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ACCESSION NBR:9612030131 DOC.DATE: 96/11/25 NOTARIZED: NO DOCKET #
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SUBJECT: Responds to NRC 961025 ltr re exercise weakness in insp rept
50-397/96-14. Corrective actions: reiterated mgt expectations
associated w/offsite notification process to appropriate
personnel responsible for protective action recommendations.

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November 25, 1996
G02-96-230

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-37
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
NRC INSPECTION REPORT 96-14
RESPONSE TO EXERCISE WEAKNESS**

Reference: Letter, dated October 25, 1996, KE Brockman (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-14 and Notice of Deviation"

The Washington Public Power Supply System hereby replies to the exercise weakness identified in your letter dated October 25, 1996. Our reply, pursuant to the provisions of 10 CFR 50, Appendix E.IV.F, provides a description of corrective measures and the schedule for completion of those actions.

Section P4.5, "Emergency Operations Facility," of the reference inspection report included one weakness for failure to make clear and timely notifications and protective action recommendations to offsite agencies. The specific weakness consisted of four examples where the offsite agency notification process was not effectively executed in the emergency operations facility.

The Supply System concurs with the assessment that command and control of the offsite notification process was less than satisfactory at times and recognizes that improvements can be made in this area. Corrective measures consist of 1) reiterating management expectations associated with the offsite notification process to appropriate personnel responsible for protective action recommendations and offsite notifications, and 2) modifying Plant Procedure (PPM) 13.4.1, "Emergency Notifications," to clarify the requirements pertaining to facsimile notifications to offsite agencies. The scheduled completion date for reinforcing management expectations is December 15, 1996. The scheduled completion date for the procedural revision is February 26, 1997.

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RESPONSE TO EXERCISE WEAKNESS

Additional followup discussions on this issue are also planned as part of Emergency Response Organization (ERO) training efforts for the next training drill cycle. During the training, the requirements for offsite agency notification will be re-emphasized. The planned completion date of November 1997 for this supplemental action coincides with the current schedule for the next training drills.

The following supplemental information pertaining to the four examples which make up the weakness is also provided for clarification purposes. For ease of reference, a summary statement for each example is provided.

Example 1 "Unclear protective action recommendations were communicated to the offsite agencies at the general emergency."

We agree that the classification form was filled out in a confusing manner. When we identified this error, timely verbal discussions with offsite officials were held to eliminate any question as to the intent of the protective recommendations issued at the time. Individuals involved were immediately counseled. We will be addressing this specific item during future ERO training.

Example 2 "The subsequent upgrade of the protective action recommendations was not communicated to the state within 15 minutes."

We agree that the timing for notification to Washington State occurred after 15 minutes. Our focus was to notify Benton County officials within 15 minutes. County procedures direct local officials to make public protective action decisions without conferring with Washington State. We recognize the need and requirement for direct contact and will address this specific item during future ERO training.

Example 3 "The offsite agency notifications at the site area emergency were not initiated until 14 minutes after event declaration."

Although offsite notifications were initiated within the required time-frame of 15 minutes, management expectation is for a more timely notification when possible. We will be addressing this specific item during future ERO training.

Example 4 "Classification forms were not sent by means of facsimile to the offsite agencies prior to verbal notification."

The procedural steps were written such that actions are taken in a logical sequence generally reflecting the intended order. The procedure lists faxing the classification form prior to a telephone call. This was not done and management expectation is that procedural steps be performed in order when possible.

RESPONSE TO EXERCISE WEAKNESS

In this particular case, the telephone call is the primary method for relaying protective action recommendations and personnel are trained that the telephone call can be made without sending the facsimile. In order to preclude future confusion the procedure will be clarified. This specific item will also be addressed during future ERO training.

In addition to the exercise weakness, a Notice of Deviation was issued pertaining to a written commitment associated with the alternate location of the emergency operations facility. As directed by the reference, a response to the deviation was not required if the description in the inspection report accurately reflected the corrective actions and Supply System position. The Supply System concurs with the assessment in the inspection report. Accordingly, no response to the deviation notice is planned.

Should you have any questions or require additional information pertaining to this letter, please contact Ms. Lourdes Fernandez at (509) 377-4147.

Respectfully,



R.L. Webring
Vice President, Operations Support/PIO
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