

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 18
BRUNSWICK: DOCKET NOS. 50-324 AND 50-325

I. BACKGROUND

The licensee submitted a completed copy of the REP which incorporated Revision 18, dated February 22, 1985.

Most of the revisions were concerned with title and/or name changes. For example, the "nearsite support facility" (EOF) became the "onsite support facility" (EOF). Similar types of changes were made throughout the REP requiring a great number of revised pages. Revisions of this nature were determined to neither increase or decrease the effectiveness of the REP and are not further considered in this review.

II. EVALUATION OF CHANGES

Table of Contents, page viii

The list of tables was changed to reflect the deletion of Table 5.9-1 "Typical Emergency Supplies Available for Emergency Facilities."

Comment: This change neither increases or decreases the plan's effectiveness as Table 5.9-1 was replaced by PEP-04.6 "Radiological Emergency Kit inventory."

1.3.1.2 Emergency Response Resources, p. 1-4

Licensee changed the discussion of assignment of response duties. In the previous revision it was implied that on-shift personnel would be assigned duties on all response teams/functions. Revision 18 says the on-shift personnel will be assigned "where practical."

Comment: Some teams and assignments may not actually need to be filled by on-shift personnel and can be augmented effectively by off-shift or even corporate personnel. This change allows the licensee latitude in making such assignments. The planning standards still appear to be met.

1.3.1.2, Emergency Response Resources, p. 1-4

To agree with the above change, the licensee changed a statement that said "under all conditions that every emergency response duty falls under some predesignated individual..." to "under most conditions that every ..."

Comment: This plan statement is less prescriptive than the previous statement. However in view of the overall emergency organization and the emergency management control system in place by the licensee the planning standards still appear to be met.

Section 1.0, Introduction, p. 1-8

When discussing the Protected Area, the licensee deleted the discussion of "No Trespassing" signs on the fenced security area.

Comment: This change neither increases or decreases the effectiveness of the plan.

3.2.2.2, Emergency Repair Director

Licensee changed the alternates for the Emergency Repair Director from the Mechanical Maintenance Supervisor or the Electrical Maintenance Supervisor to the Maintenance Supervisor for Brunswick.

Comment: This change neither increases or decreases the effectiveness of the plan.

4.4.4.1, On-Site Personnel, p. 4-13

Licensee changes statement that backup decontamination sites have been designated to the statement that backup decontamination sites will be designated.

Comment: This is a plan weakness. On May 17, 1985, this matter was discussed between W. E. Cline of the NRC staff and P. Dorokos of the licensee's staff. Based on the discussion, it appears the licensee has plans for decon sites but did not want to be committed to just a single location. Thus a plan change was made to allow selection or designation of a decon site based on accident circumstances. However it was pointed out that either the plan or procedures must contain or reference a preferred (or primary) site. The licensee agreed to make an appropriate change during the next plan revision to either specify the locations in the plan or reference a procedure with specified locations.

4.4.4.2, Equipment and Vehicles

Licensee deleted the word "all" from a discussion of vehicles being surveyed in the event of site evacuation.

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

4.4.5, Treatment of Injured and Contaminated Persons

Licensee deleted a paragraph which discussed alternate methods of transporting a individual to the hospital from the plant.

Comment: This change neither increases or decreases plan effectiveness as PEP 3.9.3 discusses Transportation of Contaminated, Injured Personnel.

4.4.7.2, General

Licensee corrected a mistake in the previous revision. They changed meteorology data to meteorological data.

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

5.2, Technical Support Center

Licensee changed a statement from "the Technical Support Center has been provided with radiation protection..." to "the TSC will be provided with radiation protection..."

Comment: The change does not appear to have any significant impact on the effectiveness of the plan. The licensee is still making a commitment to maintaining radiation protection at the TSC.

5.2, Technical Support Center

In the event of a TSC evacuation, certain TSC personnel will go to the control room.

Comment: The licensee appears to cover the contingency for designating a backup to the TSC. Control room overcrowding and control room management would likely be accommodated by keeping the number of personnel down to "certain members of the TSC group." Since the TSC is "hardened" this contingency is unlikely.

5.8, Fire Detection

Licensee changed a reference for description of detector types from Table 1.2.1 of SD-42 to SD-42.

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

5.9, Protective Facilities and Equipment

Licensee changed reference for emergency equipment from Table 5.9-1 to PEP 04.6.

Comment: This change has no effect on the plan effectiveness (see Table of Contents, p. viii, comment for discussion).

5.9, Protective Facilities and Equipment

Licensee deleted the word "typically" from a discussion of the availability of emergency equipment.

Comment: This is a plan improvement.

5.9, Protective Facilities and Equipment

Licensee changed the location of damage control equipment from the tool room to the stockroom.

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

Table 5.0-1, Functional Objectives of Emergency Facilities

Licensee changed the location of the TSC from the document control room to the site training center.

Comment: This change neither increases or decreases the plan effectiveness.

Table 5.0-1, Functional Objectives of Emergency Facilities

Licensee deleted the word trailers from the discussion of the location of the Plant Media Center.

Comment: This does not appear to impact the effectiveness of the plan. The planning standard continues to be met.

6.2.1, Plan Updates

Licensee deleted the word "all" from the discussion of organizations to receive plan updates.

Comment: This does not appear to impact the effectiveness of the plan. The planning standards continue to be met.

6.3.1, Emergency Equipment and Supplies

Licensee changed all reference to E and RC procedures to references to PEP 04.6.

Comment: PEP 04.6 provides inventory lists for emergency supplies/equipment. The planning standards continue to be met.

Appendix E.2.2, Hospitalization

Licensee changed a reference to E and RC procedure 0610 "Emergency Medical Treatment of Contaminated Patients" to PEP-03.9.3 "Transportation of Injured, Contaminated Individual."

Comment: This change has no impact on the effectiveness of the plan as PEP-03.9.3 also discussed medical treatment of contaminated individuals.

Appendix G

Licensee changed title of this Appendix from "Procedures required to implement the sections of the plan" to "minimum procedures required to implement the sections of the plan."

Comment: This change neither increases or decreases the effectiveness of the plan.

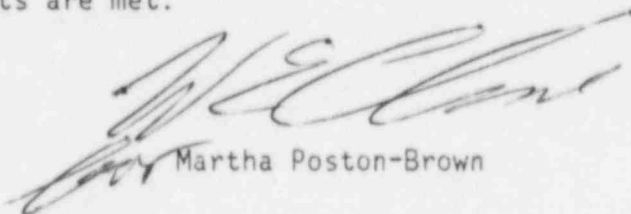
Appendix G, Minimum Procedures Required to Implement the Sections of the Plan

Licensee changed the Appendix to include reference to PEP 04.6 "Radiological Emergency kit inventory" for implementation of Section 6 "Maintaining Emergency Preparedness."

Comment: The planning standards continue to be met, as PEP 04.6 was designed to replace Table 5.9-1.

III. Summary and Conclusions

Based on the review of Revision 18 of the Brunswick Plan REP, the 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 the standards of 10 CFR 50.47(b) continue to be met. NRC's response to the licensee should reflect these requirements are met.



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