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C. Lance Terry
Group Vice President

October 29, 1996

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
TRANSMITTAL OF CPSES EMERGENCY PLAN, REVISION 25

Gentlemen:

In accordance with 10CFR50.54(q), TU Electric herewith submit Revision 25 of the CPSES Emergency Plan (EP). The changes comprising Revision 25 were evaluated and determined to not decrease the effectiveness of the existing plan. The changes were made effective at CPSES on October 1, 1996.

Changes are indicated by a Revision 25 change bar. A detailed description/justification is provided in the Attachment, except for Appendices K, P and Q, for changes indicated by the Revision 25 change bar. The following is a general summary, by section, of the changes included in this revision to the CPSES Emergency Plan:

Section 1.0 "Organization"(major revision)

1. Preface revised and relocated to new Section 1.0 "Purpose"; information previously discussed in multiple subsections was revised and/or consolidated (e.g., federal agency support described in 1.1.1.3 and 1.3.3 now in new section 1.2.5).
2. Table 1.1 "Staffing Requirements for Emergencies" and Table 1.2 "Graded Emergency Organization Response" were revised and combined into new Table 1.1 "Staffing Requirements for Emergencies." Previous Table 1.1 40-minute responders were deleted; responding personnel are now either assigned onshift and respond at NOUE, or are 70-minute responders and respond at ALERT (or higher) classification. Also, split the graded emergency response previously described in Table 1.2 from Alert/Site Area Emergency and General Emergency to Alert and Site Area Emergency/General Emergency.

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3. Revised the CPSES Emergency Response Organization (ERO). Defined key emergency response organization positions as those responsible for functions designated in new Table 1.1. Other position descriptions (not in new Table 1.1) were deleted from the Emergency Plan (but not necessarily from the ERO). Combined the detailed list of position duties and responsibilities into more general responsibility statements for each described key position.
4. Provided for accident classification to remain with the TSC Manager when other emergency response duties of the Emergency Coordinator are transferred to the EOF Manager.
5. Relocated Table 2.1 "Predetermined Response Actions" to new Table 1.2.
6. Deleted organizational Figure 1.4 "Emergency Organization Overview", 1.10 "Logistical Support Center" and 1.11 "TU Electric Corporate Support"; revised and renumbered the remaining figures to reflect the new ERO.

Section 2.0 "Emergency Classification System"

1. Revised and relocated Table 2.1 "Predetermined Response Actions" to new Table 1.2.
2. Renumbered Table 2.2 "Initiating Conditions for Emergency Classifications" to new Table 2.1.

Section 4.0 "Emergency Communications"

1. Replaced facility communications interface information in Figures 4.1 thru 4.6 with new Table 4.1 "Communications Interfaces".
2. Renumbered Table 4.1 "Emergency Communications Responsibilities and Interfaces" to new Table 4.2.
3. Revised description for section 4.1.6 "Direct Telephone Line to the System Dispatcher", 4.4 "Autodial Calling System" and 4.5 "CPSES Microwave Communications System".

Section 6.0 "Emergency Facilities and Equipment" (major revision).

1. Combined existing descriptions of the CPSES Emergency Response Facilities in the Emergency Plan and FSAR, Section III.A; describe in Emergency Plan new Section 6.
2. Deleted the Logistical Support Center (LSC).
3. Revised facility activation time goal from approximately 60-minutes to 70-minutes.
4. Revised the inventory frequency for emergency equipment and supplies from monthly to quarterly.
5. Deleted detailed descriptions of laboratory facilities in the Nuclear Operations Support Facility (NOSF) (Section 6.7) and various plant assessment systems and instrumentation (Section 6.13). These detailed descriptions were replaced with functional descriptions and/or a reference to the FSAR or other Licensing Basis Document (LBD) where a detailed description already exists.

Section 7.0 "Accident Assessment"

1. Revised a Section 7.0 "Accident Assessment " reference to procedures regarding information on "PASS" from "Emergency Plan Procedures" to "Chemistry Procedures".
2. Revised Section 7.3.2 "Offsite Radiological Assessment" to delete reference to Emergency Plan Procedures and Table 6.3 "Environmental Sampling Locations".

Section 8.0 "Protective Response" (major revision)

1. Reformatted to separately group onsite and offsite protective response.
2. Revised the practice of monitoring potentially contaminated site evacuees and discussions of respiratory protection, protective clothing and radioprotective drugs.
3. Deleted description of CPSES owner-controlled area and reference to EPZ evacuation, population distribution and special facilities maps.

Section 9.0 "Radiological Exposure Control"

1. Deleted description of "in-plant" decontamination facilities from Emergency Plan Section 9.3 "Decontamination" and Figure 9.1 "Decontamination and First Aid Facilities in the Plant"; these facilities are described in FSAR Section 12.5.
2. Revised Figure 9.2 "Emergency Operations Decontamination and First Aid Facilities in the Nuclear Operations Support Facility."

Section 11.0 "Reentry and Recovery"

1. Revised selected ERO position titles, added a general consideration for plant recovery actions, revised statements concerning "corporate support", deleted references to "construction activities" and revised Section 11.2 "Estimating Total Population Exposures".

Section 12.0 "Exercises and Drills"

1. Revised Section 12.1 "Exercises" to reflect NRC rulemaking which now requires a "biennial" rather than "annual" full participation exercise with local authorities.
2. Revised Section 12.0 and 12.3 to change "Vice President of Nuclear Operations" to "Plant Manager".

Section 13.0 "Radiological Emergency Response Training"(major revision)

1. Revised section to delete superfluous description, consolidate the emergency preparedness training program with respect to specified groups of individuals (i.e., plant staff (non-ERO); onshift staff (ERO); augmentation staff (ERO); and offsite agencies). Training not related to these specific groups or functions was relocated to other sections of the Emergency Plan or deleted as redundant to the FSAR (e.g., Section 13.3B Fire Brigade Training).

Section 14.0 "Responsibility for Planning Effort"

1. Revised statements with respect to maintaining staff proficiency (Emergency Planning staff), program responsibilities, approval authority, program audit and document/procedure review/control. The signature authority for approving Emergency Plan Procedures (EPPs) was changed from the Vice President of Nuclear Operations (Plant Manager) to the Emergency Planning Manager.

2. Revised periodic review of Emergency Plan Procedures from annual to biennial.

Section 15.0 "Appendices"

1. Revised titles of selected Appendices.

Appendix H "Letters of Agreement and Supporting Emergency Plans"

1. Revised title and Appendix to reflect the relocation of the actual "letters of agreement"; the change provides an updated list of the letters of agreements which are now maintained in the administrative files of the Emergency Planning department.

Appendix J "Emergency Equipment and Supplies"

1. Revised to delete reference to the Logistical Support Facility (LSC) and relocate a commitment from Section 6 concerning the number of company vehicles designated for use by the offsite monitoring teams.

Appendix K "List of Emergency Plan Procedures"

1. Revised to reflect deletion of Emergency Plan Procedure EPP-117 "Administrative Controls for Sampling Under Post Accident Conditions"; EPP-214 "Activation of the Logistical Support Center (LSC); EPP-215 "Corporate Support During Emergencies"; change descriptions/justifications provided in the Attachment address these deletions.
2. Revised to reflect deletion of EPP-313, "Handling Contaminated Injured Personnel". This procedure was incorporated into the station administrative procedure for the Industrial Safety Program; therefore, to prevent redundancy, EPP-313 was deleted.
3. Revised the procedure cross-reference to Emergency Plan Sections.

Appendix M "CPSES Evacuation Time Estimates and Staffing Estimates"

1. Revised to reflect an updated estimate for the time to staff the CPSES ERFs with responding ERO personnel after notification at home.

Appendix P "CPSES Emergency Plan/NUREG-0654 Cross Reference"

1. Revised to reflect an updated cross reference between NUREG-0654 criteria and changes to the CPSES Emergency Plan (thru Revision 25).

Appendix Q "Acronyms and Definitions"

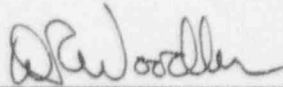
1. Revised to delete acronyms and revise and/or delete selected definitions.

Enclosed is the following as prescribed in 10CFR50.4(b)(5):

CPSER EMERGENCY PLAN - 1 Original (REVISION 25)

Sincerely,

C. L. Terry

By: 

D. R. Woodlan
Docket Licensing Manager

CLW/grp
Attachment
Enclosure

c - Mr. L. J. Callan, Region IV
Mr. J. I. Tapia, Region IV (clo)
Ms. G. Good, Region IV
Mr. T. J. Polich, NRR (clo)
Resident Inspectors (clo)

Emergency Plan Changes and Justifications

(Revision 25)

SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

1. Table of Contents, List of Tables, List of Figures
2. Incorporated the Preface into the new Section 1.0, "Purpose." Made minor editorial changes to the preface material.

Changes reflect the actual numbering sequences as the section is rewritten.

The Preface included an overview of the Plan that makes for a good introduction with out duplicating the information in Section 1.0. Therefore incorporated this information into the Plan.

Editorial changes include:

a) Deleted statement about alternate job functions being discussed in the PLAN. These alternate job functions are discussed in various Emergency Plan Procedures (EPPs). The Emergency Plan as required by 10 CFR 50.47 and App. E discusses only the primary responsibilities of key personnel.

b) Changed title of Emergency Organization to Emergency Response Organization (ERO). This is to be consistent with the industry.

c) Changed the word "activation" to "staffing", to refer to the call out of the ERO. Activation is a term used for declaring an emergency response facility ready to perform its designated functions.

3. Section 1.0, "Organization"

Deleted this section.

The Preface section replaced this information. The information contained in the deleted information is contained in the new Plan sections. This change does not remove any requirements or information, just removed duplicated information.

4. Deleted Section 1.1.1, "ERO and Responsibilities"

Relocated this information to new section, 1.2. This reduces the duplication of information in the Plan and consolidates the information into one location.

5. Section 1.1.1.1, "TU Electric"

Deleted this section.

As stated in the new 1.0 Purpose, The Plan provides the direction and coordination of the ERO. The entire Plan provides this information. The list of TU Electric responsibilities have been deleted in this section but are

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

still maintained in the Plan as discussed under response personnel responsibilities. No responsibilities have been deleted. The Plan content and intent is the same.

6. Section 1.1.1.2, "Local and State Agencies"

- a) Deleted reference to Texas Department of Agriculture.
- b) Combined with existing information in section 1.3 and removed reference to Appendix F.

a) The Texas Department of Health has primary responsibility for protective actions for radiological events, in accordance with the Texas Emergency Management Plan.

b) This information was duplicated in existing section 1.3. Combined the information and placed in one section in the Plan. (new section 1.2.2 and 1.2.4) The information in the rewrite, with the exception of the Dept of Agriculture, does not change the intent or content of the existing material.

7. Section 1.1.1.3, "Federal Agencies"
- Combined with existing information in section 1.3.3.

This information was duplicated in section 1.3.3. Combined the information and placed in one section in the Plan (new section 1.2.5). The Plan content and intent is the same in the rewrite as it was before.

8. Section 1.1.2, "Concept of Operation"

- a) Information rewritten.
- b) Deleted references to sections 2.0 and 3.0. Deleted sections 1.1.2.1 and 1.1.2.2.

a) The information was reformatted into new section 1.1.2 Response. The content of the information remains unchanged.

b) Deleted the references to sections 2.0, 3.0, and the information in 1.1.2.1, and 1.1.2.2. This information has been combined with information from Table 2.1 in new Table 1.2.

9. Section 1.1.3 "ERO Interrelationships" and 1.1.4 "Emergency Response Functions"

This information is contained in the rewrite in section 1.1.2.2, "CPSES ERO".

