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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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ATOMIC SAFETY AND LICENSING BOARD

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BEFORE ADMINISTRATIVE JUDGES

Lawrence Brenner, Chairman
Dr. Richard F. Cole
Dr. Peter A. Morris

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of : Docket Nos. 50-352-OL
PHILADELPHIA ELECTRIC COMPANY : 50-353-OL
(Limerick Generating Station, : April 23, 1984
Units 1 and 2)

CITY OF PHILADELPHIA'S STATUS REPORT
ON ITS ISSUES OF CONCERN
IN THE AREA OF EMERGENCY PLANNING

Pursuant to the direction of this Board, the City of Philadelphia ("City") hereby submits the following report as to the status of its Issues of Concern pertaining to emergency planning associated with the licensing of the Limerick Nuclear Generating Station, Units 1 and 2.

Representatives of the Commonwealth of Pennsylvania ("Commonwealth" or "State") and the City have conferred and met on numerous occasions. The last meeting took place on April 11, 1984. In addition, other conferences have been held among the City, Commonwealth and Philadelphia Electric Company ("PECO"). This process of negotiation and discussion has been productive, useful, and informative. Many issues have been resolved--some through adoption by the Commonwealth of new aspects to the Emergency Plan, some through withdrawal of the issues initially filed by the City and some through increased understanding by the City of the issues. Not all issues, however, have been resolved as of

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this date. The City is hopeful that continuing discussions and the development of additional information will lead to resolution of most if not all of these concerns. The following is a summary of the current status of Philadelphia's issues of concern.

City-1 This issue of concern relates to guidance to the County for effectuation of sampling and provision of information as well as assistance in control of contaminated water and food.

A. With respect to the sampling of water, the Commonwealth has agreed to analyze for radioactivity, two samples per month from the City's Belmont Plant. This analysis will be of:

- (1) river silt settling in the raw water basin, and
- (2) chemically enhanced sludge from settling tanks.

These tests will be in addition to the existing on-going State-to-City test reporting procedures. For additional discussion see City-3, infra.

B. With respect to the sampling and control of food and agricultural products, on April 11, 1984, the Commonwealth provided the City with the Department of Agriculture's Plan for review and consideration. This review is not yet complete. In addition, the Commonwealth has indicated that it will incorporate into the State Plan, the following procedure:

- (1) The Bureau of Radiation Protection of the Commonwealth of Pennsylvania will initially describe the area of possible food contamination in the ingestion exposure pathway.

- (2) Notification of such determination will be given by Pennsylvania Emergency Management Agency ("PEMA") to the Philadelphia Office of Emergency Preparedness.

- (3) The Commonwealth (PEMA) will incorporate into the state plan, county plans, and operating procedures for state police that personnel manning access control points surrounding plume exposure pathway EPZ will stop all open trucks containing raw agricultural products from leaving the plume EPZ. State personnel will contact the State Agricultural Department which will sample produces for radioactivity and dispose of products in accordance with established State and Agriculture Department plans.

(4) The items on such open trucks will be sampled and tested, and only if found to be uncontaminated, will be permitted to pass.

(5) With respect to sampling, testing, reporting, confiscation of food products in Philadelphia, the Commonwealth has represented that it has only approximately 15 food inspectors to perform this function, at the food processor level, and that it expects that the City will use its complement of food inspectors to perform the same function. An additional matter pertains to unprocessed food in the open air markets in Philadelphia. The final determination on these matters is still under consideration and further discussions are to be had. See City-8 for discussion of training in this area.

City-2 This issue of concern deals with the resources available at the County (Philadelphia) level to assist the State in implementing controls on foods, foodstuffs and water. State action at Access Control Points and State food inspectors, and what the City is being requested to do, is discussed under City-1 and is still under consideration. For water-related control see City-3.

City-3 This issue of concern relates to sampling and notification associated with water contamination as well as (a) protection of supplies, (b) prevention of use of contaminated water and (c) alternative sources of water.

As described in City-1, the Commonwealth will perform two tests for the City in addition to the existing State-to-City test reporting procedures. The Commonwealth has also represented to the City that both air and water surveillance, monitoring, analyses and reporting will be done by the Bureau of Radiation Protection of the Department of Environmental Resources of the Commonwealth.

(a) On-going sampling applies to routine releases from the plant. Routine sampling and analyses will be continued by the Bureau of Radiation Protection (and PECO). The "in-place" system will remain with regular reports to the City.

