

JUN 06 1985

In Reply Refer To:
Docket: 50-285

Omaha Public Power District
ATTN: R. L. Andrews, Division Manager-
Nuclear Production
1623 Harney Street
Omaha, Nebraska 68102

The NRC staff has reviewed the changes contained in enclosures to your letters LIC-84-334, 361, 366, 381 and 409 and determined that the revisions and changes to your Emergency Plan (hereafter referred to as the Plan) do not appear to decrease the effectiveness of your emergency response capabilities, and that your Plan continues to meet the standards of 10 CFR 50.54(q).

There are, however, several areas which need to be clarified or additional information provided as follows:

1. In Paragraph M.1.1.2 it is not clear where the Recovery Manager, Emergency Coordinator, and the EOF Information Specialist with their support groups will report.
2. The Plan does not define the operational meeting of "activating" an Emergency Response Facility (ERF).
3. Table B-1 shows the Shift Technical Advisor (STA) as a primary organizational element for Emergency Direction and Control. This appears to be contrary to the intent of the rest of Section B describing your emergency organization.
4. The structure of the initial phase of your emergency organization is not described by a block diagram in accordance with NUREG-0654, Criterion B (6).
5. Section P does not clearly indicate whether the Corporate Emergency Planner is the Manager, Radiological Health and Emergency Planning.
6. Section B does not clearly describe the transitional phases of the Emergency Organization, as it is transformed from the initial shift organization to the full onsite organization, and finally to include the extended corporate support group. For example, Paragraph 2.2.2, states that the Emergency Recovery Organization makes the Recovery Manager available to replace the Shift Supervisor, apparently bypassing the Emergency Duty Officer (EDO). Thus, the transmittal of emergency direction and control functions from the Shift Supervisor to the Emergency Duty Officer and up to the Recovery Manager does not appear to be clearly explained.

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7. The Plan does not describe the emergency organization role of the Manager-Fort Calhoun Station, who is not shown as qualified to be an EDO in Figure B-1.
8. Explain the apparent contradiction between Paragraph E.1.1 and Figure F-1, pertaining to notification of the Iowa Office of Disaster Services by the Shift Supervisor and the Administrative Logistic Manager respectively.
9. In reference to Paragraph E.1.1, explain the back up means of communications that would be available if all offsite means of communications failed.
10. Explain the rationale in Appendix 3 of EPIP-OSC-2, for not making positive protective action recommendations.
11. Indicate where you identify the emergency organizational members making notifications to offsite agencies as required by NUREG-0654, Criterion F(1).
12. Explain, in reference to Figure F-2, what is meant by Radiological Conference Capability.
13. Indicate the location of the Technical Support Center (TSC) and whether it is in the same elevation as the Control Room.
14. Indicate how you meet guidance Criterion F(1) of NUREG-0654 which requires a full description of emergency communication links among ERFs.
15. In Paragraph M.1.3, the phrase "relaxation criteria" is used in connection with the decision to curtail the duties of the Emergency Recovery Organization. Explain the relationships between relaxation criteria and short and long term recovery phases. Indicate whether the NRC will be consulted before entering a long term recovery phase, that is, after the reactor is in cold shutdown and no emissions of radioactivity are ensuing.

The response requested by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

It is requested that you provide this office with a written response within thirty days of receipt this letter. If you have any questions, please contact Mr. Nemen M. Terc of this office at (817) 860-8129.

Sincerely,

"Original Signed by:"

D. R. Hunter, Chief
Reactor Project Branch 2

cc (see next page)

cc:

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Kansas Radiation Control Program Director

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bcc to DMB (A045)

bcc distrib. by RIV:

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