



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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MURRAY R. EDELMAN  
VICE PRESIDENT  
NUCLEAR

May 30, 1985

PY-CEI/OIE-0052 LQ

Mr. C. J. Paperiello, Chief  
Emergency Preparedness and  
Radiological Protection Branch  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

RE: Perry Nuclear Power Plant  
Docket No. 50-440; 50-441  
Emergency Preparedness  
Appraisal 50-440/85-009 and  
50-441/85-007

Dear Mr. Paperiello:

This letter and its attachments provide the Cleveland Electric Illuminating Company response to the items noted in Appendixes A and B of Inspection Report 50-440/85-009; 50-441/85-007, dated May 1, 1985. This Report provided the results of the Emergency Preparedness Appraisal conducted February 25, 1985 through March 7, 1985 at the Perry Nuclear Power Plant (PNPP).

Attachment 1 of this letter provides our planned actions for completion of each of the Open Items identified in Appendix A. Attachment 2 of this letter provides the results of our consideration of each of the recommendations for improvement identified in Appendix B.

As was requested, this response has been submitted within 30 days of the date of your letter. If there are any questions, please feel free to call.

Very truly yours,

Murray R. Edelman  
Vice President  
Nuclear Group

MRE:sab

Attachments

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ATTACHMENT 1

Response to  
Appendix A  
Open Items

Open Item #1 (440/85009-01; 441/85007-01)

Revision 5 of the Emergency Plan must clarify the emergency planning responsibilities and authority for maintaining overall emergency preparedness as established by the February 5, 1985 memo from the Vice President Nuclear Operations Division to Department Managers. The relationships between Technical Department and Project Services Department personnel must be clarified and strengthened. This must be completed prior to fuel load.

Answer: To consolidate the various emergency planning areas, all emergency planning responsibilities have been reorganized into the Perry Project Services Department, Community Relations Section. The reorganization formally implements the organization outlined in the February 5, 1985 memo.

The former Emergency Planning Coordinator is now the Emergency Planning Unit Supervisor and reports to the Community Relations General Supervising Engineer. The Emergency Planning Unit Supervisor in turn directly supervises an "offsite coordinator" and "onsite coordinator", each of whom is assigned to the Emergency Planning Unit. All public information activities related to the PNPP Emergency Preparedness Program are performed by the Perry Media Relations Unit. The Perry Media Relations Unit reports to the Community Relations Section General Supervising Engineer, thus ensuring close coordination with the Emergency Planning Unit.

The "onsite coordinator" maintains a direct working relationship with the Perry Plant Technical and Operations Departments (PPTD/PPOD). The "onsite coordinator" interfaces directly with the PPTD and PPOD managers to ensure the effective implementation of the PNPP Emergency Plan and Implementing Instructions.

The PNPP Emergency Plan will be revised prior to fuel load to outline the Emergency Planning Unit Supervisor's responsibilities and authority for maintaining the overall emergency preparedness program. In addition, Revision 5 to the PNPP Emergency Plan will define the reorganization and clarify the interfaces with other PNPP departments.



Open Item #2 (440/85009-02; 441/85007-02)

Conduct an augmentation drill of the emergency organization to demonstrate the 30- and 60-minute goals for staffing the emergency response facilities. This must be completed prior to fuel load.

Answer: Prior to fuel load, one of the monthly periodic tests of the Emergency Pager System will be used to verify the response times for all key emergency response positions. As a part of this test, the paged individuals will provide an estimate of their response time from their present location to the Perry Nuclear Power Plant. An individual for each key emergency response position must be contacted and provide adequate response times for the test to be judged acceptable.

Open Item #3 (440/85009-03; 441/85007-03)

The Security Coordinator and Security Personnel (First Aid/Search and Rescue) must complete emergency response training in all required training modules prior to fuel load.

Answer: The Emergency Plan training modules are being revised to reflect changes which have occurred in the Emergency Plan and Implementing Instructions over the past year. Individuals designated to fill the Security Coordinator position will attend the training outlined in Table 8-1 of the PNPP Emergency Plan during the upcoming 1985 training cycle. Security personnel, who are designated First Aid/Search and Rescue responders as part of their job performance requirements, will receive their annual Emergency Plan training during the normal shift training cycle.

