

NOV 1 1985

Docket Nos.: 50-498
and 50-499

APPLICANT: Houston Lighting & Power Company

FACILITY: South Texas Project, Units 1 and 2

SUBJECT: SUMMARY OF MEETING HELD ON OCTOBER 25, 1985 TO DISCUSS THE
EMERGENCY MANAGEMENT PLAN

The applicant requested this meeting to obtain staff feedback on the Plan submitted in December, 1984. The attendees are shown in Enclosure 1.

Discussion

The applicant made a presentation using the viewgraphs shown in Enclosure 2. The objective was stated to be that a plan approved by NRC should be in place for the emergency exercise currently scheduled for July 1986. The applicant is hosting a conference on October 31, 1985 between themselves and federal, state and local authorities to help prepare for the exercise.

The staff informed the applicant that the review of the plan has been partially completed with approximately 20% remaining to be done. The review has generated a request for additional information which was handed to the applicant and has been enclosed herewith on Enclosure 3. The applicant and staff representatives discussed each item on the list. The applicant indicated that responses will be provided for the enclosed items, and those which would arise upon completion of the review, in time to support having a final version of the plan in January, 1986.

ORIGINAL SIGNED BY

N. P. Kadambi, Project Manager
Licensing Branch No. 3
Division of Licensing

Enclosures:
As stated

cc: See next page

NPK
DL:LB#3
NPKadambi/yt
10/30/85

DL:LB#3
GWKnighton
10/ /85

8511190462 851101
PDR ADOCK 05000498
F PDR

Mr. J. H. Goldberg
Houston Lighting and Power Company

South Texas Project

cc:
Brian Berwick, Esq.
Assistant Attorney General
Environmental Protection Division
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Resident Inspector/South Texas
Project
c/o U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, Texas 77414

Mr. J. T. Westermeir
Manager, South Texas Project
Houston Lighting and Power Company
P. O. Box 1700
Houston, Texas 77001

Mr. Jonathan Davis
Assistant City Attorney
City of Austin
P. O. Box 1088
Austin, Texas 78767

Mr. H. L. Peterson
Mr. G. Pokorny
City of Austin
P. O. Box 1088
Austin, Texas 78767

Ms. Pat Coy
Citizens Concerned About Nuclear
Power
5106 Casa Oro
San Antonio, Texas 78233

Mr. J. B. Poston
Mr. A. Von Rosenberg
City Public Service Board
P. O. Box 1771
San Antonio, Texas 78296

Mr. Mark R. Wisenberg
Manager, Nuclear Licensing
Houston Lighting and Power Company
P. O. Box 1700
Houston, Texas 77001

Jack R. Newman, Esq.
Newman & Holtzinger, P.C.
1615 L Street, NW
Washington, D.C. 20036

Mr. Charles Halligan
Mr. Burton L. Lex
Bechtel Corporation
P. O. Box 2166
Houston, Texas 77001

Melbert Schwartz, Jr., Esq.
Baker & Botts
One Shell Plaza
Houston, Texas 77002

Mr. E. R. Brooks
Mr. R. L. Rande
Central Power and Light Company
P. O. Box 2122
Corpus Christi, Texas 78403

Mrs. Peggy Buchorn
Executive Director
Citizens for Equitable Utilities, Inc.
Route 1, Box 1684
Brazoria, Texas 77422

Houston Lighting & Power Company - 2 - South Texas Project

cc:
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Office of Executive Director
for Operations
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Mr. Lanny Sinkin
Citizens Concerned About Nuclear Power
3022 Porter Street, NW #304
Washington, D.C. 20008

Mr. S. Head, Representative
Houston Lighting and Power Company
Suite 1309
7910 Woodmont Avenue
Bethesda, Maryland 20814

South Texas Project
Meeting on Emergency Management Plan
October 25, 1985

NameOrganization

N. P. Kadambi
J. G. Dewease
M. A. McBurnett
N. F. Walker
C. R. VanNiel
M. R. Wisenburg
E. F. Williams

NRC/NRR/DL
HL&P
HL&P/Licensing
HL&P
NRC/IE/EPB
HL&P/Licensing
NRC/IE/DEPER

ENCLOSURE 2

STPEGS EMERGENCY MANAGEMENT PLAN

I. INTRODUCTION

- ° PURPOSE
- ° FORMAT
- ° SITE/AREA DESCRIPTION

II. ORGANIZATION

- ° NUCLEAR GROUP
- ° ONSITE
- ° ONSHIFT
- ° EMERGENCY

III. EMERGENCY ACTION LEVELS

- UNUSUAL EVENT

- ALERT

- SITE AREA EMERGENCY

- GENERAL EMERGENCY

IV. EMERGENCY AND RECOVERY ACTIONS

- ° NOTIFICATION
- ° ACCOUNTABILITY
- ° EVACUATION
- ° ACTIONS FOR EACH EAL

V. EMERGENCY PREPAREDNESS

◦ TRAINING

◦ DRILLS

VI. FACILITIES

- ° EOC
- ° TSC
- ° OSC
- ° CONTROL ROOM
- ° MIC
- ° PNS

VII. MEDIA RELATIONS

- ° POLICY
- ° MIC ACTIVATION
- ° SPECIAL REQUESTS

I. CONTROL ROOM

◦ AUXILIARY SHUTDOWN PANEL

◦ HABITABILITY

II. TSC

- ° CONTROL ROOM ENVELOPE

- ° 5000 SQ FT

- ° 25 PERSONS

- ° ERFDADS

- ° RMS

- ° RADIO AND TELEPHONE

- ° LAYOUT

III. OSC

° LOCATION

IV. EOC

- ° 5000 SQ FT
- ° 35 PERSONS
- ° 0.5 MILES EAST
- ° PF = 5
- ° ERFDADS
- ° TELEPHONE/RADIO
- ° RMS
- ° AUXILIARY DG
- ° LAYOUT

