letter of agreement; and the Chevron Oil Company which is a laboratory testing facility which deals with relatively small quantities of materials. Kaiser Aluminum and Chemical Corporation of Norco, Louisiana indicated that they do not have toxic chemicals on site.

The industries were asked to provide letters agreeing to inform LP&L of future changes in their hazardous materials inventory and to inform Waterford 3, through Parish authorities, of the release of toxic materials in hazardous concentrations beyond their plant boundaries. Ten of the 12 industries have provided letters of agreement. These letters are included as Attachment 1 to this response.

LP&L will recontact the remaining industries and will submit the letters when they become available.

3. Identify and provide for staff review, the procedures (as discussed on page 6 of the LP&L evaluation report) that provide instruction on the decision to man the Technical Support Center and/or Emergency Operating Facility depending upon site concentration of toxic chemicals and whether or not the accident occurred during routine working hours; the decision to activate the emergency facilities after hours requiring evaluation of the direction of travel of the toxic gas plume as well as the responding personnel; and provisions for appropriate arrangements with the local law enforcement agencies to allow access to the plant for such support personnel.

LP&L Response:

An additional Emergency Plan implementing procedure is being developed to address the items identified in question 3 relating to decisions to man emergency response facilities and arrangements for plant access for support personnel. This new procedure is scheduled to be submitted to NRC staff by October 14, 1983.

4. With respect to radiological emergencies at Waterford 3 what means have been employed for interfacing and coordinating local industrial plans with the Waterford 3 emergency plan with regard to time to shutdown chemical process lines, evaluation of industrial plant non-essential personnel, and make-up and protection of shutdown crews?

LP&L Response:

The St. Charles and St. John Emergency Plans both assign responsibility for coordination of local industrial plans to the local emergency preparedness director. Further, the Louisiana Department of Commerce and Industry nuclear response implementing procedure includes provisions for the identification of industrial shut-down times. Finally, LP&L has been active in providing information to local industries concerning the Waterford 3 Emergency Plan. The discussion which follows highlights the steps taken to assure adequate coordination of planning efforts.

Tab 7 of both the St. Charles and St. John Emergency Plans contains arrangements for industrial response to an accident at Waterford 3. These Plans call for the early notification of industry so that shut-down preparation can be made, and for providing necessary resource support to industries to assist with protection of workers during shut-down. The responsibility section of Tab 7, Industry Response, to each Parish Plan includes the following:

"II. Responsibilities

- A. The Parish Emergency Preparedness Director or his designee maintains the following responsibilities in regard to the protective response of Parish industry:

1. To ensure the coordination of industrial emergency plans with Parish plans for an accident at Waterford 3.

2. To provide alert/notification to industries within the risk area at the time of an accident.
3. To coordinate industry actions with those taken by the Parish in response to an accident.
4. To coordinate resource requirements of industry at the time of an emergency."

These resource requirements include providing dosimeters and potassium iodide as necessary in the event of long shut-down times. Procedures are also being established in both parishes to allow access to the risk area for replacement shut-down crew members as needed during an emergency.

In addition, the Louisiana Department of Commerce and Industry provides direct assistance to risk parishes providing resource support to assist with industrial shut-down. The Department's implementing procedure for response to accidents at nuclear power facilities establishes the following:

- "V. B. The State Emergency representative will assist the Parish Emergency Organization by:
  3. Assisting in the identification of industries that have time consuming shutdown procedures in the risk area.
  4. Assisting in the determination of the number of dosimeters required for commercial/industrial dosimeter requirements for workers located within the plume exposure pathway involved in emergency shutdown.
  5. Provide estimate of number of dosimeters required to LOEP RADEF Officer."

On May 25, 1982 a training seminar was held at Waterford 3 for all major industries in St. Charles and St. John Parishes. 19 industries were represented. An attendance roster appears as Attachment 2 to this response. This seminar presented information on the Waterford 3 Emergency Plan, the emergency classification system, notification, radiation terminology, EPA protective action guides and protective actions in a radiological emergency. In addition, a sample industrial emergency plan was given out to serve as a guide in the preparation of industrial emergency plans.

5. In the event of an accident at Waterford 3 that requires rapid shut-down and evacuation of an industrial plant(s), what hazards should be expected (toxic release, production of unstable materials, uncontrolled chemical reactions, etc.)?



