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May 1, 1996

LCV-0816

Docket Nos. 50-424
50-425

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C.

**VOGTLE ELECTRIC GENERATING PLANT
EMERGENCY PLAN REVISION 23**

Gentlemen:

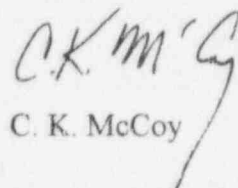
In accordance with 10 CFR 50.54 (q) and 10 CFR 50.4, Georgia Power Company hereby submits Revision 23 to the Vogtle Electric Generating Plant (VEGP) Units 1 and 2 Emergency Plan (the Plan).

Revision 23 incorporates editorial changes, changes to plant equipment, organizational changes, and other changes that improve the emergency preparedness program. With this revision, new binders and tabs are also being distributed. Enclosure 1 provides a description and justification of the individual changes. Enclosure 2 provides insertion instructions. The revised plan pages are in Enclosure 3. The changes made to the Plan do not decrease the effectiveness of the Plan.

In accordance with 10 CFR 50.4, two copies of Revision 23 are being sent to the NRC Region II office and one copy is being sent to the NRC Senior Resident Inspector at VEGP.

Please contact this office if you have any questions regarding this submittal or contact Mr. J. N. Roberts, Emergency Preparedness Coordinator, at (706) 826-3416.

Sincerely,


C. K. McCoy

CKM/PAH
cc: (See next page)

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U.S. Nuclear Regulatory Commission

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Enclosures:

1. Description and Justification of Changes
2. Insertion Instructions
3. Revised Plan Pages

cc: Georgia Power Company
Mr. J. B. Beasley Jr.
Mr. M. Sheibani
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U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

LCV-0816

Enclosure 1

Description and Justification of Changes

Enclosure 2

Insertion Instructions

JUSTIFICATION FOR REVISION 23 TO THE VEGP EMERGENCY PLAN

1. Global Change, *Natural Disaster Operation Plan (NDOP)*, to **Georgia Emergency Operations Plan (EOP)**.
Justification: Name of Plan changed by GEMA.
2. Page A-6 Paragraph A.2.2.2.a. Add, **onsite**.
Justification: Correct error.
3. Page A-7 Add paragraph 5.d.
Justification: Update of GEMA plan.
Paragraph 6.a. Change expedient to **expeditious**. Editorial
4. Page A-9 Paragraph A.4 Change *SCCEPP* to **SCEOP**, and *Bureau of Radiological Health* to **Bureau of Solid and Hazardous Waste, Nuclear Emergency Planning (NEP) Section**.
Justification: Changes to South Carolina Emergency plans and organizational name changes.
5. Page A-10 Paragraphs 4., 5., and 6. Change *1985* to **1995** to reflect updating of plans.
6. Page A-12 Paragraph A.4.2.1.b. Change *Primary* to **Backup**.
Justification: South Carolina EPD has established a new primary warning point in their State EOC.
7. Page A-14 Paragraphs 6.c. and 7.c. Change *BRH* to **NEP** to reflect organizational changes.
8. Page A-15 Paragraph A.5.2.a. Change *Law Enforcement Center* to **Central Dispatch** to reflect change in location of Allendale County's warning point.
9. Page A-20 Paragraph 3. Delete (*highway patrol dispatcher*), change *law enforcement center* to **central**, and delete *duty officer* for South Carolina Warning Point. Reasons as in paragraphs 6. and 8. above.
10. Table B-2 Dose analyst. Delete *radwaste supervisor*, add **qualified assistant team leaders**.
Justification: The radwaste supervisor position was changed to assistant team leader.

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Maintenance supervisor. Delete *superintendent, supervisors, and foreman*.
Add **Team leaders and assistant team leaders**.

OSC manager. Delete *Maintenance manager, supervisors, superintendents, and foreman*. Add **Performance team manager, assistant performance team manager, team leaders, and assistant team leaders**.

Justification: These positions have been changed to team leader titles.

Dosimetry team. Change *dosimetry specialist and health physics technicians* to **Qualified health physics personnel**.

Justification: Dosimetry specialist position has been reduced and there are other personnel (HP technicians) who are qualified to perform these duties.

- 11. Figure B-1 Change title of maintenance organization to reflect performance team concept.
- 12. Table C-2 Update location of Allendale County EOC from *Court House* to **Brandt Building**.
- 13. Table D-1 Add EALs H1.1 and H2.1 for hurricanes.

