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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 MAY 29 11:51

Before the Atomic Safety and Licensing Board

In the Matter of)
)
Philadelphia Electric Company) Docket Nos. 50-352 OC
) 50-353 OC
(Limerick Generating Station,)
Units 1 and 2))

OFFICE OF SECRETARY
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BRANCH

SUPPLEMENT TO APPLICANT'S MOTION TO SUBSTITUTE
CERTAIN ONSITE EMERGENCY PLAN IMPLEMENTING PROCEDURES
IN EXHIBIT 33

On May 4, 1984, Applicant filed a motion requesting the Board to substitute seven revised implementing procedures for those offered in evidence as part of Applicant's Exhibit 33. On May 7, 1984, the Licensing Board requested Applicant to provide "some better identification of what the changes are in the updated procedures, so we can decide if there is any material change beyond the hearing time frame; and that would have to be annotated in some fashion." (Tr. 10296)

Attached as Appendix A are a series of tables which enumerate each of the changes made in the procedures as requested.

Respectfully submitted,

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May 25, 1984

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Supplement to Applicant's Motion to Substitute Certain Onsite Emergency Plan Implementing Procedures in Exhibit 33," in the captioned matter have been served upon the following by deposit in the United States mail this 25th day of May, 1984:

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U.S. Nuclear Regulatory	Commission
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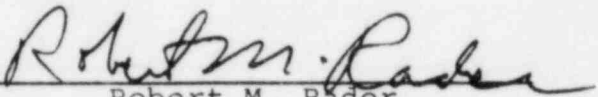
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<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-102	Unusual Event Response	2
<u>Step</u>	<u>Change</u>	
2.1	Added "unless Emergency Director is present" to clarify assumption of role. Capitalized "Unusual Event".	
4.1	Added "EP-101, Classification of Emergencies has been completed" to strengthen sequencing between EP-101 and EP-102.	
9.1	Actions capitalized and underlined.	
9.1.1.1	Added "unless determination has just been made" to reduce non-productive reclassification of the event.	
9.1.1.2	Added "Shift Supervision to initiate" to match the active party in EP-303.	
9.1.1.3	Added "if necessary" to avoid duplication of calls.	
9.1.1.4	Changed "commence" to "complete" to make indication that task completion is required on a more definite note. Adds "at higher level classifications" to give additional information.	
9.1.1.7	Corrected title from "Fire and Damage Team Leader" to "Fire and Damage Control Team Leader".	
9.1.1.9	Added step to provide an interface with EP-208.	
9.2	Capitalized and underlined follow-up.	
9.2.1.2	Added "at higher level classifications" to give additional information.	
9.2.1.3.a	Corrected Shift Chemist to Shift Chemistry Technician.	
9.2.1.3.d	Added step to ensure notifications are completed and results returned to (Interim) Emergency Director.	
9.2.1.4	Corrected "any" to "an".	
9.2.2 & 9.2.2.1	Added steps as a companion step to 9.2.1.3.d and to clarify Communicator's duties.	
10.7	Corrected procedure title.	

<u>Step</u>	<u>Change</u>
102-1	<p>Contracted Limerick Generating Station to LGS.</p> <p>Added a blank for a title or name of appropriate person.</p> <p>Added "24 hour time" and "date" to indicate what should be in blanks.</p>
102-2	<p>Deleted extra blank lines.</p>
102-3	<p>Added "unless already notified by the Interim Emergency director" to reflect step 9.1.1.3.</p> <p>Added new access code to Centrex telephone.</p> <p>Reversed order of Pennsylvania Emergency Management Agency and Montgomery county calls to reflect order in Annex E, Disaster Operations Plan.</p> <p>Added new access code.</p> <p>Added new access code.</p> <p>Added "communicator: Inform (Interim) Emergency Director when notifications are completed." to reflect addition of 9.2.2.1.</p>

