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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

May 22, 1985
PY-CEI/NRR-0241 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Emergency Plan OM15A
Appendix D Review

Dear Mr. Youngblood:

This letter provides additional information on the status of State and County review and approval of the "Evacuation Time Estimates For Areas Near The Perry Nuclear Power Plant", dated February 1985, which is included as Appendix D to the onsite Emergency Plan (OM15A). This letter responds to an April 22, 1985 letter which requested the following information.

Revision 3 of the onsite Emergency Plan was submitted by letter of April 28, 1984 (PY-CEI/NRR-0105L). The March 1984 draft of the Evacuation Time Estimates (ETE) was included for NRC review. The letter noted that the draft ETE was also being reviewed by State and County agencies and that letters of concurrence were expected. Each of the appropriate agencies did respond with letters of comment and/or concurrence on the draft, and these letters were forwarded to the NRC along with Revision 4 of the Plan on February 20, 1985 (PY-CEI/NRR-0192L), per the guidance of NUREG-0654. This is documented in Supplement 6 of the PNPP Safety Evaluation Report in Section 13.3.2.10.

Each of the comments was considered in the review and update of the ETE. Discussions have been held with the agencies which submitted comments on the draft ETE to verify that each comment has been adequately resolved in the February 1985 version of the ETE. Each agency has indicated satisfaction both with the resolution of its comments and with the February 1985 ETE. Each of the agencies therefore intends to incorporate the ETE into its radiological

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B. J. Youngblood

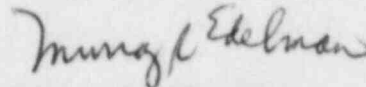
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May 22, 1985
PY-CEI/NRR-0241 L

emergency response plan in the next revision, scheduled for publication this summer. Included as Attachment 1 to this letter are the comment letters and a discussion of how those comments were resolved.

If there are any questions, please feel free to call.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe

U. S. NRC Document Control Desk
INPO Records Center

ATTACHMENT I



ALBERT E. STEWART
Director

County of Lake

OFFICE OF

DISASTER SERVICES AGENCY

39 FAIRDALE STREET
PAINESVILLE, OHIO 44077



Phone (216) 352-6281
Ext. 361

March 26, 1984

The Cleveland Electric Illuminating Company
P. O. Box 97
Perry, OH 44081

Attention: Mrs. Jan Dugan

Dear Mrs. Dugan:

Having reviewed the Evacuation Time Study for the Perry Nuclear Power Plant as proposed by HMM Associates.

I offer the following comments:

Section 1

Comment
Number

#1

1.2 The Perry Nuclear Power Plant, hereafter to be referred to as PNPP is located the Village of North Perry, a political subdivision within Lake County, Ohio. The plant site is located along the southern shores of Lake Erie. A site vicinity map for the plant is included as Figure 1.1.

The Plume Exposure Pathway Emergency Planning Zone hereafter referred to as the EPZ is the geographic area surrounding...

Figure 1.2

#2

Suggests solid outer boundry line to show EPZ.

Section 2

#3A

2.3 Third paragraph, suggest - it is assumed that the permanent population sector will evacuate from their places of residence and that all households having more than one vehicle will use only one vehicle.

#3B

Fourth paragraph suggests - additional explanation is needed by reviewer, does the plan assume this position or does it specifically warrant it?

#4

2.5 While NETVAC has been used in previous hearings with success. Has it's findings been proven in actual situations?

Section 3

- #5 3.4 Table 3.1 Are their twenty-three (23) households in the City of Mentor, within the EPZ?
- #6 3.3 First paragraph - Should not County be changed to Counties?
- #7 3.11 Is Figure 3.3 through 3.5 consistant with Warning Maps being developed and other criteria?
- #8A
#8B 3.14 Table 3.2 As a matter of comment only, where are these Medical/Jail Facilities? Sub-area (E) Headlands State Park, has on certain Holidays in the past, saw as many as 60,000 to 80,000 transients.

