



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 09 1985

Docket No. 50-288

Dr. M. A. Kay, Director
Reactor Facility
Reed College
3203 SE Woodstock Boulevard
Portland, Oregon 97202

Dear Dr. Kay:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - REED COLLEGE EMERGENCY PLAN

The staff of the U. S. Nuclear Regulatory Commission (NRC) has completed its review and evaluation of the revised emergency plan for the Reed College reactor facility that was submitted on May 7, 1985 in compliance with 10 CFR 50.54(q) and (r). The plan was reviewed against the requirements of Appendix E to 10 CFR Part 50, the guidance criteria set forth in Revision 1 to Regulatory Guide 2.6 and ANSI/ANS-15.16-1982, "Emergency Planning for Research Reactors."

We find that the you have satisfactorily corrected three of the four deficiencies identified in your emergency plan submitted on November 11, 1983. In our letter to you dated June 22, 1984, we requested a revision to the emergency plan to correct deficiencies in the areas of: 1) definitions of terms; 2) arrangements and agreements with the Good Samaritan Hospital and Portland Ambulance Service; 3) identification of non-radiological monitors and 4) recovery procedures. The emergency plan submitted on May 7, 1985 included changes which corrected these deficiencies with the exception of the agreement letters. We understand that you are in the process of obtaining the requested agreements. Satisfactory resolution of this deficiency will be accomplished when the agreement letters describing the arrangements with offsite support organizations are appended to the plan.

As discussed in our teleconference on August 5, 1985, we have performed a detailed review of your emergency organization and responsibilities for emergency response. Based on this review, we are concerned that the emergency organization is not adequate to perform the responsibilities contained in the guidance criteria. Our comments are enclosed.

We request that the plan be revised to address the identified concerns. These revisions should be coordinated with the reorganization of your reactor staff committed to during the post exit meeting with Region V conducted on May 21, 1985.

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Dr. M. A. Kay

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The revised Emergency Plan should be submitted by September 15, 1985. Following receipt of your revisions, the staff will continue its review. If you have any questions, please contact John Dosa, our new Project Manager for your facility, at (301) 492-9829.

Sincerely

Cecil O. Thomas

Cecil O. Thomas, Chief
Standardization and Special
Projects Branch
Division of Licensing, NRR

"The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511."

Enclosure:
As stated

cc: See next page

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Reed College

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cc: Director, Oregon Department
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Reed Reactor Facility Emergency Plan

Emergency Organization Review

- The guidance criteria describes the responsibilities of seven functional positions to be included in an onsite emergency organization. The plan designates the Emergency Coordinator as the individual who performs six of those functions. In a small organization it is expected that some individuals will perform more than one function; however, six functions for one individual seems overburdening. The authorities and responsibilities for those functions should be delegated to key members of the organization who report to one person with overall responsibility.
- The role of RRF management is not clear. For each emergency classification the Emergency Coordinator activates the emergency organization as needed and "in addition" RRF management. The RRF management, as described in Section 3.1.4, consists of the RRF Director and the Reactor Supervisor. Since these individuals are notified as part of the activation of the emergency organization, it is not clear whether the additional RRF Management to be notified includes other individuals not part of the emergency organization or whether the statements in Sections 7.5.1, 7.6.1 and 7.7.1 are redundant. If this RRF management is not the individuals described in Section 3.1.4, it should be defined and its role in the emergency organization should be clarified and included in the block diagram.
- The responsibility for the function of radiological assessment is not clear. Section 3.1.5 states that the Director performs this function; Section 7.3 states that health physics personnel perform this function. This function and the associated responsibilities should be clearly designated.
- There appears to be a discrepancy between the personnel on the Emergency Notification Call List (ENCL) as described in Section 3.1.1 and the Off-site Support on the block diagram. The ENCL as in Section 3.1.1 includes other members of the emergency organization whereas, the block diagram indicates that the ENCL is Offsite Support only. As used throughout the plan, it is not clear whether the ENCL is actually the emergency organization.
- The position of Director RRF as illustrated in the block diagram would never be filled. The Director RRF would take the position of Emergency Coordinator, since Director RRF is the highest person on the Organizational Hierarchy. The emergency plan does not describe a situation where the Director RRF would report to the Emergency Coordinator as implied in the block diagram.
- The plan does not describe the roles of each segment of the emergency organization as illustrated in the block diagram. The roles of the Reactor Safety Committee, Reactor Operations Committee and the Physical Plant Personnel need to be addressed.

- Sections 7.7.3 and 8.4 discusses RRF health physics personnel. This group is neither discussed in the Emergency Organization section nor illustrated in the block diagram.
- The Emergency Director described in Section 7.6.4 should be discussed in the Emergency Organization section.