10. Section 1.1.5, "Authorities and Agreements"

- a) deleted the list of documents which establish authority for local and state agency support.

a) This is a list of legal documents that provide for the support of federal, state and local agencies. This information provides no guidance or information towards the planning of emergencies. The written response plans are all in place and the interrelationships of the groups are shown in Figure 1.1. The Texas Emergency Management Plan, as discussed in new section 1.2.4, continues to

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| <p>b) rewrote paragraphs discussing written agreements.</p> | <p>include the information on establishing the authority for the state and local plans.</p> |
| <p>11. Section 1.2 "CPSES Organization", 1.2.1 "TU Electric Nuclear Production Group", 1.2.2 "CPSES Operating Organization"</p> | <p>b) Section 1.2 in the rewrite describes the different agencies involved with emergency response at CPSES. The rewrite describes the type of agreement between CPSES and the agency involved. See Appendix H for changes/justifications regarding Letters of Agreement.</p> |
| <p>a) Relocated information concerning training to section 13 of the Plan.</p> | <p>a) Section 13 of the Plan discusses training. The information concerning TRA-105 already is in section 13 of the Plan. Relocated this information from section 1.2 and combined with section 13 to reduce redundancy.</p> |
| <p>b) Summarized the remaining information and added a reference to the FSAR section 13.</p> | <p>b) The remaining information in these sections is redundant of information that already exists in the FSAR section 13. Deleted the information from the Plan and replaced with a statement that directs the individual to the FSAR section 13 for information concerning normal operations organizations, and minimum shift compliment for Control Room staff.</p> |
| <p>12. Section 1.2.3, " CPSES Emergency Organization"</p> | <p>a) The rewrite (Section 1.1.2.2) discusses the augmentation of the on shift crew. The section describes the personnel who augment the on shift crew to include: station employees, local, state, federal, and private agencies. This sentence is redundant of information already contained in the Plan.</p> |
| <p>a) Deleted the first sentence.</p> | <p>b) This is redundant of information contained in section 12 and 13 of the Plan.</p> |
| <p>b) Deleted the information concerning training, drills, and exercises.</p> | <p>c) Table 1.1 continues to show the minimum functions required to be performed and the timeliness for augmenting these functions. The information for facility activation is discussed in section 6 of the Plan and was deleted from section 1.0 because of redundancy.</p> |
| <p>c) Kept the reference to Table 1.1, deleted the information concerning facility activation.</p> | <p>d) The intent and information of the rewritten section remains unchanged from the original.</p> |
| <p>d) Reworded the paragraph leading to the list of duty and responsibilities of key emergency response organization personnel.</p> | |

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

13. Section 1.2.3.1, "Emergency Coordinator"

- a) Revised responsibilities of EC.
- b) Deleted the declaring and classifying of an emergency from the list of non-delegable responsibilities of the EC.
- c) Revised the information about the transfer of EC duties from the Shift Manager, TSC Manager, and EOF Manager.
- d) Revised discussion of when EC duties are formally transferred.

a) The existing duties and responsibilities stated in the Plan also contain task statements that are part of the primary responsibilities. The revised responsibilities state the primary responsibilities only and are inclusive of the previous task statements. The revised responsibility list is a summary of information that previously existed. The Plan continues to discuss certain additional tasks that the EC performs. The responsibility to approve news releases has been transferred to the Company Spokesperson. Based upon experience, the majority of information used in news releases has previously been approved by the Emergency Coordinator during the event response. Approving the information again for the news release is redundant and distracts the Emergency Coordinator from more important matters. This change makes news releases more timely and enhances the operation of both the EOF and News Center.

b) The responsibility to assess, classify, and declare an emergency event was relocated from the list of non-delegable responsibilities to the list of responsibilities of EC. This allows the TSC Manager to retain accident classification responsibilities when EC duties are transferred to the EOF Manager. This change minimizes the communications links to actually make an event classification; therefore, events are classified in a more timely manner and the offsite agencies are able to consider/implement protective actions in a more timely manner which is a program enhancement. This change was field tested during a drill on May 2, 1996 with no problems encountered.

c) The information was revised to incorporate the change discussed in (b) above about accident classification.

d) The information about completion of formally transferring EC duties was deleted. The criteria for allowing the transfer (i.e. briefing takes place) is still in Plan as 1.1.2.2.c. This is detail that is contained in the EPPs.

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SECTION 1

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JUSTIFICATION:

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| 14. Section 1.2.3.2, "EOF Manager"

Deleted the statement discussing transferring Emergency Coordinator duties to the EOF Manager. | This information is now discussed in section new 1.1.2.2.c. |
| 15. Section 1.2.3.3, "EOF Communications Coordinator"

Deleted the stated functions of the EOF Communications Coordinator. | The primary responsibility is maintained. The functions are deleted because this section is to address primary responsibilities, not detailed functions. The details are discussed in the EPPs. |
| 16. Section 1.2.3.4, "Company Spokesperson"

Deleted the detail list of responsibilities. | The primary responsibility is maintained. The detailed list of responsibilities is more tasks associated with carrying out the responsibility than actual responsibility statements. The details are still discussed in the EPPs. |
| 17. Section 1.2.3.5, "EOF Security Coordinator"

Deleted the detailed list of individual responsibilities and replaced with a summary statement of responsibilities. | The summary statement is the primary responsibility. The details are discussed in the EPPs. |
| 18. Section 1.2.3.6, "EOF Logistical Support Coordinator"

(See description for item 17 above.) | The summary statement is the primary responsibility. The details are maintained in the EPPs. |
| 19. Section 1.2.3.7, "EOF Radiation Protection Coordinator"

(See description for item 17 above.) | The summary statement is the primary responsibility. The details are maintained in the EPPs. |
| 20. Section 1.2.3.8, "EOF OFFRAC"

Deleted this section. | The EOF Offsite Rad Assessment Coordinator is not specified in the group of key personnel described in the Plan. The duties and responsibilities of this position remain in the EPPs and the ERO. Table 1.1 shows the |

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JUSTIFICATION:

responsibilities, functional areas, and position titles of the key ERO members.

21. Section 1.2.3.9, "EOF Engineering Support Coordinator"

Deleted the position of EOF Engineering Support Coordinator from the Emergency Response Organization.

This position has been a back-up resource to the TSC Engineering Team and has duplicated the functions of the TSC Engineering Team Coordinator. The EOF and TSC Engineering Teams are being combined and are relocated in the TSC where they are better able to work on correcting plant problems. The responsibilities of the EOF Engineering Support Coordinator are transferred to the TSC Engineering Team Coordinator. This minimizes the needed communications links and improves the working relationship between the engineering team members. This change was field tested on May 2, 1996 and was determined to be a program enhancement.

22. Section 1.2.3.10, "TSC Manager"

(See description for item 17 above.)

The summary statement is the primary responsibility. The details are maintained in the EPPs.

23. Section 1.2.3.11, "TSC Maintenance Coordinator"

This position was deleted from the Emergency Response Organization. Deleted the information in this section.

The duties and responsibilities of the TSC Maintenance Coordinator have been transferred to the TSC Operations Coordinator and the TSC Communications Coordinator. A drill was conducted May 2, 1996 to field test deletion of the Maintenance Coordinator position. The OSC was kept informed of priorities and the TSC was kept informed of ERDC team activities. A table top discussion was conducted after the drill, and the outcome of the table top was that this function could be performed without the Maintenance Coordinator. The duties are not part of the key ERO positions as determined by Table 1.1 so they are no longer described in the Plan.

24. Section 1.2.3.12, "TSC Operations Coordinator"
Deleted position description from the Plan.

The duties of this position are not part of the key ERO positions as determined by Table 1.1 so they are deleted from the Plan, but are maintained in EPPs.

25. Section 1.2.3.13, "TSC Eng Team Coordinator"

As previously discussed, (#21), the EOF Engineering Support Coordinator position has been deleted and the EOF

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JUSTIFICATION:

Incorporated EOF Engineering Support Coordinators responsibilities and summarized the responsibilities.

Engineering Team has been combined with the TSC Engineering Team. This places the engineering function in one location (the TSC), close to the plant problems, and minimize communication problems caused by the Engineering Team being in separate facilities. The summary statement is the primary responsibility. Details are maintained in the EPPs.

26. Section 1.2.3.14, "TSC ONRAC"

Deleted the detailed list of responsibilities.

The list of responsibilities were actually tasks associated with carrying out the radiological responsibilities onsite. Summarized the list into a primary responsibility statement. The details of the list are maintained in the EPPs.

27. Section 1.2.3.15, "TSC Advisor"

Changed the title of TSC Advisor to TSC Communications Coordinator. Deleted the detailed list of responsibilities and replaced with a summary statement of responsibilities.

The position title change is more descriptive of what the position is actually responsible for and provides consistency between the TSC and EOF position titles for similar jobs. Summarized the responsibility list into a primary responsibility statement. The details of the list are maintained in the EPPs.

28. Section 1.2.3.16, "Operations Advisor"

Deleted position description from the Plan.

Defined key members as those positions necessary to carry out the functions outlined in Table 1.1, "Staffing Requirements for Emergencies." Table 1.1 is based on Table B-1 from NUREG-0654. The Operations Advisor remains a position in the Emergency Response Organization, but is not a key position for carrying out Control Room or TSC responsibilities.

29. Section 1.2.3.17, "LSC Manager"

Deleted this position description from the Plan

The LSC Manager position is deleted from the ERO. The Logistical Support Center (LSC) as a separate Emergency Response Facility is deleted. The functions of the LSC have been transferred to the EOF and are a responsibility of the EOF Logistical Support Coordinator. The functions of the LSC continue to be performed.

30. Section 1.2.3.18, "OSC Manager"

Summarized the list of responsibilities.

The summary statement is the primary responsibility. The details are maintained in the EPPs.

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DESCRIPTION OF CHANGE:

31. Sections 1.2.3.19, "OSC RP Supervisor" 1.2.3.20, "OSC Maintenance/ERDC Supervisor, 1.2.3.21, "OSC Chemistry Supervisor"
Deleted these position descriptions from the Plan.
32. Section 1.2.3.22, "STA"

Relocated this information to the discussion of the on-shift personnel. Reworded the information.
33. Section 1.2.3.23, "Local EOC Advisor"
Relocated this information to new section 1.2.1.
34. Section 1.2.3.24, "Corporate Support Coordinator"

Deleted this position description from the Plan and ERO.
35. Section 1.2.4, "Minimum Staffing"

JUSTIFICATION:

These positions are not key response personnel. This section deals with key personnel only required to satisfy the requirements of Table 1.1. Table 1.1 is based on Table B-1 from NUREG- 0654. These positions and functions remain in the ERO.

The STA is an On-shift position at CPSES. The information for this position was relocated to the on-shift description (Section 1.1.2.1) for consistency. The words were changed to fit with the new layout of the section rewrite. The intent of the information remains unchanged. Additional information is also contained in the FSAR section 13.1.2.1 and FSAR Table 13.1-2.

This information was relocated to reduce redundancy in section 1.2.3.23, 1.3.1, and 6.2. The intent of the information remains the same, but consolidated the information into one location within the Plan.

By September 1, 1996, essentially all of the nuclear production support that was located in Dallas at corporate headquarters has been moved onsite at CPSES. In the current TU Electric organization, all principal nuclear management, engineering and support personnel are permanently officed at CPSES. CPSES is the only nuclear power plant in the TU Electric system. Provisions for 24-hour staffing and augmentation of the CPSES ERO are covered by the onsite CPSES personnel. Accordingly, there is no longer a need to separately designate a "Corporate Support Coordinator" position in the ERO for marshaling offsite corporate support to a CPSES emergency response. TU Electric does have other corporate resources available to CPSES; new section 1.2.1 provides a general policy statement with respect to TU Electric's commitment to the other capabilities and their availability to the CPSES ERO.