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-103	Alert Response	2
<u>Step</u>	<u>Change</u>	
4.1	Added "EP-101, Classification of Emergencies, completed" to strengthen sequencing between EP-101 & EP-103.	
9.1.1.1	Added "unless determination has just been made" to reduce non-productive reclassification of the event.	
9.1.1.2	Combined content of 9.1.1.2 and 9.1.1.3 of Revision 1 to make a single decision step of the assembly/evacuation options. Added the "assembly without accountability" and the "assembly with accountability" to reflect the change in EP-110.	
9.1.1.3	Step number changed due to previous change.	
9.1.1.4	Deleted "If necessary and". Added "Site Evacuation or" and "depending on plant conditions" to provide more options and a decisional basis.	
9.1.1.5-8	Step number changed.	
9.1.1.9	Deleted reference to Instrument and Control Technician as this is covered in EP-201.	
9.1.1.11	Expanded note to clarify action.	
9.1.1.12	Added title of security contact and number so Emergency Director knows who he's contacting.	
9.1.1.13	Corrected job title from "Shift Chemist" to Shift Chemistry Technician".	
9.1.1.14-18	Changed step number.	
9.2.1.4.a	Added "from Security Team Leader" to parallel structure of rest of step.	
9.2.1.4.g	Added step to ensure notifications are completed and results returned to Emergency Director.	
9.2.1.7.	Reworded step to provide more direction to (Interim) Emergency Director.	
9.2.2, 9.2.2.1	Added steps as companion steps to 9.2.1.4.g and to clarify communicator's duties.	
10.21	Corrected title of EP-260.	

<u>Step</u>	<u>Change</u>
10.23	No change.
103-1	Added "24 hr clock time", "date" to indicate use of blanks.
103-4	<p>A. Added "unless already notified by (Interim) Emergency Director to prevent unnecessary duplicate calls,</p> <p>B. Added new access code to Centrex telephone.</p> <p>C. Reversed order of (1) & (2).</p> <p>Added "Communicator: Inform Emergency Director when notifications are complete". to reflect 9.2.2.1.</p>

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-104	Site Emergency Response	2
<u>Step</u>	<u>Change</u>	
4.1	Added "EP-101, Classification of Emergencies, completed to strengthen sequencing between EP-101 and EP-102.	
9.1.1.1	Added "unless determination has just been made" to reduce non-productive reclassification of event.	
9.1.1.2	Reworded to provide more direction as to actions to be taken and to reflect changes in EP-110.	
9.1.1.3, 4	Changed the page placement.	
9.1.1.5	Added step to cover evacuation of construction personnel without evacuation of operating personnel.	
9.1.1.6, 7	Changed step number.	
9.1.1.8	Reworded to simplify action to be taken by person on "red phone".	
9.1.1.9	Changed step number.	
4.1.1.10	Deleted reference to Instrument and Controls Technician as this is covered in EP-201.	
9.1.1.11	Spacing changed to put EP-203 on 1 line.	
9.1.1.12	Added step to shorten amount of time needed to activate the EOF by having people called while Dose Assessment team leader is enroute.	
9.1.1.13	Step number changed and note clarified.	
9.1.1.14	Added title and number to let the Emergency Director know who he's calling.	
9.1.1.15	Step number changed and job title corrected.	
9.1.1.16-18	Step number changed.	
9.1.1.19	Step number changed and team title corrected.	
9.1.1.20	Step number changed.	

<u>Step</u>	<u>Change</u>
9.2.1.4	<ul style="list-style-type: none"> a. Added "from Security Team Leader" to parallel structure of remainder of step. b. Job title correction f. Team title correction. g. Added to ensure notifications are completed.
9.2.1.8	Reworded to clarify action.
9.2.1.9	Added step to give procedural responsibility, given in Emergency Plan.
9.2.2(Old)	Moved to EP-120.
9.2.2.2	Added step to parallel 9.2.1.4.g and clarify communicator's duties.
10.19	Title correction.
EP-104-1	Added "24 hr clock time" and "date" to indicate use of blanks.
EP-104-4	<ul style="list-style-type: none"> a. Added "unless already notified by (Interim) Emergency Director" to reduce unnecessary duplicate calls. b. Added new access code. c. Reversed (1) & (2). <p>Added "Communicator: Inform Emergency Director when notifications are completed" to reflect step 9.2.2.1</p>

