

January 26, 1984

Mr. David M. Rohrer
Office of Inspection
and Enforcement
U. S. Nuclear Regulatory
Commission
Washington, D. C. 20555

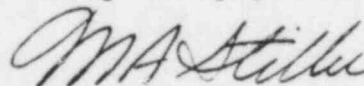
ULNRC-733

Dear Mr. Rohrer:

In response to your request, I am transmitting the attached advance copy of Union Electric's response to questions raised by the staff during their review of Revision 5A of the Callaway Plant Radiological Emergency Response Plan (RERP). These questions were formally submitted to us by Mr. Youngblood in his letter of January 5, 1984 to Mr. D. F. Schnell.

Coincidental with our transmittal to you, the Union Electric Licensing Group will formally be submitting these same answers, as requested in Mr. Youngblood's letter.

Very truly yours,



M. A. Stiller
Manager, Nuclear Safety
and Emergency Preparedness

MAS/dch
Attachment

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- 1 Ald The Vice President, Nuclear is designated as the primary Recovery Manager in Section 5.2.4.1 and Table 5-1, Revision 6, of the RERP indicates the primary for all positions. The primary and alternates for all emergency positions are delineated in the Emergency Telephone Directory.
- 2 A3, B8,
 App. E,
 Section
 IV.A.5 Letters of Agreement with Westinghouse and Bechtel are currently being sought by Union Electric Nuclear Engineering.
- 3 B3 Appendix B, Revision 6 of the RERP has a revised policy statement which clearly states the authority of the Emergency Coordinator. Section 5.2.3.1, Rev. 6 also states the authority of the Emergency Coordinator. The Manager, Callaway Plant is designated the primary Emergency Coordinator in Section 5.2.3.1 and Table 5-1, Rev. 6. The line of succession for the overall management of Union Electric's Emergency Response is clearly stated in Step 5.2.1 and indicated in Steps 5.2.2.1, 5.2.3.1 and 5.2.4.1.
- 4 B5, H4 Table 5-1 has been revised (Rev. 6) to include response times for all emergency positions including the Emergency Coordinator. The activation of the EOF within 60-75 minutes will be included in the next revision of the RERP.
- 5 B7, G4a The RERP states the "JPIC Coordinator or other individuals designated by the Recovery Manager" will be company spokesperson in Section 6.9.2. The next revision to the RERP will indicate the Vice President, Nuclear, or an individual designated by him, will be the Company spokesperson.
- 6 B9 FSAR Appendix 9.5-A, Sheet 6 Item 4 indicates that Callaway Plant is designed to be self-sufficient from a firefighting standpoint, however, outside fire protection is being negotiated now and no agreement has been reached. The Fire Brigade is briefly described in Sections 5.2.2.11 and 5.2.3.25. The Callaway Plant Fire

- Protection System is described in Section 7.3.1.13.
- 7 Clc Section 5.4.1, has been revised (Revision 6) to provide for the initial direction and coordination of the Federal response, and the resources available for support.
- 8 C3, C4
H6c An agreement has been made with Oak Ridge National Laboratory for backup laboratory analysis. The agreement is contained in Appendix C, Revision 6. References are also included in Sections 5.4.1.2, 7.3.1.7 and 7.3.1.8.
- A Letter of Agreement with Wolf Creek has been recently signed. This is discussed in Section 5.3.2. The signature page of this agreement will be contained in Appendix C in the next revision of the RERP.
- 9 D1 Chapter 4, Revision 6 has been modified to indicate accident assessment should be performed within 15 minutes.
- 10 D1, I1 "And" was replaced by "Or" in the following EAL's:
- Group 2 Conditions D, E, G, H
Group 3 Conditions I, J, K
Group 6 Condition H
Group 7 Conditions B, K
Group 8 Condition G
- It is felt that "and" is appropriate for the EAL's, Group 6 Condition G and I.
- 11 D1, I1 The value of 2735 psig is a typographical error. It will be corrected (2235) in the next revision.
- 12 D1, I1 All sample analysis involving reactor coolant activity has been changed to uCi/gram in the EAL's in Revision 6, Table 4-1.
- 13 D1 Unusual Event conditions 14 through 17 of NUREG-0654 have been included in Table 4-2, Revision 6. These were inadvertently left out of Revision 5A, Table 4-2.

