

Docket Nos.: 50-498
and 50-499

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Mr. J. H. Goldberg
Group Vice President - Nuclear
Houston Lighting and Power Company
Post Office Box 1700
Houston, Texas 77001

Dear Mr. Goldberg:

Subject: Comments and Questions on the South Texas Project Emergency Plan

The staff has been reviewing the undated Emergency Plan for the South Texas Project Electric Generating Station which you submitted on December 26, 1984, except for the evaluation of the evacuation time studies which is currently under review and will be provided separately. The acceptance criteria used as the basis for the staff's review of your Emergency Plan are specified in Section 13.3., "Emergency Planning" of the Standard Review Plan (SRP), NUREG-0800 dated July 1981 and include the Planning Standards of 10 CFR 50.47(b); the requirements of 10 CFR 50, Appendix E; and the specific guidance criteria of NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plant," dated November 1980. The guidance criteria of NUREG-0654 have been endorsed in Regulatory Guide 1.101, Revision 2, "Emergency Planning and Preparedness for Nuclear Power Reactors," dated October 1981.

Enclosed are the staff's comments on your Emergency Plan indicating the need for additional information and commitments which are necessary before we can find your Emergency Plan acceptable. We request that you provide us written responses to these comments, along with page changes for your Emergency Plan reflecting your commitments, within the schedule agreed to at our October 25, 1985 meeting which would produce a final version of the plan in January, 1986.

Sincerely,

H. Schierling for

George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing

Enclosure: As stated

cc: See next page

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Enclosure

Review Comments On The South Texas Project Electric Generating
Station Emergency Plan (December 26, 1984)

Docket Nos. 50-498 and 50-499

The following comments apply to the South Texas Project Electric Generating Station Emergency Plan (herein after referred to as the plan) and identify in parenthesis, the applicable evaluation criteria of 10 CFR 50 or Regulatory Guide 1.101, Revision 2 (NUREG-0654/FEMA-REP-1, Revision 1).

A. Assignment of Responsibility

1. The plan does not identify the state and local organizations within the State of Texas other than the Texas State Division of Emergency Management and the Matagorda County Sheriff's Office that are intended to be part of the overall response. (A.1.a and App. 5)
2. The plan does not specify each Federal, state or local organization having an operational role in the emergency response, except the Department of Energy and does not specify the concept of operations or their relationship to the total effort. (A.1.b and A.3)
3. The plan does not provide a block diagram illustrating the interrelationships between the applicant and the various Federal, state and local organizations and suborganizations during emergency conditions. (A.1.c)

4. The plan does not identify a specific individual by title who shall be in charge of each Federal, state and local organization or suborganization having an operational role in the emergency response. (A.1.d)
5. Although the plan states the communications between the plant site, the Matagorda County Sheriff's Office and the Texas Department of Public Safety are manned 24 hours per day and that the Bay City and Polacios Fire Departments as well as the Matagorda General Hospital are available 24 hours per day, it does not discuss the availability of the Houston Lighting and Power Company (HL&P) Nuclear Engineering and Construction Department or other Federal, state and local organizations having an operating role in the emergency response. (A.1.e)
6. Attachment 2 of the plan lists the agreement letters and references the Federal Radiological Emergency Response plan referring to the concept of operations between the applicant and Federal, state and local agencies and support organizations; however the agreement letters are not provided, the agreements are not adequately described and a signature page format is not used to verify these agreements. In addition the list of agreement letters does not appear to be complete. (A.3)
7. The plan does not discuss the capability for continuous (24 hour) operations for a protracted period of time or specify the individual responsible for assuring continuity of resources for HL&P in Houston as well as the state and local organizations having an operating role in the emergency response. (A.4)

