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**TU**ELECTRIC

May 27, 1994

William J. Cahill, Jr.  
Group Vice President

U. S. Nuclear Regulatory Commission  
Attn: Document Control Room  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
REQUEST FOR NRC REVIEW AND APPROVAL OF  
REVISIONS TO CPSES EMERGENCY CLASSIFICATION  
PROCEDURE

Gentlemen:

TU Electric management has recently approved, but not implemented, changes to the initiating conditions/emergency action levels used in the CPSES Units 1 and 2 emergency classification system. The current emergency classification system is described in Revision 18 of the CPSES Emergency Plan, Section 2.0, "Emergency Classification System" and Revision 8 of Emergency Plan Procedure EPP-201, "Assessment of Emergency Action Levels, Emergency Classification and Plan Activation" (including post Revision 8 approved procedure changes (PCNs)). Because of the interest that the NRC has displayed in emergency action levels in the past, TU Electric is submitting the CPSES Emergency Plan, Revision 19 and Emergency Plan Procedure EPP-201, Revision 9 to obtain NRC approval prior to implementation.

Accordingly, Enclosure 1 provides the proposed CPSES Emergency Plan, Revision 19. Enclosure 1 contains marked-up affected pages of the current CPSES Emergency Plan, Section 2.0, and a change summary, description and justification. Enclosure 2 contains a marked-up copy of the current EPP-201 (Revision 8), a copy of the proposed new EPP-201 (Revision 9), and a change summary, description and justification.

The following paragraphs provide additional information relevant to this request:

1. General Summary and Justification

The enclosed revisions are proposed to improve the overall effectiveness and credibility of the CPSES Emergency Preparedness Program. Specifically, the initiating conditions/emergency action levels considered for emergency classification have been reviewed and revised with respect to past CPSES and industry emergency declaration experiences, professional meeting findings, and recent industry

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publications. TU Electric believes that it has a responsibility to operate CPSES in a manner which best assures that the safety of the plant and the public is preserved. A part of this operating philosophy is an emergency classification system that maintains the public's trust by reflecting proper diagnosis and classification of events at CPSES. While it is important to declare an emergency when certain predetermined conditions and action levels are met, it is also important that events which do not represent a credible risk to the plant and consequently to the public not be classified as an emergency. In reality, unnecessary emergency classifications impose an unnecessary burden upon the public and impact the operating routines of the offsite immediate response agencies which include the State of Texas Department of Public Safety and Division of Emergency Management, and Hood and Somervell County Sheriff's Departments.

The proposed revisions eliminate emergency classification of some events which are determined to be either inside the operating safety envelope for the plant as defined by the Technical Specifications, including Limiting Conditions of Operation and associated Action Statement times, or events not recognized as precursors for more serious events which have potential for impact on plant safety related structures and systems. Examples of events which are proposed for elimination under these criteria are the current required emergency classification of Notification of Unusual Event (NOUE) for CPSES shutdown as required by Technical Specification Action Statement, and transportation of a contaminated and injured individual offsite, respectively.

In addition to elimination of event types as described above, TU Electric also proposes that events external to CPSES operations, such as weather related hazards, be limited in level of declared emergency classification when based solely on the external event itself without regard to effects on required plant equipment and systems. This proposed change would limit "Natural Phenomena" and "Other Hazard" events to an "Alert" emergency classification. For the emergency class to escalate to a "Site Area Emergency" or "General Emergency" would require damage to plant safety related structures and/or systems as described in the emergency action levels of other classification flowcharts independent of the natural phenomena.

## 2. Discussion with State and Local Officials

TU Electric has discussed the proposed EPP-201 revisions with representatives of the State of Texas, Department of Public Safety, Division of Emergency Management and Bureau of Radiation Control, the Hood County Judge, and the Somervell County Judge, and has received their endorsement. The offsite officials believe the proposed changes decrease the impact on the offsite agencies by reducing the response to "non-emergency" events at CPSES.

3. Notification of NRC by 10CFR50.72(b)

Some of the events affected by the proposed changes are covered by 10CFR50.72(b), Non-Emergency Events. For these events, the NRC would continue to be notified as required.

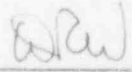
4. Proposed Schedule for Implementation.

TU Electric recognizes that the proposed changes will require careful coordination with oifsite officials and additional training of appropriate emergency organization personnel prior to implementation. It is requested that a decision on approval be made by July 11, 1994 to allow for implementation prior to the CPSES Unit 2 refueling outage.

If there are any questions concerning this submittal, please contact Mr. Norman Hood, Emergency Planning Manager at (817) 897-5889 or Mr. Don Woodlan, Docket Licensing Manager at (214) 812-8225.

Sincerely,

William J. Cahill, Jr.

By:   
D. R. Woodlan  
Docket Licensing Manager

CLW/grp

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