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January 22, 1986

Mr. Roger D. Walker, Director
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
101 Marietta Street
Atlanta, Georgia 30303

Dear Mr. Walker:

SUBJECT: INSPECTION REPORT NO. 50-160/85-4

This letter is our response to the referenced inspection of the Emergency Preparedness Plan conducted October 28-November 1, 1985. The deadline for our response was to have been January 18, 1986; however Mr. Paul Fredrickson of your staff agreed by telephone to extend the deadline to February 14, 1986.

All items in Appendix A and Appendix B are answered below.

Item Appendix A.1

"The Emergency Plan was inconsistent in that a classification of Site Area Emergency was defined in Section 4.0; however, respective Emergency Action Levels were not identified in Table I, and response to this classification was not discussed in Section 7.0 (2.2.1.1)."

The Emergency Preparedness Plan has been revised to include Site Area Emergency Action Levels in Table I and a response to this classification is now discussed in Section 7.8. The revised Plan is appended.

Item Appendix A.2

"No emergency implementing procedure was in place describing personnel monitoring at the assembly area and segregation and decontamination of contaminated personnel."

Emergency Procedures Part IX (appended) is our response to the issue raised in Appendix A.2.

Item Appendix A.3

"Emergency response training should be given to all likely onsite and offsite emergency response personnel."

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Our intent is to indeed train all personnel, onsite and offsite, in emergency response. A significant amount of this has already been done and much more needs to be done. We plan further training for all groups.

The philosophy behind our Emergency Preparedness Plan, however, is that the Emergency Director along with help from supporting groups such as Health Physics, reactor operating staff, state Environmental Protection Division, and others will direct police and/or firemen in combatting the specific emergency. It is our experience that both police and firemen are afraid of radiation. Consequently we have to show them the way and be with them.

Item Appendix A.4

"Emergency Plan, Section 10.2 required that drills be conducted biennially rather than annually as specified in 10 CFR 50, Appendix E, Section IV.F."

We prefer biennial drills not because we only have to do it once every two years, but an emergency drill unnecessarily disturbs our neighbors despite efforts to inform them that it is only a drill. No doubt that drills are needed and are beneficial to emergency personnel but how do you balance that need against creating concern in the public mind?

Heretofore annual emergency drills will be held at the NNRC starting in July 1986. The Emergency Preparedness Plan is revised accordingly.

Item Appendix B.1

"Developing a procedure describing notification methods including: the title of the person responsible, the agencies which must be notified for each class of emergency, the time period during which notification must take place and the information to be provided (2.1.1)."

We appreciate this comment and agree with the NRC with regard to its usefulness. A procedure will be developed during the next six months period. The procedure will be submitted to the Nuclear Safeguards Committee for approval.

Item Appendix B.2

"Performing quarterly updates of the emergency organization roster and the results documented (2.1.1)."

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Rather than updating the emergency organization roster quarterly we proposed to update it at least annually or when personnel changes occur.

Item Appendix B.3

"Providing backup means for internal communication at the ECC (2.1.2)."

We are studying this problem. Walkie talkies do not perform adequately; one possibility is locating one speaker of the P.A. system in the ECC.

Item Appendix B.4

"Placing copies of the Emergency Plan and Procedures in the ECC (2.3.1.1)."

This was done immediately after NRC inspection.

Item Appendix B.5

"Posting evacuation routes with maps showing the location of the assembly area throughout the facility. Old evacuation routes should be removed (2.3.2.1)."

This was also done immediately after the inspection.

Item Appendix B.6

"Including a description of accountability methods and the title of the responsible person in the procedures (2.3.2.3)."

It is not clear what this recommendation is all about!

Item Appendix B.7

"Removing outdated emergency procedures from doors, bulletin boards, and fire alarms. Posting current directions with emergency notification rosters in appropriate locations (2.3.2)."

This has been done.

Item Appendix B.8

"Developing methods and plans for keeping track of personnel dose during emergencies and making them available in the ECC (2.3.3)."

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A procedure for this purpose will be developed.

Item Appendix B.9

"Establishing a formal documentation system for emergency organization training and retraining (3.1)."

We feel that our training and retraining program for Emergency Procedures is adequate. We will continue to hold training sessions with onsite and offsite personnel. We will also keep records of these sessions including attendance rosters and material discussed.

Item Appendix B.10

"Documenting drill critiques and providing for incorporation of lessons learned into plan or procedures (3.2)."

This was done in the past and will be continued in the future (see 10.3 Emergency Plan).

Item Appendix B.11

"Developing a procedure for update and revision of the Emergency Plan (3.3)."

See Emergency Plan Sections 10.3 and 10.4.

Item Appendix B.12

"Developing a document control and distribution system for the Emergency Plan which includes dating and Plan and Procedures, and providing copies to applicable personnel and agencies (3.3)."

The distribution list for the Emergency Plan and Procedures is appended. Any revision to the Emergency Plan and/or Procedures will heretofore be designated on the cover page and revised copies will be distributed to those on the distribution list.

I hope that you will find our response satisfactory. If you have any questions please let me know.

Sincerely,


H.A. Karan
Director

RAK:jlr

Enclosures: As stated

DISTRIBUTION LIST
EMERGENCY PLAN AND PROCEDURES

1. Dr. James R. Stevenson
2. Dr. Thomas E. Stelson
All Alternate Emergency Directors
3. Dean McDowell
4. Robert Boyd
5. Steve Millspaugh
6. Bill Downs
7. Paul Sharpe
8. R.A. Karam
9. Georgia Tech Police, Mr. Jack Vickery
10. Atlanta Fire Department, Mr. Gene Sparks
11. Department of Natural Resources, Environmental Protection
Division, Mr. Jim Hardeman
12. Grady Hospital, Dr. J.W. Pinkston
13. Nuclear Regulatory Commission, Mr. Paul Frederickson
14. Les Petherick, Environmental Safety, Georgia Tech
15. Emergency Command Center