

Houston Lighting & Power Company

Electric Tower
P.O. Box 1700
Houston, Texas 77001

August 9, 1979
AC-HL-AE-330

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Denton:

Allens Creek Nuclear Generating Station
Unit 1
Docket No. 50-466

As I discussed with Mr. Vassallo, Houston Lighting & Power Company has taken important steps to study the lessons of the Three Mile Island incident which might be relevant to our Allens Creek Nuclear Generating Station (ACNGS) for which we hope to have a construction permit in 1980.

To assure that HL&P fully understands and responds to the TMI accident we have taken the following actions:

1. In April, an internal task force was established to study the areas of design, operations, emergency planning and in-house technical support.
2. Health Physics personnel worked at the TMI site to assist Metropolitan Edison's recovery efforts.
3. Engineering and operations personnel have participated in general industry efforts coordinated by EPRI's NSAC, the AIP, and owner's groups.

Of particular importance, our staff has placed heavy emphasis on the following:

1. Recommendations of NUREG-0578, "TMI-2 LESSONS LEARNED TASK FORCE STATUS REPORT AND SHORT-TERM RECOMMENDATIONS," July 19, 1979,

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2. Requirements of IE Bulletin 79-08, "EVENTS RELEVANT TO BOILING WATER REACTORS IDENTIFIED DURING THREE MILE ISLAND INCIDENT," April 14, 1979,
3. Requirements of the NRC Staff memo to the Commissioners entitled, "ACTION PLAN FOR PROMPTLY IMPROVING EMERGENCY PREPAREDNESS," July 23, 1979 (SECY-79-450).

This letter and its attachment represent HL&P commitments with respect to the requirements identified in these documents. They will be incorporated into the plant design, operating procedures or emergency plans as appropriate. Those commitments requiring detailed design work will be implemented early in the construction phase of the project. All matters related to emergency plans or operational procedures, as well as detailed design changes, will be documented in the FSAR.

ACNGS is urgently required to meet growing load requirements in the mid-1980's. We recognize, however, that, in striving for that goal, we must study and take into account the latest safety information relating to construction and operation of nuclear power plants. That is the purpose of the commitments incorporated in the attachments to this letter.

Very truly yours,



E. A. Turner
Vice President
Power Plant Construction
& Technical Services

Attachments (3)

cc: J. G. Copeland (Baker & Botts)
R. Gordon Gooch (Baker & Botts)
J. R. Newman (Lowenstein, Newman, Reis,
Axelrad & Toll)
P. A. Horn
All Parties

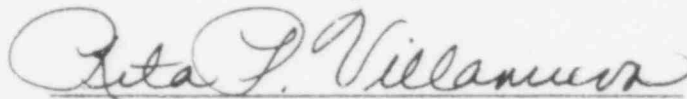
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STATE OF TEXAS

COUNTY OF HARRIS

ON THIS DAY personally appeared E. A. Turner, who being duly sworn, did state that he is Vice President of Houston Lighting & Power Company, Applicant herein, that he is duly authorized to execute and file the foregoing letter in the name and on behalf of Houston Lighting & Power Company and that the statements in said letter are true to the best of his knowledge and belief.

SUBSCRIBED AND SWORN TO this 9th day of August, 1979.



Notary Public in and for Harris County,
Texas

ALLENS CREEK NUCLEAR GENERATING STATION
HOUSTON LIGHTING & POWER COMPANY
Docket No. 50-466

NUREG-0578 COMMITMENTS

The following information addresses the requirements of NUREG-0578, "TMI-2 LESSONS LEARNED TASK FORCE AND SHORT-TERM RECOMMENDATIONS," (July 19, 1979). Where more detailed engineering or design is necessary, the details of implementation will be discussed in the FSAR.

* * * *

2.1 Design and Analysis

- Item 2.1.1 Emergency Power Supply Requirements for the Pressurizer Heaters, Power-Operated Relief and Block Valves, and Pressurizer Level Indicators in PWRs.

Recommendation:

Provide redundant emergency power for the minimum number of pressurizer heaters required to maintain natural circulation conditions in the event of loss of offsite power. Also provide emergency power to the control and motive power systems for the power-operated relief valves and associated block valves and to the pressurizer level indication instrument channels.

Response:

Not applicable to BWRs such as ACNGS.