LP&L Response:

Discussions have been held with industries in the Waterford 3 area regarding several aspects of emergency planning, including shutdown. Industries have indicated that rapid shutdowns could involve some loss of product and possible damage to equipment. However, it is unlikely that releases of hazardous materials would result from rapid shutdowns, since the shutdowns are intended to ensure the safety of the plant personnel and public. It should be noted that during the recent acrolein explosion in the vicinity of Waterford 3, no hazardous materials were released as a result of protective actions taken by local industries.

6. Emergency Plan Implementing Procedure EP-2-110 is not clear as to how those industries, not on the "Hotline" (Attachment 7.3 of the LP&L report), are going to be notified in an emergency situation.

LP&L Response:

Of the 12 industries identified in Table 2.2-3 of the Waterford 3 FSAR which have potentially hazardous toxic chemical inventories (see response to question 2), 11 are covered by the industrial hot-line and one by industrial mutual aid radio.

Of the 24 major industries within 10 miles of Waterford 3, 18 are covered by the industrial hot-line or industrial mutual aid radio. All of these industries not covered by the hot-line or by radio will receive notification by telephone directly from the Parish EOC in the event of an emergency. Also, all of the industries are located in areas covered by the Waterford 3 siren warning system which meets the design criteria established in NUREG-0654 Appendix 3.

In addition, the Louisiana Department of Commerce and Industry maintains a listing of all industries within the Waterford 3 10 mile EPZ. This Department's implementing procedure for response to accidents at nuclear power facilities states that the Department is responsible for verifying the notification of industries in the 10 mile EPZ and for assisting in the notification of these industries. This notification will be made to industry by Department representatives via telephone.

Both St. Charles and St. John Parishes will employ fan out warning as a back-up to the primary means of notification. Under this system, sheriff's deputies and/or firemen will supplement notification in risk areas by using sound equipment to notify persons and by going from door-to-door where necessary. As demonstrated in recent emergencies, this system will be used to supplement notification to industry as well.

ATTACHMENT 1

LETTERS OF AGREEMENT



cc: M. S. Deak

E. I. DU PONT DE NEMOURS & COMPANY  
INCORPORATED

PONTCHARTRAIN WORKS  
P. O. Box 2000, LAPLACE, LA. 70068

POLYMER PRODUCTS DEPARTMENT

12 Aug 81

L. V. Maurin  
Assistant Vice President  
Louisiana Power & Light  
142 Delaronde St.  
P.O. Box 6008  
New Orleans, Louisiana 70174

Dear Sir:

WATERFORD 3 - EMERGENCY PLAN/HAZARDOUS MATERIAL

Some information you requested concerning hazardous materials at this site is attached. Please respect the confidential nature of the information. With regard to future information:

1. We can provide LP&L with information regarding significant future changes in hazardous material inventory.
2. The Pontchartrain Works Emergency Plan includes prompt notification and recommendations to public authorities and to others downwind of the site in the event that hazardous concentrations of toxic materials are expected to extend beyond plant property. Those to be notified are fence line neighbors, St. John Parish Sheriff's Office, State Police, and as necessary, Mutual Aid and the U. S. Coast Guard.

Sincerely,

C. J. Defiel  
Staff Engineer

CJD/jac  
Attachment



GATX TERMINALS CORPORATION

RIVER ROAD P.O. BOX 157  
GOODHOPE, LA 70079  
504-443-2511

March 19, 1982

Mr. George Bailey  
Louisiana Power & Light Company  
Post Office Box B  
Killona, Louisiana 70066

Dear Mr. Bailey:

In accordance with our telephone conversation on March 17, 1982, with reference to notification of Waterford 3, it is our intention to follow our normal procedure for plant emergencies.

When any emergency occurs GATX notifies the St. Charles Parish Emergency Preparedness/Industrial Hot Line System. This will access the emergency system and all areas concerned will be notified.