B. Onsite Emergency Organization

1. The plan specifies the onsite emergency organization; however in Figure 9.2 this organization appears to be rather unwieldy in that 12 managers report directly to the Emergency Director. In addition duties are assigned to a Radiological Services Manager and it is unclear as to whether this is the Radiological Manager or some other individual not covered in the functional descriptions in the plan. There is no functional description in the plan for the Technical Support Center Coordinator and the Emergency and Safety Services Supervisor does not appear to be involved in the emergency organization. Also there is no line of succession for the Records Manager in the plan. (B.1 and B.2)
2. Although the plan identifies a line of succession for the Emergency Director, it does not identify or describe the specific conditions and procedures for higher level utility officials assuming this position. (B.3)
3. The functions of the Emergency Director which may not be delegated are given in the plan, however they do not clearly include the responsibility to notify offsite emergency authorities. (B.4)
4. Although minimum staffing requirements appear to be met in Table 2-1 and Figure 8.8 of the plan, they do not agree with each other and it is unclear as to whether Table 2-1 applies to shift staffing for one or two reactor units. (B.5)

5. In subsection 2.5.2 of the plan, the statement that emergency response personnel assigned to the Emergency Operations Center or Emergency Operations Facility, (EOF) will not normally be in the EOF, "but in their responsible areas of the Station" is unclear and should be fully explained. (B.5 and B.6)
6. The plan does not specify adequately the interfaces between and among the onsite functional areas of emergency activity, HL&P in Houston and the state and local emergency organizations to determine if they will be effective. The diagram in Figure 9.2 is incomplete in that it does not illustrate all the Federal, state and local emergency organizations involved in the response. (B.6)
7. The plan does not provide copies of the arrangements and agreements with contractor, private and local support agencies and the authorities, responsibilities and limits on actions of these organizations are not clearly delineated. (B.9)

C. Emergency Response Support and Resources

1. The expected response time to receive assistance from the U.S. Coast Guard is not given in the plan and although the plan indicates that assistance in weather forecasts will be obtained, the source of this assistance is not identified. (C.1.b)

2. The plan does not specify specific applicant, state and local resources available to support the Federal response (e.g. near-site airfields, telephones and other communications systems). (C.1.c)
3. The plan does not indicate that the applicant will dispatch representatives to principal offsite government emergency operations centers. (C.2.b)
4. The plan identifies radiological laboratories both onsite and offsite to provide radiological analysis assistance, however it does not describe their capabilities and copies of agreements with private organizations for the use of these facilities are not provided. (C.3)
5. The plan identifies a number of nuclear and other organizations that will provide assistance to the applicant in an emergency but the services are not adequately described and letters of agreement are not provided. (C.4)

D. Emergency Classification System

1. The plan provides for an emergency classification system but the parameters and specific instrument readings are not always provided. In addition, the actions to be taken by the applicant under each emergency class do not always follow the criteria provided with respect to notification frequency, providing dedicated communicators or ADP terminals to offsite authorities, activation of the Technical Support Center (TSC) and Operational Support Center (OSC), radiological monitoring, periodic press briefings and availability of senior technical and management personnel to offsite authorities. (D.1 and Appendix 1)

2. The initiating conditions for the emergency classification system given in the plan do not always provide an adequate emergency classification as provided in the criteria particularly for external events (e.g. earthquakes, hurricanes, missiles). In addition a number of initiating conditions in the criteria are not covered in this emergency classification system (e.g. offsite dose projections and explosions). (D.2 and Appendix 1)

E. Notification Methods and Procedures

1. The plan provides for an emergency notification procedure between the South Texas Project and offsite authorities; but it does not describe the mutually agreeable bases for notification of the response organizations or the procedures for verification. (E.1)
2. The plan does not adequately describe the procedures for alerting, notifying and mobilizing emergency response personnel both onsite and at HP&L offices in Houston. (E.2)
3. The plan describes the contents of the initial emergency messages to be sent from the plant; however, an example of the format for these messages should be appended to the plan. (E.3)
4. The contents of followup emergency messages from the plant are described; however, an example of the format for these messages should be appended to the plan. (E.4)

5. The administrative and physical means for providing prompt instruction to the public are not adequately described in the plan including: (1) where the warning sirens are located; (2) who is responsible for testing and maintaining the siren system; (3) how are individual tone alert receivers distributed, maintained and tested; (4) the instructions provided for the use of tone alerts and who provides them; (5) whether KMK5-FM is available to activate the tone alert system 24 hours per day, seven days per week; and (6) how is this station directed to activate the tone alert system and by whom. (E.6)
6. The plan does not adequately describe the contents of written messages with instructions for specific protective actions to be taken by the public and examples of these types of messages are not appended to the plan. (E.7)