- Item 2.1.2 Performance Testing for BWR and PWR Relief and Safety Valves.

Recommendation:

Commit to provide performance verification by full scale prototypical testing for all relief and safety valves. Test conditions shall include two-phase slug flow and subcooled liquid flow calculated to occur for design basis transients and accidents.

Response:

HL&P will support industry efforts to establish the functional performance capabilities of PWR and BWR safety and relief valves for normal, transient and accident conditions including two-phase slug and subcooled liquid flow. HL&P commits to incorporating in ACNGS valves verified by the resolution arrived at by ongoing industry/NRC activities.

Item 2.1.3 Information to Aid Operators in Accident Diagnosis and Control.

- a. Direct Indication of Power-Operated Relief Valve and Safety Valve Position for PWRs and BWRs.

Recommendation:

Provide in the control room either a reliable, direct position indication for the valves or a reliable flow indication devices downstream of the valves.

Response:

HL&P recognizes this recommendation as part of an effort to provide unambiguous information to allow operators to ascertain the status of the reactor coolant pressure boundary integrity. ACNGS will comply with this recommendation by providing direct position indication or reliable flow indication.

- b. Instrumentation for Detection of Inadequate Core Cooling PWRs and BWRs.

Recommendation:

Perform analyses and implement procedures and training for prompt recognition of low reactor coolant level and inadequate core cooling using existing reactor instrumentation flow.

Response:

HL&P recognizes that the purpose of this recommendation is to assist the operator in rapidly determining the status of core cooling. ACNGS will comply with this recommendation by reviewing current instrumentation and determine whether further modifications are necessary. In addition the safety analyses, and instrumentation response will be integrated with the operating procedures and training to be described in the FSAR.

Item 2.1.4 Containment Isolation Provisions for PWRs and BWRs.

Recommendation:

Provide containment isolation on diverse signals in conformance with Section 6.2.4 of the Standard Review Plan, review isolation provisions for non-essential systems and revise as necessary, and modify containment isolation designs as necessary to eliminate the potential for inadvertent reopening upon reset of the isolation signal.

Response:

ACNGS currently complies with SRP 6.2.4 with regard to diverse signals. HL&P will perform a design review of ACNGS to determine whether corrective measures for non-essential system isolation are necessary. ACNGS final design will meet the requirements of this recommendation to prevent inadvertent valve reopening upon reset of the isolation signal.

Item 2.1.5 Post-Accident Hydrogen Control Systems for PWR and BWR Containments.

- a. Dedicated Penetrations for External Recombiner or Post-Accident External Purge System.

Recommendation:

For plants that have external recombiners or purge systems, provide dedicated penetrations and isolation systems that meet the redundancy and single failure requirements of the Commission regulations. Modify design as necessary so that these systems are not connected to, or are branch lines of, the large containment purge penetrations.

Response:

ACNGS has 100% redundant recombiners within containment. The backup purge system required by SRP 6.2.5 will be reviewed to assure compliance with redundancy and single failure requirements for containment isolation. These systems will not be connected to, or are branch lines of, the large containment purge penetrations.

- b. Inerting BWR Containments.

Recommendation:

Provide inerting for all Mark I and Mark II BWR containments. This would require changes at Vermont Yankee and Hatch Unit 2 (operating plants), as well as pending OL applications for Mark I and II BWRs.

Response:

This is not applicable to ACNGS since it has a Mark III containment design.

- c. Capability to Install Hydrogen Recombiner at Each Light Water Nuclear Power Plant.

Recommendation:

A minority of the Task Force recommends that all operating reactors, which do not already have the capability, be required to provide the capability to add, within a few days after an accident, a hydrogen recombiner system for post-accident hydrogen control.

Response:

Since ACNGS has redundant recombiners within containment this is not applicable to ACNGS.

Item 2.1.6 Post-Accident Control of Radiation in Systems Outside Containment of PWRs and BWRs.

- a. Integrity of Systems Outside Containment Likely to Contain Radioactive Materials (Engineered Safety Systems and Auxiliary Systems).

Recommendation:

Perform leakage rate tests on systems outside containment that process primary coolant and could contain high level radioactive materials. Develop and implement a periodic testing program and preventive maintenance programs.

Response:

ACNGS will comply with this recommendation. Leakage rate tests will be performed on systems outside containment that could contain highly radioactive fluids. The leakage rate test program and preventive maintenance actions will be described in the FSAR.

