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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
DPR-50/Docket No. 50-289  
Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
DPR-73/Docket No. 50-320  
Oyster Creek Nuclear Generating Station (OC)  
DPR-16/Docket No. 50-219  
Revised Corporate Emergency Plan - Revision 11 RAI Response

Dear Sirs:

Our July 19, 1996 letter requested NRC approval of the GPU Nuclear Emergency Plan, Revision 11. That submittal included a copy of the GPU Nuclear Emergency Plan, Revision 11, and an attachment that summarized the forty-three (43) changes that comprised Revision 11. Our subsequent September 10, 1996 letter transmitted an additional change, for clarification and consistency, to be included in Revision 11. GPU Nuclear has determined that these changes do not decrease the effectiveness of the Emergency Plan and continue to meet the standards of 10CFR50.47(b) and 10CFR50.54(q). Nevertheless, to ensure NRC concurrence with this conclusion, we submitted this revision for approval prior to implementation.

The purpose of this letter is to document our response to a request for additional information (RAI) that was discussed during a teleconference with NRC Project Manager, Jan Norris, NRC reviewer, Narvaez Stinson, and GPU Nuclear personnel Jeffery Grisewood, Stanley R. Finicle, and Adam Miller. The attachment contains our response regarding the RAI as was discussed during the teleconference on November 18, 1996.

Sincerely Yours,

Arthur H. Rone

VP & Director, Nuclear Safety & Technical Services

AWM

Attachment

cc: Region I Administrator ( 2 copies )  
Oyster Creek Senior Resident Inspector  
TMI Senior Resident Inspector  
TMI Project Manager  
OC Project Manager

A045 1/1

270005  
9611270012 961122  
PDR ADOCK 05000219  
F PDR

**Change 18** - Where is the Radiological Control Support Coordinator's duty station during emergency conditions?

**Response** - Currently this position is located at our Annex to the Emergency Operation Facility (AEOF). The intent was to have RCT's that were not needed onsite to be staged at the AEOF. They would then be directed to the site when requests were made by the RAC. However, in recent years, we have tended to have all available RCT's report onsite right away since their services are usually needed immediately. As a result, this position typically has no one to direct. Furthermore, this position has a 4 hour response time. The Group Leader R&EC is responsible for directing the RCT's until this position is manned. The Group Leader R&EC is overall-in-charge of the radiological and environmental control efforts and conducts operations from the EOF. Since the major direction efforts typically occur in the first 4 hours anyway, it was determined that the separate position of Radiological Controls Support Coordinator was no longer necessary. The Group Leader R&EC will retain those responsibilities past the 4 hour point.

**Change 23** - What is the number of Radwaste Monitors presently in use? How many were used at the time of licensing? If more than one, when was this change made.

**Response** - There is only one Radwaste Monitor in use at Oyster Creek. There was only one used at the time of licensing. The term monitors was not technically accurate, therefore it gave the impression that there was more than one monitor.

**Change 24** - For clarification, how many calcium sulfate elements and lithium borate phosphor elements are contained in one TLD?

**Response** - TMI plans to use Panasonic 814 TLDs which have 3 calcium sulfate elements and one lithium borate. This differs from the 801 TLDs which have 2 elements of each. The calcium sulfate elements are the only ones used for environmental monitoring, and they measure gamma radiation only. They are much more sensitive, accurate, and have less "fading". The lithium borate elements have the capability to measure beta exposure component, and this additional information may be useful during or following an emergency. Environmental Affairs is retaining the ability to measure both gamma and beta exposure at all TLD stations. To retain our commitment of at least 2 elements of each type, we will be using multiple badges.

**Change 28** - Provide justification why no instructor will be required to assist in training course in accordance with Table 13, Divisional Commitments to Provide Instructors, on the basis of eliminating the PTFC.

**Response** - The PTFC is located at the GPUN Headquarters in Parsippany, New Jersey. The GPUN Training Department does not have any Emergency Preparedness trainers located there. As a matter of convenience, the Technical Functions Division conducted the PTFC training for the Training Department. The training was the same basic training that the engineers onsite receive from the Training Department. With the elimination of the PTFC, no Emergency Preparedness training will be required for the few remaining engineers located in Parsippany. Therefore, Technical Functions Division's assistance is no longer required.

**Change 35** - The issue concerning deletion of reference to the Radiological Controls Support Coordinator is pending on change Number 18.

**Response** - See response to number 18.

- Change 36**     a) TSC relocation: provide justification for relocating the TSC.  
b) With the proposed relocation, is the guidance in NUREG-0696, Functional Criteria for Emergency Response Facilities, addressing the 2-minute travel time between the TSC and the Control Room, adequately met?