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-105	General Emergency Response	2
<u>Step</u>	<u>Change</u>	
4.1	Added "EP-101, Classification of Emergencies, completed." to strengthen sequencing between EP-101 and EP-105.	
9.1.1.1	Added "unless determination has just been made" to reduce non-productive reclassification of the event.	
9.1.1.2	Added a comma between 305 and Site. Added cautionary note to provide additional option.	
9.1.1.3	Simplified wording.	
9.1.1.6	Changed "commence" to "complete" to emphasize that completion is necessary. Reworded to simplify action to be taken by person on "red phone".	
9.1.1.7	Changed to place bases on procedure not emergency level.	
9.1.1.8	Deleted reference to Instrument & Control Technician since this is in EP-201.	
9.1.1.9	Added a source for necessary phone number.	
9.1.1.10	Added step to reduce activation time for EOF as calls can be made while Dose Assessment Team leader is enroute.	
9.1.1.11	Changed step number and note clarified.	
9.1.1.12	Added title and phone number so identity of person being contacted is known.	
9.1.1.3	Job title corrected.	
9.1.1.14-16	Step number changed.	
9.1.1.17	Team title corrected.	
9.1.1.18	Step number changed.	
9.2.1.4.a	Changed to parallel structure of rest of step.	
g	Added step to ensure completion of notifications.	
9.2.1.8	Reworded and expanded to provide more options.	
9.2.1.9	Added step to provide procedural responsibilities given in the emergency plan.	

<u>Step</u>	<u>Change</u>
9.2.2(Old)	Moved to EP-120.
9.2.2, 9.2.2.1	*Added step as companion steps to 9.2.1.4 g and to clarify communicator's responsibilities.
10.19	Corrected procedure title.
10.21	Added missing reference
105-1	Added "24 hr clock time" and "date" to indicate use of spaces.
105-2	Added (INTERIM) that was missed in Revision 1.
105-4	a. Added "unless already notified by Emergency Director" to reduce duplicate notifications b. Added new access code, to Centrex telephones. c. Reversed (1) & (2). e. Added "make this phone call last and remain on telephone until NRC disconnects" to reflect step 9.1.1.6 change. Added "Communicator: Inform (Interim) Emergency Director when notifications are complete" to reflect step 9.2.2.1

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-110	Personnel Assembly and Accountability	1
<u>Step</u>	<u>Change</u>	
1.0	Deleted the following wording after "accountability", "of Peco personnel and contractors is required when an Alert of partial plant evacuation is declared". Reason: This is stated in 7.0 Action level of Procedure.	
2.1	Change "PECo personnel and contractors to "Personnel" deleted "for purposes of accountability" and added "or as otherwise directed". Reason: To clarify that there are alternate emergency assembly areas that can be used.	
2.2	Added "when required", after "Emergency Assembly Area Coordinator". Changed "of personnel at the designated area" to "of personnel at their areas". Deleted "and report missing persons to Security" after the wording of "designated area".	
2.3	Changed "2.3" to "2.4" and added a new step "2.3" to explain Bechtel and sub-contractor responsibilities during accountability.	
2.4	(Originally 2.3 in Rev. 0). Changed "a list of missing persons" to "a list of unaccounted for persons". Added "when accountability checks are required" after "persons" - Explain only when assembly with accountability is done that checks are required. Added the "(Interim) Personnel Safety Team Leader".	
2.5	(Originally 2.4 in Rev. 0). Added "Interim" to "Emergency Director". Added "Interim" to "Personnel Safety Team Leader". Corrected "the Search and Rescue Group" to "First Aid/Search and Rescue Group". Changed "missing personnel" to "unaccounted for personnel".	
7.0	Added after "an Alert" the following "Site Emergency, General Emergency, Partial Plant Evacuation". Reason - to clarify when this procedure should be enacted. Changed and capitalize "After a site evacuation is declared, this procedure no longer applies" to "Accountability section of this procedure <u>do not</u> apply during a site evacuation". Reason - to clarify when sections of this procedure are not applicable and personnel assembly locations are still being used.	