Very truly yours,

GATX TERMINALS CORPORATION

M. R. Monie, Jr.  
Terminal Manager

MRM, Jr./gj

cc: J. Fish



Letter of Agreement

Mr. L.V. Maurin  
Assistant Vice President-Nuclear Operations  
Louisiana Power & Light Co.  
Waterford 3 SES  
P.O. Box B  
Killona, La. 70066

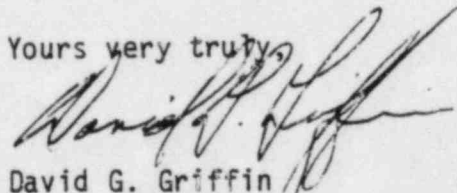
SUBJECT: Waterford 3 SES  
Emergency Plan

Dear Mr. Maurin:

This letter will serve to confirm an agreement between GHR Energy Corp. and Louisiana Power & Light Company, regarding Emergency Planning at the Waterford 3 Nuclear Plant. GHR Energy Corp. agrees to:

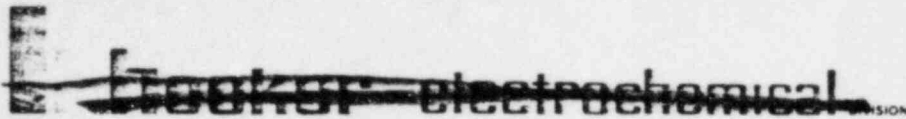
- a. Provide PL&L with information regarding significant changes in inventory of hazardous materials which could affect the safety analysis of Waterford 3, and
- b. Promptly notify Waterford 3 if a release of hazardous material which could affect Waterford 3 occurs at our facility. This notification would be via the St. Charles Parish Emergency Preparedness/Industrial Hot line System or via phone.

Yours very truly,



David G. Griffin  
Manager of Environmental Engineering

DGG/cgs



P. O. BOX 74, HAHNVILLE, LOUISIANA 70057 PHONE (504) 783-6661

August 14, 1981

Mr. L. V. Maurin  
Assistant Vice President - Nuclear Operations  
Louisiana Power & Light Co.  
Waterford 3 SES  
P. O. Box B  
Killona, Louisiana 70066

Re: Waterford 3 SES  
Emergency Plan

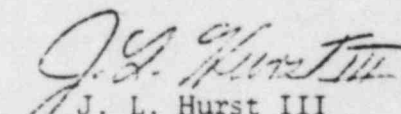
Dear Mr. Maurin:

This letter will serve to confirm an agreement between Hooker Chemicals and Plastics Corp., Taft plant, and Louisiana Power & Light Company, regarding Emergency Planning at the Waterford 3 Nuclear Plant. Hooker Chemicals and Plastics Corp., Taft plant, agrees to:

- a. Provide LP&L with information regarding changes in inventory of hazardous materials which could affect the safety analysis of Waterford 3, and
- b. Promptly notify Waterford 3 if a release of hazardous material which could affect Waterford 3 occurs at our facility. This notification would be via the St. Charles Parish Emergency Preparedness / Industrial Hot Line System or via phone.

Very truly yours,

HOOKER CHEMICALS & PLASTICS CORP.

  
J. L. Hurst III  
Works Manager

JLH/dbb



OCCIDENTAL CHEMICAL COMPANY

P. O. Box 74, Hahnville, Louisiana 70057

(504) 783-6661

March 8, 1982

Mr. L. V. Maurin  
Assistant Vice President  
Nuclear Operations  
Louisiana Power and Light Company  
Waterford 3 SES  
P.O. Box B  
Killona, Louisiana 70066

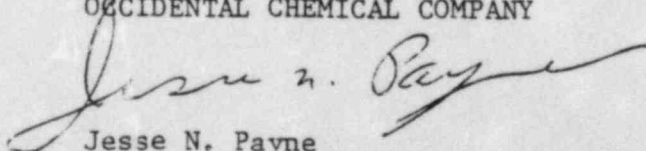
SUBJECT: Waterford 3 SES Emergency Plant

Dear Mr. Maurin:

This letter will serve to confirm an agreement between Occidental Chemical Company and Louisiana Power and Light Company (herein "LP&L"), regarding LP&L's Emergency Planning at the Waterford 3 Nuclear Plant. Occidental Chemical Company agrees to use its best reasonable efforts, as follows:

- a. To provide LP&L with information, as may be reasonably requested by LP&L from time-to-time, regarding changes in storage capability for hazardous materials which could affect the safety analysis of Waterford 3, and
- b. To promptly notify appropriate civil authorities if a release of ammonia exceeding 100 pounds occurs at our Taft Ammonia Plant facility located at Hahnville, Louisiana. This notification would be accomplished by telephone notice to the St. Charles Parish Emergency Preparedness/Industrial Hot Line System.