V. MEDIA INFORMATION CENTER

- BAY CITY HOLIDAY INN

- 12 AIR MILES NNE

- 150 PEOPLE

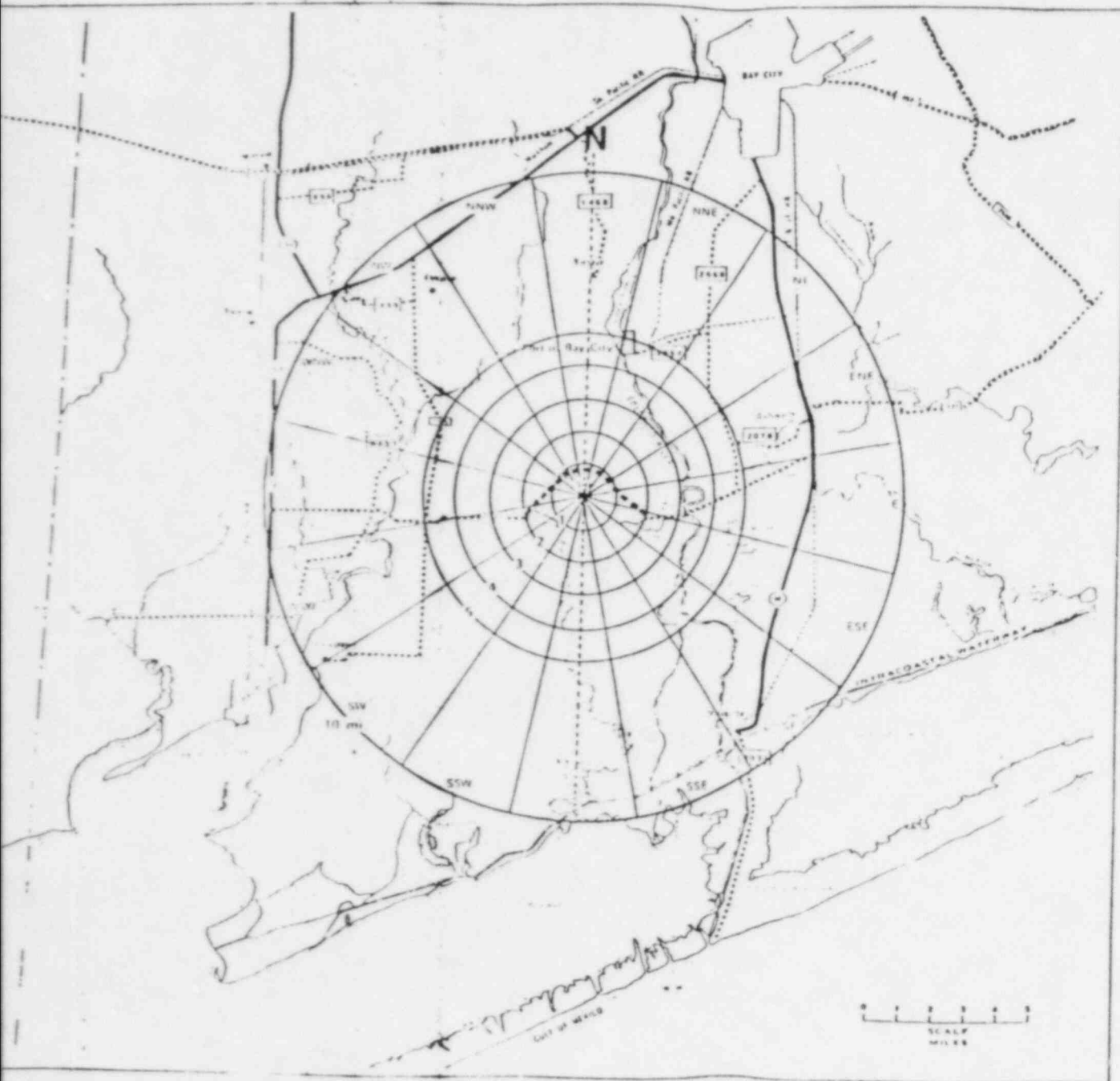
SCHEDULE

- ° EMP SUBMITTED TO NRC 12/84
- ° PNS OPERATIONAL 10/85
- ° EPPs TO BE SUBMITTED - EARLY 86
- ° NRC APPRAISAL - EARLY 86
- ° SENARIOS TO NRC 5/86
- ° EXERCISE TIME LINE TO NRC 6/86
- ° EXERCISE 7/86
- ° FEMA CERTIFICATION OF PNS - LATE 1986



FIGURE 7-4: PRIMARY EVACUATION ROUTES

LEGEND



LEGEND:

Highways

Local

State

Railroads

County Boundary

Incorporated Towns

Unincorporated Towns

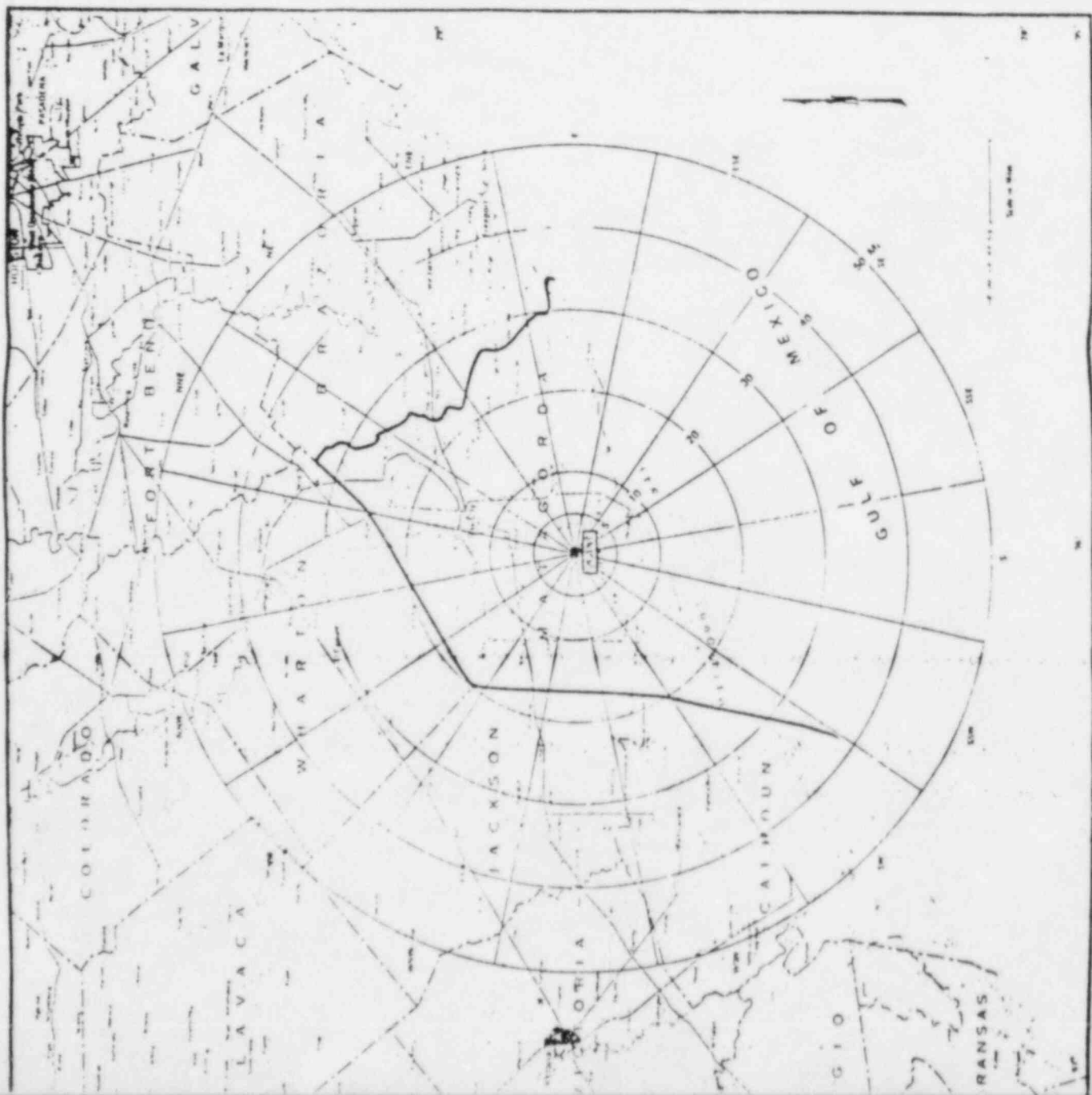
Q311.01N & 311.03N

SOUTH TEXAS PROJECT UNITS 1 & 2

IMMEDIATE ENVIRONS OF THE
SOUTH TEXAS PROJECT

FIGURE 2.1-2

Ampliment 29



Location Key

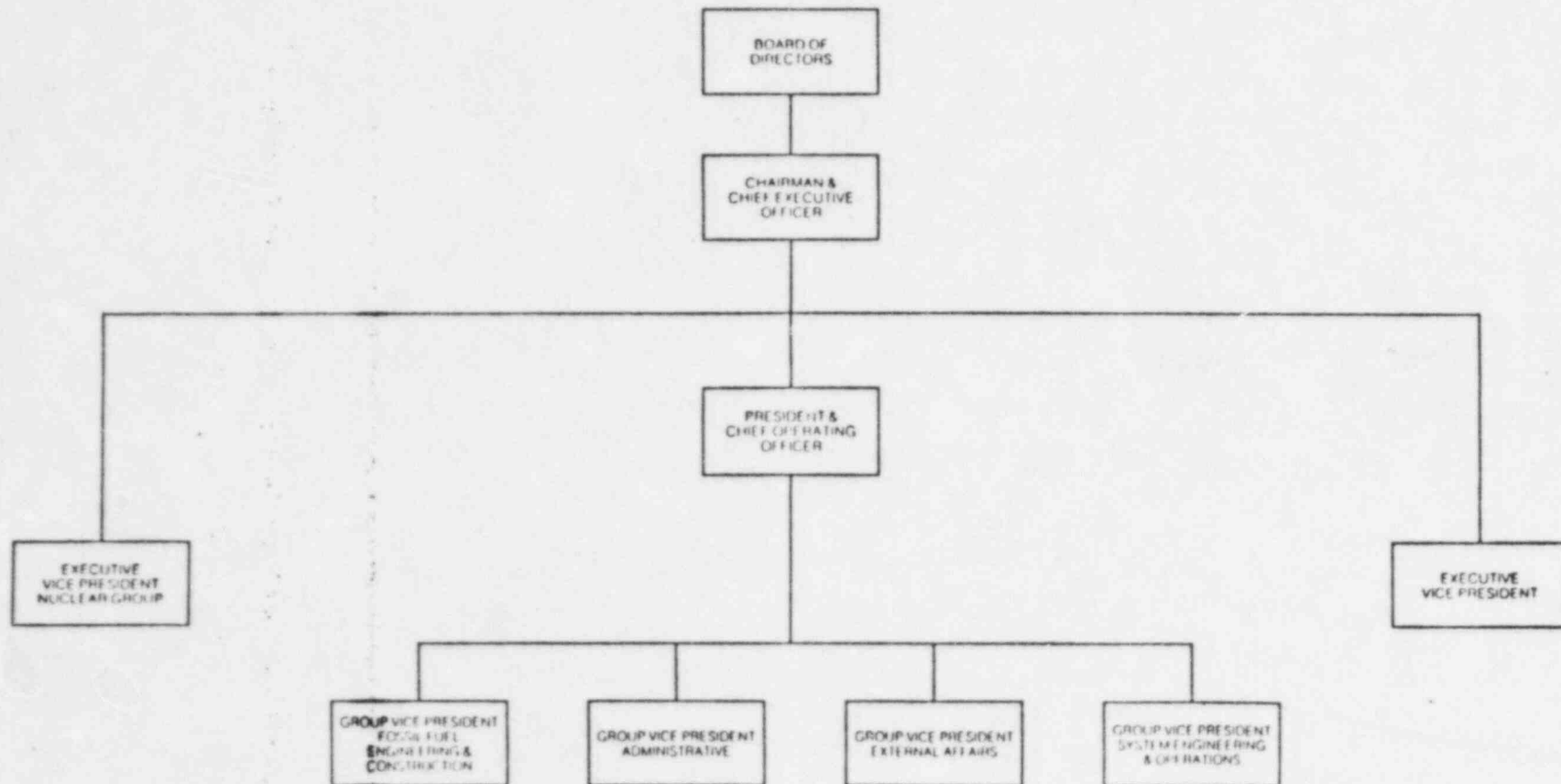
PLANT	COORDINATES	UTM
UNIT 1		
28 37 32' N		N 1 138 659 181 Meters
96 03 53' W		E 718 157 126 Meters
UNIT 2		
28 37 32' N		N 1 138 659 219 Meters
96 03 00' W		E 717 374 143 Meters
		ZONE 18

- ⊙ County Seat
- City, Town, or Village
- ✕ Scheduled Service Airport
- County Boundary
- Corporate Boundary for Towns over 25,000 population
- Railroads
- Matagorda County Boundary