Open Item #4 (440/85009-04; 441/85007-04)

Complete the TSC by demonstrating operability of the HVAC system, 480V UPS system, ERIS, and TSC radiation monitoring system prior to fuel load.

Answer: The "test description" is being developed for the Technical Support Center's HVAC, 480V UPS, and radiation monitoring systems. Testing of these TSC systems will be completed prior to fuel load.

The Safety Parameter Display System (SPDS) functions of the PNPP's Emergency Response Information System will be completed prior to fuel load.

Open Item #5 (440/85009-05; 441/85007-05)

Complete the installation, test and acceptance of the EOF ventilation system including the HVAC system and the EOF radiation monitoring system; and provide the specified thermoluminescent dosimeters (TLDs) to the EOF prior to fuel load.

Answer: The installation of the Emergency Operations Facility's radiation monitoring and ventilation systems, including the HVAC portion, is complete. The "test description" outlining the test program of these systems is being developed. Testing of the EOF ventilation and radiation monitoring systems will be completed prior to fuel load.

TLDs for the EOF, as outlined in OM15B: EPI-C2 (Maintenance and Inventory of Emergency Equipment), are ordered to meet emergency planning requirements. The TLDs will be stocked and inventoried at the EOF prior to fuel load.

Open Item #6 (440/85009-06; 441/85007-06)

Emergency kits and supplies must be stocked and installed at the following locations prior to fuel load: offsite assembly areas (first aid, radiation survey instruments, personnel decontamination supplies, etc.); access control facility (ambulance support kit); decontamination room, and dosimetry kits for offsite organizations.

Answer: The offsite assembly area equipment specified in OM15B: EPI-C2 (Maintenance and Inventory of Emergency Equipment) have been placed and inventoried in their designated locations at the CEI Ashtabula Service Center and CEI Eastlake Plant. In addition, a first aid kit will be added to the inventory and placed at each of the offsite assembly areas prior to fuel load.

Two (2) ambulance support kits and one (1) offsite organization dosimetry kit will be placed and inventoried in the Primary Access Control Point prior to fuel load.

The decontamination room, located adjacent to the Operations Support Center on the 599' level of the Control Complex Building, will be stocked and inventoried in accordance with OM15B: EPI-C2 prior to fuel load.

Open Item #7 (440/85009-07; 441/85007-07)

Complete the stocking and operability of the medical treatment first aid facility prior to the elimination of the construction contractor's first aid facility.

Answer: The First Aid Room, located adjacent to the Operations Support Center on the 599' level of the Control Complex Building, will be fully equipped in accordance with OMI5B: EPI-C2 (Maintenance and Inventory of Emergency Equipment) and operable prior to the elimination of the contractor first aid facility.

Open Item #8 (440/85009-08; 441/85007-08)

Provide extremity dosimetry for the OSC and hospital kits prior to fuel load.

Answer: Prior to fuel load, extremity dosimetry will be obtained for and placed in the emergency kits maintained in the OSC and at Lake County Memorial Hospital (East).



Open Item #9 ( (440/85009-09; 441/85007-09)

Complete the installation of readouts for the Containment High Range Radiation Monitor in the Control Room prior to fuel load.

Answer: The installation of the readouts in the Unit One Control Room for the (D19) Containment High Range Monitors has been scheduled and will be completed prior to fuel load.

Open Item #10 (440/85009-10; 441/85007-10)

Meteorological data (wind speed, wind direction, stability) must be available in the Control Room prior to fuel load.

Answer: Currently, the data transfer cables and modems are installed from the onsite meteorological tower to the Unit One Control Room. The termination of the cables at the Control Room printers and the set-up of the system modems has been scheduled for completion prior to fuel load.

Open Item #11 (440/85009-11; 441/85007-11)

The methodology and responsibility for acquisition of National Weather Service forecast information and integration of this information into protective action recommendations and dose assessment must be incorporated into the EPIs. This must be completed prior to fuel load.

