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SUBJECT: Forwards changes to Section 6 of emergency preparedness plan (EPP), Rev 11 re EALS & Figure 4.2 of EPP, Rev 12 re footnote symbol for CR Supervisor & Shift Technical Advisor positions on subj figure entitled, "...Organization."

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October 30, 1992
G02-92-245

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 29555

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NPF-21
CHANGES TO THE WNP-2 EMERGENCY PREPAREDNESS PLAN

Reference: Letter, RA Scarano (NRC) to GC Sorensen (SS),
"Review of WNP-2 Emergency Preparedness Plan,
Revision 11 and Emergency Plan Implementing
Procedure 13.1.1, Revisions 13 and 14", dated
June 30, 1992

In accordance with 10CFR50.54(q), we are submitting two proposed changes to our Emergency Preparedness Plan (EPP) that may be perceived as decreasing the effectiveness of the EPP. They are being submitted for approval prior to implementation.

One of the changes was previously submitted as Revision 11 to the EPP and by reference was found to be unacceptable in its submitted form. We have revised that change and are resubmitting it for your review and prior approval.

The other change being submitted results from our annual (Revision 12) review of the EPP and concerns a change to the Figure 4-2 chart which outlines the normal WNP-2 operating organization. The two EPP changes are summarized below.

EPP Revision 11 Resubmittal

By Enclosure 1 of the reference, it was determined that our proposed Rev. 11 to Section 6 of the EPP (identified as Item 5 in the reference) was unacceptable for two issues, deletion of Table A.2 from the EPP, and an incorrect subcaption on Table A.1. Enclosure 1 went on to discuss suggested actions the licensee could take which may make Revision 11 changes acceptable. We believe that our resubmitted changes to Revision 11, summarized below, meet your suggested action criteria.

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Response

In response to the first issue, we have made additional Revision 11 changes to Section 6 of the EPP. The revised language now defines more clearly that Tables 6-1 and 6-2 (listed as Tables A.1 and A.2 in the previous submittal) are only intended to be a representative example of the Supply System Emergency Action Level (EAL) initiating conditions listed in Emergency Plan Implementing Procedure (EPIP) Chapter 13.1.1 of the Plant Procedures Manual (PPM).

This resubmitted change also states PPM 13.1.1 provides daily guidance on EAL classification, so it, rather than the EPP, is the document which defines the Supply System's EAL initiating condition system as required by 10CFR50, Appendix E.IV.B, and NUREG-0654 Appendix 1.

This resubmitted change to Rev. 11 also defines the Supply System's intent to provide the latest revision of our EALs contained in PPM 13.1.1 to the NRC, state and local governments for their annual review. While this commitment is being stated here in the EPP for the first time, it should be noted that the Supply System has maintained a program for several years that has annually transmitted the latest revision of PPM 13.1.1 to state and local governments for their review and comments.

In addition to that program we also distribute the latest revisions of all Emergency Plan Implementing Procedures (including 13.1.1) to those persons or organizations that are assigned controlled manuals. All of the state and local governments impacted by 13.1.1 are assigned controlled manuals.

The second issue concerns an incorrect subcaption note to the Table A.1 (now submitted as Table 6-1) title. This resubmitted Section 6 Revision 11 change to the EPP corrects that subcaption note by now listing those certain symptomatic initiating conditions that do not alarm on the Graphics Display System (GDS).

EPP Revision 12 Submittal

Figure 4.2 of our EPP is an organizational chart that represents the normal WNP-2 operating organization. By footnote symbol on that chart we had indicated that our Control Room Supervisor (CRS) and Shift Technical Advisor (STA) positions were on shift at all times.

This is not a correct representation of how we are operating. In accordance with our Technical Specification Table 6.2.2-1, the CRS and STA are required to be on shift for operating Modes 1, 2 and 3. They are not required to be on shift in Modes 4 and 5.