- b. Design Review of Plant Shielding of Spaces for Post-Accident Operations.

Recommendation:

Perform a design review of the shielding of systems processing primary coolant outside of containment. Determine any areas or equipment that are vital for post-accident occupancy or operation and assure that access and performance will not be unduly impaired due to radiation from these systems.

Response:

The necessary review of shielding of systems processing primary coolant will be performed. Any areas or equipment that are vital to post-accident occupancy or operation will be identified. Access to these areas will not be unduly impaired due to radiation from these systems.

Item 2.1.7 Improved Auxiliary Feedwater System Reliability for PWRs.

a. Automatic Initiation of the Auxiliary Feedwater System.

Recommendation:

Provide automatic initiation of all auxiliary feedwater systems. The initiation signals and circuits shall be designed in such a manner that a single failure will not result in the loss of auxiliary feedwater system function. Testability of the initiating signals and circuits shall be a feature of the design. The initiating signals and circuits shall be powered from the emergency buses. Manual capability to initiate the auxiliary feedwater system from the control room must be retained and must be implemented in such a manner that a single failure in the manual circuits will not result in the loss of system function. The a-c motor-driven pumps and valves in the auxiliary feedwater system must be included in the automatic actuation (simultaneous or sequential) of the loads to the emergency buses. The design of the automatic initiating signals and circuits must be such that their failure will not result in the loss of manual capability to initiate the auxiliary feedwater system from the control room.

Response:

This recommendation is not applicable to ACNGS.

b. Auxiliary Feedwater Flow Indication to Steam Generators.

Recommendation:

Provide safety-grade indication in the control room of auxiliary feedwater flow for each steam generator. The flow instrument channels shall be powered from the emergency buses, consistent with satisfying the power diversity requirements for auxiliary feedwater systems.

Response:

This recommendation is not applicable to ACNGS.

Item 2.1.8 Instrumentation to Follow the Course of an Accident.

a. Improved Post-Accident Sampling Capability.

Recommendation:

Review and upgrade the capability to obtain samples from the reactor coolant system and containment atmosphere under high radioactivity conditions. Provide the capability for chemical and spectrum analysis of high-level samples on site.

Response:

HL&P will conduct a design and operational review of the reactor coolant and containment atmospheric sampling systems to determine the capability of personnel to promptly obtain a sample under accident conditions without incurring excessive radiation exposure. Necessary changes in design, if any, will be incorporated. A comparable review will be made of the radiological spectrum analysis facilities to determine ability to promptly quantify certain radioisotopes that are indicators of core damage. These facilities will be upgraded as necessary, as will chemical analysis facilities.

b. Increased Range of Radiation Monitors.

Recommendation:

Provide high range radiation monitors for noble gases in plant effluent lines and a high-range radiation monitor in the containment. Provide instrumentation for monitoring effluent release lines capable of measuring and identifying radioiodine and particulate radioactive effluents under accident conditions.

Response:

HL&P agrees that the ability to monitor high level releases is vital to understanding the condition of an accident. ACNGS will provide instrumentation and laboratory facilities to accomplish this goal. Monitors with ranges outlined on pages A-39 and A-40 of NUREG-0578 will be provided consistent with state-of-art technology.

c. Improved In-Plant Iodine Instrumentation.

Recommendation:

Provide instrumentation for accurately determining in-plant airborne radioiodine concentrations to minimize the need for unnecessary use of respiratory protection equipment.

Response:

Accurate determination, of in-plant airborne radioiodine concentration, will be provided by instrumentation reflecting state-of-the-art technology, and proper training and procedures.

Item 2.1.9 Analysis of Design and Off-Normal Transients and Accidents.

a. Recommendation:

Provide the analysis, emergency procedures, and training to substantially improve operator performance during a small break loss-of-coolant accident.

b. Recommendation:

Provide the analysis, emergency procedures, and training needed to assure that the reactor operator can recognize and respond to conditions of inadequate core cooling.

c. Recommendation:

Provide the analysis, emergency procedures, and training to substantially improve operator performance during transients and accidents, including events that are caused or worsened by inappropriate operator actions.