Answer: OM15B: EPI-B7b (Manual Offsite Dose Calculations), section 5.3 has been revised to require the Radiation Protection Assistant, or alternate, to contact the National Weather Service (NWS) using the PNPP Emergency Response Telephone Directory to obtain forecast meteorological data. In addition, the user is now directed to periodically contact the NWS while performing dose assessments to verify potential changes in meteorological conditions.

OM15B: EPI-B8 (Protective Actions and Guides) does not discuss obtaining meteorological information. The user of EPI-B8 is directed to EPI-B7 to obtain meteorological data.

Open Item #12 (440/85009-12; 441/85007-12)

The dedicated 5-way line in the Control Room, with connection to Ashtabula, Lake and Geauga Counties, the State of Ohio, and plant locations, must be installed and operational prior to fuel load.

Answer: The dedicated 5-way line (State/County Emergency Response Network) is currently in place and operational at the Unit Supervisor's Console in the Unit One Control Room. Periodic testing of the dedicated 5-way line began in April 1985 and is conducted monthly on the second Tuesday of each month.

Open Item #13 (440/85009-13; 441/85007-13)

Complete testing of the PA paging system to assure audibility in high noise areas and complete testing of intraplant communications system prior to fuel load.

Answer: The testing of the plant Public Address (PA) System (R51, Communications - Intraplant) will be completed prior to fuel load. The test procedure for conducting the PA system test has been reviewed and approved. Testing will include audibility checks for various locations throughout Unit One. In addition, an operability check of the PA handset modules will be conducted. A tentative testing date is currently being evaluated based on work load and accessibility to plant areas.



Open Item #14 (440/85009-14; 441/85007-14)

Where appropriate, reference EPI-A1 in the ARIs prior to fuel load.

Answer: A temporary change is currently being amended to OMLB: OAP-0505 (Preparation of Off-Normal Instructions) and OMLB: OAP-0506 (Preparation of Alarm Response Instructions) to require referencing of OML5B: EPI-A1 in the applicable ONIs and ARI.

Interfacing with Emergency Plan Implementing Instructions (EPIs) in the ONIs and ARIs shall be accomplished as follows:

1. When the event (ONI)/annunciator (ARI) by itself is indicative of an emergency condition, use the statement, "Declare an (event condition) event and take the required action per EPI-A1."
2. When the event and other conditions are required to meet an emergency condition, use the statement, "Determine if an emergency action level has been exceeded per EPI-A1, Attachment 1 as follows:

(CATEGORY)

(ACTION LEVEL)"

Existing ONIs and ARIs are currently being revised, where appropriate, using the above guidelines. The applicable EPI-A1 references will be completed in the appropriate ARIs and ONIs prior to fuel load.

Open Item #15 (440/85009-15; 441/85007-15)

Modify EPI-A1, page 7, paragraph G under Unusual Event to read,  
"Loss of offsite power or loss of onsite...".  
This must be completed prior to fuel load.

Answer: OM15B: EPI-A1 (Emergency Action Levels) is currently being revised to correct the typographical error on Attachment 1, Emergency Classification Flowchart (p. 7). The EPI text on page 38 currently reflects the proper wording in accordance with NUREG-0654, Appendix 1.



Open Item #16 (440/85009-16; 441/85007-16)

Modify EPI-A1 prior to fuel load to clearly indicate that an Alert EAL would exist any time primary coolant activity exceeded 300 uCi/cc equivalent I-131.

Answer: OM15B: EPI-A1 (Emergency Action Levels) and Section 4.0 of the PNPP Emergency Plan are currently being revised to indicate an Alert for a "Severe loss of fuel cladding" condition in accordance with Appendix 1 of NUREG-0654.

As revised, the following indication alone will result in an Alert classification:

"  
OR  
High reactor water activity as indicated by confirmed sample results of 300 uCi/cc or greater dose equivalent I-131."