Guidance on this position for the CRS and STA is also contained in NRC Generic Letter 80-72, dated July 31, 1980, entitled, "Interim Criteria For Shift Staffing", and NUREG-0737, Enclosure 3, Sections I.A.1.1 and I.A.1.3.

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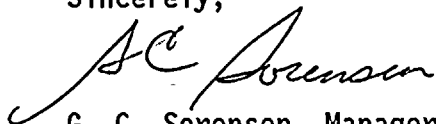
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CHANGES TO THE WNP-2 EMERGENCY PREPAREDNESS PLAN

The Supply System proposes to change the footnote symbol for the CRS and STA positions on the Figure 4.2 chart to reflect "On Shift As Required", rather than "On Shift At All Times".

Sincerely,



G. C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

GOR/bk
Attachments

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

SECTION 6

EMERGENCY CLASSIFICATION SYSTEM

6.1 INTRODUCTION

This section describes the four emergency classifications and the initiating conditions for classifying an accident. A detailed description of instrumentation used in assessing an accident is given in the Final Safety Analysis Report. The response organizations to be notified and/or activated by the Supply System for each class of emergency are listed in Table 7-1.

6.2 EMERGENCY CLASSIFICATION

Emergency classification is the responsibility of the Plant Emergency Director. Classification is made based on the guidelines provided herein, and the recommendations of the Technical and Operations staff. Input may come from the Control Room, Technical Support Center, or Emergency Operations Facility. The initial classification will most likely be made by the Shift Manager, acting as the Plant Emergency Director, and will be based on plant parameters or initial dose assessment.

The tables in this section provide examples of emergency conditions that warrant classification. They are presented as symptomatic initiating conditions (Table A.1) and situation based emergency action levels (EALs) (Table A.2). Table A.2 provides the basis for situation based Emergency Action Levels (EALs), and as such may be used as guidance.

To aid the operator, the symptomatic initiating conditions have been computerized. When certain symptomatic initiating condition has been exceeded, the Graphic Display System (GDS) will display the appropriate emergency classification and the basis for that classification. If the GDS is not operational, Table A.1 makes a useful quick reference guide to symptomatic initiating conditions. Use of these symptomatic parameters minimizes the need for operator judgements during an emergency; however, some level of subjective judgement is still required to accommodate the large number of possible situations. In situations not covered by examples, the definitions and purposes must be used as a guiding consideration in determination of an emergency classification.

6.3 CLASSIFICATION DEFINITIONS AND PURPOSES

The conditions for event classification presented here are not intended to cover all situations. Other events and combinations of situations can warrant conservative action and emergency classifications. Classifications shall be made utilizing conservative principles. In situations not covered by examples, which require judgement in determining emergency classifications, the following definitions and purposes of each classification must be used as the final consideration:

6.3.1 Unusual Event

1. Definition

A condition at the plant, or its surroundings, that threatens the normal level of plant safety, or an event where an increased awareness on the part of plant operating staff is warranted. This includes conditions at the plant that result in a plant shutdown under Technical Specification requirements where the normal level of plant safety has degraded, or is imminent.

2. Purpose

To bring the plant operating staff to a state of readiness, provide systematic handling of information and decision making, and notify the emergency response organization, including all offsite emergency authorities when necessary.

3. Rationale

The rationale for the Unusual Event classification is to provide early notification of minor events which could lead to more serious consequences given operator error or equipment failure or which might be indicative of more serious conditions which are not yet fully realized.

6.3.2 Alert

1. Definition

A condition at the plant or its surroundings where the level of safety has or could be substantially degraded; such as failure of the reactor protective system to initiate and complete a scram which brings the reactor subcritical. This includes conditions where a small release of radioactive material may warrant offsite response and/or monitoring, but does not require protective actions, or where the use of additional personnel for accident assessment and in-plant response is warranted.