Response

HL&P recognizes that one of the most important "Lessons Learned" from TMI is to integrate the operator training very closely to realistic transient analyses and instrument response. Much of the effort to accomplish this goal will be generic in nature with the NRC working with vendors, EPRI and AIF to develop a program. ACNGS will incorporate the results of these efforts by having the analyses put in the form of emergency procedures and training programs. The analyses, emergency procedures and training program outlined in recommendations 7a, 7b and 7c above will be provided.

Item 2.2 Operations

Item 2.2.1 Improved Reactor Operations Command Function.

a. Shift Supervisor Responsibilities.

Recommendation:

Review plant administrative and management procedures. Revise as necessary to assure that reactor operations command and control responsibilities and authority are properly defined. Corporate management shall revise and promptly issue an operations policy directive that emphasizes the duties, responsibilities, and authority and lines of command of the control room operators, the shift technical advisor, and the person responsible for reactor operations command in the control room (i.e., the senior reactor operator).

Response:

HL&P has reviewed the discussion at pp. A-47 to A-48 of NUREG-0578 (with special regard for the role of highest levels of corporate management) and will assure that adequate administrative and management procedures are established and implemented in compliance with this recommendation. These procedures will assure that reactor operations command and control responsibilities and authority are properly defined. Corporate management will issue an operations

policy directive that emphasizes the duties, responsibilities, authority and lines of command.

b. Shift Technical Advisor.

Recommendation:

Provide on shift at each nuclear power plant a qualified person (the shift technical advisor) with a bachelor's degree or equivalent in a science or engineering discipline and with specific training in the plant response to off-normal events and in accident analysis of the plant. Shift technical advisory shall serve in an advisory capacity to shift supervisors. The licensee shall assign normal duties to the shift technical advisor that pertain to the engineering aspects of assuring safety that pertain to the engineering aspects of assuring safe operations of the plant, including the review and evaluation of operating experience.

Response:

These staffing requirements will be reviewed by HL&P and ACNGS shall be in compliance with such requirements as may be established at the time of operating license issuance.

c. Shift and Relief Turnover Procedures.

Recommendation:

Review and revise plant procedures as necessary to assure that a shift turnover checklist is provided and required to be completed and signed by the on-coming and off-going individuals responsible for command of operations in the control room. Supplementary checklists and shift logs should be developed for the entire operations organization, including instrument technicians, auxiliary operators, and maintenance personnel.

Response:

HL&P strongly agrees that formal shift turnover from off-going to on-going individuals responsible for reactor operations is required. Procedures for ACNGS will be developed and implemented which ensure that this turnover will be performed and verified by such checklists as deemed necessary after completion of the review of this recommendation. Among the features to be considered in developing the ACNGS shift and relief turnover procedures for ACNGS will be those on pp. A-52 to A-54 of NUREG-0578.

Item 2.2.2 Improved In-Plant Emergency Procedures and Preparations.

a. Control Room Access.

Recommendation:

Review plant emergency procedures, and revise as necessary to assure that access to the control room under normal and accident conditions is limited to those persons necessary to the safe command and control or operations.

Response:

HL&P most strongly agrees with this recommendation. Control room access should be limited at all times, but during accident conditions it is mandatory that only those required for safe command and control of reactor operations are permitted access. Procedures for ACNGS will be developed and implemented which limit access to the control room during normal and accident conditions. These procedures will be developed along the guidelines of the position stated on pg. A-56 of NUREG-0578.

b. Onsite Technical Support Center.

Recommendation:

A separate technical support center shall be provided for use by plant management, technical, and engineering support personnel. In an emergency, this center shall be used for assessment of plant status and potential offsite impact in support of the control room command and control function. The center should also be used in conjunction with implementation of onsite and offsite emergency plans, including communications with an offsite emergency response center. Provide at the onsite technical support center the as-built drawings of general plant arrangements and piping, instrumentation and electrical systems. Photographs of as-built system layouts and locations may be an acceptable method of satisfying some of these needs.

Response:

HL&P agrees with the concept of an Onsite Technical Support Center to be utilized as an aid to the person responsible for reactor operations command and control in the control room. ACNGS design will provide an Onsite Technical Support Center, separate from the control room which will contain such drawings, documents, schematics, photographs and such monitoring and communications equipment as required to adequately support the reactor operations command and control function. ACNGS procedures will be developed which define the authority and lines of communication of those persons manning this center.

c. Onsite Operational Support Center.