Open Item #17 (440/85009-17; 441/85007-17)

Upon completion of the appropriate startup tests, and prior to fuel load, verify that the temporary modification to recorders H13-P601, B21-R623 A & B is removed and that these recorders provide reactor level and pressure indication.

Answer: Instruments 1B21-R623 A and B on 1H13-P601 have been reinstalled to provide the appropriate reactor level and reactor pressure indication as per OM15B: EPI-A1 (Emergency Action Levels).

Open Item #18 (440/85009-18; 441/85007-18)

Revise the Emergency Plan to include NRC Headquarters as a responding agency and specify that the NRC Headquarters Operations Center must be notified in the event of any emergency class declaration immediately after notification of offsite officials and not later than one hour. This must be completed prior to fuel load.

Answer: Prior to fuel load, the PNPP Emergency Plan will be revised to indicate the NRC Headquarters as a responding agency. The revision will also delete the NRC, NRR, Emergency Incident Response Center, Bethesda, Maryland and direct the notification of the NRC Headquarters Operation Center immediately upon completion of the notifications to the State of Ohio and local counties but within 1 hour of the initial declaration or reclassification of an emergency. OM15B: EPI-B1, (Emergency Notification System) has been revised to include this time limitation for the notification of the NRC Headquarters Operation Center.

Open Item #19 (440/85009-19; 441/85007-19)

Revise EPI-B1 prior to fuel load to provide an adequate means for verification of notification messages.

Answer: EPI-B1 (Emergency Notification System) has been revised to list the verification telephone numbers for the Control Room, TSC and EOF on the initial and follow-up notification forms (Attachments 2 and 3). A PNPP Private Branch Exchange (PBX) extension and a CEI Off-Premise Exchange (OPX) extension are listed for each onsite facility.

Open Item #20 (440/85009-20; 441/85007-20)

Conduct an assembly/accountability drill prior to fuel load to demonstrate the capability to account for all onsite personnel within 30 minutes.

Answer: Prior to fuel load, a full scale accountability drill will be conducted in accordance with OMI5B: EPI-B5 (Personnel Accountability) and OMI5B: EPI-B6 (Evacuation). The drill will encompass all personnel, unless otherwise identified in advance, within the Unit One Protected Area fence and within the Unit Two Construction Area fence. The drill is tentatively scheduled to be conducted between the hours of 6:00 p.m. to 6:00 a.m. Normal access/ exit procedures which would be in-place at fuel load will be used to account for personnel leaving the designated drill areas.



Open Item #21 (440/85009-21; 441/85007-21)

Revise the Administrative Procedures prior to fuel load to clarify that the review of the Emergency Plan and EPIs must be conducted annually.

Answer: OMLA: PAP-0507 (Preparation, Review, Approval, Revision, and Cancellation of Instructions) has been revised to require the annual review of the Emergency Plan and Implementing Instructions as part of the periodic review cycle.

An annual review of the Emergency Preparedness Program will also be conducted. See response to Open Item #22.

Open Item #22 (440/85009-22; 441/85007-22)

Appendix E, "Emergency Planning," to the PNPP Quality Assurance Plan must be issued, and it must be compatible with the requirements of 10 CFR 50.54 (t). This must be completed prior to fuel load.

Answer: Appendix E to the PNPP Quality Assurance Plan has been issued, effective March 7, 1985. Appendix E does not specify the requirements of the 10 CFR 50.54 (t). Instead, the PNPP Emergency Plan will be revised to specify the requirements of the annual independent audit and to outline the selection of the auditor and the review process. This will result in the Emergency Plan becoming the controlling document for the performance of the 10 CFR 50.54(t) audit.

Section 8.2 (Review and Updating of the Emergency Plan and Implementing Instructions) of the Emergency Plan presently identifies the Nuclear Safety Review Committee as solely responsible for conducting the annual audit required by 10 CFR 50.54(t). Section 8.2 of the Emergency Plan will be revised as follows:

"8.2     REVIEW AND UPDATING OF THE EMERGENCY PLAN  
          AND IMPLEMENTING INSTRUCTIONS

The PNPP Emergency Plan and Implementing Instructions are included in the PNPP Operations Manual. As such, the Emergency Plan and Implementing Instructions are reviewed and approved by the Plant Operations Review Committee and controlled, distributed, and revised in accordance with PNPP Administrative Procedures. Document holders will receive revisions to the Emergency Plan and Implementing Instructions in a controlled manner as they are issued.

