

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, PA 19101

DEC 20 1985

Dear Mr. Brown:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING THE PROPOSED
EXCEPTIONS TO THE STAFFING GOALS FOR EMERGENCIES

Re: Peach Bottom Atomic Power Station, Units 2 and 3

By letters dated April 3, 1981, February 2, 1983 and April 15, 1983, The Philadelphia Electric Company (PECo) requested exceptions to the staffing augmentation goals for emergencies (NUREG-0737, Supplement 1) for Peach Bottom, Units 2 and 3.

Based upon the information submitted by PECO to date, our preliminary comparison (Enclosure 1) of the emergency augmentation personnel arrival times to the goals in NUREG-0654/FEMA-REP-1, Rev. 1, Table B-1 shows that PECO would be short Senior Health Physics expertise (1), Radiological Survey Technicians (3), Health Physics Technicians (2), and Core/Thermal Hydraulics expertise (1) at the 30 minute mark. On the other hand, at the 30 minute mark the on shift staff would have had the benefit of an extra Communicator and an extra Health Physics Technician, who are available from the beginning of the emergency event. At the 60 minute mark, PECO would still be short 3 Health Physics Technicians. The potential shortcomings of this level and timing of emergency staffing are addressed in the enclosed analysis.

Because of the potential shortcomings of the PECO proposal and the time that has elapsed since the proposal was submitted, we request that PECO submit:

1. A current staffing proposal keyed to the goals in NUREG-0654/FEMA-REP-1, Rev. 1, Table B-1, identifying any differences.
2. A survey of the expected elapsed time from the declaration of an emergency to arrival of emergency response personnel for each augmentation position identified in the current staffing proposal. This is simply adding the notification time and the commuting time for each person occupying those positions.

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3. Where there are differences from Table B-1 goals for arrival times, please provide an explanation of how the functions will be performed using on-shift resources.

Please review the above request for additional information and provide responses no later than February 7, 1986.

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

Sincerely,

Original signed by

Gerald Gears, Project Manager
BWR Project Directorate #2
Division of BWR Licensing

Enclosure:

Enclosure 1 - Shift Augmentation Analysis

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Mr. E. G. Bauer, Jr.
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Peach Bottom Atomic Power Station,
Units 2 and 3

cc:

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Shift Augmentation Analysis at Peach Bottom

1. Senior Health Physics (HP) expertise - The Table B-1 goal is to provide senior health physics expertise within 30 minutes after the declaration of an emergency. This is the first augmentation supervisor to report to the site. In addition to the major task of offsite dose assessment, this individual would likely assume initial responsibility for most protective response functions and radiochemical analyses.

PECo proposes that this function will be performed by the shift supervision during the first sixty minutes. In the recent David Besse incident, shift supervision was totally occupied in attempting to recover plant stability and prevent an accident.

2. Radiological Assessment - The goal is to provide two augmentation persons for offsite surveys, one augmentation person for onsite, out-of-plant surveys, and one augmentation person for inplant surveys within 30 minutes after the declaration of an emergency; and to provide an additional seven persons at the 60 minute mark. The general function of radiological monitoring may need to be performed in a variety of locations and may require an increasing level of effort as the emergency escalates. Inplant radiation monitoring teams may be required to supplement area or process radiation monitoring systems in identifying areas of the plant through which releases may be taking place. Onsite, out-of-plant, and offsite radiation monitoring teams may be needed to verify plume location and exposure rates. Because of the constraints that would be imposed by travel times from one location to another, monitoring teams assigned to one area can be expected to be unavailable for service in another area. Teams assigned to off-site radiation monitoring cannot be diverted to inplant or onsite monitoring within any reasonable time frame (and vice versa). There may be limited ability to interchange inplant and onsite radiation monitoring assignments. However, because of the possibility that inplant and onsite monitoring may need to be conducted simultaneously, separate teams must be maintained.

PECo proposes to provide two radiation monitoring personnel onshift (as opposed to a Table B-1 goal of one person on shift) and have no augmentation radiation monitoring personnel at 30 minutes post declaration of an emergency. At the 60 minute mark seven augmentation radiation monitoring personnel would be expected but this would still be three persons short of the Table B-1 goals for 60 minutes past declaration of an emergency. PECO's explanation of coverage for these positions using "equivalent resource man-hours" and their peculiar grouping of functions is both confusing and misleading. Contrary to PECO's general theme, one person for one hour is not the equivalent of two persons between the 30 minute mark and the 60 minute mark because of the possible need to monitor different locations or perform different functions during that period of time. Also, PECO assumes that offsite surveys will not be required during the first 60 minutes because shift supervision will be calculating dose projections from the control room; this does not follow.

3. Radiation Protection - This function is comprised of access control, HP coverage of onsite teams, personnel monitoring and dosimetry. Workload requirements are a function of the number of different teams dispatched to or through radiation hazard areas. Access control and HP coverage may be required shortly after declaration of an emergency. The Table B-1 goal is to have two augmentation HP Technicians at the site in 30 minutes and two additional HP Technicians within 60 minutes after declaration of a emergency.

The PECO proposal is to provide 4 augmentation HP Technicians within 60 minutes after declaration of an emergency. PECO proposes to use the two on-shift HP Technicians who are designated for onsite and in-plant surveys to perform this function during the first hour. This could be possible if in-plant surveys, onsite-surveys, access control, HP coverage of onsite teams, personnel monitoring and dosimetry were not required at all during the first 60 minutes after declaration of an emergency or if most of these needs occurred sequentially. However, the goals in Table B-1 assume that many if not all of these needs will occur concurrently.

4. Core/Thermal Hydraulics - Capability for core physics and thermo-hydraulic analyses should be made available shortly after the declaration of an emergency because of the need for specialized knowledge of the physical processes that would occur during degradation or failure of the reactor core. This capability cannot be presumed to be present among the members of the normal shift crew who may be busy performing emergency operating procedures. The goal in Table B-1 is to have this expertise available within 30 minutes of the declaration of an emergency because of the many initiating conditions for an Alert that have the capability of escalating within this time period to a situation involving a threat to the integrity of the fuel.

The PECO proposal is to share this responsibility among the normal shift crew.