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

FROM: Alphonsa Gooden, Radiation Specialist
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SUBJECT: EMERGENCY PLAN REVIEW - REVISION 17, BRUNSWICK STEAM ELECTRIC
PLANT DOCKET NOS. 50-324 AND 50-325

I. Background

On February 10, 1985, Revision 17 to the Brunswick REP dated January 24, 1985, was submitted for review. This revision involved title changes, rewording, and restructuring of sentences. Most of the changes had very little or no significance on the emergency preparedness program. As a result, only substantive changes will be discussed.

II. Evaluation of Substantive Changes

A. Section 3.0 Emergency Response Organization

Page 3-1, 2nd paragraph, 2nd line down:

The entire reference to operating crew is deleted.

Comments: This deletion does not decrease plan effectiveness. This responsibility is discussed elsewhere in plant procedures (BSEP-PEP 2.6.2).

B. Section 3.2 On-Site Emergency Organization

1. Page 3-4, item 3.2.1, 14th line down:

Statement regarding the Site Emergency Coordinators' use of Plant P.A. System deleted.

Comments: This deletion has no effect on plan effectiveness. This responsibility is covered by the Emergency Communicator.

2. Page 3-7, item 3.2.2.3, 9th line down:

Deletion of a responsibility assigned to the Logistics Support Director.

Comment: This change does not decrease the effectiveness of the plan.

3. Page 3-11, item 3.2.7, 3rd line down:

Site Emergency Coordinator deleted from the selection process of the Damage Control Team.

Comments: This is a plan improvement item. It provides the Site Emergency Coordinator with more time to devote to other matters involving the emergency.

4. Page 3-12, item 3.2.10 last line in paragraph:

Change in procedural title.

Comments: This change is a procedural update for the operational support center leader. This update should increase plan effectiveness.

C. Section 3.3 Augmentation of On-Site Emergency Organization

1. Page 3-13, item 3.3.1.2, 2nd and 3rd lines down:

Title changes for the Administrative and Logistics Manager/Alternate position.

Comment: This plan update should increase plan effectiveness.

2. Page 3-13, item 3.3.1.3, 3rd line down:

An additional alternate added to position of Technical Analysis Manager.

Comment: This change is a plan improvement with additional personnel provided to augment emergency organization.

3. Page 3-14, item 3.3.2, 2nd line down:

Title change for the Corporate Emergency Operations Center Manager.

Comments: This change is an update to procedure and clarifies responsibility for activation of corporate center. Plan effectiveness should increase.

D. Section 3.5 Notification and Activation

Table 3.5-1 regarding notification and activation.

Comment: The addition of this table is a plan improvement item that should enhance the effectiveness of plan.

E. Section 4.2 Accident Assessment Actions

Page 4-5, item 4.2.2.2, 2nd paragraph, 9th line down:

Sentence reworded to state "if a general emergency is declared, protective action recommendations will be made to off-site authorities."

Comment: Rewording is a plan improvement. The previous statement was "consideration will be given to making protective action recommendations."

F. Section 4.4.2 Protective Action On-Site

Page 4-9, item 4.4.2.1, 5th line down:

Delete warning/notification completion time.

Comment: No mention is made regarding completion time. This change does not meet the evaluation criteria of NUREG-0654, p. 59, item J.1. This matter was discussed between W. Cline and R. Indelicato of the CP&L staff on 5/15/85. CP&L agreed to reference the appropriate emergency plan implementing procedure (PEP-3.8.2) which addresses this issue in the next plan revision.

G. Section 4.4 Protective Actions

1. Page 4-11, item 4.4.3.1, 3rd line down:

Change planned dose limits for personnel during lifesaving actions.

Comments: A reduction in whole body dose limit (from 100 REM to 75 REM) is in keeping with federal guidance. This is a plan improvement item that enhances plan effectiveness.

2. Page 4-13, item 4.4.3.1, 2nd paragraph, 14th line down:

Procedural change for reporting monitoring results.

Comment: Change is a procedural update that should increase the effectiveness of plan.

3. Page 4-14, item 4.4.5, 1st paragraph, 5th line down:

Relocated decontamination showers and supplies.

Comment: Change is a plan update that maintains the effectiveness of plan.

H. Section 5.7 Assessment Capabilities

Page 5-5, item 5.7.2, 2nd paragraph:

Entire paragraph revised

Comments: This change introduced ambiguities regarding the frequency of meteorological system calibrations. The specific time interval for performing calibration (full scale) is uncertain. In addition, frequency for performing visual checks on system deleted. This matter was discussed between W. Cline and R. Indelicato and B. McFeater of the CP&L staff on 5/16/85. CP&L agreed to reference the meteorological system calibration procedure (which specifies semi-annual calibrations) in the next revision to the plan.

I. Section 5.10 First Aid and Medical Facilities

Page 5-9, 1st paragraph, 1st line:

Location of first aid room changed.

Comment: This change is a plan update and contributes to plan effectiveness.

J. Section 6.2 Review and Update of the Plan and Implementation Procedures

Page 6-6, item 6.2.1, 12th line down:

Statement regarding updating of phone listings changed to read "shall be updated at least quarterly, if required."

Comment: To maintain continuity in plan update and effectiveness of plan, updates should be done on a quarterly basis (NUREG-0654, p. 79, item p. 10). The planning standard continues to be met.

K. Appendix B

Page 22, Letter of Agreement:

An agreement established between CP&L and New Hanover to serve as a backup medical facility.

Comment: This addition to plan will increase effectiveness of plan.

III. Summary and Conclusion

Based on review of Revision 17 to the Brunswick REP, no plan deficiencies were noted. However, inconsistencies were noted during the review that required contacting CP&L representatives for clarification. The areas requiring discussion with licensee representative were: (1) on site warning/notification completion time, and (2) calibration frequency for meteorological system.

Other changes to the plan appear to continue to meet the planning standards. The letter to the licensee should reflect the identified inconsistencies and the verbal commitment made by the licensee for remedial action.

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