2. Purpose

To provide additional help in responding to the situation and provide systematic handling of information and decision making. Declaring an Alert will provide additional manpower in the Technical Support Center to help the normal operating crew in those duties not directly related to plant control, such as offsite dose assessment, technical problem evaluation, and communications with outside organizations. It will also



activate the Operations Support Center which will provide additional manpower to respond to plant conditions. It will likewise activate the Emergency Operations Facility and Headquarters emergency centers.

6.3.3 Site Area Emergency

1. Definition

A condition at the plant or its surroundings where the level of safety has or could be degraded to the point of losing a plant function needed to protect the public from a release of radiation. This includes the violation of Safety Limits as defined in the WNP-2 Technical Specifications, or where a significant release of radioactive material has or could take place. It is a condition that warrants use of additional personnel for accident assessment, in-plant response, and offsite emergency response or monitoring, public notification, and public protective action implementation near the site.

2. Purpose

To assure that all emergency response centers are activated, field monitoring teams dispatched, evacuation coordinators readied, and to initiate predetermined protective actions for the public and to keep them informed.

6.3.4 General Emergency

1. Definition

A condition at the plant or its surroundings where the level of safety has or could be degraded to the point of substantial core damage and where the loss of primary containment integrity has occurred or is projected to occur. This includes conditions where large amounts of radioactive material have or could be released in a short period of

time. This classification warrants the use of additional personnel for accident assessment, in-plant response, and off-site emergency response to aid in the implementation of plume EPZ public protective actions.

2. Purpose

To initiate predetermined actions for the public; to provide for continuous offsite assessment; initiate additional measures, as indicated by radiological releases or plant conditions; and to provide for consultation and flow of information to and from the various offsite authorities.

Symptomatic Initiating Conditions

(All conditions alarm on the Graphics Display System)

SAFETY GROUP	PARAMETER	UE	ALERT	SAE	GE
Reactivity	Reactor Power	GE 1% with Suppression Pool Temp GE 110°F	GE 5%; 10 or more seconds after a scram	GE 5% and Suppression Pool Temp. GE 110 °F and either an SRV open or Drywell Pressure GT 1.68 psig	N/A
Core Cooling	Reactor Vessel Water Level	LE -50" (Except momentary design low level transients.)	LE -129"	LE -161"	N/A
Coolant System Integrity	Drywell Drains Cumulative Flow (FDR + EDR)	EDR + FDR GE 36,000 gal. in any 24 Hr. period ♦	N/A	N/A	N/A
	Drywell Floor Drain Flow Rate (FDR)	GE 5 gpm ♦	N/A	N/A	N/A
	Drywell Pressure	GE + 1.68 psig ♦	N/A	N/A	N/A
	Reactor Pressure	GE 1150 psig ♦	GE 1250 psig ♦	GE 1325 psig; GT SRVTPLL; GT HCTL	N/A
	Containment Isolation	N/A	MSIV closure logic met, but both inboard & outboard valves on one or more lines fail to close	N/A	N/A
Containment Integrity	Drywell Average Air Temperature	GE 135°F for GT 8 Hrs. ♦	N/A	GE 340 °F	N/A
	Drywell Pressure	LE -1.0 psig for GT 1 Hr. ♦	N/A	GT PSP;	N/A
	Suppression Pool Water Temperature	GE 110°F & Rx Power GE 1% ♦	N/A	GT HCTL	N/A
	Suppression Pool Water Level	GE +2" for more than 1 Hr. or LE -2" for more than 1 Hr. ♦	N/A	LT HCLL; GT SRVTPLL; GT 51 ft.	N/A
	Containment Isolation	N/A	Reactor Coolant Pressure Boundary lines fail to isolate when design logic is met. ♦	N/A	N/A
	Wetwell Pressure	N/A	N/A	GT PSP	N/A
Radioactivity Control	Exclusion Area Boundary (1.2 Miles) Whole Body Dose Rate	N/A	GE 0.5 mR/hr	GE 50 mR/hr	GE 1 R/hr
	Exclusion Area Boundary (1.2 Miles) Thyroid Dose Rate	N/A	GE 2.5 mrem/hr	GE 250 mrem/hr	GE 5 rem/hr