Section 4

- #9 Table 4.1 Reviewer feels it is wise to remove Lakeland Community College from Primary Reception Center. The JPIC is located here, other Lake County locations can absorb the load.
- #10 4.19 Figure 4.3 Check width of Roadway?

Section 5

- #11 5.2 Initial Notification
The land portion of the EPZ surrounding the Perry Nuclear Power Plant will have an Outdoor Siren Notification System, with Public Address capabilities that surpass requirements and recommendations yet remaining consistant with NUREG-0654/FEMA-REP-1 Appendix 3 guidelines. This system will be used by County officials to Alert and Disperse Emergency Information to the population, i.e., Evacuate, Shelter in place, Turn-on their radios and television sets for additional information, all clear. Pursuant to NUREG-0654 guidance, notification messages will commence on the designated television and EBS stations prior to the activation of the Siren/Public Address System.
- Within fifteen (15) minutes the population, within the EPZ of the plant, will have been given an informational or instructional message regarding the emergency.
- #12 5.2 Second paragraph - I sure would hope so.
- #13 5.3 Very conservative estimates.
- #14 5.4 Permanent Population, second paragraph - Suggests removal of (and local) emergency preparedness officials.
Transient Population, Suggest removal of (and local) emergency preparedness officials. Discussions with County emergency preparedness officials.
- #15 5.5 Suggests removal of (and local) emergency preparedness Officials. Discussion with County emergency preparedness officials.

5.8 The Priority Treatment

#16

ERP denotes traffic support at all intersections.

Section 6

#17

6.20 Suggest word change - Remove manual and add Physical Traffic.

Section 7

#18

7.1 While I do not agree with this approach, let it stand if it has been successful in other hearings.

#19

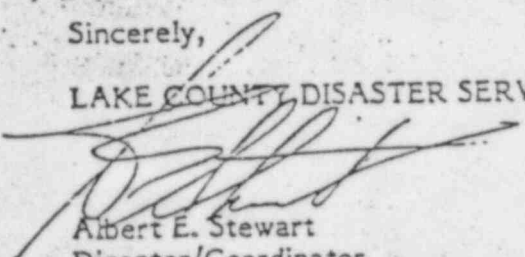
A1-6 What are we talking about, Madison Village, Madison Township, North Madison?

#20

A2-2 Again, reference is made to North Madison, there is no legal status for this assumption, it is Madison Township.

Sincerely,

LAKE COUNTY DISASTER SERVICES AGENCY


Albert E. Stewart
Director/Coordinator

mb

LAKE COUNTY DSA COMMENTS
CROSS-REFERENCE LIST

<u>Comment</u>	<u>ETE Reference/Comment</u>
#1 (Section 1.2)	Paragraph 1 of Section 1.2, p. 1-2 reworded as suggested.
#2 (Figure 1.2)	EPZ boundary indicated with solid line as suggested.
#3A (Section 2.2)	Paragraph 3 on p. 2-3 reworded as suggested.
#3B (Section 2.2)	The ETE was clarified (pg. 2-3, paragraph 4) to show that existing lane utilization is an assumption of the study. The text of Paragraph 4 is intended to indicate that the ETE assumes "normal," or existing, lane utilization and traffic control; the physical traffic control measures outlined in the County RERP would promote more efficient traffic flow out of the EPZ during an evacuation; the "flashing signals" test outlined in Section 6, pp. 6-14 and 6-20 of the ETE addresses conditions and estimates an evacuation time with "adjusted," or special traffic control measures; suggested locations for physical traffic control as well as its general impacts on an evacuation are outlined in Section 7 of the ETE.
#4 (Section 2.3)	The NETVAC model has been validated using data from the Seabrook, New Hampshire nuclear plant.
#5 (Table 3.1)	The 23 non-auto-owning- households within the City of Mentor <u>are</u> from within the EPZ, as determined from census data.
#6 (Section 3.4)	The word "County" was changed to read "Counties" as suggested.
#7 (Figures 3.3, 3.4 and 3.5)	Consistency verified with Bob Retzler, the current Lake County Disaster Services Agency Director.
#8A (Table 3.2)	Locations of medical/jail facilities are illustrated in Appendix 3.
#8B	The Headlands Beach population value of 40,000 utilized in the final ETE (see ETE p. A3-5) was based on conversations with the Park Manager and Park Maintenance Supervisor in 2/85.
#9 (Table 4.1)	Reception Center locations were not developed by HMM.

