



LONG ISLAND LIGHTING COMPANY

175 EAST OLD COUNTRY ROAD • HICKSVILLE, NEW YORK 11801

Direct Dial Number

November 7, 1983

SNRC - 973
Docket No. 50-322
(Emergency Planning)

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBMITTAL OF REVISION 2 PAGES OF LOCAL OFFSITE
RADIOLOGICAL EMERGENCY RESPONSE PLAN

Dear Mr. Denton:

On May 26, 1983, the Shoreham Nuclear Power Station Local Offsite Radiological Emergency Response Plan, Revision 0 ("the plan") was submitted as part of the Atomic Safety and Licensing Board Docket No. 50-322. Subsequently, on July 28, 1983, Revision 1 pages to the plan were submitted to all holders of the plan. The Revision 1 changes contained improvements and clarifications for the plan and procedures that resulted as work was performed in three areas: resolution of FEMA comments, response to contention and discovery items, and preparation of training material.

Since the submittal of the Revision 1 pages, significant further progress has been made towards implementing the plan. Specifically, detailed working arrangements have been developed with the Department of Energy (DOE), additional inadequacies identified by FEMA have been corrected, classroom training for LERO members has been virtually completed, and the LERO drill program is underway. In addition, responses are being prepared to the "Revised Emergency Planning Contentions" submitted on July 26, 1983. Modifications to the plan, implementing procedures and Appendix A (the evacuation plan) are necessary to reflect improvements to the plan in the course of this work. Consequently, LILCO is submitting, with this letter, Revision 2 to the plan.

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I. Discussion of Revisions

There are a total of 823 pages in the Revision 2 package. These changes are broken down into the following four categories:

(1) FEMA Comments

The Federal Emergency Management Agency's review of the plan, released on June 23, 1983, rated 34 elements as Not Adequate. We believe that Revision 1 to the plan corrected 22 of these inadequacies. The Revision 1 submitted letter indicated that in LILCO's view, 7 other elements were partially corrected by Revision 1 but required further improvement, and 5 elements could not be addressed at that time.

Revision 2 further corrects these remaining elements, as follows:

- A.3 Action: An additional 23 letters of agreement have been obtained and are now included in the plan. These letters cover 12 ambulance companies, 6 additional bus companies, and 5 other organizations.
- C.4 Action: See A.3.
- E.7 Action: The Emergency Broadcast System messages have been modified to include general evacuation routing.
- J.10.d. Action: Letters of agreement have been obtained with ambulance and bus companies identifying specific transportation resources.
- L.4 Action: Ambulance companies have been contacted and letters of agreement obtained with 12 companies.

Consequently, in LILCO's view, 3 of the elements that were partially addressed in Revision 1 are now fully addressed in Revision 2 (Items A.3, C.4, and E.7), and 2 elements that were not addressed in Revision 1 are now partially addressed in Revision 2 (items J.10.d and L.4), leaving only 7 elements outstanding.

Of the pages revised in response to FEMA comments, 35 reflect improvements in the plan, 2 in Appendix A, and none in the procedures. This represents 4% of the total Revision 2 pages.

(2) Changes to Respond to Contentions 23, 25, 65

In response to the "Revised Emergency Planning Contentions" filed in the Shoreham operating-license proceeding on July 26, 1983, certain clarifications and modifications to the plan are required. Contentions 23 (Shadow Phenomenon), 25 (Role Conflict), and 65 (Evacuation Time Estimates) are presently scheduled to go to hearing on December 6. Consequently, for the convenience of the Licensing Board and the parties, we have separated those pages with changes that in our view particularly bear upon those three contentions. The changes responding to Contentions 23, 25, and 65 total 7 pages in the plan, 43 in Appendix A, and 44 in the procedures. This is 11% of the total Revision 2 pages.

(3) Improvements to the Plan

As a result of training, drills and additional planning work, and in response to the remaining contentions, changes have been made to 51 pages in the plan, 79 in Appendix A, and 262 in the procedures. This represents 48% of the total revised pages. Of these changes 48 pages reflect changes in the titles of the Department of Energy response personnel as a result of further discussion with the Brookhaven Area Office.

(4) Minor Editing

The remaining 43 revised pages in the plan, 47 in Appendix A, and 210 in the procedures (37% of the total revised pages) contain minor editing changes. That is, they involve page number changes, shifted text (otherwise unchanged), correction of typographical errors, correction of tables of contents to reflect changes in the text, or single word changes for the sake of accuracy, clarity, or consistency.

II. Instructions for Handling of Revised Pages

The Revision 2 pages should be inserted into the binders in your possession and the pages that Revision 2 replaces destroyed, in the following manner:

1. Plan Revisions

Blue with page numbers on the bottom starting with page 2.1-1 and ending with page 4.1-4, are the Revision 2 pages for the LILCO Transition Plan inserts. These pages are to be inserted into the binder marked "Local Offsite Radiological Emergency Response Plan Inserts" in the LILCO Transition section.

White with page numbers on the bottom starting with Table of Contents and ending with Appendix C, are the Revision 2 pages for the binder marked "Local Offsite Radiological Emergency Response Plan." These pages are to be inserted into the appropriate section in the plan.