Justification: To be consistent with the other nuclear plants in The Southern Company. All state and county governments in the 10 mile EPZ had verbally agreed to this change.

- 14. Page E-1 Paragraph E.1 Delete "*specific*" from ... by sounding a **specific** tone signal for the emergency. Change *pulse* and *yelp* to **warble** for a Site Area Emergency and General Emergency.

Justification: To be consistent with the other nuclear plants in The Southern Company. This will enhance cross training of different site personnel.

- 15. Table E-1 Control Room Staff. Delete *Plant & system* from Plant telephone system
Table E-2 and add **PA system** and **pager** for notifying Vogtle duty manager.

Vogtle duty manager. Delete "*plant & system*" from Plant telephone system.

Justification: Update notification methods.

- 16. Page F-1 Paragraph F.1.1., 2nd paragraph Add **and the three South Carolina counties**. Replace *dedicated circuit* with **...is a prearranged conference call over commercial telephone lines and...**

Justification: The dedicated circuit ADL has been replaced with a prearranged conference set up on a special conference bridge called ALLEGRO

JUSTIFICATION FOR REVISION 23 TO THE VEGP EMERGENCY PLAN

located at the Savannah River Site. The previous ADL equipment was obsolete, difficult to maintain, and unreliable.

17. Page F-2 Paragraph F.2.1. Delete *warning point* and add **emergency operations center (SEOC)**. Delete *at the Emergency Preparedness Division Office (State emergency operations center (SEOC))*.

Changes are also made to the second paragraph to reflect the changes made to the ADL as in paragraph 16 above.

Justification: The South Carolina Warning Point has been moved to the state emergency operation center (SEOC). This change incorporates that move and cleans up the wording.

18. Pages F-4, F-5, & F-6 Delete *Corporate office hotline* and *Corporate office dial*. Delete *line* from Facsimile line. Add **prearranged conference** in place of dedicated circuit for the ADL.

Justification: The Corporate Office hotline and Corporate Office dial provided a dedicated path to the corporate office over The Southern Company microwave system. These circuits were seldom used during drills and exercises and the existing nondedicated circuits to the Corporate Office over the Southern Company microwave, which can be accessed from any plant PBX line, are considered adequate.

19. Table F-1 Delete *corporate office hotline* and *corporate office dial*. Add ERDS capability to GEMA, NRC Operations Center, and NRC Region II. Add ADL capability to SC Counties.

20. Page G-1 Third paragraph. Delete *in local telephone booths*. Add **on siren poles**.

Justification: There are currently only six public phone booths in the Vogtle 10 mile EPZ. Replacing these sign locations with placards on each of the 47 emergency siren poles should improve the probability of providing emergency information to transients. In addition, other public locations such as convenience stores will continue to have placards displayed and brochures available.

21. Page G-2 Paragraph G.1. Delete *public phone booths*. Add **siren poles**.

22. Page H-2 Second line. Delete *the TSC is activated based on*. Add **required by**.

Justification: Remove any ambiguity from the meaning of the sentence.

23. Page H-11 Paragraph 2, first bullet. Add **Chemistry Display Console**. Delete *and annunciation*.

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Second bullet. Add **Communicates with the IPC to provide PERMS data to general plant areas.**

Justification: The PERMS is being modified to improve reliability and maintainability.

24. Page H-12 First Bullet. Add **except safety related DPMs which have one way communications.**

Third bullet. Delete *TSC and Health physics control point.* Add **Radiochemistry Lab.**

Fourth bullet. Delete *Control room and TSC.* Add **Radiochemistry Lab.**

Justification: Update to PERMS. Those areas where displays have been deleted will have information available from IPC terminals. The printers in the control room and TSC have been found to be unnecessary and rarely used.

25. Page H-17 Delete paragraph 7, *Gross Failed Fuel Detector.*

Justification: The gross failed fuel detector has been removed due to high maintenance and high radiation dose (2 REM/yr - reference DRC/MDC #93-V1N0052-0-1). The information provided by the instrument is not used for emergency plan implementation.

26. Page J-1 Paragraph J.1.2. Add new paragraph, **A security related emergencymade by the Emergency Director.**

Justification: For some security related events involving armed intruders, it may not be prudent to order assembly and accountability because the act of assembling may help to provide targets for the intruder.

