

UNION ELECTRIC COMPANY

1901 GRATIOT STREET  
ST. LOUIS, MISSOURI

DONALD F. SCHNELL  
VICE PRESIDENT

December 22, 1983

MAILING ADDRESS:  
P. O. BOX 149  
ST. LOUIS, MISSOURI 63166

Mr. Richard C. DeYoung, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

ULNRC-708

Dear Mr. DeYoung:

DOCKET NO. 50-483  
CALLAWAY PLANT, UNIT 1  
REQUEST FOR EXCEPTION TO EOF  
ACTIVATION TIME RECOMMENDATION

In a meeting on November 28 and 29, 1983, with David Rohrer of your Staff, we were told that the Callaway Plant Emergency Operations Facility (EOF) must be physically activated approximately one hour after declaration of a Site Area Emergency. The Callaway Plant Radiological Emergency Response Plan (Onsite Plan) calls for staffing the EOF with corporate personnel primarily from our St. Louis office, which would entail approximately a three-hour activation time. Consequently, we request an exception from the recommendation contained in NRC guidance documents that the EOF become fully activated in one hour.

We understand the Staff's one-hour EOF activation criterion to be based on the recommendations contained in NUREG-0654, Rev. 1 (Nov. 1980); NUREG-0696 (Feb. 1981); and NUREG-0737, Suppl. 1 (Dec. 1982). Specifically, NUREG-0654 recommends that emergency facilities be activated and staffed in a timely fashion. NUREG-0696 states that designated emergency response personnel shall report directly to the EOF to achieve full functional operation within one hour. NUREG-0737 provides as a goal that the EOF be staffed in accordance with Table 2 of that document, which specifies one hour for availability of the EOF Director. NUREG-0737 also notes that reasonable exceptions to the specified goals for staffing and response times for their arrival will be considered by the Staff. These recommendations recently were discussed by the Commission in the TMI-1 restart decision. See Metropolitan Edison Co. (Three Mile Island Nuclear Station, Unit No. 1), CLI-83-22, 18 N.R.C. \_\_\_\_\_ (Sept. 8, 1983).

8312300134 831222  
PDR ADOCK 05000483  
F PDR

Acc'd  
1/0 Add R.C. DeYoung

We believe staffing of the emergency response facilities at Callaway Plant meets the intent of NUREG-0737 and NUREG-0696, and constitutes a reasonable exception to the one-hour EOF activation goal specified in Table 2 of NUREG-0737. At Callaway, those onsite personnel responding to an emergency within the first hour who have functions subsequently carried out at the EOF initially report to the Technical Support Center (TSC). See Onsite Plan, Table 5-1. These emergency response functions are carried out at the TSC until corporate personnel arrive at the Callaway Plant site, which is conservatively estimated to take two to three hours after declaration of a Site Emergency. All data systems and displays available in the EOF also are present in the TSC to ensure satisfactory emergency response capability.

Specifically, the following EOF functions, specified in NUREG-0696 and NUREG-0737, are fully satisfied by our proposed staffing arrangement:

1. Management of overall licensee emergency response. Initially, the functions of the EOF Director identified in NUREG-0737, Table 2 are performed by the Emergency Coordinator in the TSC. The Emergency Coordinator will be responsible for directing overall emergency response from the TSC until arrival of the Recovery Manager. See Onsite Plan, Section 5.2.3.1.
2. Coordination of radiological and environmental assessment. This activity will be accomplished in the TSC by the Health Physics (HP) Coordinator and the Dose Assessment Coordinator until these personnel are relieved by corporate staff at the EOF. See Onsite Plan, Sections 5.2.3.3 and 5.2.3.10.
3. Determination of recommended public protective actions. The Emergency Coordinator, located in the TSC, is responsible for recommending public protective actions. He is assisted in this determination by the HP Coordinator and the Dose Assessment Coordinator. When the onsite emergency staff is relieved by corporate personnel, this function is transferred to the corporate staff located in the EOF. See Onsite Plan, Section 5.2.3.1.
4. Coordination of emergency response activities with Federal, State, and local agencies. Initial communications with offsite agencies are made from the Control Room and the TSC. At the Alert or higher classification, the Offsite Liaison Coordinator, who is a member of the corporate

organization, reports to the EOF and handles coordination with offsite agencies from that location.

Since onsite nuclear operations personnel initially will perform the emergency functions described above, we believe that having these individuals report to the TSC results in the most efficient use of manpower, time, and space. If these personnel were required to work from the EOF, an awkward transition would take place when corporate personnel begin to arrive at the EOF. Operations personnel would be required to physically move from the TSC to the EOF at the declaration of a Site Area Emergency and then move back to the TSC when relieved.

We believe that, in the case of the Callaway Plant, it would be counterproductive to require all personnel with responsibilities for offsite emergency response functions to report to the EOF within one hour. We are aware of the Commission's decision in the TMI-1 case. However, we believe that the basis for the Commission's requirement in that case that the EOF be operational in one hour was its disapproval of the licensee's plan to conduct offsite response activities from the control room for the first four hours of an emergency. In the Commission's view, this proposal did "not adequately reflect one of the primary lessons learned from the Three Mile Island accident," namely, "that those in the control room should be free to concentrate on accident assessment, plant control, and accident mitigation and should not be responsible for carrying out other critical functions such as radiological assessment and making protective action recommendations." CLI-82-22, slip op. at 14.

The Callaway Plant Onsite Plan does not present this problem. Notwithstanding the fact that the EOF is not operational within one hour, at Callaway, since the functions of radiological assessment and protective action recommendations will be the responsibility of individuals stationed in the TSC, the attention of control room personnel will not be distracted away from plant technical conditions. Furthermore, the opportunity for face-to-face communications between the licensee and government officials, which was another Commission concern in the TMI-1 case, is not adversely affected by the Callaway Plant Onsite Plan. This is because the Offsite Liaison Coordinator reports to the EOF at the Alert (or higher) classification within 90 minutes after declaration.

In summary, we believe that the Callaway Plant Onsite Plan effectively and efficiently uses manpower and other resources available over the initial hours of an emergency. We also believe that the way in which this is accomplished

at Callaway, with an orderly transition from TSC to EOF direction of radiological assessment and protective action recommendations as corporate personnel arrive from St. Louis, is fully consistent with the Commission's decision in the TMI-1 case. Consequently, we hereby request an exception from the regulatory guidance criterion that the EOF be activated in one hour.

Very truly yours,

  
Donald F. Schnell

NGS/lkr



STATE OF MISSOURI )  
 ) S S  
CITY OF ST. LOUIS )

Donald F. Schnell, of lawful age, being first duly sworn upon oath says that he is Vice President-Nuclear and an officer of Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By Donald F. Schnell  
Donald F. Schnell  
Vice President  
Nuclear

SUBSCRIBED and sworn to before me this 22nd day of December, 1983.

Barbara J. Pfaff  
BARBARA J. PFAFF  
NOTARY PUBLIC, STATE OF MISSOURI  
MY COMMISSION EXPIRES APRIL 22, 1985  
ST. LOUIS COUNTY