



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

P.O. BOX 5000 - CLEVELAND, OHIO 44101 - TELEPHONE (216) 622-9800 - ILLUMINATING BLDG. - 55 PUBLIC SQUARE

*Serving The Best Location in the Nation*

MURRAY R. EDELMAN

VICE PRESIDENT  
NUCLEAR

April 28, 1984  
PY-CEI/NRR-0105 L

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

Perry Nuclear Power Plant  
Docket Nos. 50-440; 50-441  
Emergency Plan-OM-15A  
Revision 3

Dear Mr. Denton:

Enclosed are three (3) signed originals and thirteen (13) copies of the revised chapters of the Perry Nuclear Power Plant Emergency Plan, CEI Report No. OM-15A. This revision includes the modifications which resulted from the NRC review comments as outlined in SER Supplement 4, section 13. (See also January 11, 1984 and January 17, 1984 NRC letters forwarding staff comments on the Emergency Plan.) A cross-reference between the SER comments and the PNPP responses is attached. This submittal should resolve all of the concerns expressed in the SER supplement.

The enclosed pages replace in entirety those currently in the plan. This revision is in a format designed to keep current the license application and the Emergency Plan.

Very truly yours,

Murray R. Edelman  
Vice President  
Nuclear Group

MRE:kay

Enclosures

cc: Jay Silberg, Esq.  
John Stefano  
Max Gildner

8405020276 840428  
PDR ADOCK 05000440  
F PDR

A045  
1/16

Murray R. Edelman who, being duly sworn, deposed and said that (1) he is Vice President, Nuclear Group of The Cleveland Electric Illuminating Company, (2) he is duly authorized to execute and file this report on behalf of The Cleveland Electric Illuminating Company and as duly authorized agent for Duquesne Light Company, Ohio Edison Company, Pennsylvania Power Company and the Toledo Edison Company, and (3) the statements set forth therein are true and correct to the best of his knowledge, information and belief.

Murray R. Edelman

Murray R. Edelman

Sworn to and subscribed before me, this 28<sup>th</sup> day of April,  
1984.

Joanne Robinson

JOANNE ROBINSON, Notary Public  
State of Ohio - Lake County  
My comm. exp. Nov. 12, 1988

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of Duquesne Light Company,  
Ohio Edison Company, Pennsylvania Power Company,  
The Cleveland Electric Illuminating Company  
The Toledo Edison Company,  
Perry Nuclear Power Plant, Units 1 & 2  
Docket Nos. 50-440 and 50-441

---

CERTIFICATION OF SERVICE

This is to certify that a copy of Revision No. 3 to the Emergency Plan, CEI Report No. OM-15A for Perry Nuclear Power Plant, Units 1 and 2, dated April 28, 1984, has been served on the following Federal, State and Local Officials, by deposit in the United States Mail, addressed as follows:

Federal Activities Branch  
U.S. Environmental Protection Agency  
Region V Office  
230 South Dearborn Street  
Chicago, Illinois 60604

Ohio Department of Health  
Attn: Radiological Health Program  
Directory  
P.O. Box 118  
Columbus, Ohio 43216

Honorable Laurence Logan, Mayor  
Village of Perry  
4203 Harper Street  
Perry, Ohio 44081

Honorable Robert V. Orosz, Mayor  
Village of North Perry  
North Perry Village Hall  
4778 Lockwood Road  
North Perry Village, Ohio 44081

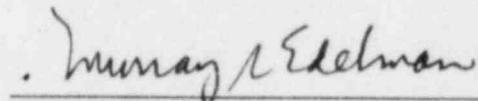
Mr. Arthur Warren, Chairman  
Perry Township Board of Trustees  
4169 Main Street  
Perry, Ohio 44081

Mr. Jim Williams  
Nuclear Preparedness Officer  
State of Ohio Disaster Services Agency  
ODSA, Adjutant General Department  
2825 West Granville Road  
Worthington, Ohio 43085