See justification for Table 1.1.

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| 36. Section 1.2.5, "Other Onsite Emergency Organization Assignments"
Deleted a portion of the second sentence. | The information which is referenced by the material has been moved to the section which describes the on-shift capabilities (1.1.2.1) for emergency response; therefore, the statement that is deleted no longer applies to this section. The intent of the section remains unchanged. |
| 37. Section 1.2.5.1, "Station Operations and Fire Fighting"

Deleted this section from the Plan. | This information is a brief summary of the content of the Technical Specifications 6.1 and the FSAR section 13.1.2. Since this material is covered in detail in other licensing documents it does not need to be summarized in the Plan. |
| 38. Section 1.2.5.2, "Security"

Revised and relocated information. | Revised this information; however, the content and intent of the section remains unchanged. Material is relocated to new section 1.1.2.1. |
| 39. Section 1.2.5.3, "Administrative Support"
Deleted this section from the Plan. | This information is generic in nature and is duplicated by the responsibilities listed for the EOF Logistical Support Coordinator. |
| 40. Section 1.2.5.4, "RP and Chemistry"

Deleted this section from the Plan. | Table 1.1 outlines the functions and tasks to be performed by the RP Technicians. Section 13.0 addresses the qualifications of Emergency Response Organization members. This is duplicate information that already exists in the Plan; The information is also in FSAR Table 13.1-2. |
| 41. Section 1.2.5.5, "Engineering Teams"

Deleted this section from the Plan. | The EOF Engineering Team is being combined with the TSC Engineering Team. This provides one location near the plant for engineering analysis. This increases efficiency due to locating the teams together and removing the communication barriers that have existed. This was field tested May 2, 1996 during a drill. The engineering team performed their function well, and agreed that the change was an improvement for the team. The rest of the verbiage in this section is duplicate information that exists in Table 1.1, Figure 1.6, and responsibilities of the TSC Engineering Team Coordinator. |
| 42. Section 1.2.6, "Interfaces"

This information reworded and | The intent and content of this section remains unchanged with the exception of the Logistical Support Center. The LSC has been deleted as an emergency response facility. |

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DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| relocated to section 1.1.2.2. | The functions of the LSC have been reassigned to personnel in the EOF. Figure 1.1 shows the interrelationships between organizations. |
| 43. Section 1.2.7, "Long Term Operations"

Deleted this section from the Plan. | The information concerning the Emergency Coordinator is duplicate information already contained in section 1.0 of the Plan. The information concerning the recovery efforts is duplicated in section 11.0, "Recovery and Reentry." |
| 44. Section 1.2.8, "Corporate Support"
Reworded the information in this section. | See discussion in item 34. |
| 45. Section 1.2.9, "Squaw Creek Park",

Deleted this section from the Plan. | This section duplicated information that is contained in section 8.1 and 8.2. More instructions are given in section 8.0; therefore, deleted this information in section 1.0. |
| 46. Section 1.3, "Emergency Response Support Organizations"
Deleted this information from the Plan. | This information is introductory in nature and provides no actions or requirements, it is merely a discussion of what follows. |
| 47. Section 1.3.1, "Local Agencies"
Made editorial changes to the section. | Editorial changes do not alter the content of the section. The material is now in section 1.2.2. |
| 48. Section 1.3.1.1, "Law Enforcement"

Made editorial changes. | The location of the Local EOC's is deleted. The Hood and Somervell County Emergency Plans establish the locations of the Local EOC's. Section 6.0 of the Plan also describes the location of the local EOC's. The new material is in section 1.2.2. |
| 49. Section 1.3.1.2, "Fire Fighting Support"
Made editorial changes. | Content remains unchanged. New material is in section 1.2.2. |
| 50. Section 1.3.1.3, "Medical Support"

Deleted this information from the Plan. | This was nothing more than a reference to another section of the Plan. Deletion of the reference changes no content. The information in the referenced section remains unchanged. |

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

51. Section 1.3.2, "State Agency Support"
Made editorial changes.

Content remains unchanged. New material is in section 1.2.4.

52. Section 1.3.3, "Federal Agency Support"

Made editorial changes.

Content of the information remains unchanged with the exception of the information in section 1.3.3.3 which discussed the DOE. CPSES has a letter of agreement with the DOE which outlines the information and provides the details from section 1.3.3.3. The redundancy has been deleted. New material is in section 1.2.5.

53. Section 1.3.4, "Private Organization Support"
Made editorial changes.

Content of the information remains unchanged. Added information concerning Houston Lighting and Power, and American Nuclear Insurers. New material is in section 1.2.3.

54. Table 1.1, "Staffing Requirements"

See description of changes/justifications for Table 1.1.

55. Table 1.2 "Graded Emergency Organization Response"

a) Split the Site Area Emergency and Alert functions. Added the Site Area Emergency Functions to the General Emergency. This is how the Plan actually reads as far as actions taken by emergency response organization personnel. This is supported throughout the Plan.

Table 1.2 was combined with Table 1.1 into new Table 1.1. The following changes describe Table 1.2 information as incorporated in new Table 1.1.

b) The LSC has been deleted as an emergency response facility. See section 6.0 for more details on this deletion. The EOF has taken over the functions previously performed by the LSC.

a) Moved Site Area Emergency functions to column with General Emergency.

c) Title changed to TSC Communications Coordinator to be more reflective of the duties the position performs.

b) Deleted the Logistical Support Center

d) Deleted this position from the ERO. Security Plan and procedures perform without the TSC Security Advisor position. The Security Shift Supervisor maintains responsibility for implementing the Security Plan. Drill on May 2, 1996 field tested this change with no problems encountered.

c) Changed title of TSC Advisor

d) Deleted TSC Security Advisor

e) Deleted Shift Manager from Radiation Protection.

e) Shift Manager has no RP duties at an Unusual Event.

Emergency Plan Changes and Justifications

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

- f) Updated Engineering Team information
- g) Added mechanics, electricians, and I&C Technicians to emergency repair area. Changed Control Room to auxiliary operators and deleted RP Techs.
- h) Replaced operations and safety services with Fire Brigade.
- i) Changed Control Room Personnel to Control Room Communicator.

f) The STA in the Control Room initially has responsibility for engineering functions, to include core thermal hydraulics. The nuclear member of the Engineering Team relieves the STA of this function. The nuclear member also can perform shutdown margin and core damage assessment. These are all normal day to day activities of these personnel. The remainder of the Engineering Team is staffed at the ALERT and provides corrective actions for plant problems under the direction of the Engineering Team Coordinator.

g) RP Techs are already covered on this Table in the Radiological Assessment section. The Auxiliary Operators are more descriptive as who would be doing corrective actions from the Control Room, and added the mechanics, electricians and, I&C Techs. This is an improvement over the existing program.

h) Fire Brigade is the specific group which provides fire fighting function.

i) The change allows other on-shift personnel to perform the communications function. This is supported by Table 1.1, which identifies Control Room Communicators for this function.

- 56. Figure changes.
- a) Figures 1.1, 1.5, 1.6, 1.7, 1.8, 1.9 revised and renumbered.
- b) Figures 1.4, 1.10, 1.11 are deleted.

a) Changes to these figures reflect changes that have been made to the ERO.

b) Fig 1.4 is being deleted because the text (Section 1.1.2.2.c) provides the overview of the ERO during different levels of activation and new Fig 1.1 shows the total response organization depending on the level of facility activation.

Fig 1.10 has been deleted because the LSC has been deleted as an emergency response facility. The EOF has taken the duties previously performed by the LSC. Fig 1.5 shows the LSC functions in the EOF.

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SECTION 1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

Fig 1.11 has been deleted because the corporate support function has been deleted. See discussion in item 34 this section.

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TABLE 1.1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

1. Station Operations Referenced FSAR Section 13.1.2.3 and FSAR Table 13.1-2	The information in the Plan is a summary of the information in the FSAR. The FSAR prescribes the current required minimum on shift complement. Also the Plan only shows the minimum staffing for one unit operation, while CPSES is now a two unit site. The FSAR discusses minimum staffing for two units during all modes of operation. Referencing the FSAR prevents inconsistencies between the Plan and the FSAR.
2. Emergency Direction and Control Added task statement to the table.	This addition is for clarification purposes for the function of Emergency Direction and Control.
3. Communications a) Added local, state, and federal personnel to the task statement. b) Specified by title rather than expertise the positions which conduct these functions. c) Moved the 40 minute responder to on-shift (NOUE) and reduced the 70 minute responders (Alert) by one.	<p>a) The addition of this information more clearly defines the function of communications.</p> <p>b) The titles rather than expertise makes the Plan more clear.</p> <p>c) The Plan currently allows one communicator to make the station, local, state, and federal notifications. This remains unchanged. During the federal notifications, if the NRC wants the communicator to remain on the line, the communicator requests assistance from the Shift Manager who assigns a member of the crew from the unaffected unit to talk with the NRC. This is the 40 minute responder that is being moved to on shift. This is reflected in the written EPPs and this practice has worked well in the past during drills and exercises. This arrangement has also been demonstrated during NRC walk throughs on the simulator to test the on shift minimum response capabilities.</p> <p>The 70 minute responder is the TSC Communications Coordinator. The reduction of 70 minute responders is possible by having the Control Room Communicator walk upstairs with the TSC Manager (Emergency Coordinator) when the command function is transferred to the TSC. There are still two (2) communicators available, both now in the TSC to conduct the communication / notification functions.</p>

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TABLE 1.1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

4. Station System Engineering

Made the STA responsible for the duties and responsibilities of the 40 minute responders for engineering and health physicist.

The intent of the communication function is to have two people making notifications, whether they are in the TSC or the Control Room. The Plan provides for two communicators in each facility. Initially, by having both communicators on shift; later, by calling in one additional communicator and having one of the control room communicators relocate to the TSC when the command function transfers to the TSC. The intent of having two communicators is assured by this change, and so the Plan as rewritten is as good as before.

The Plan currently requires health physicist expertise to arrive within 40 minutes. There is also a 40 minute responder in the radiological assessment function. Both of these 40 minute responders are to perform offsite dose projections using the CPSES computer model. The function of performing dose projections is transferred to the STA in this revision with no additional responders.

The Plan and EPPs now reflect the guiding principle of the NRC when making protective action recommendations(PARs), which is to base the initial PARs upon plant conditions. By basing the PARs on plant conditions rather than dose projections, the PARs reach the general public faster, which better ensure public protection and safety.

The STA is trained and has the capability to perform dose projections using the computer model and performs dose projections on a priority/time availability basis to verify that plant condition PARs were sufficient.

As the emergency response facilities become activated, the function of performing dose assessment/projections is transferred to the EOF per the Plan and EPPs.

The engineering function, specifically core/thermal hydraulics is also transferred to the STA. This is part of the qualification requirements called for by the FSAR section 13.1.2.3.

Emergency Plan Changes and Justifications

(Revision 25)

TABLE 1.1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

With the STA satisfying the capability requirements for dose projections and engineering, there is no need to have 40 minute responders to report to perform these functions. Since the functions are capable of being performed by a member of the on shift crew rather than waiting for a 40 minute responder, this change is an enhancement to the Plan.

