

The Light company

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December 26, 1984
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File Number: G9.8

Mr. D. G. Eisenhower, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhower:

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Electric Generating Station
Emergency Management Plan

Enclosed for NRC review and approval are thirteen (13) copies of the South Texas Project Electric Generating Station Emergency Management Plan. Three (3) additional copies are being transmitted to R. D. Martin (NRC Region IV). This Plan has been prepared in accordance with NRC requirements and documents the emergency planning and preparedness for the South Texas Project. This Plan supersedes the previously docketed South Texas Project Emergency Plan.

Before NRC initiates the review of the enclosed Plan, we believe a meeting with the reviewers to help familiarize them with the South Texas Project, background and historical information, and the overall emergency planning effort would be beneficial. Such a meeting would also help to facilitate the review as well as familiarize our emergency planning staff with the NRC reviewers, review process and potential concerns regarding the Plan. We will contact the NRC Licensing Project Manager for the South Texas Project to establish a schedule for this meeting. We are also ready to meet with the NRC reviewers at any time during the review that it is necessary to resolve comments.

We believe that the enclosed Plan complies with the intent of the NUREG 0654 criteria for emergency planning. In your review you will notice that owing to the remote location of the South Texas Project site from populated areas it is not possible for some off-duty emergency response personnel to

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drive to the site in 30 minutes. Our studies of drive times from the major population centers near the site indicate that 45 minutes will be required under normal conditions for response of the following off-duty personnel:

- 1) Health Physics Supervisor,
- 2) Six Health Physics Technicians,
- 3) One Shift Administrative Assistant,
- 4) One Instrument and Control Technician,
- 5) One Electrical Maintenance Technician, and
- 6) One Nuclear Engineer.

The South Texas Project is a remotely located site which is a significant advantage to the public health and safety, but which precludes a 30 minute response time for the above off-duty personnel.

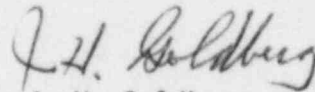
The following items are not in the Plan at this time and will be provided in a future update to the Plan.

- 1) The exact location of the Media Information Center (6.1.5)
- 2) The Site layout (Attachment 5)
- 3) Site Evacuation Routes (Attachment 17)
- 4) The layouts for the Technical Support Center, Operations Support Center, and Site Access Facility (Attachment 19)
- 5) Several parameters to be included in the Emergency Action Levels (Attachment 13)

Also enclosed is a copy of the objectives for the 1986 emergency exercise at the South Texas Project. We are submitting these objectives for your review and approval.

If you have any questions concerning this issue, please contact Mark McBurnett at 512-972-3651, extension 6054.

Very truly yours,



J. H. Goldberg
Vice President
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MAM:ggs

- Enclosures:
- 1) South Texas Project Electric Generating Station Emergency Management Plan
 - 2) South Texas Project Emergency Exercise Objectives

cc:

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South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
South Texas Project Electric Generating Station
Radiological Emergency Exercise 1986
Exercise Objectives

I. General

- A. Demonstrate the capability of the emergency organizations to implement the emergency plans and procedures.
- B. Demonstrate the capability of Houston Lighting & Power, the State, and Matagorda County to function in a coordinated manner to manage the emergency.
- C. Identify deficiencies in the plans, procedures, emergency facilities and equipment, and training.
- D. Create conditions that require all four emergency classifications to be exercised.
- E. Sequence events to allow a sufficient interval for onsite and offsite emergency organizations to demonstrate appropriate actions.
- F. Have the actual running time of the scenario be approximately six to eight hours, with a minimum of scenario time compression.
- G. Provide enough data and a logical progression of events to enable control room personnel to follow and evaluate the problem(s) using their procedures and training.
- H. Provide for an exercise of the recovery organization and reentry procedures via a table top format.
- I. Allow adequate time for critiquing to identify potential improvements in the emergency response procedures, interfaces, facilities and equipment, as necessary.

II. South Texas Project Electric Generating Station

A. Incident Assessment and Classification

- 1. Demonstrate the ability of the shift organization to assess the incident conditions, to determine which Emergency Action Levels have been reached, and to classify the incident correctly in accordance with the Emergency Action Level classification procedures.