In addition, guidance will be provided to document holders on how to make comments and recommendations concerning the Emergency Planning Program to CEI.

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. The results of the review with offsite agencies are reported to the Vice-President, Nuclear Group, and the NSRC by the Emergency Planning Unit Supervisor.



An annual review of the Emergency Preparedness Program in accordance with 10 CFR 50.54(t) will be conducted by an independent group selected by the Emergency Planning Unit Supervisor. The review will be conducted by a group that has no direct responsibility for implementation of the Emergency Preparedness Program for PNPP. The review will include an evaluation of the Emergency Plan and Emergency Plan Implementing Instructions, drills and exercises, response capabilities, and the adequacy of interfaces with State and County officials. This review will verify compliance with CEI Corporate Policy, CEI Quality Assurance Program, Federal Regulations and operating license provisions. At the completion of the review, the group will prepare a written report including recommendations for improvements and will provide this report to the Nuclear Safety Review Committee (NSRC) and the Emergency Planning Supervisor. Those portions of the report involving the interface with State and local governments will be made available to the appropriate State and local governments. The Emergency Planning Unit Supervisor is responsible for resolution of all recommendations, and will then report to the NSRC on the disposition of the recommendations.

The NSRC will, on an annual basis, review the results of the independent review, any regulatory agency Emergency Preparedness Inspection Reports, any Quality Assurance Audits of Emergency Preparedness, and any other reviews of the Emergency Preparedness Program and report to the Vice-President, Nuclear Group, on the overall adequacy of the PNPP Emergency Preparedness Program.

Documentation of the above reviews and resolutions will be retained for at least five (5) years.

Open Item #23 (440/85009-23; 441/85007-23)

Update letters-of-agreement so that none are more than two years old at fuel load.

Answer: Currently, the PNPP is actively seeking to update the letters-of-agreement contained in the PNPP Emergency Plan. Prior to fuel load, the PNPP Emergency Plan will be revised such that the Appendix B, "Letters-of-Agreement", will have been updated to ensure that no agreement is older than two years.

Open Item #24 (440/85009-24; 441/85007-24)

Complete the distribution of public emergency information handbooks and other informational material prior to fuel load.

Answer: The distribution of the public emergency information handbooks is scheduled for June 1985. The handbooks are being printed and will be available to meet this schedule.

Public emergency information advertisements for the telephone directories encompassing the 10 mile EPZ have been placed. The ads will appear in the upcoming annual revision of the telephone directories.

Open Item #25 (440/85009-25; 441/85007-25)

The operability of the entire siren system must be demonstrated prior to fuel load.

Answer: A full scale test of the siren system within the 10 mile EPZ is scheduled for June 12, 1985.

ATTACHMENT 2

Response to  
Appendix B  
Improvement Items



Improvement Item #1

The plan should be revised as follows: describe in Section 8.0 the managerial overview responsibility of the Technical Superintendent; describe in Section 8.0 that the EPC has, in addition to the responsibilities delineated in Section 8.1.1 (1) to (8), the responsibility for overall coordination with offsite support groups and agencies.

Answer: As outlined in response to Open Item #1 (440/85009-01; 441/85007-01), the PNPP emergency preparedness program has been reorganized; therefore, the Technical Superintendent will no longer function in the manner previously stated. The PNPP Emergency Plan will be revised to reflect the overview responsibilities being assumed by the Community Relations General Supervising Engineer.

Revision 5 to the PNPP Emergency Plan will also outline the Emergency Planning Unit Supervisor's responsibility for the overall coordination of the PNPP with offsite agencies and support groups.

Improvement Item #2

All individuals with assigned responsibilities in the emergency planning effort should be delegated commensurate authority to implement these functions.