5. Radiological Assessment

a) Changed the name of Chem & Envir Technician to Chemistry Technician.

a) This change reflects the position title in the normal operating organization.

b) Added vehicle drivers to the offsite survey task.

b) Offsite survey teams are made up of one driver and one RP Tech by the EPPs. This change reflects the makeup of the offsite survey team.

c) Moved the 40 minute responder for onsite surveys to on shift.
(NOUE)

c) The function of onsite surveys is to locate unmonitored releases as soon as possible. With the PC-11 "looking" for releases from within the plant and the onsite surveys determining if there are any unmonitored releases, any release that does occur should be detected rapidly. The information can be used to form PARs sooner and the health and safety of the public is better assured.

d) Moved the 40 minute responder for offsite surveys to Site Area Emergency column and reduced the total number of offsite survey personnel to two.

d) The Plan currently states that an offsite survey team must be deployed within 120 minutes of an emergency. The Plan also describes sending field teams out at the Site Area Emergency in both section 7.0 and new Table 1.2. With the 120 minute criteria established, there is no reason to bring one individual in to respond within 40 minutes. Therefore the 40 minute responder is deleted. An offsite survey team is composed of at least one RP Tech and one driver. Previously, Table 1.1 called for one 40 minute responder and three 70 minute responders. This allowed for the dispatch of two offsite survey teams, each team with two RP Techs. However, the Plan and EPPs are written to require only one team within 120 minutes of the emergency. The previous Table 1.1 numbers were actually an overstatement of the minimum resources required to perform the task of offsite surveys. One team is sufficient to initially determine if a release is having an impact to the

Emergency Plan Changes and Justifications

(Revision 25)

TABLE 1.1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

general public. One team is made up of one driver and one RP Tech, as reflected in the rewrite. Additionally, this change allows for the redistribution of three RP Techs back towards the station where they could be better put to use in the early phase of an accident.

Though the staffing number actually decreased from four to two offsite survey individuals, the required task of performing offsite surveys can be accomplished with two individuals forming one team.

6. System Corrective Action

Added to the Task statement the words "Emergency Repair." Moved the 40 minute responders to on shift (NOUE). Added an additional Electrician and I&C Technician to the 70 minute responders (Alert).

Electricians, mechanics, and I&C Technicians have been on shift since Jan. 1, 1996. This change reflects changes that have taken place in the normal operating organization. Adding additional 70 minute responders in each discipline allows 2 person teams to be dispatched from the same discipline for second checking and self verification which decreases the occurrence of errors that might be made in the field. This enhances the program.

7. Protective Actions

Deleted this entire function, task, and staffing requirements.

The tasks that responders performed (i.e. access control, personnel monitoring, dosimetry issue) have all been automated. Personnel requiring access to the RCA receive training on how to use the system to allow self-service at access control. Individuals are responsible for getting dosimetry required for entry, reading the access permit, processing in on the access control computer, all without the aid of an RP Tech. This is the practice during normal operations; therefore, there is now no need to have personnel on shift or required to respond to perform these functions.

8. Firefighting, Rescue Operations, and First Aid

a) Combined these functional areas and added task statements to the functions.

b) Changed the Local support from

a) These tasks are performed by the same personnel so they have been combined.

b) Letters of Agreement are in place with local support agencies for medical, firefighting, and rescue support. These agreements provide assistance as requested. Response is as soon as possible from the time of notification. As such, they do not fit in any of the three

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TABLE 1.1

DESCRIPTION OF CHANGE:

JUSTIFICATION:

40 minutes to 70 minutes (ALERT).

categories (on shift, 40 min, and 70 min), but are listed to show that there is additional resources available if needed.

9. The 70 minute column was incorporated into the Alert column.

When existing Table 1.1 and 1.2 were combined, the 70 minute responders are shown by title in the Alert column. Section 6.0 describes activation times for the TSC and OSC to be 70 minutes from an Alert declaration. Therefore, the Alert column corresponds to 70 minute responders. The information previously contained in the 70 minute column remains unchanged with the exception of changes made in items 1-8.

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NEW TABLE 1.2

DESCRIPTION OF CHANGE:

1. Table 2.1 is relocated to Section 1.0 as new Table 1.2.

JUSTIFICATION:

Section 1.0 of the Plan describes the concept of operations for the Emergency Response Organization. Section 2.0 of the Plan describes the emergency classification system. The information in Table 2.1 was determined to fit better in section 1.0 than it did in section 2.0; therefore, the table was relocated.

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SECTION 2

DESCRIPTION OF CHANGE:

1. Section 2.1, "Emergency Classifications"
Removed the reference to Table 2.1. Table 2.1 is relocated to Section 1.0 as new Table 1.2.
2. Table 2.1, "Predetermined Response Actions" (new Table 1.2)

Removed the regulatory definitions and purpose statements from Table 2.1.
3. Table 2.1, NOUE (new Table 1.2)
a) Added the time limit for notifying state and local authorities. (This change is for all four classifications.)
b) Added notifications to NRC. (This change is for all four classifications.)
c) Deleted augmentation of on-shift resources as precautionary measures.
d) Added periodic updates to offsite authorities.
4. Table 2.1, Alert (new Table 1.2)
Added activate the ERDS at an Alert or higher classification level.
5. Table 2.1, Site Area Emergency and General Emergency (new Table 1.2)
Deleted the Logistical Support Center from the list of facilities to be activated.

JUSTIFICATION:

This change is only relocation of material. See discussion for new Table 1.2, item 1.

The definitions and purpose statements for each emergency classification are already in the Plan in Section 2.1. The purpose statements are word for word from NUREG-0654 and are explanations used to describe what the classifications were to be used for as defined in the early 1980's. Today, emergency classifications are more widely understood and purpose statements are not particularly useful. The purposes are discussed in the text of section 2.1. The predetermined response actions (new Table 1.2) also reflect the purposes of the classification.

Items a, b, and d are all additions to the existing Plan. These additions are all enhancements to the program.

Item c is not a predetermined action. As stated, the statement reads "if required." As stated in Section 1.0 of the Plan, the Emergency Coordinator can take actions as required to protect the health and safety of the public. Therefore, since this is not a predetermined action and the Emergency Coordinator already has the authority to take the action, the information is deleted.

This is in accordance with 10CFR50.72 (a)(4). The addition is an enhancement to the Plan.

The LSC is being deleted as an emergency response facility. See discussion for Section 1, item 29, and Section 6, item 14.

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SECTION 4

DESCRIPTION OF CHANGE:

JUSTIFICATION:

1. Section 4.0, First paragraph,
Deleted reference to Figures 4.1 through 4.6. Replaced with new Table 4.1.

Table 4.1, "Communications Interfaces" contains equivalent information as the previous figures, just in a new format. The single page table rather than six pages of figures makes it easier to see the actual communication interfaces. The table is therefore an improvement over the figures, and constitutes an improvement to the Plan. (See individual changes to each figure to determine differences between Table 4.1 and associated figures.
2. Section 4.4, Changed words from
"up to 16" to "multiple".

In June of 1996 Emergency Planning upgraded the autodialing machine. The new machine software runs faster than the old machine software. Also with the upgrade, four (4) additional phone lines were added for a total of twenty (20). The function of the system is to call out the ERO in the event of an emergency. The Plan sets the timing goal for activating the facilities. The number of lines needed for the call out machine is a function of the number of people to be called and the facility activation time specified. The number of lines does not need to be specified in the Plan since the time requirement for activation is in the Plan.
3. Section 4.5, Changed
"Southwestern Bell trunks" to
"commercial trunk lines".

The important point here is that the capability exists for commercial trunk lines. The corporate company name is unimportant
4. Table 4.1, (new Table 4.2)
 - a) Deleted the Logistical Support Center

a) The Logistical Support Center as a separate emergency response facility is being deleted. See discussion for Section 1, item 29, and Section 6, item 14.
 - b) Deleted Dallas Corporate Office

b) See discussion for Section 1, item 34 and new section 1.2.1.
5. Changed figures 4.1- 4.6 to delete
point-to-point designation for all
phones with the exception of the
Control Room to TU Electric

In situations where point-to-point phones are used there is also a standard telephone unit. In some positions there are two point-to-point phones and a standard phone. It is not possible to have effective communications on two or

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SECTION 4

DESCRIPTION OF CHANGE:

- dispatcher.
6. Changed the Emergency Notification System to read as Federal Telecommunication System. Deleted the Health Physics Network designation. (Various figures)
 7. Deleted the Logistical Support Center on the figures.
 8. Deleted the corporate offices from the figures and Figure 4.7.
 9. Deleted the two way radio communication link between security and the CPSES emergency response facilities on the figures.
 10. Deleted the state/county dedicated system line from the BRC on the figures.

JUSTIFICATION:

three lines at the same time. It also is not possible to have effective communications on one line while the other phone is ringing endlessly. To solve these barriers to effective communications, the work stations with multiple phones have been reconfigured by combining the multiple phones on to one instrument. The single instrument phone have speed dial buttons in place of the point-to-point feature. The same locations are still able to be called. The clutter of multiple phones is gone, the noise level in the facilities has been decreased, and the individuals are able to communicate more effectively. This new setup was field tested during an exercise on May 2, 1996 with nothing but positive responses.

The ENS and HPN lines are provided by the NRC. The NRC has made changes to these lines. They are now part of the Federal Telecommunication System as described in section 4.2. This change reflects changes that have already been made by the NRC and now makes the Plan accurate.

This supports the discussion of the change described in 4.a above.

The justification for this is in the discussion of 4.b above.

Per the Plan section 4.1.4 the in-plant radio system is different from the security radio system. This change makes the communications interfaces consistent with the text of the Plan.

The BRC has never received information via the state/county line. This line only connects CPSES with the local counties and DPS Waco. (See section 4.1.9 of the Plan.) The BRC does receive notifications per the EPPs by telecopier, which is accurately reflected in the communication interfaces. There is a dedicated line in

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SECTION 4

DESCRIPTION OF CHANGE:

JUSTIFICATION:

both the TSC and EOF which can be used for telephone communications between the plant and the BRC.

11. Deleted the telephone link to the onsite and in-plant survey teams from the figures.

The survey teams are dispatched from the OSC with radios. The teams use radios to keep the OSC informed of status. If the radios were unavailable the plant page party system could be used. Telephones could be used by these teams under extraordinary circumstances but they would not be readily available. The current arrangement implies that the telephones would be readily available. This change reflects the actual communication links normally used.

12. Added communication links not previously shown.
(new Table 4.1)

This revision describes communication links that are readily available for use between the various agencies and facilities. Additions to new table 4.1 clearly define these communication links and are an enhancement to the program.

13. Section 4.1.6, "Direct Telephone Line to System Dispatcher"

Deleted words "and speaker circuit."

This section describes an existing line to the system dispatcher. This line does not include a speaker circuit. This change reflects as built design of the line.

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SECTION 6

DESCRIPTION OF CHANGE:

JUSTIFICATION:

- | | |
|--|---|
| 1. Section 6.0, first paragraph, first sentence, Added the word "Response" | This provides consistency throughout the Plan, when discussing the ERO. |
| 2. Section 6.0, first paragraph, second sentence, relocated the information to section 6.1.3, added the words "staffed", deleted the words "and thus is not considered in this discussion." | The addition of the word "staffed" adds to the discussion of the section. Deleting the rest of the sentence is appropriate since section 6.1 now describes the Control Room. |
| 3. Section 6.0, second paragraph, second sentence, deleted the words "Facility layouts and." | The facility layouts were required when all the emergency equipment and telephones were stored in lockers. The equipment is now setup in the facility along with the phones. A facility layout is no longer required to arrange the facility; therefore, the layout diagrams have been deleted. |
| 4. Section 6.0, second paragraph, last sentence, deleted the sentence. | Duties and responsibilities of key ERO positions are described in section 1.1.2. Other support personnel responsibilities are described in the EPPs, as appropriate, as stated in section 1.0. |
| 5. Added new section 6.1 to discuss the Control Room. | The Plan discusses Control Room duties and responsibilities in section 1.0 and the Control Room is mentioned throughout the Plan. This information provides consistency for the Plan. |
| 6. Revised section 6.1 as new section 6.2. Combined information from the FSAR since the FSAR, Section III.A.1.2, also describes the TSC. Arranged the information into appropriate subsections to match FSAR format. | Having descriptive information for an emergency response facility (ERF) in two separate Licensing Basis Documents (LBD's) is cumbersome and redundant. The information in the two documents were not exactly the same but led to interpretations that could be different. By combining the information and describing in the Plan only, there is a single source of information describing this ERF. The intent of the information remains unchanged. |
| 7. In rewriting section 6.1 into new section 6.2, editorial changes were | a. see justification #6, above. |

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SECTION 6

DESCRIPTION OF CHANGE:

- made as follows to the information to allow the combination of the sections and splitting the information into subsections.
- a. 1st para., 1st and 2nd sentences; 2nd para., last sentence; and 3rd para., 2nd, 3rd, and 4th sentences.
- Combined with information from FSAR III.A.1.2 and relocated to section new 6.2.1.
- b. 1st para., 3rd sentence; and 3rd para., 1st sentence.
- Combined with information from FSAR III.A.1.2 and relocated to new section 6.2.3.
- c. The goal or estimate for activating emergency response facilities is changed from "60 minutes" to "70 minutes."
- d. 2nd para., 1st sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.2.2.