Very truly yours,  
OCCIDENTAL CHEMICAL COMPANY

  
Jesse N. Payne

**Shell Oil Company • Shell Chemical Company**

A Division of Shell Oil Company



Norco Manufacturing Complex  
P.O. Box 10  
Norco, Louisiana 70079

LETTER OF AGREEMENT

January 11, 1982

Louisiana Power & Light Company  
ATTN Mr. L. V. Maurin  
Assistant V.P. - Nuclear Operations  
Waterford 3 SES Nuclear Plant  
P. O. Box B  
Killona, LA 70066

Gentlemen:

SUBJECT: HAZARDOUS MATERIALS CAPABLE OF AFFECTING WATERFORD 3 SES  
NUCLEAR PLANT AT KILLONA, LA.

This letter will serve to confirm an Agreement between Shell Norco Manufacturing Complex and Louisiana Power & Light Company (L.P.&L.), concerning L.P.&L. emergency planning at their Waterford 3 Nuclear Plant located at Killona, Louisiana. Shell Norco Manufacturing Complex agrees to:

1. Advise L.P.&L. periodically regarding significant changes in hazardous materials inventory that could affect the safety analysis of Waterford 3 Nuclear Plant at Killona, Louisiana, and
2. Promptly notify Waterford 3, via the St. Charles Parish Civil Defense Emergency Operations Center "hot line" telephone system, if a hazardous material release occurs at our facility that could affect the Waterford 3 Nuclear Plant.

In agreeing to undertake the foregoing action, Shell does not assume any additional liability, beyond that which it might otherwise have, for any release of a hazardous material at the facility.

Very truly yours,

A handwritten signature in cursive script, appearing to read "H. V. Bettencourt".

H. V. Bettencourt  
Manager

DRC/dad

Shell Oil Company



One Shell Square  
P. O. Box 61555  
New Orleans, Louisiana 70161

Onshore Division

DATE: JANUARY 12, 1982

Louisiana Power & Light Co.  
Waterford 3 SES  
P. O. Box B  
Killona, LA 70066

ATTENTION: MR. L. V. MAURIN  
ASSISTANT VICE-PRESIDENT, NUCLEAR OPERATIONS

RE: HAZARDOUS MATERIAL QUESTIONNAIRE - CRAWFISH PLANT

GENTLEMEN:

Attached is our response to the questionnaire included in your letter dated July 23, 1981. We regret the delay; your original letter was not received at the plant. If you require additional information, contact Mr. S. J. Kaiser (504-588-7487).

We foresee no hazardous material inventory changes at the Crawfish Plant. Should we significantly revise the plant's design or operating procedures, you will be notified. The Crawfish Plant is tied into the St. Charles Parish Emergency Hot Line; notification of an accidental release of a significant amount of hazardous material would be given over this system.

Very truly yours,

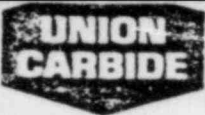
M. L. Mardick  
Division Production Manager

SJK/CLO

ATTACHMENT







UNION CARBIDE CORPORATION POST OFFICE BOX 110, HAHNVILLE, LOUISIANA 70057  
POLYOLEFINS DIVISION - STAR PLANT

January 20, 1982

Mr. L. V. Maurin  
Assistant Vice President - Nuclear Operations  
Louisiana Power and Light Company  
Waterford 3 SES  
Post Office Box B  
Killona, Louisiana 70066

SUBJECT: Waterford 3 SES  
Emergency Plan

Dear Mr. Maurin:

This letter will serve to confirm an agreement between Union Carbide Polyolefins Star Plant and Louisiana Power and Light Company, regarding Emergency Planning at the Waterford 3 Nuclear Plant. Union Carbide Polyolefins Star Plant agrees to:

- a) Provide LP&L with information regarding changes in inventory of hazardous materials which could effect the safety analysis of Waterford 3, and
- b) Promptly notify Waterford 3 if a release of hazardous material which could affect occurs at our facility. This notification would be via the St. Charles Parish Emergency Preparedness/Industrial Hot Line System or via phone.