F. Emergency Communications

1. Although the plan provides for a 24 hour per day, redundant emergency communications system between the South Texas Project, HP&L in Houston, Matagorda County Sheriff's Office and Texas Department of Public Safety in Pierce, it does not provide adequate information on the communications other state and local agencies and emergency operations centers. (F.1)
2. The plan does not provide the titles and alternates of these individuals responsible for the State and local communications links. (F.1 and 10 CFR 50, Appendix E, IV.E.9)

3. The plan does not cover the testing of the entire emergency communications system on a periodic basis. (F.3 and 10 CFR 50, Appendix E, IV.E.9)

G. Public Education and Information

1. The plan does not provide sufficient details on the types and topics of public information to be disseminated to determine if it meets the criteria. (G.1 and G.2)
2. Although the plan provides for the Media Information Director or other designee, as the primary spokesman, these individuals are not identified in Table 2-2 and his relationship to the Communications Coordinator as well as the description of the public information organization is unclear. (G.3.a and G.4.a)
3. The location and facilities of the Media Information Center is not adequately described in the plan. (G.3.a)
4. The plan does not provide sufficient information on the arrangements for the timely exchange of information among the designated spokespersons from HP&L and the various Federal, state and local response organizations to evaluate these arrangements against the criteria. (G.4.b)
5. Although the plan provides for a Rumor Control Coordinator, this individual is not identified in Table 2-2 and his capabilities and staffing are not described. In addition the means and methods for dealing with rumors are not adequately described. (G.4.c)

6. The program to annually acquaint news media with emergency plans, information concerning radiation and with points of contact for the release of emergency information are not adequately described. (G.5)

H. Emergency Facilities and Equipment

1. The description of the Technical Support Center (TSC) is unclear and implies that there is one TSC for the station while the FSAR indicates there is a TSC for each reactor unit. The information on the TSC given in FSAR Appendix 7A should be included in this description of the facilities and any discrepancies corrected between the plan and the FSAR. The plan indicates there are drawings for the layout and location of the TSC in Attachment 19, however no such drawings are provided in the plan. FSAR Figures 7.A.5.8-4 and 7.A.5.8-2 should be provided in Attachment 19 of the plan. In addition the description of the emergency data acquisition systems, availability of data, information, drawings and radiation monitoring instrumentation should be provided. (H.1)
2. The description of the Operational Support Center (OSC) is inadequate and the layout and exact location are not provided in the plan; although the plan states these are shown in Attachment 19. FSAR Figure 7.A.5.8-1 and a layout drawing of the OSC should be provided in the plan. (H.1)

3. The plan description of Emergency Operations Center, which is the equivalent of the Emergency Operations Facility (EOF), is incomplete and should include the information given in FSAR Appendix 7A. The figures provided in Attachment 19 of the plan are inadequate and should be replaced by FSAR Figures 7.A.5.8-5, 7.A.5.8-6 and 7.A.5.8-7. Also the backup or alternate EOF address is not provided, no layout of this facility is provided and the time necessary to activate this facility is not given. (H.2)
4. The Houston Emergency Operations Center, the Radiation Protection Office and the Site Access Facility appear to be part of the emergency response facilities but their functions are not clearly described in the plan. The functions and staffing of these facilities and their locations should be provided. (H.1 and H.2)
5. The plan does not clearly describe the activation and staffing of the TSC, OSC, EOF and other facilities; however FSAR Appendix 7A states that the TSC and EOF can be staffed in approximately one hour. The plan should provide a clear description of the activation and staffing including staffing times and where the key numbers of the emergency organization will be located during each emergency classification. (H.4)
6. The plan provides a description of the seismic and meteorological monitoring systems, but the range and sensitivity of this instrumentation and how the data from these systems is transmitted to the emergency response facilities is not provided. (H.5.a)