Recommendation:

Each operating nuclear power plant should establish and maintain a separate onsite operational support center outside the control room. In the event of an emergency, shift support personnel (e.g., auxiliary operators and technicians) other than those required and allowed in the control room shall report to this center for further orders and assignment.

Response:

ACNGS will provide an Onsite Operational Support Center outside the control room, as a mustering point for operational support personnel.

Item 2.2.3 Revised Limiting Conditions for Operation of Nuclear Power Plants Based Upon Safety System Availability.

Recommendation:

Require that the Technical Specifications for each reactor provide that the reactor be placed in a hot shutdown condition within 8 hours and in a cold shutdown condition by the licensee within 24 hours of any time that it is found to be or to have been in operation with a complete loss of safety function (e.g., loss of emergency feedwater, high-pressure ECCS, low-pressure ECCS, containment, emergency power or other prescribed safety function). Require that an assessment of the cause of the loss of safety function be made (e.g., maintenance, operations error) and that an evaluation of alternative corrective actions be made and documented by the licensee. Require that the senior corporate officer responsible for operation of the facility present the licensee recommendation for corrective action and evaluation of the alternatives at a public meeting with senior NRC officials. Require that the senior NRC officials issue their decision at that public meeting, or a subsequent public meeting if time is required for staff evaluation, concerning the adequacy of the changes to improve operational reliability proposed by the utility. Allow the facility to return to power only after NRC approval of the changes proposed by the licensee.

Response:

As indicated by NUREG-0578, p. A-63, implementation of this suggestion requires a rule change and certain rulemaking procedures. The effects of such a rule are far-reaching and should receive careful study. HL&P will participate in any rulemaking on this subject and, of course, comply with any rule which may emerge.

ALLENS CREEK NUCLEAR GENERATING STATION
HOUSTON LIGHTING & POWER COMPANY
Docket No. 50-466

BULLETIN 79-08 COMMITMENTS

The information which follows addresses HL&P's response to IE Bulletin No. 79-08, "Events Relevant to Boiling Water Reactors Identified During Three Mile Island" (April 14, 1979). Although this document is, at least initially, intended for operations of licensed Boiling Water Reactors, HL&P has reviewed it for its applicability at construction permit stage. Certain items have been identified, as to which appropriate commitments can be made now. The following responses address each item of IE Bulletin 79-08.

* * * *

ITEM:

1. Review the description of circumstances described in Enclosure 1 of IE Bulletin 79-05 and the preliminary chronology of the TMI-2 3/28/79 accident included in Enclosure 1 to IE Bulletin 79-05A.
 - a. This review should be directed toward understanding: (1) the extreme seriousness and consequences of the simultaneous blocking of both trains of a safety systems at the Three Mile Island Unit 2 plant and other actions taken during the early phases of the accident; (2) the apparent operational errors which led to eventual core damage; and (3) the necessity to systematically analyze plant conditions and parameters and take appropriate corrective action.
 - b. Operational personnel should be instructed to (1) not override automatic action of engineered safety features unless continued operation of engineered safety features will result in unsafe plant conditions (see Section 5a of this bulletin); and (2) not make operational decisions based solely on a single plant parameter indication when one or more confirmatory indications are available.
 - c. All licensed operators and plant management and supervisors with operational responsibilities shall participate in this review and such participation shall be documented in plant records.

Response:

One of the responsibilities of our in-house Task Force is to review information concerning TMI including IE Bulletins, NSAC Reports and NUREGs such as O600. With regard to the NRC recommendations above:

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- 1a. These matters will be incorporated and stressed in the training program for the ACNGS operating staff.
- 1b. Operating personnel will be instructed as indicated and appropriate procedures will be established to meet the requirement of recommendation 1b.
- 1c. Operating personnel, as well as plant managers and supervisors with operating responsibilities will participate in the programs described in 1a. and 1b.

ITEM:

- 2. Review the containment isolation initiation design and procedures, and prepare and implement all changes necessary to initiate containment isolation, whether manual or automatic, of all lines whose isolation does not degrade needed safety features or cooling capability, upon automatic initiation of safety injection.

Response:

- 2. The recommended review will be conducted for ACNGS. This item is included in recommendation 2.1.4 of NUREG-0578. Non-essential systems will be isolated and will not degrade needed safety features or cooling capability.