- 14 E1 Public Relations monitors the EBS stations which provide the general public Protective Action Recommendations. Once a Protective Action is heard by Public Relations, they will inform the Recovery Manager of the contents. This will serve as the verification of Protective Action Recommendations. A tone alert radio tuned to the EBS station will also be in the TSC for monitoring for Protective Action Recommendations. This will be indicated in the next revision of the RERP.
- 15 E4, J, K, M A new Follow-Up Notification Form is included in Revision 6, Figure 6-2. The new form provides for the necessary information.
- 16 E6, J7 Section 6.7.2 through 6.7.2.2 has been modified (Revision 6) to describe the administrative and physical means to provide the general public protective action recommendations, including the capability of the 15 minutes from notification of a General Emergency.
- 17 E7 The RERP does not contain preplanned messages for Protective Action Recommendations. The messages given to the general public are the responsibility of the County officials and the preplanned messages are contained in the County and State Emergency Plans. This is discussed in Section 6.7.2.2. (Rev. 6).
- 18 F2, L1 Communications with Callaway Memorial Hospital and Callaway County Ambulance is described in Section 5.4.3.1. (Rev. 6). The specific communication systems which can be used is described in Sections 7.2.2, 7.2.4, and 7.2.7.2.
- 19 G2 Section 8.1.4 has been revised (Rev. 6) to indicate telephone numbers for additional information and EBS radio stations will be contained in the Public Information Booklet.
- 20 G3a, G4c Section 6.9.3 has been added to Revision 6 to describe the rumor control methodology. No telephone numbers are contained in the RERP. Section 8.1.3

- (Rev. 6) discusses the means by which the News Media get acquainted with the point of contact for release of public information in an emergency.
- 21 H6a The seismic instrumentation described in Section 7.3.1.1.2 meets the requirements of NUREG-0737. A backup means of providing this type information is not necessary, especially when the probability of earthquakes are considered. The RERP does not address a backup means.
- 22 H7 Section 7.3.2 has been modified (Rev. 6) to indicate Field Monitoring Emergency Equipment Kits are stored in the EOF and are available at all times for emergency use.
- 23 H8 Sections 7.3.1.1.1, 6.5.2.1 and Section 5.4.1.5 (new section in Rev. 6) discusses the National Weather Service and the information which can be obtained. Security will also maintain a weather alert radio in the Security Building and will relay any pertinent information to the Control Room.
- 24 H10 Section 8.5 has been modified (Rev. 6) to indicate the inspection criteria and that calibrations will be performed to ensure manufacturer's specifications are met.
- 25 H12 Section 6.5.2.1 has been modified (Rev. 6) to indicate samples collected by Field Monitoring Teams will be returned to the EOF.
- 26 I1 All TBD's in EAL's have been completed. Revision 6 has a complete set of EAL's.
- 27 I1 Group 3 Condition J, "and" has been changed to "or" as indicated in Item 10.
- Group 6 Condition H, this EAL pertains to radioactivity being released to Containment or Fuel Building. Specific references to fuel pool water levels should not be needed. Radiation levels are monitored by area radiation monitors in these areas.