7. The plan does not provide an adequate description of the plant radiological monitoring systems or how the data from these systems are transmitted to the emergency response facilities. The plan should include a summary of the information on these systems provided in FSAR Sections 7.5.1, 9.3.2, 9.3.6, 11.5.2 and other appropriate FSAR sections as well as a description of how these data are transmitted, displayed and what data is available in the TSC and EOF. (H.5.b)
8. The plan does not provide an adequate description of the plant process monitoring and ESF instrumentation and does not described how the data from this instrumentation is transmitted and displayed and what data is available in the TSC and EOF. (H.5.6)
9. The plan does not describe how meteorological data will be acquired from offsite or from other sources (H.6.a and H.8)
10. The description of the offsite radiological monitor capability and equipment is not provided. (H.6.b)
11. The description of the offsite laboratory facilities and equipment to support onsite and offsite monitoring is not adequate in the plan. (H.6.c)
12. The plan does not provide for offsite radiological monitoring or equipment. (H.7)

13. The plan does not adequately describe the provisions for inspection, inventory and checking operability of emergency instrumentation and equipment or the frequency of these inspections and checks. (H.10)
14. Appendix 18 of the plan provides for lists of portable instrumentation and other equipment for emergencies, however the ranges and sensitivities of the instrumentation is not provided and most the lists do not appear to be complete. The most common omission observed was dosimetry. (H.11)
15. The plan does not describe how field monitoring data and samples will be collected and analyzed or how the data from Federal, state and local organizations will be coordinated. (H.12)

I. Accident Assessment

1. The plan does not completely identify the plant systems or provide the effluent parameter values for a spectrum of off-normal conditions and accidents to the example initiating conditions (e.g. dose projections). The plan does not always specify the kinds of instruments being used and their capabilities. (I.1)
2. The plan does not provide adequate information on the capabilities, types of instrumentation and equipment and resources for accident assessment including post-accident sampling, effluent monitors, in-plant iodine and particulate measuring instrumentation and radiation monitoring in containment to determine if the criteria are met. (I.2)

3. The plan does not adequately describe the methods and techniques to be used to determine the source term of releases of radioactive material from the plant or radiation instrument readings expected. (I.3.a)
4. The plan does not adequately describe the methods and techniques to determine the magnitude of the radioactive releases based on plant system conditions and effluent monitors or measurements. (e.g. failed fuel monitors, PASS) (I.3.b)
5. The plan does not establish the relationship between effluent monitoring readings and onsite and offsite exposures and contamination for various meteorological conditions. (I.4)
6. The plan provides for the capability of acquiring and evaluating meteorological information; however, the description is not adequate for evaluation against the criteria. The NRC, state and local will have access to this data, but it is unclear how this information is provided to the TSC and EOF. (I.5)
7. The plan does not establish a methodology for determining the release rate/projected doses if the instrumentation used for assessment reads offscale or is inoperable. (I.6)
8. The plan does not describe the capabilities, techniques, instrumentation and other resources for field monitoring within the emergency planning zones and this capability does not appear to be an intrinsic part of the applicant's emergency operations. (I.7)

9. The plan does not adequately describe methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of radiological hazards through the liquid or gaseous release pathways. The means for activation and notification of field teams as well as their composition, transportation, communication, monitoring equipment and estimated deployment times are not provided in the plan. (I.8)
10. The plan states that the applicant has portable instrumentation and equipment to measure 1×10^{-7} microcuries per cc of radioiodine under field conditions, but the techniques and instrumentation are not described and the effects of the presence of noble gases and high background radiation are not provided. (I.9)
11. The means for relating various measured parameters to dose rates for the key radionuclides given in Table 3 of the criteria and gross radioactivity measurements are not described in the plan. The provisions for estimating integrated dose from projected and actual dose rates and comparing these estimates with the protective action guides is not adequately described. (I.10)

J. Protective Response

1. The plan provides for transportation of onsite personnel using either HL&P or privately owned vehicles and states that the evacuation routes are provided in Attachment 17. However, no evacuation routes are provided in Attachment 17 and there is no information on the relocation or assembly areas for evacuated onsite personnel provided in the plan. (J.2)

