



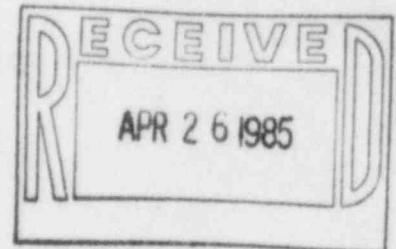
GULF STATES UTILITIES COMPANY

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Mr. Robert D. Martin, Regional Administrator
Nuclear Regulatory Commission
Region IV, Office of Inspection and Enforcement
611 Ryan Plaza, Suite 1000
Arlington, Texas 76011



Dear Mr. Martin:

River Bend Station-Unit 1
Refer to: Region IV
Docket No. 50-458/Report 85-03

This response addresses your letter dated March 19, 1985 concerning the inspection of the River Bend Station (RBS) annual Emergency Preparedness Exercise conducted by Mr. J. B. Baird, Inspection Team Leader, during the period January 15-17, 1985. The deficiencies and open items identified in Sections 3 through 7 of Inspection Report 85-03 are addressed in the enclosure. Additional recommendations provided throughout the report will be considered for implementation during the next RBS annual Emergency Preparedness Exercise. This completes Gulf States Utilities Company's response to Inspection Report 85-03.

Sincerely,

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

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JEB/WJR/RJK/kt

Attachment

cc: Mr. E. L. Jordan, Director
Division of Emergency Preparedness & Engineering Response
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

LC-038/85

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NRC INSPECTION OF RBS EMERGENCY PREPAREDNESS EXERCISE
JANUARY 15-17, 1985

MAIN CONTROL ROOM

Deficiencies

- Notification of the NRC was not performed immediately after notification of state and local agencies. (485/8503-01)

RESPONSE: The notification procedure (EIP-2-006) has been revised to emphasize the need to notify the NRC of an emergency "immediately" after notification of State and local agencies. Communicators have been instructed in the proper procedure. Notification time criteria will be re-emphasized during the next training cycle.

- Status board(s) were not provided to display significant parameters and trends in the control room. (485/8503-02)

RESPONSE: Displays in the Main Control Room are intended to be provided by the Emergency Response Information System terminal and the Digital Radiation Monitoring System Terminal, as well as by the alarms and indications on the control panel. There does not appear to be any benefit in adding fixed status boards in the Main Control Room; in fact, these may become a distraction to operations personnel. GSU's position is that status boards in the Main Control Room are not warranted.

Open Items

- Review the control room communications staffing, layout and procedures, and revise as necessary so that the communicator will be dedicated to notification responsibilities. (458/8503-03)

RESPONSE: The Main Control Room has been modified to provide additional space and orientation for the Communicator, as well as for the other members of the Main Control Room staff. The Communicator is dedicated to communications by procedure.

TECHNICAL SUPPORT CENTER (TSC)

Deficiencies

- The TSC support staff incorrectly assessed protective actions indicating that additional training is necessary on use of protective action determination procedures. (458/8503-04)

RESPONSE: Protective action formulation has been reiterated in discussions with responsible personnel following the evaluated exercise and will be emphasized during the next scheduled training cycle for emergency response personnel.

- An unapproved procedure (informal aid to emergency classification) was available and in use in the TSC. (458/8503-05)

RESPONSE: Personnel have been instructed to use only approved procedures for classifying emergencies. EIP-2-001, dealing with emergency classifications, has been reviewed and accepted by the NRC Emergency Preparedness reviewer. Changes to the classification procedure may be needed to make the procedure more user friendly. This procedure will be evaluated for possible revision at a later date.

Open Items

- Provide for obtaining and using predictive meteorological data in the TSC. (458/8503-06)

RESPONSE: Meteorological information is obtained from the RBS meteorological tower. The projected dose calculations are updated approximately every fifteen minutes using meteorological data averages over the previous fifteen minute interval. Forecasted meteorological information is available from the National Weather Service (NWS) at Ryan Airport in Baton Rouge. The NWS telephone number is provided in EIP-2-024. Meteorological parameters available from NWS may be used as estimates for dose assessment calculations. Severe weather notification, which might impact offsite protective actions, is provided to the Main Control Room from the System Load Dispatcher in Baton Rouge.