- Group 6 Condition I, indications for low water in the fuel pool will be added to this EAL in the next revision of the RERP and EIP-ZZ-00101.
- Group 8 Condition F, Indications were reworded and "and" was changed to "or" (Rev. 6).
- 28 I3, I4 Section 6.5.2.1 has been modified (Rev. 6) to indicate the amount of radioactivity being released can be determined utilizing instrument readings, plant parameters and effluent monitors. These indicators are used in determining the off-site dose projections.
- 29 I5 Section 6.7.2.2 (Revision 6) has been revised to clearly indicate the necessary radiological and meteorological data to perform dose assessment will be provided to off-site officials responsible for dose assessment.
- 30 I6 Section 6.5.2.1 has been modified (Rev. 6) to indicate there is a contingency method available to determine off-site doses if all instrumentation is off scale or inoperable.
- 31 I7, I8 Sections 6.5.2 and 6.5.2.1. (Rev. 6) contain information concerning the provision and methodology for field monitoring. These were revised in Revision 6 to clarify and expand the methodology. Sections 7.3.2, 7.3.1.3.2 and Appendix E contain information concerning the equipment available for Field Monitoring Kits.
- 32 I10 Section 6.5.2.1 has been revised (Rev. 6) to indicate the off-site doses can be estimated using actual or projected dose rates. It also states the capability to perform dose assessment based upon specific isotopes is also available. This includes isotopes identified in NUREG-0654.
- 33 J1d The Plant Emergency Alarm can be heard throughout the Protected Area (blue flashing lights in high noise areas are also activated) and in some areas of the

- Owner Controlled Area. Security will have a roving patrol to supplement the alarm in the Owner Controlled Area in areas which the alarm cannot be heard. This will be indicated in the next revision of the RERP.
- 34 J5 Section 6.7.1.3 indicates the Shift Security Supervisor/Security Coordinator is responsible for limiting and controlling access when accountability is required. This implies maintaining accountability but it will be further clarified in the next RERP revision.
- 35 J7 The description of the Public Alert System in the RERP has been revised (Appendix I, Revision 6) to describe the current system of sirens and tone alert radios. Section 6.7.2.1 has been revised (Rev. 6) to indicate the methodology for the control and activation of the Public Alert System.
- 36 J10a Section 8.1.4 was revised (Rev. 6) to indicate Reception and Care Centers are included in the Public Information Booklet. Reception and Care Centers are the responsibility of the State and as such are only touched on in the RERP.
- 37 K1 Emergency Exposure Limits in the RERP are for Union Electric emergency workers. Exposure limits for off-site agencies are contained in the off-site plan and procedures. This is clarified in Rev. 6 Section 6.8.1.
- 38 K2 Exposure in excess of 10CFR20 limits are controlled in accordance with procedures and is discussed in Section 6.8.1.
- Clarification will be made in the next revision that the over exposures are controlled by a radiation protection program.
- 39 K7 Sections 7.5, 6.7.3.2 and 6.7.14 have been modified (Rev. 6) to indicate protective clothing will be made available as replacement clothing should personal clothing become contaminated. Section 6.8.2 has been modified (Rev. 6) to indicate decontamination includes radioiodine skin contamination.

ITEM	NUREG-0654	DISCUSSION
40	N1	Section 8.2 has been modified (Rev. 6) to include provision for unannounced drills and drills under variable weather conditions. The State and local participation was modified to reflect the current FEMA and NRC rules.
41	N5	<p>Section 8.3 has been modified (Rev. 6) to indicate the Manager, Callaway Plant will review and approve the RERP and EPIPs.</p> <p>Section 8.3 also discusses the means to identify and correct problems in the Emergency Preparedness Program. Additional information will be provided in the next revision.</p>
42	Ola	Section 8.1.2 has been revised (Rev. 6) to include radiation protection for the off-site emergency response personnel who will conduct activities within the Plume Exposure Pathway EPZ.
43	P3	Chapter 8 and Section 8.3 have been revised (Rev. 6) to indicate the Manager, Nuclear Safety and Emergency Preparedness has the responsibilities of the Emergency Planning Coordinator as defined in P3 of NUREG-0654.
44	P4	Section 8.3 has been modified (Rev. 6) to indicate the annual independent audit will take into account problems identified in drills and exercises.
45	P6	Appendix J (Rev. 6) has been updated to include an accurate listing of supporting emergency plans.
46	P7	Appendix F (Rev. 6) has been updated to the current EPIPs, and references have been added to indicate which sections the EPIPs implement.
47	P9	Section 8.3 has been revised to ensure the Nuclear Safety Review Board provides an independent review and audit at least annually.