2nd para., 2nd sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.2.6.

2nd para., 3rd sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.2.4.

JUSTIFICATION.

- b. see justification #6, above.
- c. The time to activate the CPSES emergency response facilities (ERFs) (i.e. TSC, EOF, and OSC) is "as soon as possible" after notification following a classification of alert or site area emergency as applicable. This activation time has not changed. The goal of achieving facility activation "within 60 minutes" is an estimate based on several factors including emergency response organization demographics, assumed weather conditions, changes in surrounding general population density, traffic control and/or road system development, and consideration of all significant steps in an individuals physical preparation and travel from home to the ERFs. This change from "60" to "70" minutes simply provides an updated estimate to the expected achievable time for facility activation, (see change for Appendix M). The expected timing for facility activation still remains "as soon as possible." On this basis, this change does not decrease the effectiveness of the emergency preparedness program. It only represents a change in the estimate based on more current information of the contributing factors.
- d. see justification #6, above.
- e. This information is personnel duties and responsibilities, which is discussed in new section 1.1.2.2 and shown in new Figure 1.3.

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SECTION 6

DESCRIPTION OF CHANGE:

JUSTIFICATION:

2nd para., 4th sentence, combined with information from FSAR III.A.1.2 and relocated to new sections 6.2.8 and 6.2.9.

6.1.5/Fig1.2/Fig1.3; 3rd para., last three sentences, Combined with information from FSAR III.A.1.2 and relocated to new section 6.1.5. The information about the Ops Coord. and Ops Advisor is shown on new Fig. 1.2 and 1.3.

e. Fourth paragraph, deleted.

8. Revised section 6.2 into new section 6.3. Combined information from the FSAR since the FSAR, Section III.A.1.2, also discusses the OSC. Arranged the information into the appropriate subsections to match FSAR format.

See justification for Section 6, item 6.

9. In rewriting section 6.2 into new section 6.3, editorial changes were made as follows to the information to allow the combination of the sections and splitting the information into subsections.

a. see justification for Section 6, item 6.

b. see justification for Section 6, item 6.

c. see justification for Section 6, item 6.

d. The rooms and offices that the OSC are contained within have been renamed. The changes to the Plan reflect the current room naming.

a. 1st para, 1st sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.3.1.

e. Relocated the information to the appropriate subsection. Deleted the reference to the LSC because the LSC as a dedicated ERF is being deleted (see section 1, item 24, and section 6, item 14). Reworded the sentence after deleting the LSC so that the sentence reads clearly.

b. 1st para, 2nd sentence, combined with information from FSAR III.A.1.2 and relocated to section 4.0 and Table 4.2.

c. 1st para, 3rd and 4th sentences, combined with information from

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SECTION 6

DESCRIPTION OF CHANGE:

JUSTIFICATION:

- | | |
|--|--|
| d. FSAR III.A.1.2 and relocated to new section 6.3.2. | f. see justification for Section 6, item 6. |
| e. Revised the rooms and offices that the OSC is located within. | g. This information is redundant to information in section 6.11. |
| f. 1st para, last sentence, relocated the information to new section 6.3.4. Also deleted the reference to the Logistical Support Center and reworded the sentence. | h. This information is personnel duties and responsibilities which is covered in section 1.1.2.2. The responsibility is covered also in Table 1.1. |
| g. 2nd para, 1st sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.3.3. | |
| h. 2nd para, 2nd and 3rd sentences, revised the information and relocated to section 6.11. | |
| 10. 2nd para, last sentence, deleted the information. | |
| 10. Revised section 6.3 into new section 6.4. Combined information from the FSAR since the FSAR, Section III.A.1.2, also discusses the EOF. Arranged the information into the appropriate subsections to match FSAR format . | See justification for Section 6, item 6. |
| 11. In rewriting section 6.3 into new section 6.4, editorial changes were made as follows to the information to allow the combination of the sections and splitting the information into subsections. | |
| a. 1st para, 1st three sentences, combined with information from FSAR III.A.1.2 and relocated to new section 6.4.1. | a. see justification for Section 6, item 6. |
| | b. see justification for Section 6, item 6. |
| | c. see justification for Section 6, item 6. |
| | d. see justification for Section 6, item 6. |
| | e. see justification for Section 6, item 7.c. |
| | f. see justification for Section 6, item 6. |

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SECTION 6

DESCRIPTION OF CHANGE:

- b. 1st para, last sentence, combined with information from FSAR III.A.1.2 and relocated to section new 6.4.2.
 - c. 2nd para, combined with information from FSAR III.A.1.2 and relocated to new section 6.4.4.
 - d. 3rd para, 1st sentence and 4th para, last sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.4.3.
 - e. Changed the facility activation time from goal of 60 minutes to 70 minutes.
 - f. 3rd para, 2nd sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.4.8.
 - g. 3rd para, 3rd sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.4.9. The communications comments are addressed by section 4.0 and Table 4.2.
 - h. 3rd para, 4th sentence, deleted.
 - i. 3rd para, 5th sentence, combined with information from FSAR III.A.1.2 and relocated to new section 6.4.4.
 - j. 4th para; 1st, 2nd, and 3rd sentences. This information relocated to section 1.1.2.2, Fig 1.5, and Table 1.1.
12. Revised section 6.4 into new section 6.5 to be consistent with the format of the previous facility discussions. Intent of the information remains unchanged.

JUSTIFICATION:

- g. see justification for Section 6, item 6.
- h. This information is a description of the NOSF and not the EOF. The News Center is described in new section 6.5. The decon facilities are describes in section 9.3. The lab facilities are described in the FSAR section II.B.3.4.
- i. see justification for Section 6, item 6.
- j. Section 1.0 is for discussion of duties and responsibilities. The EOF positions are discussed in section 1.1.2.2. The EOF organization is shown in Fig 1.5. Table 1.1 shows the functional responsibilities and minimum staffing. Section 1.0 already states that ERO responsibilities are in EPPs, as appropriate. This information is redundant as described above and is deleted.

Only reformatted this section.

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SECTION 6

DESCRIPTION OF CHANGE:

13. In rewriting section 6.4, editorial changes were made as follows to the information to allow the combination of the sections and splitting the information into subsections.
 - a. 1st para, 1st sentence, relocated to new section 6.5.1.
 - b. 1st para, 2nd sentence, relocated to new section 6.5.4.
 - c. 1st para, 3rd sentence, relocated to section 6.5.2.
 - d. 2nd para, 1st sentence, revised and relocated to section 6.5.3.
 - e. 2nd para, 2nd sentence, deleted the information.
 - f. 3rd para, relocated information to new section 6.5.5.
14. Section 6.5; deleted the entire section.
15. Section 6.6 is being combined with information from FSAR III.A.1.2. The material that is specific to a facility is being relocated to the respective facility habitability section. The generic information will remain in section 6.6.
16. In rewriting section 6.6, editorial

JUSTIFICATION:

- a. Revised section to be consistent with the format of the previous facility discussions.
 - b. Revised section to be consistent with the format of the previous facility discussions.
 - c. Revised section to be consistent with the format of the previous facility discussions.
 - d. Relocated the information to section 6.5.3. Revised to be consistent with the other facility activation statements.
 - e. Section 1.0 discusses duty and responsibilities of the ERO. News Center Manager position is being deleted, but the tasks of the position are being transferred to other News Center staff positions. The Company Spokesperson is the lead person in the News Center. The Company Spokesperson is discussed in section 1.1.2.2. The News Center organization is shown in Fig. 1.6. Table 1.1 assigns public information responsibilities to the Company Spokesperson.
 - f. Revised section to be consistent with the format of the previous facility discussions.
- The functions that have been carried out by the LSC are being transferred to the EOF. Personnel previously assigned to the LSC are being reassigned to the EOF. Fig 1.5 shows the new EOF organization.
- See justification for Section 6, item 6.
- a. The entire section 6.0 is revised to describe the

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SECTION 6

DESCRIPTION OF CHANGE:

- changes were made as follows to the information to allow the combination of the sections and splitting the information into subsections.
- a. 1st para, 1st sentence, deleted
 - b. 1st para, 2nd sentence, relocated the information to section 6.2.6.
 - c. 1st para, 3rd sentence, deleted the LSC, relocated the OSC information to section 6.3.4 and the News Center information to section 6.5.5.
 - d. 1st para, last two sentences, relocated the information to section 6.4.6.
 - e. 2nd para, 1st and 2nd sentences, relocated this information to each facility discussion on habitability.
 - f. 2nd para, last sentences, revised the wording of the last sentence.
 - g. 3rd para, relocated information to new section 6.4.6.
17. Section 6.7; 1st para, revised the description to site location relative to the EOF rather than refer to a figure.
18. Section 6.7; 2nd para, replaced with a reference to the FSAR section II.B.3.4.

JUSTIFICATION:

specifications in NUREG-0696. The statement does not need to be in the Plan and is redundant to discussion in FSAR III.A.1.2.

- b. Combined with information from FSAR section III.A.1.2 and relocated to the TSC habitability section 6.2.6.
- c. The LSC as a separate facility is being deleted (see section 1, item 24, and section 6, item 14). Combined with FSAR section III.A.1.2 and relocated to the OSC habitability section 6.3.4. and News Center habitability section 6.5.5.
- d. Combined with information from FSAR section III.A.1.2 and relocated to the EOF habitability section 6.4.6.
- e. The CR and TSC are designed to be habitable during design basis accidents, per new section 6.1.4. The OSC, EOF, and News Center have discussion of habitability and action for facility evacuation, per new sections 6.3.4, 6.4.6, and 6.5.5 respectively.
- f. New words allowed transition to what follows based on preceding information being relocated. The intent of the sentences remains unchanged.
- g. This information more appropriate in the discussion of the EOF. Information remains unchanged.

The lab is located just outside the EOF. The text description makes it clear where the lab is without referring to a figure.

The subject lab is actually for training purposes by the chemistry section. Chemistry and Chemistry Training maintain the lab and lab equipment. If required, the lab could be made ready for sampling as discussed in the

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SECTION 6

DESCRIPTION OF CHANGE:

JUSTIFICATION:

19. Revised section 6.8 to provide only a list of the labs available. Deleted the information associated with the labs.

FSAR. The information in the Plan is verbatim to information contained in the FSAR in a complete section on the PASS. The information is more appropriate to remain in the FSAR with a reference to this information in the Plan.

20. Deleted the information in section 6.9. Replaced with a reference where the information can be found.

In section 1.0 of the Plan, outside support resources are identified. Also in section 1.0, more detail is provided about the labs; therefore, only listed the labs in section 6.8 and referred to the more detailed descriptions in section 1.0.

