



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

JAN 21 1997

Mr. C. L. Terry
TU Electric
Group Vice President, Nuclear
ATTN: Regulatory Affairs Department
P.O. Box 1002
Glen Rose, Texas 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION EMERGENCY PLAN
REVISION 25

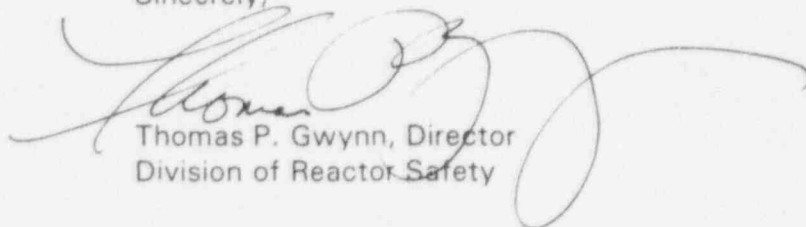
Dear Mr. Terry:

This letter acknowledges receipt of your letter dated October 29, 1996, which transmitted changes to the Comanche Peak Steam Electric Station Emergency Plan submitted under the provisions of 10 CFR 50.54(q).

Based on your determinations that the changes do not decrease the overall effectiveness of your emergency plan, and that it continues to meet the standards of 10 CFR 50.47(b) and the requirements of Appendix E to Part 50, NRC approval is not required. However, based on the emergency plan revision overview provided by your staff during a December 4, 1996, meeting in the Region IV office, some of the changes may be inconsistent with the criteria of 10 CFR 50.54(q) or involve policy matters. Moreover, we understand that the emergency plan has been completely rewritten. Accordingly, Revision 25 is being referred to our Office of Nuclear Reactor Regulation for a full review. The primary policy matters are identified in the enclosure to this letter.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter will be placed in the NRC Public Document Room.

Sincerely,



Thomas P. Gwynn, Director
Division of Reactor Safety

Enclosure: As stated

Docket Nos.: 50-445; 50-446
License Nos.: NPF-87; NPF-89

TU Electric

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cc:

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E-Mail report to D. Nelson (DJN)

E-Mail report to NRR Event Tracking System (IPAS)

bcc to DMB (IE35)

bcc distrib. by RIV:

L. J. Callan

DRP Director

Branch Chief (DRP/A)

Project Engineer (DRP/A)

Branch Chief (DRP/TSS)

T. Essig (NRR/DRPM/PERB)

Resident Inspector (2)

DRS-PSB

MIS System

RIV File

Leah Tremper (OC/LFDCB, MS: TWFN 9E10)

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L. J. Callan
 DRP Director
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ENCLOSURE

PRIMARY POLICY MATTERS

Docket Nos. 50-445; 50-446

Change 1:

Staffing requirements were changed in the Section 1 tables; 40-minute responders were deleted.

Regulatory Basis:

10 CFR 50.54(q) states, in part, that licensees "shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) and the requirements of Appendix E of this part."

10 CFR 50.47(b)(2) states, in part, that "adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available..."

NUREG-0654; FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Evaluation Criterion B.5 states that staffing requirements and augmentation capabilities shall be as described in Table B-1. Table B-1 identifies minimum onshift personnel, 30-minute responders, and 60-minute responders.

Change 2:

Facility activation time goals were changed from 60 minutes to 70 minutes.

Regulatory Basis:

Same as for Change 1.

Emergency Plan Change Summary:

Under 10 CFR 50.54(q), a licensee can make changes to its emergency plan without NRC approval only if the changes do not decrease the effectiveness of the plans, and the plans, as changed, continue to meet the standards in 10 CFR 50.47(b) and the requirements of Appendix E. Deleting the 40-minute responders and revising the activation time goals from 60 to 70 minutes involve policy matters that could indicate a decrease in the effectiveness of the emergency plan.

Since the emergency plan was completely rewritten, increasing the potential for omitted commitments, and the changes involve policy matters, Revision 25 to the Comanche Peak Steam Electric Station Emergency Plan is being referred to the Office of Nuclear Reactor Regulation for a full review.