After "a personnel roster" add **(TSC and OSC only).**

Justification: It is not necessary to sign in on a personnel roster in the control room as a shift roster is maintained and is used to determine accountability.

27. Page J-3 Third paragraph. Delete, *Wash water and solutions form the personnel decontamination process along with.*

Justification: Delete requirement to collect water used to decontaminate personnel outside of the plant because FEMA does not require it to be done. Reference: FEMA-REP-18, page D.22-1, Issue 1; which states in part, "Special arrangements for the collection and containment of water used for decontamination are not necessary."

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28. Page K-3 Paragraph K.3, first paragraph. Delete *Table K-2 presents*. Add **are delineated in plant admin. and health physics procedures**.
- Justification:** Table K-2 is identical to action levels in plant admin. and health physics procedures. There is no need to have special action levels for emergency procedures.
- Second paragraph. Delete *Liquid waste will be collected and returned to the plant for processing*.
- Justification:** Same as page J-3.
29. Page K-4 Second paragraph and last paragraph. Delete *of table K-2 and Table K-2 provides guidance to be used in this effort*. Add **standard health physics**.
- Delete sentence *Personnel indicating greater than 20,000 dpm/100 cm² will bedecontamination*.
- Justification:** Use standard health physics for contamination limits and guidance.
30. Table K-2 Delete entire table.
31. Page L-1 Paragraph L.1, second paragraph. Delete, ... *5000 dpm/100 cm² beta/gamma above background....*
- Justification:** It is not necessary to state contamination limits. Standard plant health physics procedure limits will be used.
32. Appendix 1 Page 1-2. Delete *GFFD gross failed fuel detector*.

Appendix 8 Emergency Communications Plan

33. Page 2 Paragraph E. Delete. This is redundant to a statement in paragraph 1.0.
34. Page 3 Paragraph 4.0.F. Change *will* to **should**.
- Justification:** State and county agency representatives may not be available.
35. Pages 15-21 Section 8.0 Major revision to this section. The following position descriptions were deleted.: E. Government Relations Coordinator; G. Media Monitor; H. News Writers for the EOF, ENC, GOOC and Corporate Office; I. Southern Company Services Liaison; K. Technical Briefer; L. Facilities/Operations Coordinator; N. Community Relations Coordinator; O. ENC Secretary; Q. Employee Communications Coordinator; R. Telephone Response Teams;

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S. Corporate Public Information (PI) Secretary; T. Technical Assistants, U. Financial Response Officer; V. Corporate Facilities Assistant. Notification information was removed from the remaining position descriptions.

Justification: The position descriptions that were removed are not considered principal Emergency Communication staff and therefore their descriptions are not appropriate for this plan. Position duties are contained in procedures. Notification methodology should not be part of a position description and it is adequately described in section 7.0 of this appendix and implemented by procedures.

36. Page 15 Paragraph 8.0.A, last sentence. Delete sentence *The PI Director will maintain contactEmergency Communications Manager.*

Justification: Unnecessary detail which is too prescriptive.

37. Page 16 Paragraph D. Delete sentence *He will remain in constant contactvia dedicated telephone line.*

Justification: Unnecessary detail which is too prescriptive.

38. Page 29 Change *office* to **Headquarters.**

39. Page 30 Paragraph F.2. Delete entire paragraph. Renumber paragraphs which follow.

Justification: Signs and posters have been deleted from phone booths. Verification of other displays/sign is covered in paragraph 3. below.

40. Page 31 Paragraph 5. Delete entire paragraph.

Justification: Information about the plant is available at the visitors center and through periodic public meetings and exercise critiques.

41. Table 2 Public Information Director and Emergency Communications Manager: Delete *VP, Corporate Communication.*
Company Spokesperson: Delete *Manager, Engineering Technical Support.*
EOF Information Coordinator: Delete *Employee/Ext. Communication Supervisor.*
Local Media Monitor: Add **Marketing Staff Members.**
Corporate Media Relations Coordinator: Delete all specific positions. Add **Corporate Communication Staff.**

Justification: Staff changes and added flexibility in assignments.

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42. Volume 1, Preface, Folding Map, VOGTLE ELECTRIC GENERATING PLANT & SAVANNAH RIVER SITE 59 MILE EPZ INGESTION PATHWAY, figure IV:

Justification: Update Waynesboro insert to reflect change to Backup EOF location.