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MURRAY R. EDELMAN
VICE PRESIDENT
NUCLEAR

August 20, 1984
PY-CEI/NRR-0135 L

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

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Clarifications to Revision 3
Submittal of the Emergency
Plan OM-15A

Dear Mr. Denton:

The third revision of the Emergency Plan for Perry Nuclear Power Plant (PNPP) which was submitted on April 28, 1984 included changes which resulted from the NRC review comments as outlined in Safety Evaluation Report (SER) Supplement 4, Section 13. Additional clarification is provided on several of the items previously addressed in that revision. The necessary clarifications are individually addressed in the attachments to this letter. Those clarifications which include changes to the Emergency Plan will be incorporated into Revision 4 of the Plan. The attachments follow the format of the SER to facilitate review and resolution in a future SER supplement. Please contact us if there are any questions.

Very truly yours,

A. Kaplan for M. Edelman
Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

cc: J. Silberg, Esq.
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13.3.2.2 (1) and 13.3.2.9 (1)

Table 5-1 of the Emergency Plan will be revised to more accurately reflect present plans for Radiation Monitoring Team (RMT) staffing. The RMT's are composed of one (1) Radiation Protection Section Technician and one (1) I & C Technician. The RMT's are responsible for monitoring all areas from the Protected Area fences out to the EPZ boundary. This includes both onsite (out-of-plant) and offsite areas. Table 5-1 will reflect staffing of one team (2 individuals) at 30 minutes and an additional two teams (4 individuals) at 60 minutes. Each team will have a radio equipped vehicle and the equipment necessary to perform field surveys (see RMT Kit contents; OM15A Appendix C). This allows the teams to be utilized in all areas of the EPZ in order to effectively monitor for radioactive releases.

13.3.2.3 (2) and (3)

The PNPP Post-Accident Sampling System (PASS), including descriptions of the system's radiation detection capabilities, the capabilities of the laboratory equipment in the TSC and EOF, and the provisions for backup lab facilities for analyzing high level samples are detailed in our September 16, 1983 and October 14, 1983 submittals on "TMI Action Plan Item II.B.3.; Post Accident Sampling System." The NRC Staff's assessment and resolution of the PASS is contained in Section 9.3.2 of SER Supplement 4.

13.3.2.4 (1)

Table 4-1 details the Initiating Conditions and Emergency Action Levels (EAL's) used for determining emergency classifications. In the first EAL listed under the Site Area Emergency classification, the use of AND logic rather than OR logic is necessary to preclude the unwarranted declaration of a Site Area Emergency that could result from either case being exceeded as a result of a non-emergency condition. The second EAL listed under the Site Area Emergency classification will be revised in Revision 4 of the Emergency Plan as follows:

a. Reactor water level below TAF AND;

1). Very high coolant activity as indicated by confirmed reactor water sample results of 300 uCi/gm dose equivalent I-131;

OR

2.) Containment High Range Radiation Monitor above curve 3 of Figure 4-1;

OR

3.) Main Steam Line Radiation Monitor reading greater than 3.6 x full power background.

13.3.2.5. (1)

Current drafts of the Standard Operating Procedure (SOP) for the Emergency Communications Center (ECC) provide instructions to the ECC Watch Commander in the event of a rapidly escalating emergency. If one of the County Commissioners or the Disaster Services Agency Director cannot be reached within a limited time of the notification (12 minutes), the ECC Watch Commander will act appropriately in accordance with his instructions as outlined in the SOP for activation of the sirens and EBS messages.

13.3.2.4 (2)

The third paragraph of Section 8.2 of the Emergency Plan will be revised as follows:

"The PNPP Emergency Plan, including appended letters of agreement and Emergency Action Levels will be reviewed and agreed upon by State and local officials, and will be reviewed at least annually thereafter."

13.3.2.6 (1)

Figure 7-6 will be revised to delete the "OPX (Dimension) Conference Loop" and "PBX (Kolm) Conference Loop."

13.3.2.6 (2)

Section 7.2.2.8 will be revised as follows:

7.2.2.8 Medical Support

Communications between PNPP and the Perry Township Fire Department are via telephone. Communications between PNPP and Lake County Memorial Hospital, East are via telephone. Communications between the Perry Township Fire Department's ambulance and Lake County Memorial Hospital, East are via radio.

13.3.2.8 (2)

The second paragraph of Section 8.3 in the PNPP Emergency Plan will be revised to read "Emergency equipment will be calibrated using approved PNPP calibration instructions at the same frequency as equipment in routine use." In addition, the Plan will be revised to indicate that the following equipment will be available to the control room for emergency use:

- 10 Full sets of protective clothing
- 10 0-5R dosimeters
- 8 Self-Contained Breathing Apparatus with plug-in capability.
- 1 High Range Survey meter (ion chamber) 1 mR/HR to 50 R/HR range.

13.3.2.8 (3)

A letter of agreement is being obtained from the Cleveland-Hopkins branch of the National Weather Service to provide back-up meteorology for PNPP. Section 7.3.7 will be revised to reflect this and a copy of the letter will be included in Appendix B of the Plan.

13.3.2.14 (1)

Section 8.5.4.1 of the Emergency Plan will be revised as shown below:

1. (No change).
2. The degree of participation by State and local agencies will be in accordance with Federal Regulations. Each exercise will include testing of the Prompt Alerting System.
3. (Delete)
4. (Renumber as #3, otherwise no change).

13.3.2.14 (3)

Section 8.5.4.3 of the Emergency Plan will be revised so that #5 will read
"Each Communications Test listed above will involve evaluating the aspect of
understanding the contents of the message including a check of hardware, voice
quality and message clarity."