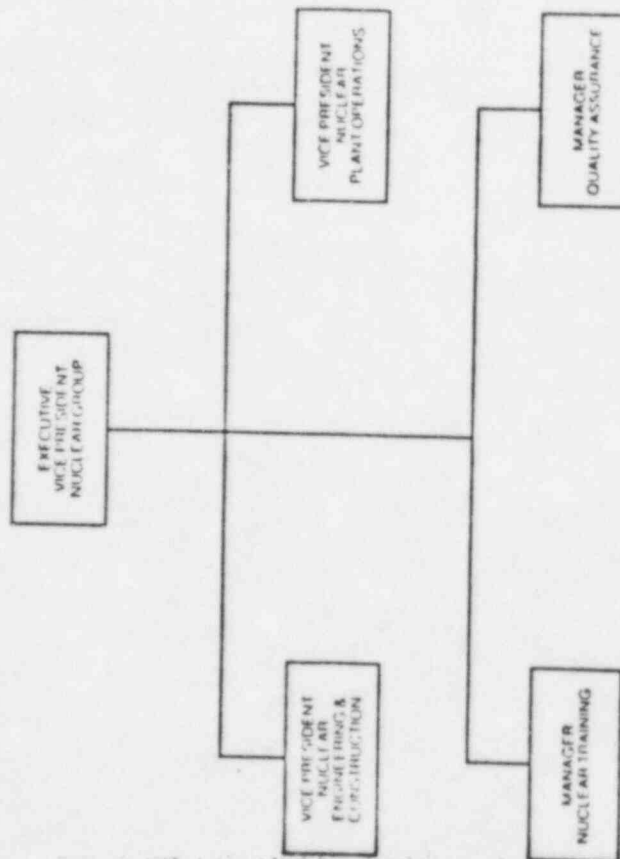
SOUTH TEXAS PROJECT UNITS 1 & 2

REGION SURROUNDING THE
SOUTH TEXAS PROJECT

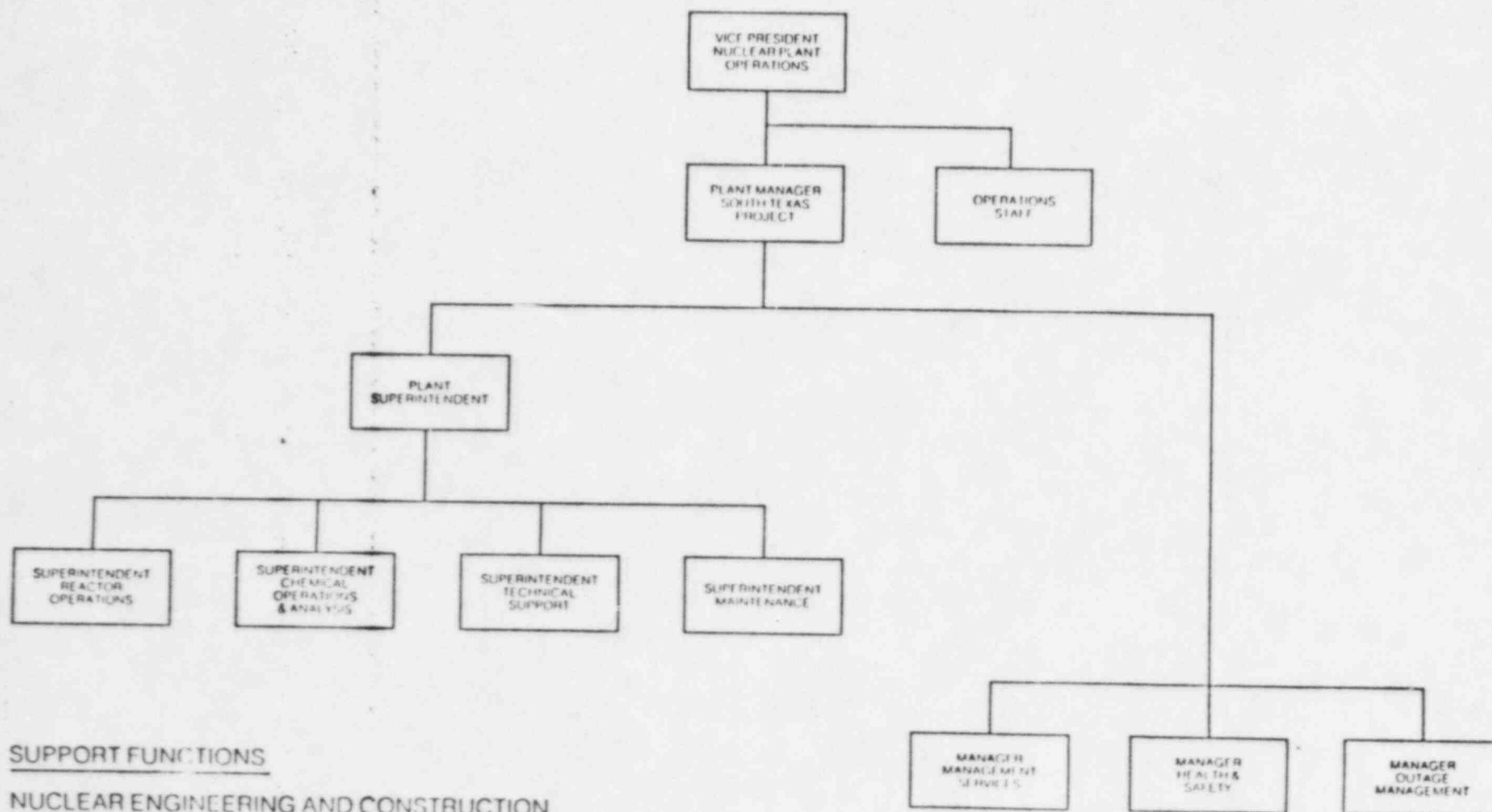
HOUSTON LIGHTING & POWER COMPANY
SENIOR EXECUTIVE ORGANIZATION



