

Official

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MEMORANDUM FOR: William E. Cline, Chief
Emergency Preparedness Section

FROM: Martha Poston-Brown, Radiation Specialist
Emergency Preparedness Section

SUBJECT: EMERGENCY PLAN REVIEW - REVISION 4/16/85
SURRY NUCLEAR STATION - DOCKET NOS. 50-200 AND 50-201
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I. BACKGROUND

The licensee submitted a complete copy of the REP, dated April 16, 1985. The submittal included pages on which the only changes were re-typing and re-pagination.

Most of the changes in this revision of the plan were concerned with name/title changes. For example the "Fire Marshal" became the "Loss Prevention Supervisor" and the "nearsite EOF" became the "local EOF." This revision also reflected the change in name of the licensee, Virginia Power and Electric Company (VEPCO) became the Virginia Power Company. The Commonwealth of Virginia also revised the name of the state support agency from Office of Energy and Emergency Services (OEES) to the Department of Emergency Services (DES). These and other similar changes were made throughout the emergency plan, necessitating many revised pages. Revisions in the above categories were determined to neither increase nor decrease the effectiveness of the REP and are not further considered in this review.

II. EVALUATION OF SUBSTANTIVE CHANGES

1.0 Definitions - Glossary of Terms p. 1.5

Licensee added the definition of the local emergency operation facility (LEOF). The definition also discussed the location and function of the LEOF (LEOF was also added to Section 1.1 Acronyms and abbreviations).

Comment: This is a plan improvement.

3.0 Summary of Emergency Plan p. 3.3

Licensee added a statement that requires all changes to the Emergency Plan and Implementing Procedures must be approved by the Station Nuclear Safety and Operating Committee (SNSOC).

Comment: This is a plan improvement.

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Table 4.14 Initiating Conditions: Notification of Unusual Event p. 4.4

- (2) Licensee rewrote sentence. "Safety limits of Technical Specifications are not met/are exceeded" became "Technical Specifications limiting conditions of operations... have been exceeded."
- (4) Licensee changed sentence so that "Radiological effluent excess Technical Specifications instantaneous limits" became "Process or effluent indicators/alarms are not available."
- (9-10) Licensee rewrote section, "Allowable limits of the Technical Specifications have been exceeded" was changed to "Reactor Coolant System leak rate exceeds Limiting Conditions of Technical Specifications."
- (12) "Allowable limits of Technical Specifications have been exceeded" was changed to "Loss of Containment Integrity."

Comment: The above revisions were made in order to clarify the table. These changes have no significant impact on the emergency plan, and are considered a minor plan improvement.

Table 4.1.C Initiating Conditions: Site Area Emergency p. 4.27

- (10) Licensee changed the reading on the Ventilation Vent High Range Monitor from $2.26 \times 10^2 \mu\text{Ci/cc}$ to $2.26 \times 10^{-2} \mu\text{Ci/cc}$.

Comment: This is a plan improvement as the listing of the first value was obviously too high.

Table 4.1.D Initiating Conditions: General Emergency p. 4.37

- (9) Licensee corrected a typographical error on the Process Vent High Range Monitor reading. The previous revision has the reading at $5 \times 10^1 \times 10^1 \mu\text{Ci/cc}$ when it should have been $5.10 \times 10^1 \mu\text{Ci/cc}$.

Comment: This is a plan improvement.

5.2.1.1 Station Emergency Manager, and
5.2.1.3 Emergency Procedures Coordinator

Licensee rewrote these two sections in order to clarify the duties of the positions, and also to make the descriptions more concise.

Comment: This is a plan improvement.

5.2.1.8 Emergency Administrative Director

Licensee added the responsibility of "ensuring a TSC log" is kept of personnel and activities in the Technical Support Center.

Comment: This is a plan improvement.

5.2.1.12 Maintenance Support Team

Licensee added the position of a Planning Supervisor to the Maintenance Team.

Comment: This change neither increases nor decreases the effectiveness of the plan as the function of the team remains the same.

5.2.1.15 Administrative Support Team

Licensee rearranged the text of this section to increase the rapid flow of thought.

Comment: This change has no significant impact on the plan effectiveness. The planning standard continues to be met.

5.2.1.19 Evacuation Monitoring Team

Licensee rewrote this section to be more concise. Changes also reflected the renaming of the offsite evacuation assembly area to the Remote Assembly Area (RAA).