- #10 (Figure 4.3) A comprehensive field survey of links and intersections of the evacuation roadway network was completed by HMM in October 1983, including measurements of intersection approach and mid-block lane widths (see ETE pp. 2-1, 4-1).
- #11 (Section 5.2) Paragraph 1 of Section 5.2, p. 5-2 reworded.
- #12 (Section 5.2, Paragraph 2) Commentary only. No action necessary.
- #13 (Section 5.3) The comment that notification, preparation and mobilization distribution times are conservative is correct. The assumptions are meant to be conservative. Many conservatisms are built into the ETE. Mr. Stewart felt comfortable with the notification/preparation/mobilization times discussed in Section 5.3 and illustrated on Figure 5.1 of the ETE.
- #14 (Section 5.3, p. 5-4) The words "and local" were removed from paragraphs 2 and 3 as suggested.
- #15 (Section 5.3, p. 5-5) The words "and local" were removed from the last sentence of paragraph 3 under the sub-title "Special Facilities" as suggested.
- #16 (Section 5.4, p. 5-8) The ETE conservatively assumes existing lane utilization and traffic control measures (see response to comment #3B and paragraph 5, p. 2-3 of the ETE).
- #17 (p. 6-20) The word "physical" replaced "manual" in the last sentence as suggested.
- #18 (Section 7.2) Evacuation confirmation method approved by Bob Retzler, the current Lake County Disaster Services Agency Director.
- #19 (Appendix 1) As suggested, reference to "North Madison" has been removed. These population totals are included as part of "Remainder of Madison Township."
- #20 (Appendix 2) Same action as #19.



DIRECTOR
DALE B. WEDGE

County of Geauga

13281 PAINESVILLE RAVENNA ROAD • GEAUGA COUNTY SAFETY CENTER
CHARDON, OHIO 44024

DISASTER SERVICES AGENCY

PHONE (216) 285-2222, EXT. 603

March 26, 1984

DEPUTY DIRECTOR
RONNIE N. EGING

Jan Dugan
10 Center Road R225
Perry, Ohio 44081

Ref: Comments on Time Evacuation Study

Dear Jan:

#1
Page 4-1: In all areas where it states that this is based on discussions with County and local law enforcement and emergency preparedness officials, I would like to state that we only had one meeting with H.M. At that meeting we only discussed what routes would most likely be used for an evacuation and problems with weather. This produced an addition of Old 44 (North Street - Ravenna Road). No other information was discussed with these consultants.

#2
Page 4-4: On southbound exits I do not understand 534 south ~~to~~ Route 166 west to Geauga County Reception Centers. It would seem that once on Route 166, they would go to Route 528 and then south to the Middlefield Reception Centers. The Chardon Reception Centers are primarily used for evacuees from Lake County.

#3
Page 5-1: I do not find any portion of the plan that defines the various weather conditions. During our meeting with H.M, we indicated the problems in Thompson with severe winter weather. We would like to have a better understanding of what they are basing their estimates on. We can see a change in the estimates of time.

#4
Since working on the plan we have found special groups in Thompson that should be addressed. We have found two (2) campsites, a group home and a day-care center for which we have written SOPs.

I find no other problems in Sections 4, 5, 6 and 7.