<u>Step</u>	<u>Change</u>
9.1	Added explanatory note to clarify when personnel assembly will be enacted after announcements.
9.1.1	Added steps to establish two types of assembly: <ul style="list-style-type: none"> a. Assembly without accountability (emergency teams report to assembly area - others standby (step 9.1.1, Rev. 1). b. Assembly with accountability (emergency teams report to assembly areas - others leave the protected area (step 9.1.2 Rev. 1).
9.1.3	(Originally 9.1.2 of Rev. 0).
9.1.3.1	Changed steps to establish action steps for assembly without accountability and assembly with accountability. <ul style="list-style-type: none"> 9.1.3.1 - Assembly without accountability. 9.1.3.2 - Assembly with accountability.
9.1.3.2	Expanded on how to do an accountability check at assembly area for Emergency Assembly Area Coordinators.
9.1.4	(Originally 9.1.3 of Rev. 0) <ul style="list-style-type: none"> Added steps to establish security actions for assembly without and with accountability. 9.1.4.1 Assembly without accountability. 9.1.4.2 Assembly with accountability.
9.2.1	Added "(Interim)" in front of "Emergency Director" and deleted Interim Emergency Director.
9.2.1.1	Changed "missing personnel" to "unaccounted for personnel".
9.2.1.2	Added "(Interim)" to "Personnel Safety Team Leader".

Appendix EP-110-1, Emergency Assembly Areas

- 1) Changed the following groups to leave the protected area for accountability purposes.
Bechtel/Subcontractors in Restricted Area

Step

Change

- PECo Field Engineers
- Administration Staff and Unescorted Visitors
- Escorted Plant Visitors (Note 1)
- 2) Added assembly areas for Maintenance and I&C Technicians
- 3) Added Note relating to OSC habitability (Note 2).

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-208	Security Team Activation	1
<u>Step</u>	<u>Change</u>	
2.1	Added "designated" to indicate who may assume role.	
3.2	Added Appendix EP-208-2 containing material from EP-254.	
5.1	Added material from EP-254.	
7.0	Added "Whenever a personnel assembly is announced" to cover their use in EP-110. Capitalized Site Evacuation.	
3.9.1	Changed "Immediate Actions" to "Actions" per change in A-21.	
9.1.1.2	Expanded and reworded to allow delegation of making actual call.	
9.1.1.3	Changed wording to make it assignment of group leaders not the entire group. Added note to provide for transition from Interim team leader to team leader.	
9.1.1.4	Added step to ensure personnel are properly equipped.	
9.1.1.5-6	Added duties of Interim team leader that were listed previously only under team leader.	
9.2.1.4	Resequenced from 9.2.1.7.	
9.2.1.5	Added step with information from EP-254 to reduce number of procedures the Security team must work with. (Same for rest of EP-254 inclusions).	
9.2.1.6	Added step as interface to EP-102 through EP-105 follow-up.	
9.2.1.7	Added step to provide a point of interface for PP's.	

<u>Step</u>	<u>Change</u>
9.2.2.1	Added step to indicate by whom they are activated.
9.2.2.2	Added step to describe communications and added location of traffic vest from EP-254.
9.2.2.3	Changed wording clarify action. Added note to give information removed from step's text.
9.2.2.4	Added step for duty not previously covered.
9.2.2.5.a	Moved list to EP 208-2 table.
b	Added to be consistent with EP-305 (from EP-254)
c	Reworded to clarify duty when computer is operating.
9.2.3.1	Added step because of changes in EP-110.
9.2.3.2.a	Reworded to reflect changes to 9.2.2
b	Reworded to interface with Bechtel Procedure.
c	Reworded to clarify action required.
e	Added to provide information for Emergency Director and Personnel Safety Team Leader.
9.2.4.2	Added "(see EP-110)".
EP-208-2	Added table to include information from EP-254.