♦ Not applicable in operational modes 4 & 5

Table A.1

900420.1EP

Situation Based Emergency Action Levels

SITUATION BASED SAFETY CATEGORY	UE	ALERT	SAE	GE
Plant Safety Barrier	Plant shutdown under Technical Specification requirements where the normal level of plant safety has degraded. ♦	Exceeding a Limiting Safety System Setpoint, as defined in the Technical Specifications.	Exceeding a Safety Limit, as defined in the Technical Specifications.	Loss of two of the following barriers, and loss of, or high potential for loss of the third. <ul style="list-style-type: none"> • Fuel Clad • Reactor Coolant Pressure Boundary • Primary Containment
Plant Safety Level	Natural phenomenon or other hazards within or near the Exclusion Area Boundary (1.2 miles) that threaten the normal level of plant safety.	Natural phenomenon and other hazards that represent a substantial degradation in the level of plant safety.	Situations where the level of safety has, or could be, degraded to the point of losing a plant function that is required to mitigate release of radioactive material.	Any major internal or external events that could cause a degradation of plant safety such that the release of large amounts of radioactive material in a short period of time is possible.
Emergency Response Team Awareness Level	Situations that warrant increased awareness on the part of Plant operating staff.	Situations that warrant the use of additional personnel for accident assessment and offsite radiation monitoring.	Situations that warrant the activation of the TSC, OSC, and EOF for the purpose of event assessment, in-plant response, and offsite response or radiation monitoring, public notification and public protective action implementation near the site.	Situations that require technical or emergency support for radiological release beyond the Exclusion Area Boundary.
Release of Radioactivity	A situation where a release of radioactive material in excess of Technical Specification limits exists, but no offsite monitoring is required.	A situation where the release of radioactive material warrants offsite radiation monitoring.	A situation where a significant release of radioactive material could take place.	A situation where significant amounts of radioactive material has or could be released in a short period of time.
Security Action Level	Conditions that threaten the security of the Plant and require increased precautionary measures. (Refer to the Safeguards Contingency Plan (SCP) for additional information.)	Ongoing security compromise requiring additional support. (Refer to the SCP for additional information)	A security compromise seriously affecting the physical control of the Plant. (Refer to the SCP for additional information).	Confirmed sabotage and a loss of security control in an area that could cause an uncontrolled radiation release or could impact the Plant's ability to perform a safe shutdown.

♦ Not applicable in operational modes 4 & 5

Table A.2

900420.2EP

EP 6-7

Revision 11
July 1991

Examples of Situation Based Emergency Action Levels

Safety Category	UI Examples	ALERT Examples	SAE Examples	GE Examples
Plant Safety Barrier	If in Operating Condition 1 or 2 and: [TSAS]	—	—	—
	3.4.5.a.1.2 The reactor coolant has a specific activity greater than 4 microcuries/gram DOSE EQUIVALENT I-131.	—	—	—
	3.4.5.a.2 The reactor coolant has a specific activity greater than 100/E microcuries per gram.	—	—	—
	3.6.1.1 The loss of primary containment integrity for more than one hour.	—	—	—
	3.6.1.8 Any containment purge/isolation valves open for more than one hour for any reason other than inerting, deinerting, or pressure control.	—	—	—
	3.6.2.1.c The average suppression pool water temperature > 120°F.	—	—	—
	3.6.2.3 Both suppression pool cooling loops inoperable.	—	—	—
	3.7.1.3.a The spray pond level drops below 14.5 feet.	—	—	—
	3.7.1.3.b The spray pond water temperature exceeds 77°F.	—	—	—
	3.7.1.3.c The average sediment depth on the spray pond floor exceeds 6 inches.	—	—	—