Comment: The first change is a plan improvement. The second change to this section is insignificant.

5.4.4 Surry County

Licensee deleted a statement that required the Shift Supervisor to report Emergency Classifications in the Classification System given in Tables in Section 4.0.

Comment: This matter was discussed between M. R. Poston-Brown and W. E. Cline of the NRC staff and B. Parkhurst and G. Topping of Virginia Electric and Power Company on May 29, 1985. It was pointed out that this section of the plan addressed notification to the sheriff when evacuation might be necessary. This notification is in addition to that made to local government officials pursuant to 10 CFR 50.47(b)(5). The purpose of the notification is for traffic control coordination. The effectiveness of the plan is not decreased by this change.

- Figure 5.6 State Radiological Emergency Response Organizations,
Figure 5.7 Local Government Radiological Emergency Response Organization;
and
Figure 5.8 Radiological Response Field Organization

Licensee added these organizational charts to the emergency plan.

Comment: This is a plan improvement.

6.4.1 Protective Cover, Evacuation, Personnel Accountability

Licensee deleted a discussion of having security perform the function of collecting all the badges of personnel evacuating the Protected Area.

Comment: This change has no real effect on the implementation of the plan as badges are dropped off in security as individuals exit the facility.

6.4.1 Protective Cover, Evacuation, Personnel Accountability

Licensee added a statement that requires continuous accountability of all staff still on-site after a site evacuation.

Comment: This is a plan improvement.

6.4.1 Protective Cover, Evacuation, Personnel Accountability p. 6.21

Licensee added reference to Figures 6.2 and 6.3 on population distribution. Licensee also stated that the current time evacuation studies would be submitted to the state following the ten year census. The licensee will then allow the state to determine the need for a new study.

Comment: This is a plan improvement.

6.4.3.2 Emergency Planning Zone p. 6.25

Licensee added a reference to protective action recommendations when discussing the "normal" status of the plant.

Comment: This change neither increases nor decreases the plan effectiveness, the change was made for clarification.

6.5.1 Emergency Exposure Limits p. 6.26

Licensee added a discussion on the use of volunteers during an emergency and the criteria for selection for such volunteers.

Comment: This is a plan improvement as use of such criteria coincides with Federal guidance and is a standard Health Physics practice.

6.5.2 Decontamination and First Aid p. 6.27

Licensee added a discussion of procedures used for vehicle and personnel monitoring at the remote assembly areas.

Comment: This is a plan improvement.

Figure 6.2 Population Data By Sector p. 6.32 and
Figure 6.3 Evacuation Times for Surry Station Center p. 6.33

Licensee added these new figures to Section 6.0.

Comment: This is a plan improvement (see Section 6.4.1).

7.1 Emergency Control Centers; b. Operational Support Center p. 7.2

Licensee changed the permanent location of the Operational Support Center (OSC). Also added statement that the OSC needs NUREG-0696 guidance.

Comment: These additions neither increase nor decrease the plan effectiveness.

7.1 Emergency Control Centers; e: Local Public News Center p. 7.4

Licensee added a statement that says "small groups of media may be accommodated at the LEOF in a location designated and approved by the Recovery Manager."

Comment: This change has no significant impact on the plan effectiveness.

7.3.2 Facilities and Equipment for Offsite Monitoring p. 7.25

Licensee added a reference to the availability of earthquake information from the National Earthquake Information Services.

8.7 Testing and Maintenance of Emergency Equipment p. 8.40

Licensee changed the period of time required for testing of NRC communications systems. Previously the tests were done on a quarterly basis; now the plan calls for a monthly test.

Comment: This is a plan improvement.

8.8 Informing The Public p. 8.42

Licensee added a statement that requires them to be able to give information about and attention to the needs of the handicapped in a emergency situation.

Comment: This is a plan improvement.

III. SUMMARY AND CONCLUSION

Based on this review of the newest revision of the Surry REP, the revisions and changes to the REP appear to meet the requirements of 10 CFR 50.54(q) in that the changes did not decrease the effectiveness of the plan, and in that the changes did not decrease the plan effectiveness, and the standards of 10 CFR 50.47(b) continue to be met. NRC's response to the licensee should reflect that these requirements are met.

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