21. Deleted the information in section 6.10. Replaced with a reference to section 10.0.

The FSAR section 12.5.2.2 describes the in-plant decon facility. The Plan section 9.3 describes the NOSF decon facility. The Plan (section 6.9) now references these descriptions to prevent redundancy. The information about liquid and solid waste is relocated to section 9.3.

22. Section 6.11; 1st para, deleted the listing of ERF's, revised frequency of inventories, added information on correcting problems, and recorded information.

Section 10.0 revised to adequately describe the emergency aid facilities. A reference to the information in section 10.0 removes redundancy.

The listing of ERF's is redundant since the sentence already states "each". The frequency of inventories has been changed from monthly to quarterly. This change is consistent with guidance provided in NUREG-0654, criteria H.10, and is supported by an evaluation of the occurrence and significance of past observed discrepancies. In order to assess the effect of this change, the results of past monthly inventories was evaluated. The evaluation concluded that the number and significance of the inventory discrepancies observed would not make any difference with respect to inventory frequency and the effective availability of the subject equipment and supplies. The evaluation found only minor (insignificant) discrepancies during the period and no significant discrepancies. Regardless of whether the observed minor discrepancies are considered monthly, or totaled and considered cumulatively every three months, the result is the same, i.e., no significant unavailability

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SECTION 6

DESCRIPTION OF CHANGE:

JUSTIFICATION:

of the dedicated emergency response equipment or supplies. On the basis of the above discussion and historical evaluation, and in consideration that storage locations and storage inventory practices have not otherwise changed, it is concluded that the inventory frequency for emergency response equipment and supplies may be changed from monthly to quarterly without decreasing the expected availability of the subject equipment or supplies. Accordingly, there is no decrease in the effectiveness of the emergency preparedness program.

23. Section 6.11; deleted the 2nd para.

The information deleted is described in Appendix J of the Plan. Deletion of the material prevents redundancy.

24. Section 6.11; 3rd para, relocated information to section 8.1.6.
Deleted "federal" as a group for whom CPSES stockpiles KI.

Section 8.0 of the Plan discusses protective measures. KI is a protective measure, so the information is more appropriate in section 8.1.6. There are no requirements for making KI available for federal workers. A check with NRC Region IV Offices confirmed that CPSES does not need to supply federal workers with KI, so "federal" was deleted.

25. Section 6.11; last two paras, relocated information to Appendix J.

Appendix J is the Plan section where equipment and kits are described. This information is more appropriate in Appendix J.

26. Section 6.12; 1st two paras, revised the information.

The new section provides for the establishment, location, and provides a reference where more detailed information can be found. The intent of the information remains unchanged.

27. Section 6.12; 3rd para, relocated the information.

Section 1.0 discusses duties and responsibilities of ERO personnel. Section 1.2.2 provides a discussion of the advisor's for the local EOC's. The information is more appropriate in section 1.2.2 than in section 6.12 so the information has been relocated.

28. Section 6.13; changed the word "describe" to "identify".

NUREG-0654 H.5 provides guidance for information in this section. NUREG-0654 states that the licensee

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SECTION 6

DESCRIPTION OF CHANGE:

JUSTIFICATION:

should identify and establish assessment systems and equipment. The guidance does not specify or require detailed descriptions of the identified systems or equipment. Therefore, the systems and equipment that have been identified are listed in section 13.0. The detailed system descriptions have been deleted since they are not required. The details have been replaced with a functional statement of the system or equipment and a reference to where the details can be found (e.g. FSAR). Also added where the systems can be accessed where appropriate. The deleted information was "for information only" and no actions required by the ERO have been deleted. The corresponding Figures and Tables have also been deleted.

29. Tables 6.1, 6.2, and 6.3.

See justification for Section 6, item 28

Deleted these Tables.

30. a. Figures 6.1, 6.2, 6.3, 6.4, 6.5, and 6.6.

a. See justification for Section 6, item 28.

Deleted these figures.

b. See justification for Section 1, item 24 and Section 6, item 14.

- b. Figure 6.7.

Deleted this figure.

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SECTION 7.0

DESCRIPTION OF CHANGE:

1. Section 7.0, third paragraph, changed Emergency Plan Procedures to Chemistry Procedures.
- 2.a) Section 7.3.2, second paragraph, changed Emergency Plan Procedures to Plant Procedures.
- b) Section 7.3.2, second paragraph, deleted reference to Table 6.3.

JUSTIFICATION:

- EPP-117 is an administrative procedure. The information contained in EPP-117 is duplicated in the Position Assistance Documents, Chemistry Procedures and Chemistry Instructions. Deletion of EPP-117 will increase the efficiency of PASS Teams by deleting redundant information.
- a) Updated locations for these environmental monitoring locations are contained in Plant procedures. This removes a reference to a redundant source of information.
 - b) See justification for Section 6, item 28.

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SECTION 8

DESCRIPTION OF CHANGE:

Reformatted entire Section 8 of the Plan.

JUSTIFICATION:

Reformatted in order to group onsite protective response separately from offsite protective response. The current mix of these two concepts is confusing and causes much repetition of information within this section.

All required concepts of protective response that were addressed in the old Section 8 are addressed by the new Section 8.

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|---|---|
| 1. Reworded section 8.0. | Definition and descriptive information only. |
| 2. Section 8.1.1, deleted site description. | Site description redundant to FSAR Section 2.1.. |
| 3. Changed the term "plant Employees, contractors, and visitors" to "onsite plant personnel and visitors". | New term is cleaner and more encompassing. |
| 4. Section 8.1.1, deleted description of the Plant Page-Party System. | System description redundant to FSAR section 9.5.2. |
| 5. First two paragraphs of 8.1.2, deleted site description and list of activities permitted within owner controlled areas. | Site description and listing of activities permitted within owner controlled areas redundant to FSAR Section 2.1.2. |
| 6. 3rd paragraph of 8.1.2, warning of offsite personnel within owner controlled areas was relocated to new Section 8.2. | Now grouped with other offsite protective actions for consistency. |
| 7. Last sentence of 3rd paragraph of 8.1.2, deleted statement of expectation to warn all personnel of the emergency before it effects them. | This is a statement of an expectation or planning standard. No specific actions possible. |
| 8. First 2 paragraphs of section 8.2 rewritten into new section 8.1.1, | Creation of a separate section (8.1.1.) dealing just with evacuations effecting onsite personnel consolidates |

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(Revision 25)

SECTION 8

DESCRIPTION OF CHANGE:

JUSTIFICATION:

"Evacuation".

information previously found among several subsections.

9. The statement allowing an early dismissal of non-TU Electric engineering and construction personnel (3rd para. of 8.2) was deleted.

This capability (evacuation at any classification) is clearly discussed in the first paragraph of the new section 8.1.1. The group encompassed by the term "non-TU Electric engineering and construction personnel" is no longer applicable at CPSES.

10. Changed "The Emergency Coordinator shall declare a site evacuation if the emergency classification is a SAE..." to a should statement (1st sentence of 4th para. 8.2)

The first paragraph of the new section 8.1.1 allows the EC to use judgement in deciding whether an evacuation presents a higher risk to evacuating personnel than remaining in place.

11. Area affected by a site evacuation and responsibilities (5th para of 8.2) rewritten into new section 8.1.1.

Creation of a separate section (8.1.1.) dealing just with evacuations affecting onsite personnel consolidates information previously discussed in several subsections.

12. Details concerning actions taken by Squaw Creek Park personnel in response to an evacuation declaration are removed from this section.

Squaw Creek Park (SCP) maintains an emergency plan that details actions to be taken in response to an emergency declaration or ordered evacuation. SCP is notified in accordance with EPPs.

13. Accountability (6th and 7th para of 8.2) rewritten into it's own section, with the following changes:

New section 8.1.2

- a. what constitutes accountability has been removed.
- b. removed discussion of accountability methods (security computer).
- c. removed action by facility managers to accomplish initial accountability.
- d. Results of accountability are

- a. Accountability is defined in App. Q. Removes redundant information from the section.
- b. Plant procedures better implement the methods to accomplish this task.
- c. No action is necessary by the facility managers. Security performs initial accountability whether the facilities are activated or not.
- d. This change allows the normal Security and emergency response organization chain of command to be used to handle this report. Plant procedures better implement the methods to report accountability results and to locate missing

Emergency Plan Changes and Justifications

(Revision 25)

SECTION 8

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| reported as specified by plant procedures versus always straight to the EC. | personnel. |
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| 14. Section 8.2, deleted site evacuation time estimate. | NUREG 0654, section J.8 specifically requires plume exposure EPZ evacuation time estimates only. An EAB evacuation estimate was performed to verify attributes of the Plan evacuation scheme, but it is not required to be included in the Plan. |
| 15. Section 8.3(1st para.) changed to offsite radiological monitoring of site evacuees (if necessary) by offsite reception center versus radiological monitoring teams dispatched from the plant. | New section 8.1.3 discusses the availability of offsite reception centers for radiological monitoring of site evacuees if deemed necessary by the EC. |
| 16. Section 8.3(2nd para.), deleted. | Covered in sections 6 and 9. These supplies and facilities are not intended for support of a site evacuation effort. |
| 17. Section 8.3(3rd and 4th para.), deleted. | Since evacuees are to be directed to an offsite reception center for monitoring and decontamination, this detail is not necessary in the Plan. |
| 18. Section 8.4, deleted. | Covered in new section 8.1 |
| 19. Section 8.4.1, Respiratory Protection, rewritten into new section 8.1.4, with the following changes:
a. does not discuss CR breathing air
b. does not discuss supply and maintenance of EOF respirators
c. deleted mention of NC and LSC | a. CR breathing air (SCBAs and spare air) is discussed in FSAR section 6.4.1.3.
b. Supply and maintenance of EOF respiratory protective equipment is controlled by the Plan, Section 6 and Appendix J.
c. These are not on-site facilities. Protective measures (habitability assessment / relocation) for these facilities are handled by plant procedures. |
| 20. Protective Clothing (section 8.4.2) rewritten into new section 8.1.5, with the following changes:
a. minor wording changes | a. editorial changes with no change of intent
b. CPSES has no intention of dressing out everyone in all facilities. Normal RP supplies of protective clothing will ensure an adequate quantity are |

Emergency Plan Changes and Justifications

(Revision 25)

SECTION 8

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| b. delete mention of quantity of PCS available. | available for the limited population during an emergency. |
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| 21. Section 8.4.3, Radioprotective Drugs, is revised to new Section 8.1.6. | This change identifies that KI quantities and stockpile locations will be cited in an implementing procedure or other instructions. This change identifies that State and Local Governments also play a roll in the use of KI based on their respective plans. This change meets the intent of NUREG 0654 and allows CPSES the flexibility to change the specific amounts without making a Plan change in the future |
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| 22. Section 8.5, Offsite Protective Actions, rewritten into new section 8.2, with the following changes:
a. 2nd half of 1st para. concerning implementation of protective action decisions is deleted
b. 2nd para. is deleted
c. 3rd para is reworded into the 2nd para of the new section 8.2 | a. EBS message information is only one aspect implemented by the local officials; this information is included in the local Plans and is not appropriate here.
b. This information is contained within section 3.0 of the Plan.
c. Minor editorial changes without change of intent. |
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| 23. Section 8.5.1, revised discussion of EPZs that started section 8.5.1; new section 8.2.1. | Intent of the paragraph is unchanged, but revised to be more concise and consistent with the way the rest of the Plan has been revised. |
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| 24. Section 8.5.1(2nd para), deleted CPSES owner-controlled area from description of zones and removed reference to the number of zones. | This makes the descriptions in the Plan consistent with information provided to the public and consistent with the definition of an EPZ. Zone descriptions and details are included in Appendix F and G of this Plan. |
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| 25. Section 8.5.1(3rd para.), split between new sections 8.2 and 8.2.2. | New format improves information presentation and clarity. |
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| 26. Section 8.5.2, rewritten into new section 8.2.2. Removed the developmental reference to | Evacuation plans are included in the local county plans and are administered therein. |
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Emergency Plan Changes and Justifications

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SECTION 8

DESCRIPTION OF CHANGE:

JUSTIFICATION:

NUREG-0654.