Answer: See response to Improvement Item #6

Improvement Item #5

Specific selection and qualification criteria should be developed and implemented for individuals performing emergency preparedness development activities.

Answer: See response to Improvement Item #6

Improvement Item #6

A professional training program for emergency planners should be established and implemented. This program should be described in Section 8.0 of the Plan.

Answer: As a part of reorganization of emergency preparedness personnel and the formation of an Emergency Planning Unit, the following areas are currently being evaluated:

1. An Emergency Planning Specialist position which would include several levels of advancement. This approach would allow personnel to be assigned according to experience level and would also allow the development of a specific job improvement program.
2. Personnel development and training requirements based on internal job performance and professional training courses available in the emergency preparedness field.
3. Assignment of job hierarchy based on assigned responsibilities. The assignment of authority will be based on the Emergency Planning Unit structure being developed and the responsibilities delineated in the PNPP Emergency Plan.

This will not be reflected in the Emergency Plan.



Improvement Item #3

Explicit authority should be given to the EPC for the overall emergency preparedness coordinating effort.

Answer: The Emergency Planning Unit Supervisor is responsible for coordinating the overall emergency preparedness effort. Section 8.1 (Organizational Preparedness) of the PNPP Emergency Plan will be revised to delineate this responsibility.

Improvement Item #4

The EPC should report to the plant manager or equivalent.

Answer: The Emergency Planning Unit Supervisor reports directly to the Community Relations General Supervising Engineer; however, the Emergency Planning Unit Supervisor has the autonomy to go directly to the Perry Plant Managers or the Vice President, Nuclear Operations Division if conditions warrant.

Interfacing with and obtaining approval from senior PNPP management personnel has not been demonstrated as a problem in the past.

Improvement Item #7

The Information Liaison should be added to the TSC position of Figure 5.3 of the Emergency Plan since this position must be filled during an Alert.

Answer: Section 5.2.2.3 (Technical Support Center) of the PNPP Emergency Plan will be revised to discuss the Information Liaison's function in the TSC prior to the activation of the Emergency Operations Facility. This will also be indicated on Figure 5-3 of the Emergency Plan.

Improvement Item #8

All references in the General Emergency(sic) Training (GET) module to "Site Emergency" should be changed to "Site Area Emergency".

Answer: See response to Improvement Item #9

Improvement Item #9

The GET module referencing a fire lasting 15 minutes as an Unusual Event should be changed to specify a fire lasting for 10 minutes as identified in the EALs.

Answer: The General Employee Training (GET) module covering emergency planning is currently scheduled for review in 1985. The noted discrepancies will be corrected in the next GET revision. In the interim, these two items are being addressed by the GET instructors at each session.

Improvement Item #10

To avoid a poor dose projection, and therefore an incorrect protective action recommendation, the MIDAS software should be revised to allow time share computation of diverse dose projection problems originating from any of the Emergency Response Facilities.

Answer: Dose assessment personnel will be trained during the upcoming annual emergency plan training cycle on the limitations of the current MIDAS software package and precautions to be used when accessing MIDAS from multiple terminals.

The option to modify the MIDAS software package to allow independent dose projections from multiple terminals is currently being evaluated. A decision will be made at a later date based on user-worth, software and hardware limitations, and cost.



Improvement Item #11

Procedures for obtaining and using backup meteorological data should be clarified and simplified.

Answer: EPI-B7b (Manual Offsite Dose Calculations) has been revised to address Open Item #11 (440/85009-11; 441/85007-11) concerning the acquisition and use of National Weather Service data. EPI-B7b will be reviewed during the next annual review cycle in an attempt to further simplify and clarify the acquisition and use of backup meteorological data.

Improvement Item #12

Procedures should be established to ensure PNPP will be included in the notification of severe weather through the utility's Systems Operation Center.

Answer: A notification of severe weather is received from the CEI Systems Operation Center (SOC) as a matter of practice; no formal procedure needs to exist.

Improvement Item #13

PAP-0501 and PAP-0101 should be revised to conform to the present plant organization.