NUCLEAR GROUP



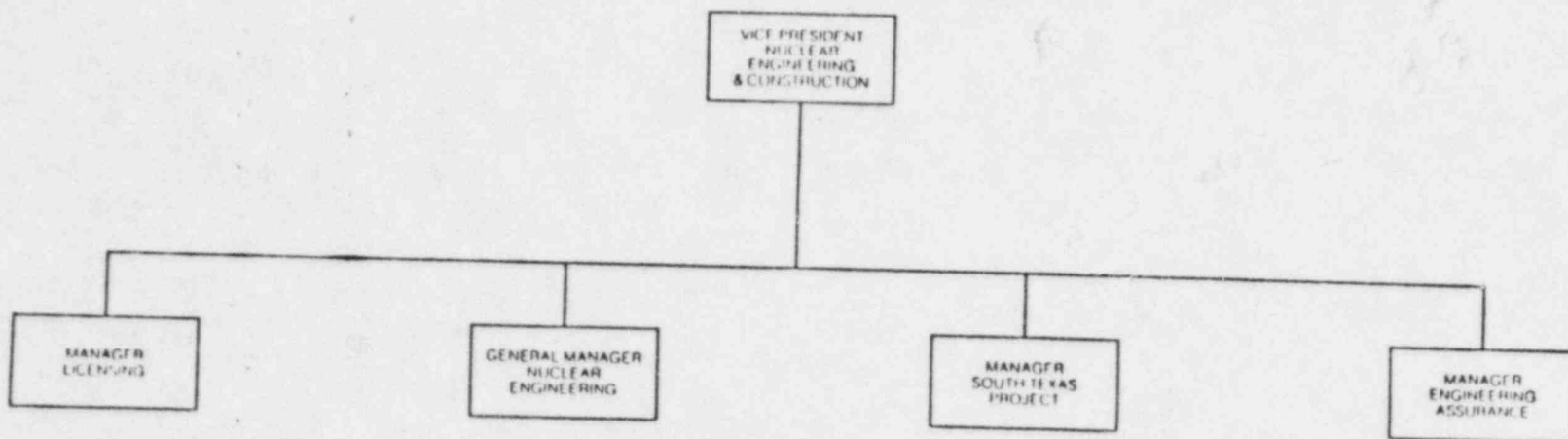
NUCLEAR PLANT OPERATIONS



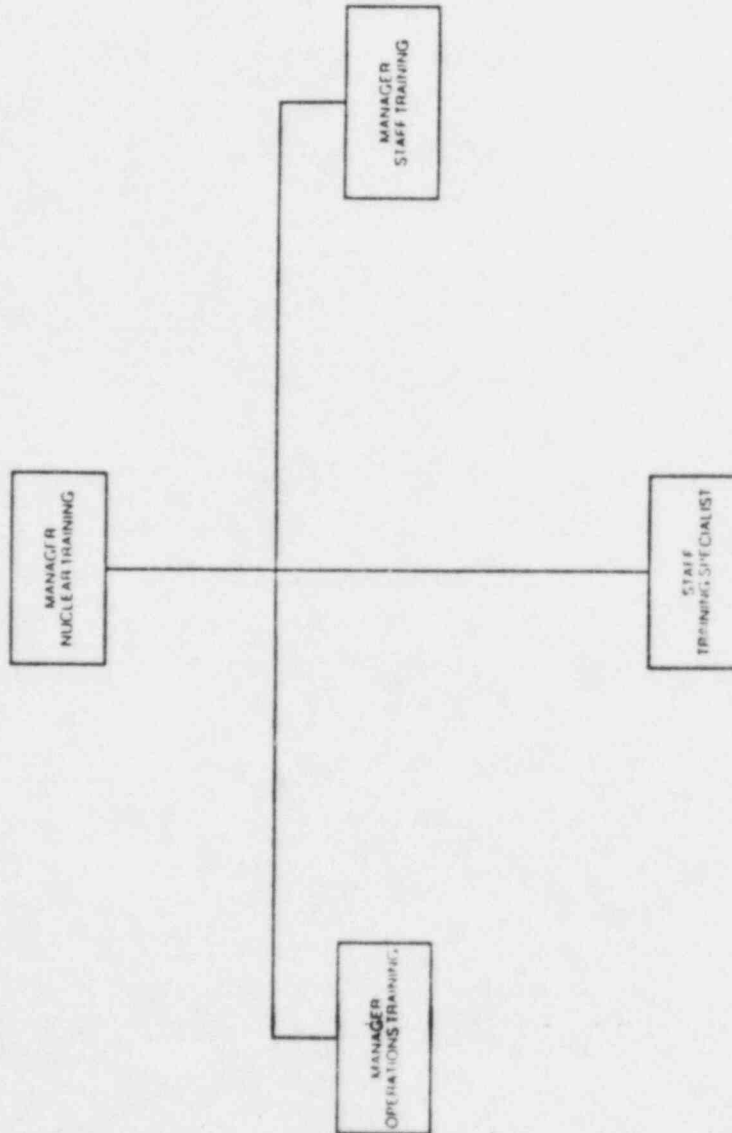
SUPPORT FUNCTIONS

NUCLEAR ENGINEERING AND CONSTRUCTION
STORES
PURCHASING
SECURITY
NUCLEAR TRAINING

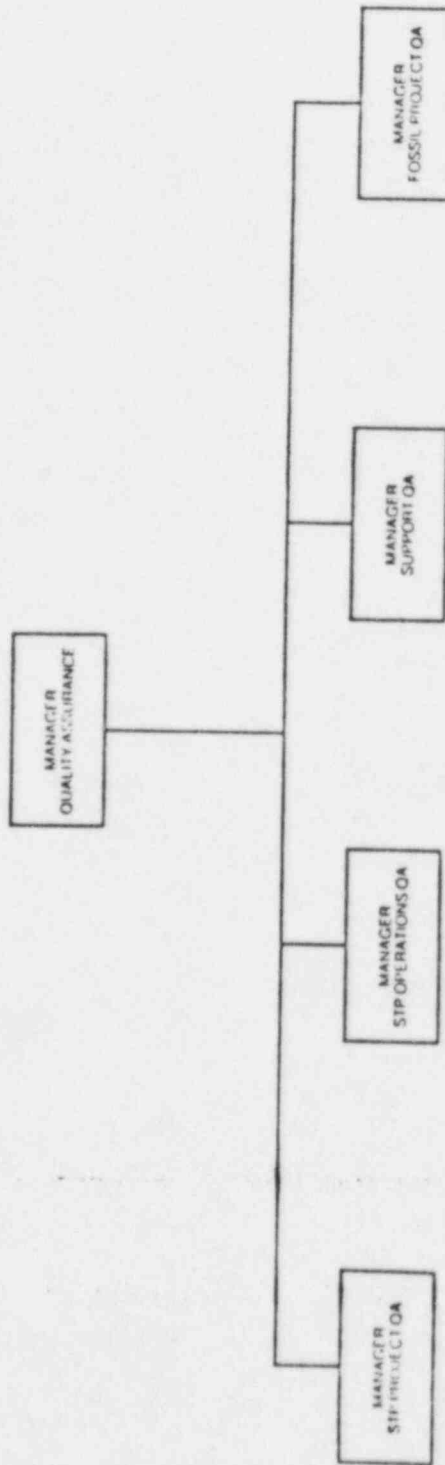