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| 27. | Section 8.5.3, deleted reference to EPZ evacuation maps. | Not needed by CPSES ERO personnel. Part of county plans. |
| 28. | Section 8.5.4, deleted reference to population distribution maps. | Not needed by CPSES ERO personnel. Part of county plans. |
| 29. | Section 8.5.5, deleted reference to maps showing special facilities within the EPZ. | Not needed by CPSES ERO personnel. Part of county plans. |
| 30. | Section 8.5.6, rewritten into new section 8.2 without reference to SANDIA studies. | New format improves information presentation and clarity. SANDIA studies have been superseded by EPA-400-R-92-001. |

Emergency Plan Changes and Justifications

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SECTION 9

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| 1. | Deleted description of in-plant decontamination facilities; now references FSAR Section 12.5. | Redundant to FSAR, Section 12.5 |
| 2. | Relocates information from Section 6.9 of the Plan to Section 9.3 | Relocation of information within the Plan. |
| 3. | Delete Figure 9.1 | Redundant to FSAR, Section 12.5 |
| 4. | Revise Figure 9.2 | Shows redistribution and redesignation of work space in the Decontamination Area. |

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SECTION 11

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| 1. Section 11.0, 3rd para.; changes title from TSC Advisor to TSC Communications Coordinator. | Changed to reflect new title in Plan section 1. |
| 2. Section 11.0, 4th para., line 2; added phrase "verification of system/equipment status and alignment" | This is a vital consideration for initial plant recovery actions. |
| 3. Section 11.0, 6th para., line 2; replace "a previously evacuated area" with "an area previously evacuated for radiological reasons". | Reworded to clarify that the concern to be addressed here is "radiological hazards." |
| 4. Section 11.1, line 1; revised reference to corporate support. | See discussion for Section 1, item 34 and new Section 1.2.1. |
| 5. Section 11.1.1.1, 1st para., line 2; removed the goal of restoring CPSES to fully operational status. | This goal could be an unrealistic expectation of the recovery organization. The goals of the Recovery Organization are stated in 11.0, 1st sentence. |
| 6. Section 11.1.1.1, 1st para., line 3; changes who is selected for the position of Recovery Manager. | The current requirement to designate an individual who is trained as an Emergency Coordinator is not regulatory driven and is not appropriate since the site is exiting the emergency phase and entering the recovery phase. |
| 7. Section 11.1.1.1, 2nd para.; delete the last sentence. | Sentence is redundant to statement/intent of the first part of the same paragraph and new section 11.1.1.4. |
| 8. Section 11.1.1.3, b and d; delete "and construction". | Both CPSES units are operational and no longer have construction activities. |
| 9. Section 11.1.1.4; revised discussion of corporate support. | See discussion for Section 1, item 34 and new Section 1.2.1. |
| 10. Section 11.2; revised the section. | The current statement describes station activities that support ongoing license compliance, not emergency response efforts. The State of Texas Emergency Management Plan covers this information during |

Emergency Plan Changes and Justifications
(Revision 25)

SECTION 11

DESCRIPTION OF CHANGE:

JUSTIFICATION:

emergency response.

11. Figure 11.1; delete the word
"office" from corporate support.

The intent of this figure is to show support available
from the corporate level, not a particular office.

Emergency Plan Changes and Justifications

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SECTION 12

DESCRIPTION OF CHANGE:

JUSTIFICATION:

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| 1. Section 12.1, changed "annual" to "biennial." | Federal Register (6/14/96) changed 10CFR50 App. E from a requirement to hold an annual full participation exercise to a biennial requirement. This change matches the Plan to the current requirements. |
| 2. Section 12.0 and 12.3, changed "Vice President of Nuclear Operations" to "Plant Manager." | Changed to reflect current CPSES Organization titles and responsibilities per FSAR Chapter 13.1. |

Emergency Plan Changes and Justifications

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SECTION 13

DESCRIPTION OF CHANGE:

1. Section 13.0, 1st para., Rewrote the first two sentences to be more concise.

JUSTIFICATION:

The Emergency Preparedness Training Program is administered at group levels. The extent of training that each group receives is dependent upon the individual's responsibility to emergency planning. The groups are divided as Plant Staff (personnel employed or contracted by TU Electric who are involved in the operation, construction, maintenance or support of operation, construction, maintenance at CPSES-and are non ERO members), On-shift Staff (ERO members), Augmentation Staff (ERO members), and Offsite Response Agencies.

The Plant Staff (non-ERO) personnel have no emergency preparedness duties and responsibilities other than reporting emergencies. Section 13.0 as rewritten describes what information the non-ERO members are required to receive (reporting emergencies and expected actions in case of an emergency). The details of how the information is delivered to the individuals is described in TRA-105, "Emergency Preparedness Training" as stated in section 13.0 of the Plan.

This training meets and exceeds the requirements of 10CFR19.12, Instruction to Workers.

2. Section 13.0, 1st para., Deleted the end of the second sentence. Deleted the 3rd sentence.

This part of the second sentence was a "maybe" clause that provided no real information. Section 13.0 now states what information non-ERO personnel are to receive. TRA-105 outlines the details of how this information is actually disseminated.

The third sentence was deleted because the information is not training related. As stated in the rewrite, non-ERO members are given information on reporting emergencies and expected actions in case of an emergency. These expected actions are detailed in section 8.1.1, 8.1.2, and 8.2 of the Plan. ERO members are directed to report to their respective facility. As stated in the Plan, personnel should follow instructions provided over the announcing system or by Security.

Emergency Plan Changes and Justifications

SECTION 13

DESCRIPTION OF CHANGE:

JUSTIFICATION:

Therefore there is no utility in making the statement that the information is posted around the site.

3. Section 13.0, 2nd para.,
Reworded the first sentence.

In the rewrite of the sentence added the information that TRA-105 outlines the training requirements for personnel who routinely visit or are assigned to the site. This would include non-ERO personnel. The sentence previously only pertained to ERO members. This change combines the information in the above changes with the ERO training requirements. The intent to provide information to non-ERO personnel and train ERO members in their specific duties and responsibilities remains unchanged.

4. Section 13.0, 2nd para., Deleted
the second and third sentences.

The second sentence is nothing more than a description of procedure TRA-105, "Emergency Preparedness Training." Based on the rewrite of section 13.0, this descriptive information is already contained in the first sentence of section 13.0. Therefore, there is no need to repeat the information.

The third sentence is an administrative function put into place to prevent unqualified personnel from being assigned to the ERO Roster. This section deals with the training that ERO personnel receive not the administrative workings of maintaining the ERO Roster. As rewritten, the section states that ERO personnel receive training to qualify them for their respective position. The administrative maintenance requirements for the ERO Roster are contained in TRA-105, EPP-100, and Staff Guideline 008. These documents specify that CPSES does not place personnel on the ERO Roster until their qualification requirements are complete.

5. Section 13.0, 2nd para.,
Relocated the fourth sentence to
section 14.0 of the Plan.

The intent of this information is already contained in section 14.0. This sentence was relocated to section 14.0 and rewritten to mesh with what is already in section 14.0. This change only relocates information to another section of the Plan.

6. Section 13.0, 3rd para., Rewrote

10 CFR 50 App E (F) (5) states that all training,

Emergency Plan Changes and Justifications

SECTION 13

DESCRIPTION OF CHANGE:

JUSTIFICATION:

the paragraph to include additional means to provide for formal critique of training.

including exercises, shall provide for formal critiques....

This change better states what CPSES defines as formal critiques. Student feedback is still included as one of four methods that may be used to satisfy the requirement for a formal critique. This change is an enhancement to the program.

7. Section 13.0, 4th para., Changed the responsibility for the Emergency Response Training Program to Emergency Planning Manager. Relocated to section 14.0 of the Plan.

The EP Manager is now responsible for all EP Training. This change reflects an organizational change that has taken place. This responsibility relocated to section 14.0 of the Plan.

8. Section 13.0, 5th para., Deleted the information from section 13.0.

The information in this paragraph is redundant of information that is already in section 14.0 of the Plan. An annual independent review of the Emergency Plan and Emergency Plan Procedures is conducted by Nuclear Overview Department which was formerly the Quality Assurance Department. The independent review includes emergency preparedness training.

9. Section 13.1, Deleted the information in this section.

10 CFR 50.47 (b)(15) requires training to personnel who may be called upon to assist in an emergency, but does not specify what that training has to be. 10 CFR 50 App E (IV) (F) requires that the Plan provide a description of the training program, not individual training modules. Section 13 as rewritten provides the description of the training program based upon the level of involvement with emergency related activities. The section specifies who will be trained and what level of training they will receive; with the specifics of how the program is implemented being outlined in procedure TRA-105, "Emergency Preparedness Training."

The level of detail provided by section 13.1 far exceeds the level of detail required by the regulations. This level of detail is appropriate for the procedure TRA-105.

10. Section 13.2, Deleted the

This section (13.2) states that ERO members are

Emergency Plan Changes and Justifications

SECTION 13

DESCRIPTION OF CHANGE:

information in this section.

JUSTIFICATION:

provided training under a list of broad categories. The rewrite states that personnel assigned to the ERO receive training to qualify them for their respective position. However, the broad list of categories has been deleted based upon the following discussion.

Section 1.0 of the Plan assigns duties and responsibilities for functions that must be conducted in an emergency as well as the expected responses for the different classification levels. This is where the broad list of functions, duties and responsibilities exists.

Emergency Planning has conducted a job and task analysis for each position of the ERO. Based upon the results of the task analysis, training has been designed to qualify each member of the ERO to perform the duties and responsibilities for their specific function.

In summary, Section 13.0 as rewritten states that personnel assigned to the ERO receive training to qualify them for their respective position. The section also states that the training program is outlined in TRA-105, "Emergency Preparedness Training."

Therefore, the intent of 10 CFR 50 App E (IV) (F) is maintained without relisting the categories in section 13.0 of the Plan.

11. Section 13.3, Deleted the information in this section.

New Table 1.1 of the Plan prescribes that personnel are required to be on shift at all times to provide first aide response. This is a functional responsibility of members of the ERO. Therefore, they must receive training to qualify them for their position. This training is outlined in TRA-105.

NUREG-0654 O.3 provides guidance that this training should be equivalent to Red Cross Multi-Media. The Red Cross Multi-Media course was discontinued in the late 1980's. However, CPSES has continued to use the most current revision of Red Cross first aid training materials available.

Emergency Plan Changes and Justifications

SECTION 13

DESCRIPTION OF CHANGE:

JUSTIFICATION:

The level of detail, specifying the actual course that must be taken, far exceeds the requirements for information in the Plan. TRA-105 is the proper level for this type of information, and TRA-105 provides for the training requirements for each ERO position. Section 10.2, "Onsite First Aid", discusses onsite capability and training for the first aid response.

12. Section 13.4, Deleted the information in this section.

10 CFR 50.48 and 10 CFR 50 App R outline the requirements for fire protection at nuclear power plants. FSAR section 13.3B outlines the CPSES Fire Protection Program. Section 13.3B.2.1 outlines the training requirements for the Fire Brigade which includes radiological aspects of fire fighting. With this information in the FSAR, it is not necessary to duplicate any of the information in the Plan.