ITEM:

- 3. Describe the actions, both automatic and manual, necessary for proper functioning of the auxiliary heat removal system (e.g., RCIC) that are used when the main feedwater system is not operable. For any manual action necessary, describe in summary form the procedure by which this action is taken in a timely sense.

Response:

- 3. ACNGS will review those actions necessary for proper functioning of the auxiliary heat removal systems. Procedures for the activation of manually initiated actions in a timely manner will be described in the FSAR for ACNGS.

ITEM:

- 4. Describe all uses and types of vessel level indication for both automatic and manual initiation of safety systems. Describe other redundant instrumentation which the operator might have to give the same information regarding plant status. Instruct operators to utilize other available information to initiate safety systems.

Response:

4. As discussed in our response concerning Recommendation 2.1.3 and 2.1.9 of NUREG 0578 information available to the operator to determine the plant status and the need for manual actions will be reviewed. A description of the instrumentation (including water level) and how it relates to operator actions will be provided in the FSAR. The operator training program will assure that operators are trained utilize all available information to initiate safety systems.

ITEM:

5. Review the action directed by the operating procedures and training instructions to ensure that:
 - a. Operators do not override automatic actions of engineered safety features, unless continued operation of engineered safety features will result in unsafe plant conditions (e.g. vessel integrity).
 - b. Operators are provided additional information and instructions to not rely upon vessel level indication alone for manual actions, but to also examine other plant parameter indications in evaluating plant conditions.

Response:

- 5a. Procedures will be developed to ensure that operators do not override automatic actions of engineered safety features unless continued operation will result in unsafe conditions.
- 5b. The procedures and operational training for ACNGS (to be described in greater detail with the FSAR submittal) will stress that operators shall take into account other available plant parameter conditions and not merely rely on vessel level indication.

ITEM:

6. Review all safety-related valve positions, positioning requirements and positive controls to assure that valves remain positioned (open or closed) in a manner to ensure the proper operation of engineered safety features. Also review related procedures, such as those for maintenance, testing, plant and system startup, and supervisory periodic (e.g., daily/shift checks,) surveillance to ensure that such valves are returned to their correct positions following necessary manipulations and are maintained in their proper positions during all operational modes.

Response:

6. HL&P will review from a design viewpoint all safety-related valve positions, position requirements and controls to assure that valves remain positioned to assure proper operation of ESFs. Operational procedures will also be developed, to assure that such valves are returned to correct position after being moved and are maintained in that position.

ITEM:

7. Review your operating modes and procedures for all systems designed to transfer potentially radioactive gases and liquids out of the primary containment to assure that undesired pumping, venting or other release of radioactive liquids and gases will not occur inadvertently.

In particular, ensure that such an occurrence would not be caused by the retesting of engineered safety features instrumentation. List all such systems and indicate:

- a. Whether interlocks exist to prevent transfer when high radiation indication exists.
- b. Whether such systems are isolated by the containment isolation signal.
- c. The basis on which continued operability of the above features is assured.

Response

7. HL&P will review ACNGS operating modes and procedures to assure the inadvertent or undesirable transfer of radioactive fluids or gases outside of containment will be prevented. The systems designed to transfer potentially radioactive gases and liquids out of the containment together with the information required by Item 7. a., b., and c will be provided in FSAR.

ITEM:

8. Review and modify as necessary your maintenance and test procedures to ensure that they require:
 - a. Verification, by test or inspection, of the operability of redundant safety-related systems prior to the removal of any safety-related system from service.
 - b. Verification of the operability of all safety-related systems when they are returned to service following maintenance or testing.

- c. Explicit notification of involved reactor operational personnel whenever a safety-related system is removed from and returned to service.

Response:

8. The necessary administrative controls will be described during the OL review. The controls will be designed to ensure that maintenance and test procedures address verification of the operability of necessary safety-related systems and the explicit notification of appropriate personnel of any change in the operational status of those systems.

ITEM:

9. Review your prompt reporting procedures for NRC notification to assure that NRC is notified within one hour of the time the reactor is not in a controlled or expected condition of operation. Further, at that time an open continuous communication channel shall be established and maintained with NRC.

Response:

9. Procedures for this purpose will be described in the Plant Technical Specifications for ACNGS submitted with the FSAR.