NUCLEAR ENGINEERING & CONSTRUCTION



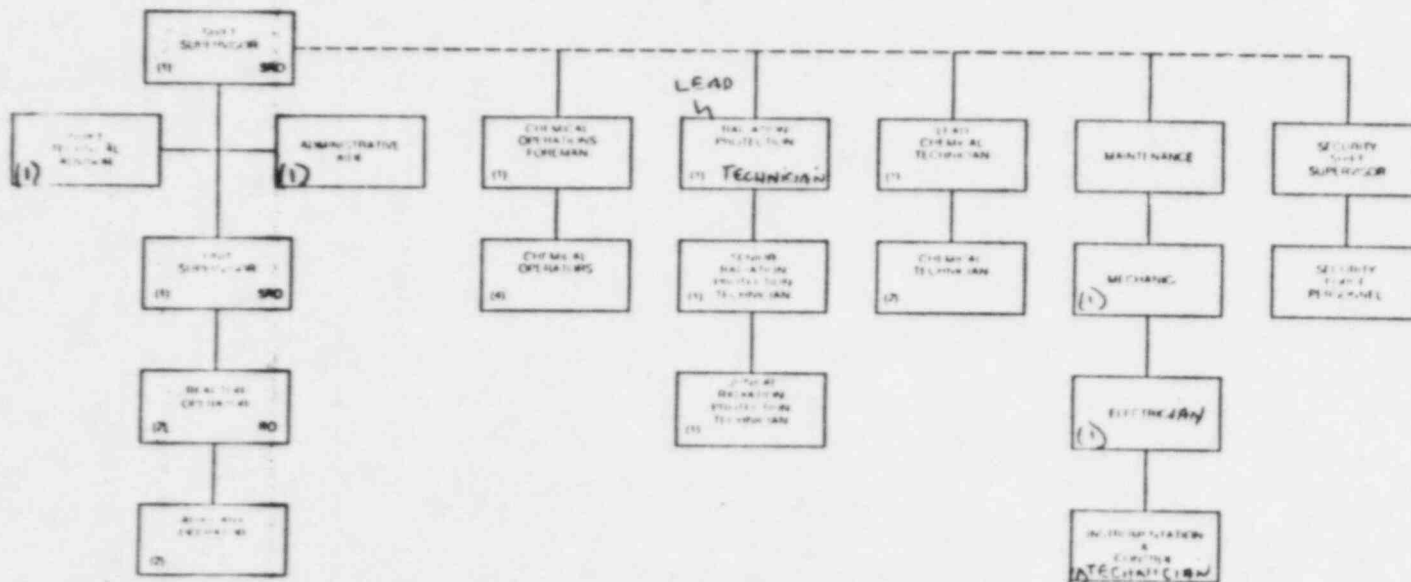
NUCLEAR TRAINING



QUALITY ASSURANCE



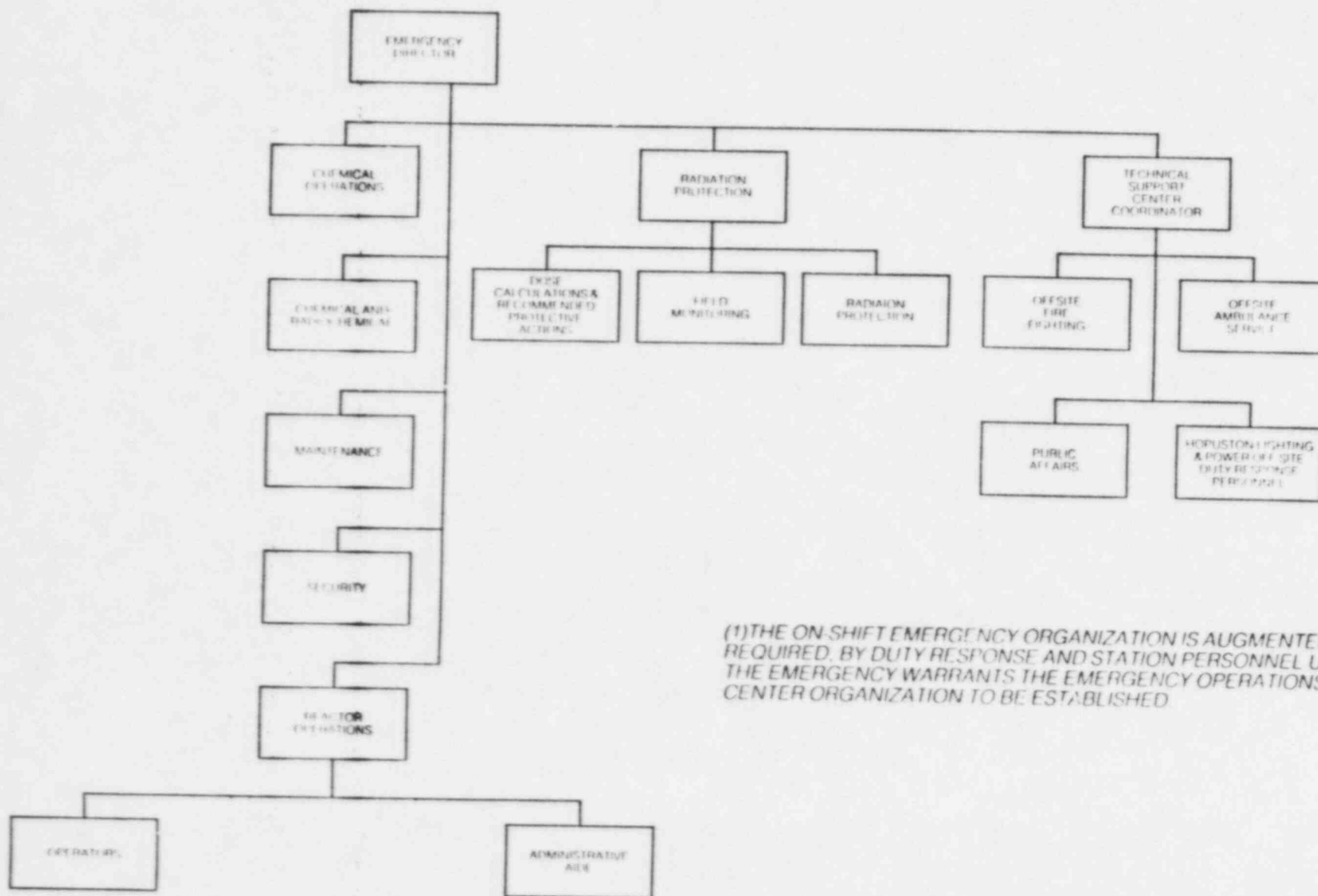
SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
ONSHIFT COMPLIMENT
(PER UNIT)



SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
EMERGENCY MANAGEMENT PLAN
ATTACHMENT 9
EMERGENCY RESPONSE ORGANIZATIONS

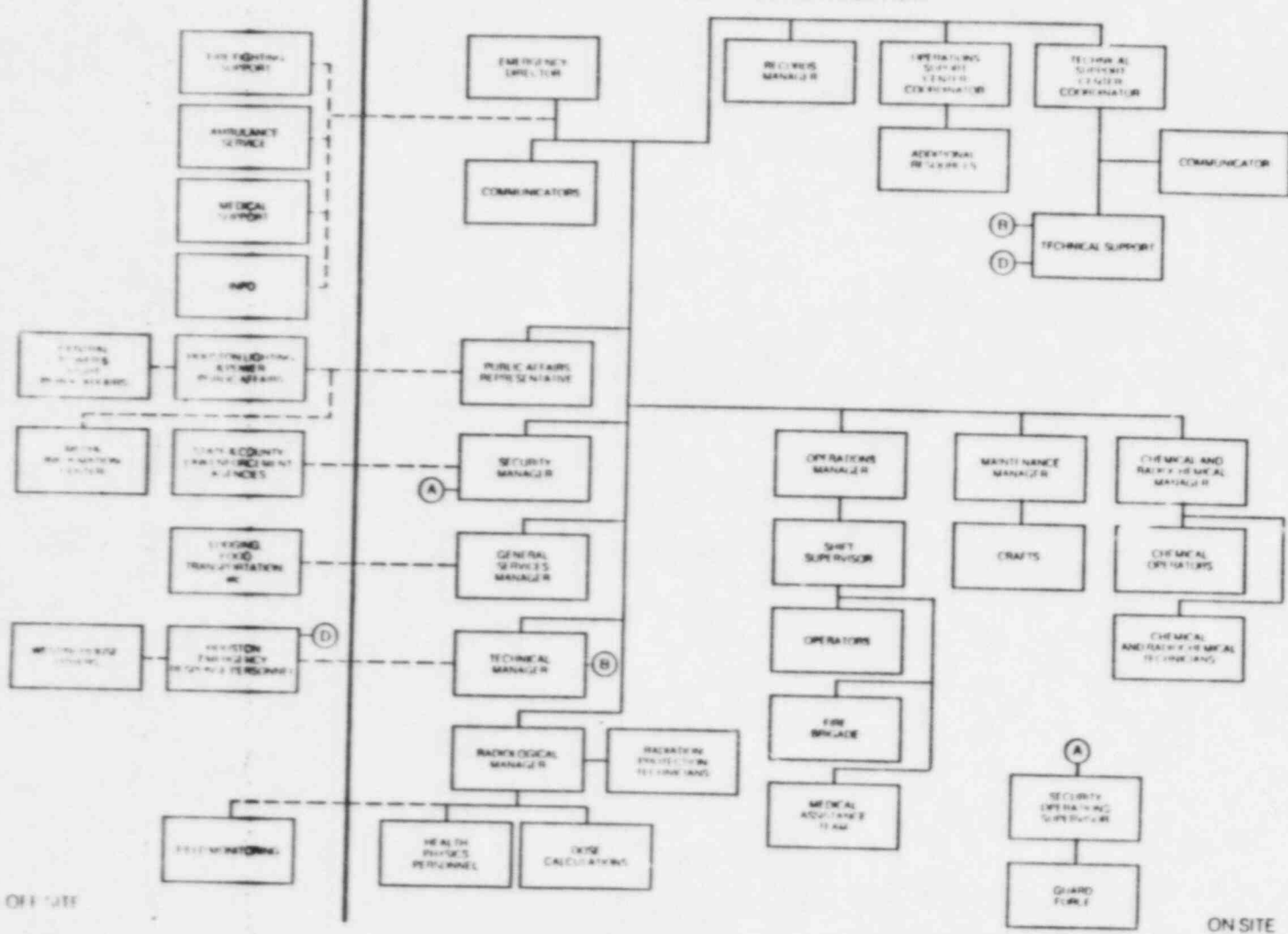
		<u>PAGE</u>
Figure 9.1	Onshift Emergency Organization	9-2
Figure 9.2	Emergency Operations Center Emergency Organization	9-3
Figure 9.3	Media Relations Organization	9-4

ON-SHIFT EMERGENCY ORGANIZATION (1)