13. Section 13.5, Deleted the information in this section.

10 CFR 73 App B (II) outline the requirements for the training and qualification of security personnel. The CPSES Security Plan and the Security Training and Qualification Plan specify the training requirements for the security force at CPSES. With this information in the Security Plans, it is not necessary to duplicate any of the information in the Plan.

14. Section 13.6 and 13.7, Combined these two paragraphs. Revised the paragraphs to be concise and delete redundant information.

10 CFR 50.47 (d)(7) requires that radiological emergency response training has been made available to those offsite who may be called upon to assist in an emergency onsite.

The rewrite of sections 13.6 and 13.7 provides for training to be offered to all offsite emergency response organizations who may be called upon to help in an onsite emergency. The current sections 13.6 and 13.7 call for training to only a small group of the offsite agencies. Therefore, the rewrite is more encompassing than what was originally written and better implements the requirements of 10 CFR 50.47 (d)(7).

15. Section 13.8, Relocated information to section 14.0.

NUREG-0654 discusses this information in section P which is equivalent to section 14.0 of the CPSES Plan.

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SECTION 13

DESCRIPTION OF CHANGE:

JUSTIFICATION:

For consistency with NUREG-0654, this information is being relocated in the Plan.

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SECTION 14

DESCRIPTION OF CHANGE:

JUSTIFICATION:

- | | |
|--|--|
| 1. Added 1st para to section 14.0. | For consistency this incorporates information relocated from section 13.8 of the Plan. NUREG-0654 contains this information in section P which is equivalent to section 14.0 of the Plan. |
| 2. Sentence 1; changed title from "Vice President of Nuclear Operations" to "Plant Manager" | Reflects organizational change and FSAR 13.1. |
| 3. Sentence 2 deleted | Written procedures are necessary for the implementation of the Plan and are required by the regulations. |
| 4. Sentence 3; deleted reference to a specific retention period, and changed to read "Copies of the Emergency Plan and Emergency Plan Procedures are distributed to the appropriate individuals and organizations with emergency response/planning responsibilities. These documents are controlled and changed/revised in accordance with station administrative procedures." | Record retention is an aspect of document control and is addressed by station administrative procedures and regulatory guidance (ANSI .45.2.4 -1974 - "Requirement for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants"). |
| 5. Sentence 4; replace "The Vice President of Nuclear Operations shall approve the Emergency Plan and recommended changes to the Emergency Plan and Emergency Plan Implementing Procedures." with new sentences 3 and 5. | a. Responsibility for approving changes to the Emergency Plan remains with the Plant Manager. |
| a. <u>sentence 3</u> - The Plant Manager has overall responsibility for the emergency preparedness program and shall approve changes to the Emergency Plan. | b. The responsibility for approving Emergency Plan Procedures (EPPs), and changes thereto, is reassigned from the Plant Manager to the Emergency Planning Manager. This approval is consistent with the regulations and is the management approval practice at other industry plants in NRC Region IV. |
| b. <u>sentence 5</u> - The Emergency | At the time of licensing and initial operation of CPSES, the Vice President of Nuclear Operations (Plant Manager) was assigned the responsibility for approving all CPSES Station Administration, Security and |

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SECTION 14

DESCRIPTION OF CHANGE:

Planning Manager shall approve the Emergency Plan Procedures and is responsible for maintenance and coordination of emergency preparedness program and training of the Emergency Response Organization (ERO).

JUSTIFICATION:

Emergency Preparedness procedures. This level of management approval was assigned at the time to most effectively ensure specific program compliance aspects, and in addition, to ensure other general plant aspects such as broad safety related, operational or organizational/personnel impacts and overall station acceptance. It has now been determined that Plant Manager approval for changes to the EPPs adds little or no value; therefore, approval should be reassigned to the Emergency Planning Manager to support more effective use of available resources. The 50.54(q) evaluation of this change is as follows:

In order to assess the effect of this change, an evaluation must be made as to the value added by the Plant Manager's review and approval. In the current CPSES procedure approval process, the Emergency Planning Manager reviews and approves EPP changes prior to submittal to the Plant Manager for approval. Because of his day-to-day involvement in emergency preparedness program development and compliance, involvement in current industry issues, interface with onsite CPSES Emergency Organization personnel and offsite officials, etc., the Emergency Planning Manager is much more cognizant of emergency preparedness program requirements and impacts than the Plant Manager; therefore it can be assumed that the Plant Manager would not add any substance, relative to that already added by the Emergency Planning Manager, to the procedure approval process with respect to maintaining emergency preparedness. The Plant Manager might add value regarding broad safety, operational or personnel impacts that go beyond just maintaining emergency preparedness. The Plant Manager might be expected to provide management expectations in these areas.

If broad safety or operational concerns were expected, the process should specify operations involvement or even SORC review. These are not required by the regulations or the current CPSES Licensing Basis

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SECTION 14

DESCRIPTION OF CHANGE:

JUSTIFICATION:

Documents. The only area remaining where value might be added is in the area of personnel impacts and management expectations. Personnel concerns are not normally resolved or even obvious from the content of procedures. Personnel problems are more likely to surface when emergency organization position assignments are made and during drills or training. There is ample opportunity at that time for the Plant Manager to ensure that any personnel matters are addressed to his satisfaction. That leaves management expectations as an area for adding value. Although a very broad term, management expectations, as they may exist regarding emergency preparedness, are best captured by the Emergency Plan. Changes to the CPSES Emergency Plan are already approved by the Plant Manager.

On the basis of the above discussion, it is concluded that the Plant Manager provides no substantial value to the review/approval of EPPs over that value already provided by the Emergency Planning Manager; therefore, the change does not decrease the effectiveness of the CPSES emergency preparedness program.

6. Sentence 5 - "NRC approval shall be obtained as appropriate" is deleted.

This was a redundant statement. NRC approval of appropriate changes are inherently obtained because of the licensing process and the maintenance of that license as delineated by 10CFR50.54Q.

7. Sentence 6: review of the Plan remains on an annual basis, but review of the emergency plan procedures is changed from annually to biennially.

The emergency plan procedure review was changed based on a letter from Thomas P. Gwynn (NRC) to W. J. Cahill (TU Electric) dated July 31, 1994. The enclosure to this letter entitled "Plant Procedure Review Guidance" specified that non-routine procedures (procedures such as emergency operating procedures, off normal procedures, procedures which implement the emergency plan, and other procedures which may be dictated by an event) should be reviewed at least every two years and revised as appropriate. Based on this information, and the fact that discrepancies are usually

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SECTION 14

DESCRIPTION OF CHANGE:

JUSTIFICATION:

found from procedure implementation/use during drills or exercises and not from the annual review, leads to the conclusion that this change ~~does~~ not decrease the effectiveness of the emergency preparedness program.

8. Sentence 7; rewritten and relocated to sentence 5 of new section.

Paragraphs 2 and 3 were combined and rewritten to reflect a logical sequence of the areas of responsibility and the position or organization that is identified with those responsibilities.

9. Sentence 8; deleted.

Specific responsibilities of the Emergency Planning Group are delineated in the EPPs. The listed examples of responsibilities were encompassed in a categorical responsibility statement which is the responsibility of the Emergency Planning Manager. The Manager then assigns tasks as needed to the emergency planners.

10. Sentence 9; revised wording.

Revision is editorial only to make it fit with the other changes in this section.

11. Sentence 10; revised sentence to expand the scope and relocated to sentence 13.

The independent review encompasses the entire emergency preparedness program, including the Plan and procedures. This review is required by 10CFR50.54(t).

12. Sentence 11; deleted sentence, addressed by new sentence 13.

This sentence is encompassed under the umbrella of emergency preparedness "program". This review is required by 10CFR50.54(t) which provides the criteria for program reviews.

13. Sentence 12; deleted retention period. Revised sentence and relocated to sentence 14.

This record retention is an aspect of document control and is covered by administrative procedures and required by the regulations (10CFR50.54(t)).

14. Sentence 13; revised sentence and relocated to sentence 9.

Copies are necessary for effective implementation of the Emergency Preparedness Program and station administrative procedures ensures distribution to the appropriate personnel.

15. Sentence 14; revised sentence and

Editorial rewrite for consistency to other parts of the

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SECTION 14

DESCRIPTION OF CHANGE:

relocated to sentence 10.

16. Sentence 15; deleted sentence.

JUSTIFICATION:

Plan.

This is a facet of emergency preparedness maintenance and is encompassed in the maintenance procedure of the emergency preparedness program.

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APPENDIX H

DESCRIPTION OF CHANGE:

JUSTIFICATION:

- | | |
|--|---|
| 1. Table of Contents, page vii; add "List of" to title of Appendix H. | 10CFR50.47(b)1 requires that emergency responsibilities of the various supporting organizations have been specifically established. The Plan states in Section 1.1.5 that, "written agreements have been executed with support agencies, as well as private support organizations, having an emergency response role." The Plan describes the support agencies and private sector organizations. The Plan also describes these agencies responsibilities. This DOES NOT change any of the agencies or responsibilities of these agencies. This changes merely removes the written agreements from Appendix H, replaces the agreements with a list of agreements, and adds a note that Emergency Planning maintains the agreements on file. The letters of agreement will continue to be updated as necessary and reviewed annually per the Plan, Section 1.1.5. |
| 2. Last para. of Section 1.1.5; describes Appendix H of the Plan as containing a list of the Letters of Agreement versus containing the Letters of Agreement themselves. | See justification for item 1. |
| 3. Section 1.3.1; describes Appendix H of the Plan as containing a list of the Letters of Agreement versus containing the Letters of Agreement themselves. | See justification for item 1. |
| 4. Section 1.3.4.2; references the Letter of Agreement, but deletes saying that it is in App. H. | See justification for item 1. |
| 5. Section 15.0; add "List of" to title of Appendix H. | See justification for item 1. |
| 6. Appendix H, Title Page; add "List of" to title of Appendix H. | See justification for item 1. |

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APPENDIX H

DESCRIPTION OF CHANGE:

JUSTIFICATION:

7. Appendix H; revise listing of Letters of Agreement and Organization titles to reflect current letters maintained.

See justification for item 1.

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APPENDIX J

DESCRIPTION OF CHANGE:

1. First paragraph; deletes reference to the Logistical Support Center.
2. Added information relocated from Section 6.11 of the Plan.
3. Third paragraph; added information concerning equipment inventory and location.

JUSTIFICATION:

- See discussion for Section 1, item 24 and Section 6, item 14.
- Relocated information (i.e. number of company vehicles available for offsite monitoring) to a more relevant section.
- Clarify that inventories are prescribed by and maintained in accordance with an EPP.

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APPENDIX M

DESCRIPTION OF CHANGE:

JUSTIFICATION:

- | | |
|---|--|
| 1. Staffing augmentation time estimate formula; added factor T_w . | T_w is not addressed in the current App. M estimates. It is the time to travel from a responders vehicle to the emergency response facility which can take from 5 to 15 minutes depending on the number of security personnel on duty and the number of other personnel trying to access the facility. |
| 2. Changed population distribution for ERO domiciles. | Changes in the assumptions made to the staffing evaluation are applicable. Over the past several years since licensing of both units, there has been a shift in the residence locations of CPSES personnel. Since the original App. M estimate, more people have moved closer to the site, but for those people that still live outside the Glen Rose / Granbury / Tolar local areas, it takes longer to arrive on site. This is attributed to the installation of traffic lights on the roads traveled to CPSES, even taking into consideration the speed limit increase to 70 mph. There are still a significant number of key ERO personnel that would be challenged to arrive safely in the ERF within the 60 minute goal. These changes reflect the most recent ERO survey. |
| 3. Updated listed travel time estimate ranges for the various cities. | These changes reflect the most recent ERO survey. |
| 4. Updates goal for TSC and EOF activation time estimates. | This reflects the changes listed above. |

ENCLOSURE TO TXX-96492