2. Appendix A Addendum Revisions

The set of pages, buff with page numbers on the bottom starting with List of Effective Pages and ending with page B-1, are the Revision 1 pages for the binder marked "Appendix A, Evacuation Plan Addendum." These pages are to be inserted into the Addendum in the appropriate sequence.

3. Procedure Revisions

Blue with page numbers on the upper right corner, starting with OPIP 2.1.1, page 1 and ending with OPIP 4.1.4, page 12, are the Revision 2 pages for the LILCO Transition Implementing Procedures Inserts. These pages are to be inserted into the appropriate procedures in the binder marked "Local Offsite Radiological Emergency Response Plan, Implementing Procedures, Inserts." in the LILCO Transition section.

White with page numbers on the upper right corner starting with List of Implementing Procedures and ending with OPIP 4.2.2, page 6, are the Revision 2 pages for the two volumes marked "Local Offsite Radiological Emergency Response Plan Implementing Procedures, Volume I and Volume II." These pages are to be inserted into the appropriate volume and section of the Implementing Procedures.

Each set of revision pages is further divided by paper tabs into each of the four categories of revision.

Only revised pages have been sent and all are marked "Rev. 2". All changed text is indicated by a vertical bar in the right margin. Deleted text is indicated by a horizontal bar in the right margin. A vertical bar just above or just below the text in the right margin indicates text shifted from a prior page, but otherwise unchanged.

It should be noted that 19 pages must be deleted after inserting the Revision 2 pages. These are:

Plan Figure 1.1.2, page 3.8-7, Attachment 3.1.1, and Attachment 3.8.1 pages 1 through 11.

Procedures OPIP 3.6.3 - page 47, OPIP 3.9.1 - page 17, and OPIP 3.9.2 - page 27.

Appendix A Page V-10, and page V-11.
Addendum

The plan, procedures, and Appendix A will be updated periodically to incorporate new information, results of FEMA and NRC Staff reviews, and as feedback is obtained from drills and exercises.

Should you have any questions, please contact this office.

Very truly yours,



M. S. Pollock
Vice President - Nuclear

JLS/bd/jcc

cc: Mr. C. Petrone
All parties listed in Attachment 1.

ATTACHMENT 1

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All other holders of SNPS Local Offsite Radiological Emergency Response
Plan.

DOCUMENT SIGNOFF FORM

To: Holder, Manual No. 55 Local Offsite Emergency Plans
and Implementation Procedures

From: Emergency Planning Coordinator

Subject: REVISION TRANSMITTAL

Attached is Revision No. 2 to the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures for insertion
into your Controlled Copy No. 55. Two copies of this memorandum
have been provided. Once you have complied with the instructions
presented below, sign one copy and place it in front of your con-
trolled copy of the Manual. Sign the second copy of the memorandum
and return it within seven (7) working days to:

Emergency Preparedness Coordinator
LILCO
175 East Old Country Road
Hicksville, New York 11801

The undersigned acknowledges completion of the following actions:

1. The receipt and incorporation of Revision No. 2 dated 11/7/83
in Controlled Copy No. 55 of the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures.
2. Destruction of all pages which have been superseded by the
revision.

Signature _____ Date _____

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Rev. 1
7/19/83

DOCUMENT SIGNOFF FORM

To: Holder, Manual No. 55 Local Offsite Emergency Plans
and Implementation Procedures

From: Emergency Planning Coordinator

Subject: REVISION TRANSMITTAL

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LILCO
175 East Old Country Road
Hicksville, New York 11801

The undersigned acknowledges completion of the following actions:

1. The receipt and incorporation of Revision No. 2 dated 7/7/83
in Controlled Copy No. 55 of the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures.
2. Destruction of all pages which have been superseded by the
revision.

Signature _____ Date _____

DOCUMENT SIGNOFF FORM

To: Holder, Manual No. 52 Local Offsite Emergency Plans
and Implementation Procedures

From: Emergency Planning Coordinator

Subject: REVISION TRANSMITTAL

Attached is Revision No. 2 to the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures for insertion
into your Controlled Copy No. 52. Two copies of this memorandum
have been provided. Once you have complied with the instructions
presented below, sign one copy and place it in front of your con-
trolled copy of the Manual. Sign the second copy of the memorandum
and return it within seven (7) working days to:

Emergency Preparedness Coordinator
LILCO
175 East Old Country Road
Hicksville, New York 11801

The undersigned acknowledges completion of the following actions:

1. The receipt and incorporation of Revision No. 2 dated 11/7/83
in Controlled Copy No. 52 of the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures.
2. Destruction of all pages which have been superseded by the
revision.

Signature _____ Date _____

DOCUMENT SIGNOFF FORM

To: Holder, Manual No. 52 Local Offsite Emergency Plans
and Implementation Procedures

From: Emergency Planning Coordinator

Subject: REVISION TRANSMITTAL

Attached is Revision No. 2 to the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures for insertion
into your Controlled Copy No. 52. Two copies of this memorandum
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trolled copy of the Manual. Sign the second copy of the memorandum
and return it within seven (7) working days to:

Emergency Preparedness Coordinator
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The undersigned acknowledges completion of the following actions:

1. The receipt and incorporation of Revision No. 2 dated 11/7/83
in Controlled Copy No. 52 of the Local Offsite Radiological
Emergency Response Plan and Implementation Procedures.
2. Destruction of all pages which have been superseded by the
revision.

Signature _____ Date _____