(b) The Bureau of Radiation Protection will confer with the City's Water Department officials to arrive at a definition of a "non-routine" liquid discharge. If there is a "non-routine" discharge into the Schuylkill River, the

Commonwealth of Pennsylvania (PEMA) will notify the Philadelphia Office of Emergency Preparedness. The Bureau of Radiation Protection will sample, analyze and report contamination levels to the City Water Department expeditiously. The Commonwealth has represented to the City that the Commonwealth does have sufficient resources to perform the required tracking analysis from Limerick to the City's Water intakes and through to the taps, and, to report the results of analysis expeditiously. The tracking and time of reporting of analysis results will be evaluated by the City at the time of the July 25, 1984 exercise.

(c) Subsequent to any such "non-routine" liquid discharge, ad-hoc health-physics judgments will be made as to when to relax the procedures.

(d) The Pennsylvania Bureau of Radiation Protection is drafting a procedure, "Estimation of Liquid Release Consequences to Downstream Water Users." This procedure will contain the bases for decisions concerning the intake closing for downstream water users as will the calculation method for estimating downstream concentrations. The radioactive isotopes which Department of Environmental Resources measures in river water are tritium, Mn-54, Fe-59, Co-58, Co-60, Zn-65, ZrNe-95, I-131, Cs-124, Cs-137, and BaLa-140. The City will review this material when it is received and is reviewing the list of radioactive isotopes measured.

(e) The City has requested a water transport model to be able to predict the impact on Philadelphia's water supply of any "non-routine" liquid discharge and contaminants from precipitation after an accident on Philadelphia's water supply so as to determine what emergency measures may be required. This issue of concern remains unresolved. PEMA is to request PECO to supply the model and will also arrange a conference with PECO, the City, and appropriate state agencies regarding this item.

(f) The issue of concern relating to alternate sources of water has not been resolved. One alternative being discussed is reliance on surrounding communities. PEMA has agreed to arrange a meeting with the Pennsylvania Department of Environmental Resources, the City, and bordering communities to discuss this matter. Another planning issue is development by the City of an conservation plan appropriate to severe accident conditions.

With respect to notification, the Commonwealth has represented that it will incorporate the following procedure in its plan.

(a) In the event of an "unusual event" as defined by NRC procedures or any other (less severe) public notification circumstance (to be determined by PEMA), PEMA will first notify the Philadelphia Office of Emergency Preparedness which will then institute "in-City" notification procedures.

(b) If there has been some spill or release into the Schuylkill River, then in addition to notification, PEMA will also supply the name and telephone number of the responsible Pennsylvania Bureau of Radiation Protection official to the Philadelphia Office of Emergency Preparedness so that direct communications can be established.

(c) If there is a "site emergency" or "general emergency" the City's Water Department and Health Department officials are to be represented at PECO's

Emergency Operating Facility. (This is now pending a written confirmation letter agreement from PECO).

In addition, the Commonwealth has represented that it will cause the Bureau of Radiation Protection to provide to the City a list of water and air contaminants of concern; whereupon the City will assess its capability to analyze same, and then will make a determination whether additional equipment is required. Finally, the Commonwealth will ascertain what equipment, if any, has been provided from any source with regard to emergency planning for any other Pennsylvania nuclear facility. (See City-12 for additional discussion concerning water and air contaminant measurements.)

City-4 This concern relates to the sampling, testing and reporting of contamination of aquatic life in the food chain. The Commonwealth has represented that the Pennsylvania Fish Commission will sample, test and report on the status of aquatic life subsequent to a radiological incident. The City, however, remains concerned about the effects on aquatic life as a result of routine discharges into the Schuylkill over a period of time, as well as "non-routine" releases. Accordingly, the issue of testing only after a radiological incident is of continuing concern to the City. It is anticipated that further discussions will be conducted on this issue.

City-5 This item relates to the City's concern regarding medical and other protective measures. The Commonwealth has represented to the City that the list of support hospitals in Philadelphia to treat radiological cases has been reduced from 32 to 22. The issue as to whether the hospitals are equipped to handle these needs and whether the State should obtain specific agreements for these hospitals and medical services remains open. The necessity for any other protective measures is under review by the City.

City-6 This issue of concern deals with the prevention of distribution and consumption of contaminated processed food. This issue is discussed under City-1(B)(5) and is still under consideration with further discussions to be had.