2. The plan does not adequately describe the methods, procedures, instrumentation and equipment to be used for radiological monitoring of personnel evacuated from the site. (J.3)
3. The plan provides for the evacuation of onsite non-essential personnel during a Site Area or General Emergency; however, the arrangements for the possible radiological monitoring and decontamination of these personnel are not adequately described. (J.4)
4. The procedures and techniques to account for all individuals onsite to ascertain the names of missing individuals within 30 minutes is not adequately described. (J.5)
5. The plan does not provide an adequate description of how personnel remaining or arriving onsite will be issued protective clothing and respiratory protection or whether KI or other protective drugs will be provided. (J.6)
6. The mechanism for recommending protective actions and the dose limits for the principal radionuclides in the ingestion pathway are not adequately described. In addition, some of the proposed protective action recommendations need clarification. (J.7)

7. The maps provided in the plan are inadequate and illegible. Maps should be provided illustrating preselected radiological monitoring points, both onsite and offsite evacuation routes, relocation centers, assembly areas for onsite personnel, hospital locations, siren locations, school locations, evacuation zones, EOF and backup EOF locations, state and local EOC locations, local airports, population centers, and other important topographical features within the emergency planning zones. (J.10.a, J.10.b and J.10.c)

K. Radiological Exposure Control

1. The plan does not establish exposure guidelines for performing first aid, personnel decontamination and medical treatment as well as for personnel performing ambulance service. (K.1.d, K.1.e, K.1.f and K.1.g)
2. The plan does not adequately describe the plant emergency radiation protection program on implementation of exposure guidelines, how decisions to exceed normal exposure limits will be made, exactly which individuals by emergency position title have authority to permit exceeding the exposure guidelines, and the methods for recording and controlling radiation exposure of emergency personnel. (K.2)
3. The plan does not adequately describe the guidelines for issuing personnel dosimetry of different types and what ranges of dosimetry are available. (K.3.a)

4. The methods and guidelines for reading, recording and maintaining dose records during emergencies is not adequately described in the plan. (K.3.b)
5. The limits and guidelines for determining the need for decontamination of emergency personnel and injured personnel are not provided in the plan. (K.5.a)
6. The description of the instrumentation and methods for the radiological monitoring of wounds as well as radioactive waste disposal and contamination control for contaminated, injured personnel during ambulance transport and at the Matagorda County Hospital is inadequate. (K.5.b)
7. The plan does not adequately define the contamination and control procedures and guidelines for drinking water and food supplies. (K.6.b)
8. The plan does not provide for decontamination and monitoring of onsite personnel at relocation sites or provision for extra clothing. (K.7)

L. Medical and Public Health Support

1. The plan provides for medical services for handling injured as well as injured and contaminated plant personnel at the Matagorda General Hospital, but it does not indicate that this hospital can evaluate radiation exposure and uptake. The plan also states that the University

of Texas System Cancer Center is available for consultation and treatment, but does not indicate whether this is the backup hospital for the plant. In addition, the exact location of both hospitals is not provided nor is there documentation of the agreements with these institutions. (L.1)

2. Although the plan provides for an onsite medical assistance team on each shift and a plant First Aid Room, it does not describe the teams capabilities or the equipment in the First Aid Room and its exact location. (L.2)

3. The plan provides for transport of injured and contaminated personnel from the plant to medical facilities, but documentation of this capability by agreement is not provided. (L.4)

M. Recovery and Reentry Planning and Post-Accident Operations

1. The plan does not describe adequately the general plans and procedures for reentry and recovery of the plant after an accident in that the conditions do not include that plant systems are in a long-term stable condition; personnel radiation exposure control and dosimetry are not described adequately; relief and turnover procedures are not described; the notification and communications with offsite authorities are not well defined and the use of offsite assistance and resources are not described. (M.1)

2. The plan does not describe the recovery organization management structure and does not provide the key positions by title or their authorities and responsibilities during recovery operations.
3. The specific means and procedures for informing both onsite and offsite authorities that recovery operations are being initiated is not described in the plan. (M.3)
4. The plan provides for the evaluation of population radiation dose using prepositioned thermoluminescent dosimeters located throughout the 10 mile EPZ; however, the locations, number of dosimeters, the dosimeter type, range and sensitivity, the dosimeter exchange procedures and how these dosimeters will be used to estimate population dose is not provided. In addition, the use of field measurements and dose projections to supplement the dosimetry data and the distance from the site that the population dose will be estimated is not covered in the plan. (M.4)