B. Notification and Communications

1. Demonstrate the ability to notify the State and County officials within 15 minutes of classification.
2. Demonstrate the ability to notify onsite personnel using the Station alarm/public address system and security rounds.
3. Demonstrate the ability of the emergency organizations to communicate between:
 - a. The Station emergency response centers;
 - b. The Station emergency response centers and the Houston Emergency Operations Center;
 - c. The Station, State, County, and Federal Emergency Operations Centers; and
 - d. The Station and the Radiological Monitoring Teams.
4. Demonstrate the ability to notify the NRC within one hour of classifying the incident.
5. Demonstrate the ability of the Emergency Director to provide accurate and timely information to Public Relations.

C. Radiological Consequence Assessment

1. Demonstrate the ability to perform an initial assessment of the radiological consequences. This will involve the ability to perform calculations.
2. Demonstrate the ability to establish an offsite Radiation Monitoring Team.
3. Demonstrate the ability of the Radiation Monitoring Team to perform intended functions.
4. Demonstrate the ability to perform calculations with the radiological survey information and trend this information by computer model.
5. Demonstrate the ability to recommend appropriate Protective Actions.

D. Emergency Facilities Activation and Operation

1. Demonstrate the ability to activate the emergency organization and to staff and activate the emergency response facilities (Control Room, Operations Support Center, Technical Support Center, Emergency Operations Center and Site Access Facility).

2. Demonstrate, through discussion, the ability to perform a shift change in each of the emergency response centers.

E. Emergency Direction and Control

1. Demonstrate the ability of the Emergency Director to direct the emergency organizations in the implementation of the emergency plan and procedures.
2. Demonstrate the ability to technically evaluate the incident conditions and implement corrective actions to mitigate the consequences.
3. Demonstrate the ability to perform personnel accountability, search and rescue, and Station evacuation.

F. Medical Emergency Response

1. Demonstrate the ability of onsite personnel to provide emergency first aid to an injured, contaminated person until the ambulance arrives.
2. Demonstrate the ability of the ambulance service to transport a contaminated, injured individual from the site to the hospital.
3. Demonstrate the hospital's ability to handle and treat a contaminated, injured individual.

G. Internal Communication and Rumor Control

1. Demonstrate the Station emergency organization's ability to control onsite rumors.

H. Recovery Operations

1. Demonstrate ability to conduct recovery operation using a table top exercise.

III. STATE OF TEXAS:

A. Notification and Mobilization of Emergency Response Personnel

- (1) Demonstrate the ability to alert and mobilize State emergency response personnel in a timely manner.

B. Emergency Response Facilities and Communications

- (1) Demonstrate the ability to activate the State emergency response facilities in a timely manner.
- (2) Demonstrate the functional and operational adequacy of the State emergency response facilities.

- (3) Demonstrate the adequacy, operability, and effective use of emergency communications equipment and the adequacy of communications procedures and methods.
- (4) Demonstrate that adequate communications exist between State personnel stationed at the various emergency response facilities and those State personnel performing field activities.

C. Direction and Control

- (1) Demonstrate support from responsible elected or appointed State officials regarding emergency plan familiarity, conduct of operations, and decision-making.
- (2) Demonstrate the ability of key State emergency response personnel to maintain command control over State emergency response activities conducted from their respective emergency response facilities throughout the exercise.
- (3) Demonstrate the ability to gather, assess and disseminate information regarding the status of the emergency conditions and the status of emergency response activities in a timely manner.
- (4) Demonstrate the ability to effectively call upon outside support organizations.
- (5) Demonstrate the ability of each applicable State agency to execute its emergency response plans and procedures to protect the general public as appropriate.
- (6) Demonstrate the ability to mobilize and coordinate manpower and materials to support protracted operations.

D. Radiological Assessment

- (1) Demonstrate the ability to direct and coordinate the deployment of the State offsite Radiological Monitoring Teams in a timely manner.
- (2) Demonstrate the ability of the State offsite Radiological Monitoring Team personnel to efficiently and effectively utilize their procedures to perform dose rate surveys, collection and analysis of radiological samples, and other prescribed activities.
- (3) Demonstrate the ability to coordinate the State offsite radiological monitoring activities with those conducted by the South Texas Project Electric Generating Station.

- (4) Demonstrate the ability to perform offsite dose assessment activities in a timely manner.
- (5) Demonstrate the ability to coordinate the State offsite dose assessment activities with those conducted by the South Texas Project Electric Generating Station.
- (6) Demonstrate the ability to control and coordinate the flow of information regarding offsite radiological consequences with radiological assessment personnel.