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-230	Chemistry Sampling and Analysis Team Activation	1
<u>Step</u>	<u>Change</u>	
1.0	Added "required to activate" Chemistry Sampling and Analysis Team.	
2.3	Changed "direct members <u>by</u> performing "to direct members <u>to</u> perform."	
3.3	Deleted appendix to EP-230-3 "Offsite Post Accident Sampling Analysis" and moved offsite sampling procedure to EP-244, Rev. 0.	
7.1	Added "(Interim)" Emergency Director activates Chemistry Sampling and Analysis Team.	
8.2	Changed "the" Health Physics Tech to "a" Health Physics Tech.	
9.1	Changed "Immediate Actions" to "Actions"	
9.1.1.1	Added "(Interim)" to Chemistry Sampling and Analysis Team Leader.	
9.1.2	Changed "Chemistry Sampling & Analysis Team Leader " to "Senior Shift Chemistry Technician" (who is the Interim Chemistry Sampling and Analysis Team Leader).	
9.1.2.1	Moved note about minimizing exposure if chem lab habitability is degraded.	
	Added where to report if laboratory is uninhabitable-2nd floor Admin.	
9.1.2.2	Added Interim Chem Sampling & Analysis Team Leader assuming role after discussion with Emergency Director and note that Team Leader will relieve him once fully cognizant of situation.	
9.1.2.5	Added step for Team Leader to request Emergency Exposure authorization from the Emergency Director as required.	
9.1.3.1	Added that the Group Leader assembles group "at the Cold Chem Lab".	
	Changed "Ensure that a Health Physics Technician or Health Physics Qualified Chemistry Technician is available" to "request a Health Physics Technician from the Plant Survey Group Leader in the OSC."	

<u>Step</u>	<u>Change</u>
9.1.3.2	Added step for Group Leader to evaluate sample condition and or locations and instruct group members to take the necessary samples using indicated procedures.
3.7	Added step for Group Leader to have member's doses evaluated to ensure that members don't exceed guidelines without prior approval of (Interim) Emergency Director.
9.1.3.8	Added steps for Chem Sampling and Analysis Group Leader to request Team Leader to obtain emergency exposure authorizations from the (Interim) Emergency Director.
9.1.4.2	Added for members to "collect and analyze samples as directed by Group Leader".
9.2.1.1	Changed step so that Chemistry Sampling and Analysis Team Leader reports results to Emergency Director and Dose Assessment Team Leader and took out Rad Protection Team Leader.
9.2.1.2	Changed step to provide group leaders (not members) with periodic status changes etc.
9.2.1.3	Put off-site analysis in separate procedure EP-244, Off Site Analysis of High Activity Samples instead of Appendix EP-230-3.
9.2.2.2	Added Group <u>Leaders</u> will inform group members of status changes.
9.2.2.3	Added step Group Leader will request augmentation personnel from Team Leader as required.

<u>Procedure</u>	<u>Title</u>	<u>Rev.</u>
EP-303	Local Evacuation	2
<u>Step</u>	<u>Change</u>	
1.0	Changed word "provide" to "define" steps necessary to be taken by site personnel in the event that a local evacuation is required... deleted (due to a localized uncontrolled hazard-.	
4.1	Added Prerequisite - "Implementation of EP-101, Classification of Emergencies is not required."	
9.1.1	Added "if radioactive contamination is suspected remain at a safe area until frisked by HP."	
9.2	Changed "Follow-up Actions" to "Follow-up."	
9.2.1.1	Added "Ensure that all personnel who have left the area are not contaminated."	
9.2.1.3	Changed the word "problem" to "occurrence".	
9.2.1.4	If problem cannot be contained... added "consult EP 101" before "and direct evacuation of other areas".	