Sincerely yours,

Dale B. Wedge

Dale B. Wedge
Director

DEW/pl

ADSAAA/B/5

GEAUGA COUNTY DSA COMMENTS
CROSS-REFERENCE LIST

Comment

ETE Reference/Comment

#1 (Meetings)

Dale Wedge, Geauga County DSA Director has since agreed that two meetings with HMM took place; ETE-related procedures and assumptions beyond those indicated by Mr. Wedge were discussed at these meetings and were documented by HMM.

#2 (p. ETE 4-4)

The ETE was revised to show evacuees heading south along Routes 528 and 534 to the Geauga County (Middlefield) reception centers.

#3 (Adverse Weather
Consideration)

The ETE addresses and defines winter weekday and summer weekend adverse weather conditions (refer to ETE pp. 2-3, 2-4, 2-8 and 6-2). Severe adverse weather conditions could result in sheltering, rather than evacuation. Discussions with Dale Wedge have clarified the assumptions to his satisfaction.

#4 (Special Groups
Consideration)

The campsites and group home in Thompson Township have been included in the study and are included on pp. A3-5 and A3-6; the day care center is addressed in the text of Section 3.4, p. 3-9, paragraph 2.



COUNTY OF ASHTABULA

EMERGENCY MANAGEMENT AGENCY

25 West Jefferson Street
Jefferson, Ohio 44047
(216) 576-9090, 576-9148

Mike Wheeler
Emergency
Management
Coordinator

January 23, 1985

Jan Dugan
Emergency Planning Unit TV 1
Perry Nuclear Power Plant
PO Box 97
Perry, Ohio 44081

Dear Jan,

This letter is to inform you that after reviewing the Evacuation Time Study for the Perry Nuclear Power Plant with the Sheriff's Department it meets with our approval.

Sincerely,

K. Michael Wheeler, Coordinator
Ashtabula County Emergency Management Agency

KMW/jf

ASHTABULA COUNTY DSA COMMENTS
CROSS-REFERENCE LIST

Comment

ETE Reference/Comment

No Comments

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2825 WEST GRANVILLE ROAD
WORTHINGTON, OHIO 43085-2712
DISASTER SERVICES AGENCY

AGOH-DS-NOO

January 29, 1985

Ms. Jan Dugan
Cleveland Electric Illuminating Co.
Perry Nuclear Power Plant
P.O. Box 97
Perry, OH 44081

Dear Ms. Dugan:

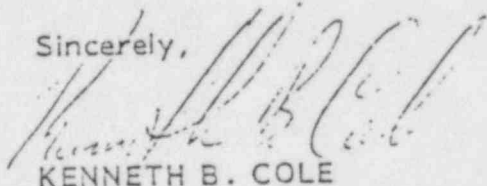
My staff has reviewed the "Evacuation Time Estimates for Areas Near the Perry Nuclear Power Plant" (March 1984), prepared for CEI by HMM Associates.

The study is sound and should become an individual resource document. The concerns we did identify do not affect the overall integrity of the study. However, we would appreciate your comments or further explanation on the following items:

- #1 - Page 2-2, Paragraph 1, Line 5: What are the site-specific characteristics of the PNPP EPZ?
- #2 - Page 2-3, Paragraph 6: What is the source of the assumption that snowstorms would reduce roadway capacity by 30 percent during winter conditions? This figure seems low, particularly for the "snowbelt" counties.

Thank you for your time in resolving our questions. If our concerns need further clarification, please do not hesitate to contact me or the response supervisor, Larry Grove, at (614) 889-7157.

Sincerely,


KENNETH B. COLE
Nuclear Operations Officer

STATE OF OHIO DSA COMMENTS
CROSS-REFERENCE LIST

Comment

ETE Reference/Comment

#1

In response to this comment, some site-specific characteristics considered in developing preparation and mobilization times have been identified on p. 2-2, paragraph 1, lines 6 and 7.

#2

The sources of assumptions regarding adverse weather capacity and travel speed reductions are presented in a footnote on p. 2-4. Discussions with Larry Grove of the Ohio Disaster Services Agency have clarified the assumptions to ODSA's satisfaction.