N. Exercises and Drills

1. The plan does not indicate that exercises will be conducted in accordance with NRC and FEMA criteria or that exercises will be designed to test a major portion of the basic elements existing within the emergency plans and organization of the applicant as well as state and local authorities. (N.1.a)

2. It is unclear whether the variations in the exercise scenarios over a five year period will test the major elements of the emergency organizations of the applicant as well as state and local authorities and there are no provisions for unannounced exercises. (N.1.b)
3. The plan does not state that all drills will be supervised and evaluated by a qualified drill instructor. (N.2)
4. The plan does not indicate that one of the purposes of communications drills is to test the comprehension and understanding of emergency messages of various types. Also the plan does not describe adequately the procedures used for conducting emergency drills. (N.2.a)
5. The plan does not describe adequately the procedures used for conducting medical emergency drills and does not indicate that radiation monitoring, contamination control and decontamination of the injured person as well as other personnel and facilities involved will be tested during this drill. (N.2.c)
6. The radiological monitoring drill procedures are not described adequately in the plan and monitoring of the ingestion pathway is not included. These drills should be conducted semi-annually rather than annually as stipulated in the plan. The statement that "On-station monitoring situations will also be a portion of this drill periodically" needs to be clarified. [N.2.d.(1)]

7. The plan does not describe adequately the post-accident sampling drills and does not include the radiation protection, contamination controls and the methods by which actual radiation levels will be provided for such drills. [N.2.d.(2)]
8. The descriptions of exercises and drills given in the plan do not indicate how they will be carried out to allow free play for decisionmaking, the appropriate evaluation criteria, the simulation of events and the arrangements to provide advanced materials to official observers. (N.3)
9. The management control system to ensure that corrective actions are taken to rectify deficiencies observed during exercises and drills is not described adequately in the plan. (N.5)

0. Radiological Emergency Response Training

1. The plan does not describe adequately the training program for offsite support personnel who may be called upon to assist plant personnel under emergency conditions and it is unclear whether these personnel will receive training in basic radiation protection. (0.1.a)
2. The training procedures and techniques described in the plan are not provided in adequate detail. The statement, "Demonstration of practical factors and drill participation (with on-the-spot correction where appropriate)," is unclear and should be rewritten to clarify its meaning. (0.2)

3. The plan does not describe adequately the specialized and initial training for instructing and qualifying emergency personnel. The scope, nature and frequency of most of this training is not provided in the plan. A training matrix identifying specific training courses and emergency positions or groups or teams to be provided this instruction as well as a description of the instructional topics to be covered in each course should be appended to the plan. (0.4 and 0.5)

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

1. The plan does not provide specifically for training of the individuals responsible for the emergency planning effort. (P.1)
2. The plan states that agreement letters with support organizations "... will be reviewed and updated as needed, at least once every two years." rather than on an annual basis as recommended in the criteria. (P.4)
3. The plan does not describe adequately the methods for distributing the controlled copies of the plan or the identity of the holders of these controlled copies. The plan provides for a signed receipt for revised pages to the plan from the holders of controlled copies, but does not indicate who gets these receipts and reviews them to ensure that all controlled copies of the plan have received updates. (P.5)

4. The plan lists the state and county emergency plans, but does not provide a detailed listing of all the supporting plans and their sources. (P.6)
5. The plan contains an appendix listing by title, the emergency plan implementing procedures including the sections of the plan to be implemented. This appendix also should list all the standard plant procedures to be used or implemented during emergencies. In addition, the listing should be organized by subject area or some other method of organization rather than the random listing provided. (P.7)
6. The cross-referencing of the plan to the criteria is deficient in that the references are not always complete or are sometimes in error (e.g., D.1, J.2) and are often too general in that a whole chapter, appendix or a major section of the plan is referenced. (P.8)
7. The plan does not clearly define how the corporate management will be involved or aware of detected deficiencies and corrections to the emergency plan and procedures. The plan should describe the members and functions of the "Plant Operations Review Committee." Also the plan should describe the "Station Operations Quality Assurance Department" and how it interfaces with the corporate Quality Assurance Manager. (P.9)
8. The plan statement that a quarterly update of telephone listings for the "Duty Emergency Response Organization" will be performed and that "other listings of notification telephone numbers" will be updated in accordance with procedures is imprecise and should be clarified. (P.10)