Answer: OMLA: PAP-0101 (Perry Plant Department Organization) was revised effective 3/22/85 to reflect the present Perry Plant Technical and Operations Department organization. PAP-0101 is being revised to reflect the formation of the Emergency Planning Unit in the Perry Project Services Department.

OMLA: PAP-0501 (PNPP Operations Manual) is currently being revised to reflect the present plant organization.

Improvement Item #14

A method of resolving errors introduced during the procedure printing cycle should be developed.

Answer: An Administrative Unit Instruction (OM2: AUI) is currently being developed that will require procedures to be page and quality checked prior to distribution.

Improvement Item #15

During the augmentation of emergency personnel, key persons paged might not have enough information to determine how many persons represent an adequate number; therefore, minimum manning should be specified for positions such as communicators, log keepers, etc.

Answer: Currently, OM15B: EPI-A6 (Technical Support Center Activation) and OM15B: EPI-A8 (Emergency Operations Facility Activation) specify a recommended minimum staffing of communicators and support staff personnel. The responsibility for the support staff and communicator positions is assigned directly to the TSC Administrative Assistant and the EOF Manager. In addition, during an emergency the shift I & C technician is designated as the Control Room Communicator to assist the Shift Supervisor in conducting the required notifications.

The augmentation of health physics and chemistry personnel, and maintenance, electrical and I & C supervision are also outlined in EPI-A6 and OM15B: EPI-A7 (Operations Support Center Activation) for specific emergency classifications.

Key personnel will be trained in facility manning requirements and recommendations during the upcoming annual emergency plan training cycle.



Improvement Item #16

EPI-B1, Attachment 1 should be revised to "direct" emergency personnel to report to their stations.

Answer: OM15B: EPI-B1, Attachment 1 (Pager Message Format) currently directs the activation of specific emergency response facilities. Key personnel who are trained to respond for their facility are currently the only personnel utilizing the emergency pager system.

No problems in personnel response have been demonstrated during the previous evaluated and practice exercises with the wording currently used in Attachment 1.

Improvement Item #17

Two operators and at least one HP and one chem tech should be added to the recall list to augment the shift personnel available to the Shift Supervisor during an emergency.

Answer: Currently, OM15B: EPI-A6 (Technical Support Center Activation) directs the augmentation of health physics personnel upon activation of the TSC, and additional health physics and chemistry support upon activation of the EOF.

No additional operator support is specified in the Implementing Instructions; however, the Shift Supervisors have been trained to contact additional personnel if required, or to activate and utilize the Operations Support Center.

It should be noted that normal and abnormal unscheduled evolutions and operations, not listed as classifiable emergencies, occur throughout a plant's operating life. The plant's operating staff is therefore proficient in personnel augmentation.

Improvement Item #18

The emergency plan and procedures should be revised to indicate that the Emergency Coordinator has the authority to initiate a Site Area Evacuation prior to the declaration of a Site Area Emergency.

Answer: Section 6.4.1 (Onsite Protective Actions) of the PNPP Emergency Plan will be revised to direct site personnel to begin personnel accountability in the event of a Site Area or General Emergency, or at the discretion of the Emergency Coordinator based on an assessment of plant conditions.

OM15B: EPI-B5 (Personnel Accountability) and OM15B: EPI-B6 (Evacuation) will be revised during their next annual review to specifically allow the Emergency Coordinator to initiate a Site Area Evacuation at his/her discretion prior to the declaration of a Site Area Emergency.

Improvement Item #19

Procedures EPI-A6, EPI-A7 and EPI-A9 should be reviewed for consistency and continuity relative to the functions and responsibilities of the Maintenance Coordinator, the OSC Coordinator, the Reentry Team Coordinator and the Operations Manager.