E. Protective Response

- (1) Demonstrate the ability to control the exposure of State and local emergency workers.
- (2) Demonstrate the ability to perform timely assessments of offsite radiological conditions to support the formulation of protective action recommendations.
- (3) Demonstrate that decisions can be made regarding protective action measures for the general public and emergency workers within the Plume Exposure Pathway Emergency Planning Zone.
- (4) Demonstrate the ability to formulate measures to protect the general public and emergency workers within the Plume Exposure Pathway Emergency Planning Zone.
- (5) Demonstrate the ability to advise local jurisdictions regarding the implementation of protective action measures and to assist local jurisdictions in the implementation of protective action measures as appropriate.

F. Public Information

- (1) Demonstrate the ability to prepare and disseminate information releases to the news media and the general public in a timely manner.
- (2) Demonstrate the ability to coordinate all State information releases to the news media and the general public with those of the County and Houston Lighting & Power Company.

G. Reentry and Recovery

- (1) Demonstrate the ability to identify and discuss all reentry and recovery activities based upon the current or projected conditions in the affected offsite areas and methods for de-escalating the general public's response to the emergency condition.

IV. MATAGORDA COUNTY:

(A) Notification and Mobilization of Emergency Response Personnel

- (1) Demonstrate the ability to alert and mobilize local emergency response personnel in a timely manner.

(B) Emergency Response Facilities and Communications

- (1) Demonstrate the ability to activate the Matagorda County Emergency Operations Center in a timely manner.
- (2) Demonstrate the functional and operational adequacy of the Matagorda County Emergency Operations Center.
- (3) Demonstrate the adequacy, operability, and effective use of emergency communications equipment and the adequacy of communications procedures and methods.
- (4) Demonstrate that adequate communications exist between the County Emergency Operations Center and other emergency response facilities.

(C) Direction and Control

- (1) Demonstrate support from responsible elected or appointed local officials regarding emergency plan familiarity, conduct of operations, and decision-making.
- (2) Demonstrate the ability of the County Judge to maintain control over the emergency response activities conducted from the County Emergency Operations Center throughout the exercise.
- (3) Demonstrate the ability to gather, assess and disseminate information regarding the status of the emergency conditions and the status of emergency response activities in a timely manner.
- (4) Demonstrate the ability to effectively call upon and utilize outside support agencies when local capabilities are exceeded.
- (5) Demonstrate the ability of the County emergency response organization to execute its emergency operations plan to protect the general public within its jurisdiction.

(D) Protective Response

- (1) Demonstrate that decisions can be made by the County officials regarding protective action measures for the general public within the Plume Exposure Pathway Emergency Planning Zone.

- (2) Demonstrate that the County officials can formulate and execute measures to protect the general public within the Plume Exposure Pathway Emergency Planning Zone.
- (3) Demonstrate the ability to alert the general public within the Plume Exposure Pathway Emergency Planning Zone in a timely manner utilizing the Prompt Notification System.
- (4) Demonstrate the ability to prepare messages to be broadcasted over the Emergency Broadcast System.
- (5) Demonstrate the decision-making processes of local jurisdictions to provide control of access to restricted offsite areas and to effectively perform a coordinated evacuation of the general public.
- (6) Demonstrate that each local jurisdiction can coordinate the implementation of protective action measures for the general public within the Plume Exposure Pathway Emergency Planning Zone with the appropriate State agencies.

(E) Public Information

- (1) Demonstrate that the emergency response organization can coordinate information releases to the news media and the general public with those of the State and Houston Lighting & Power Company.

(F) Reentry and Recovery

- (1) Demonstrate the ability of the County jurisdictions to identify and discuss reentry and recovery activities based upon the current or projected conditions in the affected offsite area and methods for de-escalating the general public's response to the emergency condition.

V. GUIDELINES AND CONSTRAINTS

- A. Provide for player flexibility to the greatest extent possible.
- B. Develop a scenario which does not jeopardize real plant operations nor security.
- C. If necessary, delay the operator from taking corrective actions which may terminate the event to allow exercising of the emergency plan functions.
- D. Simulate conditions that warrant a high volume of media communications.

- E. Create an equipment failure which requires emergency repairs to be made in "high radiation" areas.

NOTE: These are scenario high radiation areas only.

- F. Create a scenario in which the communication of equipment status and capabilities are critical.
- G. Create a scenario in which an individual is (simulated) injured to the extent that transportation to a hospital for emergency medical care is necessary, and that the "injured worker" has external radioactive contamination on his clothing and/or person.