City-7 This issue of concern relates to relaxation of protective actions and recovery.

With respect to relaxation of protective actions concerning air and water surveillance, monitoring and analyses following an incident, ad-hoc health-physics judgments will be made. As to processed food, this is more fully discussed under City-1(B)(5) and further consideration is to be given to that matter.

The Commonwealth represented that the Pennsylvania Department of Environmental Resources will provide to the City Water Department, references and recommended procedures to remove levels of radioactive contamination in a conventional water treatment plant, such as Philadelphia's. Upon receipt this material will be reviewed and analyzed by the City.

City-8 This issue of concern deals with training of personnel, exercise and drills. The Commonwealth has represented:

(a) that monitoring of the water system will be included in the July 1984 test;

(b) that the Commonwealth will provide all the monitoring services required to do the tracking from Limerick to the City water intakes and at the taps and well as testing thereof.

If deficiencies in the monitoring system are discovered in the July 1984 test or thereafter, appropriate modifications in the monitoring system will be discussed.

The Commonwealth has also represented that it will coordinate the administration of the following training to designated personnel of the City.

(a) By Bureau of Radiation Protection ("BRP"): an understanding of radioactive terminology, measurement and analysis and applicable water quality standards. There exists the need to know what type of radioactive emissions can be discharged from the Limerick Plant, what type of analysis is necessary to determine their concentrations and how to interpret the water quality data.

(b) By BRP: an understanding of the predictive models and assessment of time of travel and resultant contaminant concentrations in Philadelphia as caused by an incident at Limerick. It is the City's understanding that PECO has employed a computer model to assess the impact of an incident at Limerick upon water quality downstream in the Schuylkill River. The City requires an understanding of that model.

(c) By BPR: an understanding of the plan of action regarding the monitoring of the water quality resulting from an event, as well as the method of communication and projected delay in receipt of water quality data.

(d) PEMA has agreed to obtain PECO's consent that the City personnel will be permitted to attend PECO's training sessions, or, if PECO does not so agree, that PEMA or BRP will give the following training: an understanding of the methods of operation of the EOF at Plymouth Meeting and the on-site assessments groups, as they relate to water quality. The City needs to understand exactly how it is to interface with the above-mentioned groups. The City has requested that PEMA and PECO coordinate their efforts in order to provide this training program.

(e) By BPR: an understanding of the plan of action regarding transmission of incidents and water quality data to the press.

(f) Training for City Health Department officials in interpretation of data from air quality samples with regard to radiological releases shall be provided either by PECO, in conjunction with existing plans for training of state officials or by the State following the State's receipt of training from PECO.

The matter of training City personnel to inspect and control food products is subject to future discussions.

City-9 The City is without knowledge as to the status of the written agreements specified in NUREG-0654 Section II A (3) referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones, and therefore is of continuing concern to the City.

City-10 Withdrawn.

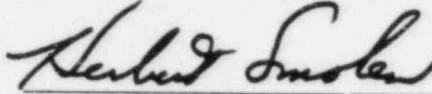
City-11 Withdrawn.

City-12 This issue of concern relates to protective actions for exposure from foodstuffs and water some of which have been previously discussed. It also concerns short and long term protective action guidance from airborne radioactive contaminants deposited on ground, property and equipment, and includes the effects on people, water and food by ingestion and inhalation under various climatic conditions, wind patterns and soil run-off (of water) scenarios. To a large extent, emergency planning (protective actions) relating to this issue of concern requires a more detailed analysis than the State indicates it has available. The City is in the process of conducting an analysis which will assist the City in assessing emergency planning concerns in a spectrum of situations. This analysis is expected to be completed shortly at which time further discussions and conferences will be conducted.

As can be seen from the foregoing status report, considerable progress has been made toward resolution of the City's issues of concern although certain

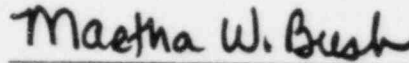
items still remain open for further consideration. The negotiation process is continuing with all parties participating in a cooperative mutual effort.

Respectfully submitted,

A handwritten signature in cursive script, reading "Herbert Smolen".

HERBERT SMOLEN

Deputy City Solicitor

A handwritten signature in cursive script, reading "Martha W. Bush".

MARTHA W. BUSH

Deputy City Solicitor

BARBARA W. MATHER
City Solicitor

Dated: April 23, 1984