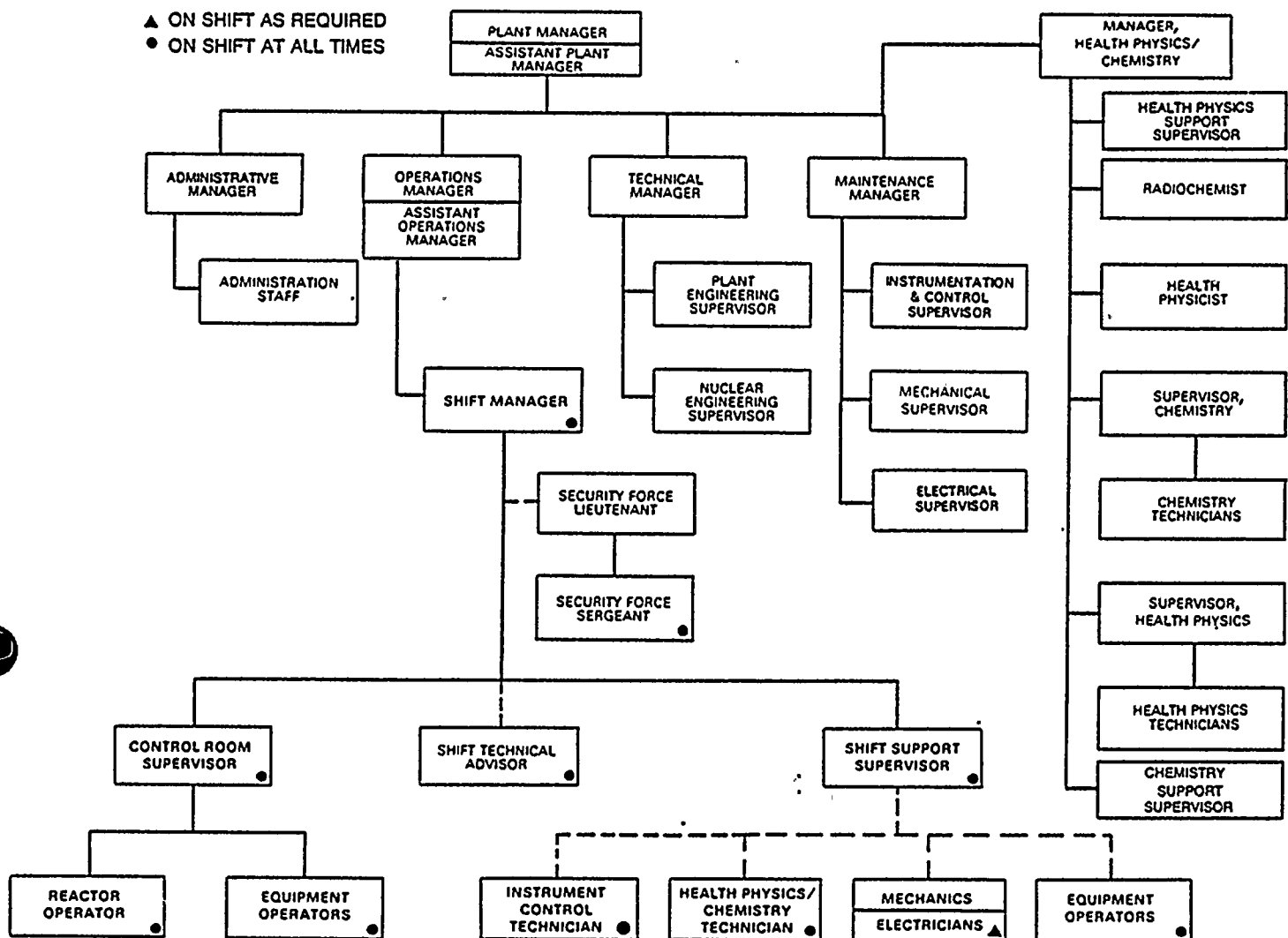
[TSAS: Technical Specification Action Statements

TABLE A.2

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EP. 6-8

Revision 10
July 1990



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FIGURE 4-2. NORMAL WNP-2 OPERATING ORGANIZATION

Rev. 7
April 1988