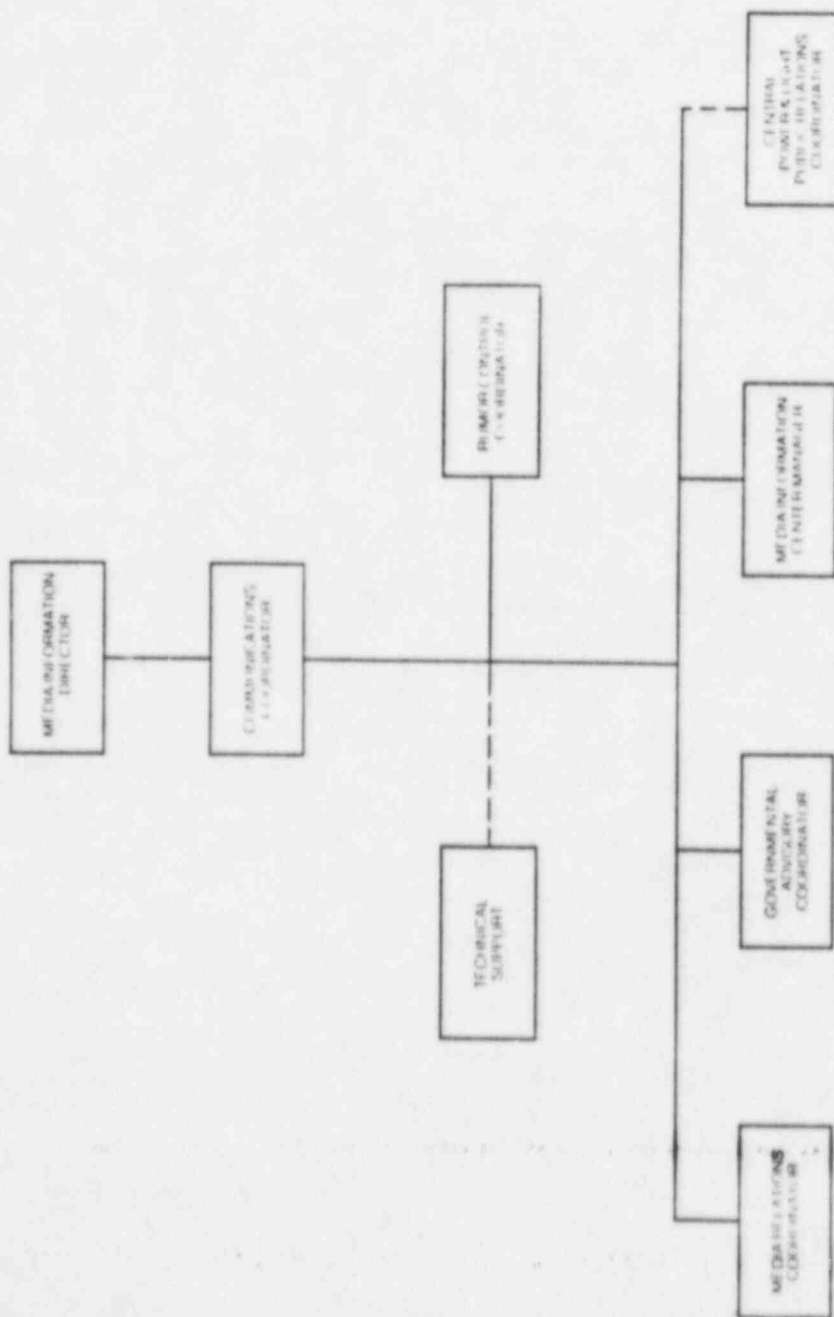


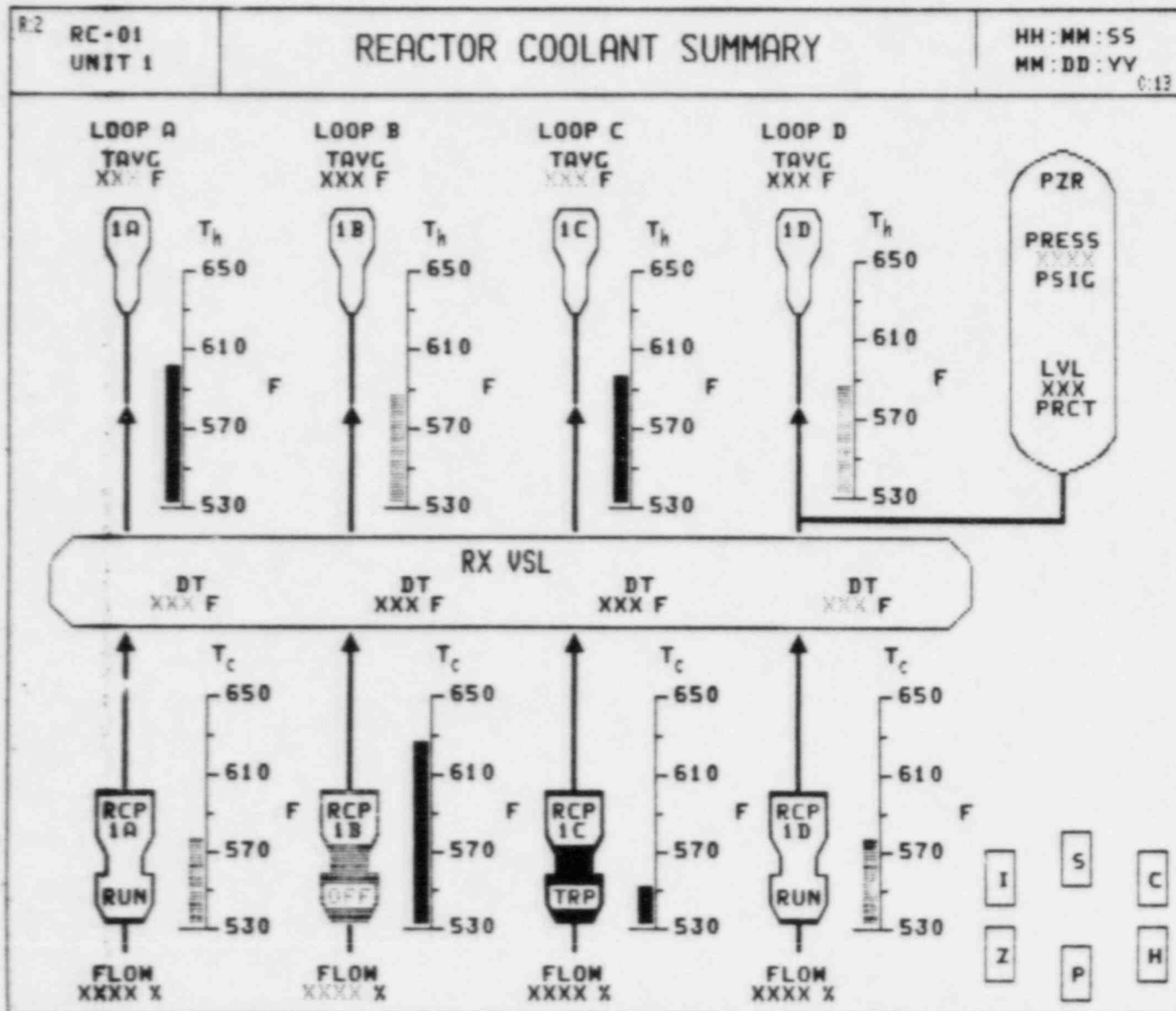
(1) THE ON-SHIFT EMERGENCY ORGANIZATION IS AUGMENTED, AS REQUIRED, BY DUTY RESPONSE AND STATION PERSONNEL UNTIL THE EMERGENCY WARRANTS THE EMERGENCY OPERATIONS CENTER ORGANIZATION TO BE ESTABLISHED.

EMERGENCY OPERATIONS CENTER ORGANIZATION



MEDIA INFORMATION CENTER ORGANIZATION





DRAFT

Enclosure ³ ↗

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 Emergency 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. (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, telephone 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 is 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. earth-

quakes, 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 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)

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)

5. The administrative and physical means for providing prompt instruction to the public are not adequately described in the plan including: (1) where 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)

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 to 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.

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 of activation and notification of field team 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 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)

NOV 1 1985

MEETING SUMMARY DISTRIBUTION

Docket No(s): 50-498/499

NRC PDR

Local PDR

NSIC

PRC System

~~PRC System~~

Attorney, OELD

GWKnighton

Project Manager NPKadambi

JLee

NRC PARTICIPANTS

N. P. Kadambi

C. R. VanNiel

E. F. Williams

bcc: Applicant & Service List