**Response** - The TSC is being relocated to the room adjacent to the Control Room (ECC). The reasons for the relocation are to provide more overall space for the TSC and to make it more effective by housing all of the engineers in a single room. The facility is still located within the Control Tower and the response time to this facility is reduced since it will be now be on the same floor as the Control Room. The estimated time to get from the Control Room to the TSC is about 15 to 30 seconds. The guidance in NUREG-0696 is still being maintained. All current functions and capabilities will be retained in the new facility. The current TSC will be used as a back up if necessary. Current equipment located in this facility will be maintained.

**Change 37** - Provide justification for deleting the reference to the Emergency Management line to GPU Headquarters.

**Response** - TMI maintains telephone communication throughout the entire GPU system using a company-owned microwave and fiber optics links (i.e., tie-lines) system. Access to this system is through the plant telephone system which bypasses potentially congested public use circuits. This system would be the preferred system to use to contact GPU Headquarters if such contact became necessary. Therefore the separate commercial Emergency Management line is no longer needed. It should be noted that this Emergency Management line was never needed or used during any drill or exercise.

**Change 41** - Table 15, Emergency Response Organization Staffing Responsibilities: deletion of reference to Radiological Controls Support Coordinator pending proposed change Number 18.

**Response** - See response to question 18.

## **Attachment for Revised Corporate Emergency Plan, Revision 11, RAI Response**

**Change 3** - Provide the section of the EPIP that addresses the declaration of an Unusual Event based on contaminated injuries.

**Response** - For TMI, there is no Unusual Event Classification based on contaminated injuries. The NRC approved elimination of the Unusual Event declaration for this event based on the branch technical positions. TMI still maintains an Emergency Plan Implementing Procedure (EPIP) which provides instructions on the notification process and handling of contaminated injured individuals. At Oyster Creek, this Unusual Event Classification remains in EPIP-OC-.01. Oyster Creek has recently received approval for elimination of this declaration based on the branch technical positions. Oyster Creek will shortly eliminate the Unusual Event Classification from EPIP-OC-.01 and information regarding the handling of contaminated injuries will be moved to appropriate Rad Con, Operation and/or Medical procedures.

**Change 4** - Deleting the references to the specific number (3) of Radiological Controls Technicians (RCT's) would lessen the clarity of the licensee's commitment in this area, therefore, the licensee should provide further justification for this change or retain this section as it is.

**Response** - Table 5 On-Shift Emergency Organization Staffing already identifies the manning requirements. The information referred to in Section 5.1.1 #6 is redundant to the existing commitments found in Table 5. In our present Emergency Plan, one of the three RCT's referred to in Section 5.1.1 mans the onshift Radiological Controls Coordinator (RCC) position. That leaves the other 2 RCT's available to do plant surveys and other radiological controls tasks. In Revision 11 to the Emergency Plan, we are reducing the number of onshift RCT's from 3 to 2. However, we will still have 2 RCT's available to do plant surveys and other radiological controls tasks. Table 5 eliminates the onshift RCC position which was filled by the third RCT.

Recent technological advances implemented at TMI and Oyster Creek have reduced the manpower intensive activities associated with emergency dose assessment functions and responsibilities of Radiological Controls personnel in an emergency. These technological improvements either reduce or eliminate the need for direct personnel involvement, making the individuals task easier, more efficient and less time consuming. A major task of the RCC used to be signing personnel onto RWP's and providing dosimetry. These tasks are now automated and no longer require the RCC's time. The only real task for the RCC now is to relay information from the Radiological Assessment Coordinator (RAC) to the RCT's. There have been major advances in the dose assessment process that now provides the RAC with the additional time necessary to control the RCT's directly. (Such direct control improves effectiveness by eliminating a source of possible miscommunication.) The RAC computer system now is able to access the Plant Process Computer and retrieve data automatically. It then automatically does a dose projection adding in 10 different possible pathways. Updated information is automatically provided to the RAC at least once every 15 minutes. The RAC computer system no longer requires manual input of plant data or running of the code; therefore the RAC is now able to better manage the dose assessment program. As a result the RAC will be able to take on the additional responsibilities currently done by the onshift RCC without neglecting the existing RAC duties. Drills have been successfully conducted at both sites in order to test the RAC in performing both the RAC and RCC duties.

**Change 8** - What personnel perform dose assessment at TMI?

**Response** - The Radiological Assessment Coordinator.