Mr. Michael Wheeler, Emergency Coordinator  
Ashtabula County Disaster Services Agency  
25 West Jefferson  
Jefferson, Ohio 44047

Mr. Dale Wedge, Director  
Geauga County Disaster Services  
Agency  
13281 Painesville-Ravenna Road  
Geauga County Safety Center  
Chardon, Ohio 44024

Al Stewart, Director  
Lake County Disaster Services  
Agency  
39 Fairdale Street  
Painesville, Ohio 44077



---

Murray R. Edelman  
Vice President  
Nuclear Group

CROSS-REFERENCE BETWEEN SER SUPPLEMENT 4 COMMENTS AND PNPP EMERGENCY PLAN

<u>SER Supplement 4 Comment</u>	<u>PNPP Plan Section</u>
13.3.2.2 (1)	Table 5-1; *
(2)	5.2.2.4; 6.1.3
(3)	5.2.2.1; 5.2.2.3; 5.2.2.4
(4)	5.2.1; 5.2.2.1; 5.2.2.3; 5.2.2.4; 6.1.2
13.3.2.3 (1)	5.4.4
(2)	7.3.9
(3)	7.3.9
13.3.2.4 (1)	Table 4-1; *
(2)	8.2
(3)	4.1.4; 6.4.3; *
13.3.2.5 (1)	6.4.2
(2)	7.2.5
13.3.2.6 (1)	7.2.2; Figure 7-6
(2)	7.2.2.8
13.3.2.7 (1)	8.4.1.1
(2)	7.1.4
13.3.2.8 (1)	5.2.3
(2)	Appendix C; 8.3; *
(3)	7.3.7
(4)	*
13.3.2.9 (1)	5.2.2.4; Table 5-1
13.2.2.10 (1)	6.4.1; Figure 6-7
(2)	6.5.3; Appendix C; 6.4.1
(3)	*
13.3.2.11 (1)	6.5.1
(2)	6.5.3; 6.4.4.1; Appendix C
13.3.2.12 (1)	5.3.3.2; 5.3.3.3; *
(2)	6.5.3; 8.1.3
13.3.2.14 (1)	8.5.4.2
(2)	8.5.4.1
(3)	8.5.4.3; *
13.3.2.15 (1)	8.1.3
13.3.2.16 (1)	8.2
(2)	8.2; *
(3)	Appendix F

\*Clarification is provided in attached pages.

- (1) The applicant's concept of augmented shift staffing, with respect to health physics capabilities, is not consistent with the guidance found in Table 2 of Supplement 1 of NUREG-0737. The applicant should either change their concept to be consistent with the guidance or provide alternative means for achieving the goals set forth in the guidance.

#### RESPONSE

Table 5-1 of the PNPP Emergency Plan has been revised to be consistent with the guidance found in Table 2 of Supplement 1 of NUREG-0737. One area where this may still not appear clear is Radiological Accident Assessment. The 60 minute column of Table 5-1 indicates that the Chemistry Unit Supervisor will be fulfilling this function. This is because at PNPP, the Chemistry Unit is responsible for routine offsite dose assessment instead of Health Physics as is the case at most other plants. Therefore, in keeping with the policy of assigning responsibilities during an emergency to reflect normal functions, the Chemistry Unit Supervisor will perform emergency dose assessment.

13.3.2.4      Emergency Classification System

- (1) The plan should incorporate into the PNPP emergency classification scheme the comments forwarded to the applicant (Youngblood: January 11, 1984).

RESPONSE

The comments forwarded in Youngblood: January 11, 1984 have been addressed on Table 4-1 of the PNPP Emergency Plan with the exception of the comment on Site Area Emergency initiating condition 15b. This was not incorporated because the location of PNPP and the design of the intake structure preclude the sensitivity to low lake level that may be true at other coastal sites.