- Reorient site survey and 10-mile EPZ maps in TSC to be consistent in direction. (458/8503-07)

RESPONSE: The site map is being reoriented so that north is straight up on the map; however, this places the site at approximately a 45 degree angle from normal orientation with which personnel are familiar. It is felt that this may cause confusion and delay in identifying onsite locations. Following a trial of the reoriented site map, a final decision will be made on the format.

EMERGENCY OPERATIONS FACILITY (EOF)

Deficiencies

- Provisions for NRC site team space and interface requirements were not adequate. (458/8503-09)

RESPONSE: Space for the NRC Director of Site Operations and at least five other NRC personnel has been provided in the EOF Operations Area. In addition, two offices are identified for NRC use, as well as another work area which will accommodate approximately four additional persons in the EOF. The ENS or HPN has not yet been installed, but commercial communications systems are available in all NRC identified areas.

- The procedure for notification of emergency classification and protective action recommendations to offsite authorities was not implemented so that notification and recommendation were accomplished within 15 minutes. (458/8503-10)

RESPONSE: During the evaluated exercise, notification was delayed at one point due to the late arrival of state representatives and the effort applied to obtain state approval of protective action recommendations in accordance with procedures; however, the procedure allows recommendations to be made directly to the parishes without state approval if obtaining such approval will delay timely notification and recommendations. Responsible personnel have been reinstructed in the need for timely protective action recommendations.

Open Items

- Improve display of offsite monitoring data on 10-mile EPZ map in EOF. (458/8503-11)

RESPONSE: Several methods of displaying offsite monitoring data have been tried during drills and exercises. The most useful method appears to be a method whereby the data is applied to the EPZ map using stick-ons which are color-coded for time of the data collection. This area will be further evaluated during the 85-86 drill and exercise schedule.

- Improve EOF status boards display of plant radiation levels and protective actions implemented by state and local authorities. (458/8503-12)

RESPONSE: Protective actions actually implemented by local parishes will be posted on the EPZ map near the Recovery Manager's work station. This was done during the evaluated exercise but was not labeled. Responsible personnel will be indoctrinated during the next training cycle on proper posting methods. The only plant radiation levels which are important to the EOF are the effluent monitors and containment monitors. These are already provided on the status boards. All other plant monitors are displayed on the Digital Radiation Monitoring System RM-11 terminal in the dose assessment room.

- Review and revise contamination check provisions to permit rapid access of key people to EOF. (458/8503-13)

RESPONSE: During EOF activation, key personnel are admitted through the normal access doors. During activation, contamination surveys of the facility are performed by a Radiation Protection technician. Following activation, the facility is closed off and all access is through the west entrance door which is controlled by a frisking station. Evaluation of EOF access procedures during drills and exercises indicates that revision to EIP-2-021 "EOF Support Functions" is not warranted.

- The emergency initiating condition specified in EIP-2-001 should be included on the follow-up notification message forms. (458/8503-14)

RESPONSE: The notification message form contains a block in which a brief cause of the emergency is described. The format of this description has been agreed upon, in general, by the offsite agencies. Initiating conditions in EIP-2-001 are written in terms of systems and parameters which would not be meaningful to local Parish Civil Defense Directors and would add confusion and delays to the notification process through necessary lengthy explanations of the initiating conditions.

JOINT INFORMATION CENTER

Deficiencies

- Procedures for formulating and releasing significant information to news media were not adequate to assure the prompt release of this information. (458/8503-15)

RESPONSE: Procedures for media notification at the Alert declaration are being revised to assure prompt release of information. Media will be notified prior to or simultaneously with the activation of the Joint Information Center (JIC). The JIC will be fully activated at the Alert. Media will also be notified and updated when the JIC becomes operational.

- Work space in the JIC was not adequate to accommodate a significant increase in media representatives. (458/8503-16)

RESPONSE: Additional work space for the media has been designated upstairs in the River Bend Training Center to be used as necessary during JIC operations.

RESCUE AND FIRST AID/MEDICAL CARE

Open Items

- Reemphasize contamination control procedures during training sessions for rescue and medical teams personnel. (458/8503-08)

RESPONSE: Contamination control measures for first aid and rescue team personnel will be reemphasized during the next training cycle.