



Nebraska Public Power District

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NSD921204
November 10, 1992

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/92-14

This letter is written in response to your letter dated October 15, 1992 transmitting Inspection Report 50-298/92-14. Therein you identified five (5) weaknesses in our emergency preparedness program observed during the 1992 annual emergency exercise. The attachment to this letter contains a description of our corrective measures for the weaknesses noted and our schedule for completing these actions.

Pursuant to discussions between members of the NRC Region V staff and NPPD management on October 30, 1992, revisions to the Cooper Nuclear Station (CNS) Emergency Plan and affected Emergency Plan Implementing Procedures (EPIPs) will be implemented to provide for an alternate Operations Support Center (OSC) in the event personnel contamination prevents the return of OSC teams to the primary OSC. These revisions will be completed by March, 1993.

Should you have any questions concerning this matter, please contact me.

Sincerely,

G. R. Horn
Nuclear Power Group Manager

/rg
Attachment

cc: Regional Administrator
USNRC - Region IV

NRC Resident Inspector
Cooper Nuclear Station

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Statement of Weakness (298/9115-01)

The analysis and technical assessment of plant conditions was identified as a repeat exercise weakness first identified during the 1991 emergency exercise.

Planned Corrective Action

The Emergency Response Organization (ERO) will be upgraded such that as the event escalates beyond a Notification of Unusual Event (NOUE), the Plant Manager will relieve the Shift Supervisor as the Emergency Director and function from the Technical Support Center (TSC). If the event should escalate to a Site Area Emergency or General Emergency, the Site Manager will become the Emergency Director and operate from the Emergency Operations Facility (EOF). The Plant Manager will remain in the TSC to focus on the analysis and technical assessment of plant problems.

In the existing arrangement, the Emergency Director relocates from the Control Room to the TSC at the Alert classification and then to the EOF as the event escalates to the Site Area or General Emergency classifications. This process tends to cause the technical assessment resources to be focused only on the problems which are causing the event to escalate. Consequently, other problem areas do not always receive an adequate level of analysis and technical assessment in a timely manner. With the arrangement planned, the Plant Manager will stay focussed on the plant and necessary technical assessment activities, while the Site Manager will be able to concentrate on off-site consequences and interfaces.

Additionally, EPIPs will be revised and position specific training will be conducted to provide detailed guidance for addressing accident management techniques. This guidance will include techniques for problem recognition and communication, problem categorization, problem prioritization, resource allocation, CNS specific estimating techniques (similar to those in RTM-91), and trending of key parameters, as well as instructions for coping with the dynamic nature of accident management.

Schedule of Implementation

The ERO upgrade, EPIP revision, and position specific training will be completed by March 1993.

Statement of Weakness (298/9214-01)

Failure to take steps to ensure Technical Support Center/Operational Support Center continued habitability during a release was identified as an exercise weakness.

Planned Corrective Action

EPIP 5.7.7, "Activation of TSC", will be revised to relocate the Continucus Air Monitor (CAM) unit closer to the TSC entrance and to activate High Efficiency Particulate Adsorber (HEPA) filters upon activation of the TSC.

EPIP 5.7.7, "Activation of TSC", will also be revised to ensure the radiation shielding doors are closed when radiation surveys indicate the need.

Schedule of Implementation

EPIP 5.7.7, "Activation of TSC", will be revised and the CAM unit relocated by November 1992.

Statement of Weakness (298/9214-02)

The failure to detect and classify general emergency conditions promptly was identified as an exercise weakness.

Planned Corrective Action

The District will revise guidance documents and conduct position specific training for "low threshold" core damage events. The following specific actions will be taken:

- EPIP 5.7.1, "Emergency Classification", Appendix 3 will be revised, and Emergency Action Level 2.3.1 clarified to add more degraded core symptoms and indicators for the potential loss of the fission product barriers.
- The cladding damage criterion will be clarified and NOTE 3, to section 8.6 in EPIP 5.7.17, "Dose Assessment", "For the purpose of this procedure, cladding failure below 1% is considered a non-accident condition" will be removed.
- The use of the "most conservative" dose model results will be stipulated in pertinent procedures.
- "Low threshold" core damage scenarios will be included in future training and drills.

Schedule of Implementation

The procedure revisions will be completed by January 1993. The new material will be included in continuing emergency preparedness training conducted thereafter.

Statement of Weakness (298/9214-03)

The failure of the licensee to approve initial notification messages properly to state and local government agencies and the failure to complete the initial notification process in a timely manner was identified as an exercise weakness.

Planned Corrective Action

EPIP 5.7.6, "Notification", will be revised to allow Facility Directors to sign the initial notification forms with Emergency Director verbal approval and appropriate Emergency Director log entries.

Performance-based training was developed and implemented for the off-site communicators. Remedial training on the new material, for all of the off-site communicators was completed October 29, 1992.

Schedule of Implementation

EPIP 5.7.6, "Notification", will be revised by November 1992.

Statement of Weakness (298/9214-04)

The use of two dose assessment programs for decision making purposes without clear guidance on reconciling conflicting results was identified as an exercise weakness.

Planned Corrective Action

EPIP 5.7.1, "Emergency Classification", and EPIP 5.7.17, "Dose Assessment" will be revised to provide procedural guidance on the use of both models, and to act on the most conservative model results, in the event of a release exceeding license limits. Training reflecting this guidance will be provided for ERO decision makers and dose assessment personnel.

The Atmospheric Dose Assessment Model (ADAM) source term code error will be corrected.

Schedule of Implementation

Procedural guidance, improved training, and ADAM source term code error correction will be completed by January 1993.