- (3) Protective action recommendations based on the potential for release of radioactive materials should be more thoroughly discussed in the plan. Specifically, the plan should discuss: (1) other non-radiological means of core status determination; (2) the relationship between gap activity and percent failed fuel as it relates to protective action recommendations; and (3) how the core status graph found in Figure 4-1 of the plan will be used in the emergency action level scheme.

#### RESPONSE

Protective action recommendations based on the potential for a release are more thoroughly discussed in Sections 4.1.4 and 6.4.3 of the Emergency Plan. Specifically these discussions relate the curves of Figure 4-1, which provide indication of gap activity and percent failed fuel, to specific protective action recommendations.

#### NOTE TO REVIEWERS:

Part (1) of this finding has been withdrawn by the NRC (See Youngblood: February 29, 1984).



13.3.2.8

Emergency Facilities and Equipment

- (2) The plan should indicate that emergency equipment and supplies will be available in the Control Room. Further, calibration frequency for emergency equipment should be specified, and the plan should indicate that instruments removed from service will be replaced with a comparable instrument.

RESPONSE

Emergency equipment and supplies available in the Control Room are discussed in Appendix C of the PNPP Emergency Plan and Section 8.3 of the PNPP Emergency Plan discusses calibration of emergency instruments.

NOTE TO REVIEWER:

The request for specification of calibration frequency has been withdrawn by the NRC (See Youngblood: February 29, 1984).

13.3.2.8

Emergency Facilities and Equipment

- (4) The applicant should provide a commitment that the permanent emergency response facilities and equipment will be operational prior to fuel loading, or that adequate interim facilities and capabilities will be in place.

RESPONSE

Commitments regarding the completion of emergency response facilities were provided in CEI Letter PY-CEI/NRR-0032L of April, 15 1983 from M. R. Edelman to B. J. Youngblood in response to Generic Letter 82-33.

- (3) The evacuation time estimate study should address the effects of adverse weather (i.e., a thunderstorm) on a Summer Sunday evacuation. Also, the plan should indicate that the evacuation time estimates have been reviewed by the appropriate State and local officials.

#### RESPONSE

The evacuation time estimate study for PNPP has been reevaluated. The most recent draft of this new study is included as Appendix D to the PNPP Emergency Plan. This draft is currently being reviewed with State and local officials and a letter of concurrence is expected from each. This draft study is being submitted at this time to allow adequate time for staff reviews. We expect only minor changes to occur between this draft and the final.

13.3.2.12 Medical and Public Health Support

- (1) A letter of agreement with the Northwestern Memorial Hospital should be included in the plan.

RESPONSE

Section 5.3.3.2 has been revised to clarify the point that the agreement with Northwestern Memorial Hospital is made by Radiation Management Corporation and not by PNPP. Section 5.3.3.3 indicates that PNPP maintains an agreement with Radiation Management Corporation for emergency medical assistance.

#### 13.3.2.14 Exercises and Drills

- (3) The plan should indicate that part of each communication drill will involve evaluating the aspect of understanding the contents of the message.

#### RESPONSE

Section 8.5.4.3 has been revised to indicate that the ability of emergency response personnel to understand and transfer messages over the various communication systems will be evaluated during the Annual Emergency Plan Exercise rather than during each communication drill. The PNPP interpretation of the more frequent communications tests is that these tests are to ensure operability of the systems not to evaluate personnel performance.

13.3.2.16      Responsibility for the Planning Effort: Development,  
Periodic Review, and Distribution of Emergency Plans

- (2) The administrative procedures used to revise and update the Emergency Plan and implementing procedures should be described in more detail. Particularly, the plan should indicate that revised pages are dated and marked to show where changes have been made.

RESPONSE

Section 8.2 has been revised to provide more detail on revisions and updates to the Emergency Plan and implementing instructions. The PNPP Administrative Procedures provide for pages to carry a revision number and indication of where changes were made, in that revision by side bar. The date of revision is indicated on the title page.