Yours very truly,

J. M. Cockrell  
Plant Manager

JMC:ls



UNION CARBIDE CORPORATION  
P. O. BOX 50, HAHNVILLE, LOUISIANA 70057  
Ethylene Oxide/Glycol Division

September 8, 1981

Mr. L. V. Maurin  
Assistant Vice President-Nuclear Operations  
Louisiana Power and Light Company  
Waterford III SES  
P. O. Box B  
Killona, Louisiana 70066

Subject: Waterford III SES Emergency Plan

Dear Mr. Maurin:

This letter will serve to confirm an agreement between Union Carbide Ethylene Oxide/Glycol Taft Plant and Louisiana Power and Light Company, regarding emergency planning at the Waterford III nuclear plant. Union Carbide Ethylene Oxide/Glycol Taft Plant agrees to:

- a. Provide LP&L with information regarding increases in inventory of hazardous materials of a significant nature which could affect the safety analysis of Waterford III.
- b. Promptly notify Waterford III if a release of hazardous material which could affect Waterford III occurs at our facility. This notification would be via the St. Charles Parish Emergency Preparedness Industrial Hot Line System or via phone.

Very truly yours,

# Witco Chemical

Mr. L. V. Maurin  
Assistant Vice President-Nuclear Operations  
Louisiana Power & Light Co.  
Waterford 3 SES  
P.O. Box B  
Killona, La. 70066

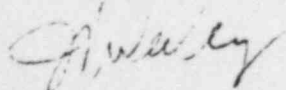
SUBJECT: Waterford 3 SES  
Emergency Plan

Dear Mr. Maurin:

This letter will serve to confirm an agreement between (Witco Taft Plant) and Louisiana Power & Light Company, regarding Emergency Planning at the Waterford 3 Nuclear Plant. (Witco Taft Plant).

- a. Provide LP&L with information regarding changes in inventory of hazardous materials which could affect the safety analysis of Waterford 3, and
- b. Promptly notify Waterford 3 if a release of hazardous material which could affect Waterford 3 occurs at our facility. This notification would be via the St. Charles Parish Emergency Preparedness/Industrial Hot Line System or via phone.

Yours very truly,



J.R. Daley  
Vice President  
Mfg. and Engineering



ATTACHMENT 2

EMERGENCY PLAN TRAINING

ATTENDANCE ROSTER

EMERGENCY PLAN TRAININGATTENDANCE ROSTER

5/25/82

<u>NAME</u>	<u>COMPANY</u>	<u>DEPARTMENT</u>
Wayne M. Melancon 3	Clark Oil	Safety
Roseann T. Novasel 1	Kaiser	Safety
Phil Lem 1	Union Carbide	Employee Relations
C. M. Duhon 1	Shell Oil	Health & Safety
Art James 1	Union Carbide	Safety
Weldon M. Danos 1	Hooker Chemical	Saf. & Ind. Hygiene
Darrell Horn 2	Monsanto	Safety
R. Fernandez 1	Shell Chemical	Safety
James Delaune 1	Shell Chemical	Training
David R. Pakarinen 1	Shell Chemical	Environmental
Tom Jones 1	Union Carbide	Safety/Health
Barton Coccaro 1	Occidental Chem.	Technical
John Carnall 3	Amer. Cyanamid	Safety
Jesse Payne 1	Occidental Chem.	Manager
Ikey Lucas	St. Charles Parish	E.P. Director
Leonard E. Culotta 2	Texaco (Gas)	
Harold L. Hebert 2	Texaco (PGPP)	
W. H. Hebert 2	Texaco (Gas)	
C. Rennick 1	Argus-Witco	Safety
Dennis Humphrey 1	Witco	Engr.
Peter J. Champagne 2	Cargill	Plant Supr.
Michael J. Moran 2	Cargill	Plant Engr.
B. F. Lewis 2	Marathon Oil	Technical
Ruth Smith 2	Farmers Export	Safety
Howard Troutman 2	Farmers Export	Plant Mgr.
Edward Fuselier 1	Waterford 1 & 2	Ops. Super.
A. J. Landry 1	Shell Oil	Health & Safety
F. L. Sospenzi 3	Nalco Chem.	Plant Mgr.
E. P. Gauthier 3	Nalco Chem.	Safety
F. L. Irle 1	Union Carbide-Star	Emergency Coord.
M. R. Monie 1	G A T X	Terminal Mgr.
T. W. Gray 1	G A T X	Safety Dir.
Tommy Vanacor 1	Good Hope Energy	Safety Dir.
Woody Powell 1	Good Hope Energy	Sr. Safety Engr.
Bertram Madere	St. John Parish	C. D. Director
A. J. Landry 1	Shell Oil	



- 1 - FSAR Industry
- 2 - Non-FSAR Industry within 10 miles of Waterford 3
- 3 - Industry beyond 10 miles of Waterford 3