Answer: The position of Reentry Team Coordinator (RETC) is the General Supervisor (GS) or General Supervising Engineer (GSE) who, in the judgement of the Operations Manager, is responsible for the area being re-entered. The arrangement thus allows the normal emergency organization to be utilized for re-entry. The Perry Plant GS(s) and GSE(s) are normally assigned key TSC positions, and the OSC is available to supply re-entry team personnel. The GS or GSE is given the title of Reentry Team Coordinator to specify his responsibilities. The RETC shall utilize the Maintenance Coordinator and the OSC Coordinator in their stated roles to accomplish the re-entry objectives.

OM15B: EPI-A9 (Re-entry) will be reviewed and revised as part of the annual review cycle in an attempt to clarify between re-entry and emergency operations.

Improvement Item #20

Additional references to the EPIO Manual should be incorporated into the Emergency Plan.

Answer: The PNPP Emergency Plan will be revised to include references to the Emergency Public Information Organization-Implementing Instructions Manual in Section 5.0 (Organizational Control of Emergencies) and Appendix E (List of Supporting Plans).



IMPROVEMENT ITEM #21

10CFR 50.54 (t) should be referenced in the QA plan, Appendix E, as the regulatory basis for conducting the annual audit.

ANSWER: The PNPP Emergency Plan will be revised to serve as the controlling document for the performance of the 10 CFR 50.54 (t) audit. Refer to Open Item #22 (440/85009-22; 441/85007-22) for a detailed description of the proposed emergency plan revision.

Improvement Item #22

Section 8.2 of the Emergency Plan should be revised to ensure it adequately describes the scope of the annual audit.

Answer: Section 8.2 (Review and Updating of the Emergency Plan and Implementing Instructions) of the PNPP Emergency Plan will be revised to clarify the scope and content of the annual review. See response to Open Item #22.

Improvement Item #23

The hospital procedure for handling contaminated patients should be integrated or appended to the EPIs.

Answer: The hospital procedures as written do not control the actions of the plant's health physics personnel; these procedures provide guidance to hospital personnel on the handling, movement and treatment of a contaminated-injured individual. OM15B: EPI-B4 (First Aid and Medical Care) provides the health physics actions onsite and requires the collection of PNPP dosimetry and the monitoring for contamination at the hospital. Health Physics personnel are trained annually in general hospital procedures and interfacing with hospital personnel.

Since the hospital procedures are written to outline hospital actions only, these procedures will not be included in the PNPP Implementing Instructions at this time; however, PNPP health physics personnel will continue to be trained annually in the aspects of interfacing with hospital personnel.

Improvement Item #24

The Lake County Memorial Hospital - East should be provided with a copy of the applicant's Emergency Plan and appropriate EPis dealing with contaminated-injured personnel.

Answer: A controlled copy of the PNPP Emergency Plan has been provided to the Lake County Memorial Hospital Administrator.

An additional controlled copy of the Emergency Plan and OML5B: EPI-B4 (First Aid and Medical Care) will be provided to Lake County Memorial Hospital-East for use as a reference in the Emergency Room, Radiation Emergency Area (REA).

Improvement Item #25

A procedure for maintenance and testing of the siren system should be established and implemented.

Answer: See response to Improvement Item #26

Improvement Item #26

A test frequency for the siren system which conforms to the frequencies and methods recommended in NUREG-0654, Appendix 3 should be implemented. A description of the tests and frequencies should be included in the Emergency Plan.

Answer: Instruction, NDASI-0951: Prompt Alert System, is being developed to outline the test frequencies and methods to be used for the maintenance and testing of the siren system. NDASI-0951 meets the test frequencies specified in NUREG-0654, Appendix 3 (Section C.3.h).

Section 7.2.5 (Prompt Alerting and Notification System) of the PNPP Emergency Plan will be revised to include a description of siren tests and frequencies.



Improvement Item #27

The fine print on the EPI-A1 flow chart should be enlarged.

Answer: The two pages of the EPI-A1 flowchart were each purposely reproduced on 8 1/2" x 11" sheets of paper to allow simultaneous viewing of both sheets by the user. This format was preferred by the instruction users during the previous training period and emergency preparedness practice exercises. PNPP does not therefore plan to enlarge the flowchart; however, the improvement item will be re-evaluated during the next annual review.