ITEM:

10. Review operating modes and procedures to deal with significant amounts of hydrogen gas that may be generated during a transient or other accident that would either remain inside the primary system or be released to the containment.

Response:

10. The review will be conducted and operating modes and procedures will be described during OL review for dealing with significant amounts of hydrogen gas inside the primary system or containment which may be generated during a transient or accident.

ITEM:

11. Propose changes, as required, to those technical specifications which must be modified as a result of your implementing the items above.

Response:

11. All of the foregoing items will be reviewed prior to submittal of the OL application. Technical specifications coming out of this review will be prepared and submitted during OL review.

ALLENS CREEK NUCLEAR GENERATING STATION
HOUSTON LIGHTING & POWER COMPANY
Docket No. 50-466

EMERGENCY PLAN COMMITMENTS

The Commission's Staff recently submitted to the Commissioners an "Action Plan for Promptly Improving Emergency Preparedness" (SECY-79-450, July 23, 1979). That document outlines immediate steps to improve licensee preparedness "at all operating power plants and for near term OLs." Although not applicable by its terms to pending CP applicants HL&P's Task Force on Emergency Planning has been evaluating many of the matters discussed in SECY-79-450. Although details will be furnished during the OL review, HL&P, based on its study to date submits the following comments and commitments with respect to emergency plans for the ACNGS:

* * * *

ITEM:

1. Upgrade licensee emergency plans to satisfy Regulatory Guide 1.101, with special attention to the development of uniform action level criteria based on plant parameters.

Response:

1. The Emergency Plan for ACNGS submitted with the Operating License application will comply with the requirements of Regulatory Guide 1.101 as applicable. HL&P will upgrade the present Construction Permit-stage Emergency Plan to assure the capability to take protective measures consistent with Regulatory Guide 1.101 out to a distance of 10 miles from the plant site. In all cases, special attention will be given to the establishment of uniform action level criteria appropriate to the ACNGS design.

ITEM:

2. Assure the implementation of the related recommendations of the NRR Lessons Learned Task Force involving instrumentation to follow the course of an accident and relate the information provided by this instrumentation to the emergency plan action levels. This will include instrumentation for post-accident sampling, high range radioactivity monitors, and improved in-plant radiiodine instrumentation. The implementation of the lessons learned recommendation on instrumentation for detection of inadequate core cooling will also be factored into the emergency plan action level criteria.

Response:

2. HL&P is committed to these design features in Attachment 1. (See responses to Recommendations 2.1.3 b and 2.1.8 of NUREG-0578.) The information provided by this instrumentation will be related to the emergency plan action levels.

ITEM:

3. Determine that an Emergency Operations Center for Federal, State and local personnel has been established with suitable communications to the plant, and that upgrading of the facility in accordance with the Lessons Learned recommendation for an inplant technical support center is underway.

Response:

3. HL&P is committed to this recommendation.

ITEM:

4. Assure that improved licensee offsite monitoring capabilities (including additional TLB's or equivalent) have been provided for all sites.

Response:

4. ACNCS will comply with this requirement.

ITEM:

5. Assess the relationship of State/local plans to the licensee's and Federal plans so as to assure the capability to take appropriate emergency actions. Assure that this capability will be extended to a distance of 10 miles as soon as practical but not later than January 1, 1981. This item will be performed in conjunction with the Office of State Programs and the Office of Inspection and Enforcement.

Response:

5. HL&P is cooperating with another utility applicant in Texas as well as cognizant agencies of the State of Texas and local government to develop an emergency response plan designed to assure the capability to take protective measures out to a distance of 10 miles for the plant site. It is the intent of the participating organizations to submit such a plan before the end of this year.

ITEM:

6. Require test exercises of approved Emergency Plans (Federal, State, local, licensees), review plans for such exercises, and participate in a limited number of joint exercises. Tests of licensee plans will

be required to be conducted as soon as practical for all facilities and before reactor startup for the new licensees. Exercises of the State plans will be performed in conjunction with the concurrence reviews of the Office of State Programs. Joint test exercises involving Federal, State, local and licensees will be conducted at the rate of about 10 per year, which would result in all sites being exercised once each five years.

Response:

6. ACNGS will comply with all requirements regarding the nature and frequency of periodic drills of emergency plan. Procedures for this purpose will be part of the plan to be submitted per Item 5., above.