



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT

362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

November 25, 1996

Docket No. 50-213

B16045

Re: 10CFR50.47(b)
10CFR50, Appendix E

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

Haddam Neck Plant
Emergency Preparedness Exercise
NRC Inspection Report No. 50-213/96-07

The purpose of this letter is for Connecticut Yankee Atomic Power Company (CYAPCO) to provide a description of additional corrective measures CYAPCO has taken or plans to take related to the Haddam Neck Plant (HNP) emergency preparedness exercise conducted on August 14, 1996.

CYAPCO takes very seriously the recent weaknesses which were the subject of the inspection report. CYAPCO has reviewed the NRC findings, and the results of its own assessments of the causes which contributed to this event. Based on that review, CYAPCO has developed the corrective actions discussed in Attachment 1. Many of the corrective actions will be implemented in the short-term and all of the corrective actions will be completed by March 31, 1997. CYAPCO will also demonstrate in 1997, the effectiveness of the corrective actions. Note that the corrective actions may be revised, as appropriate, if the joint owners decide to permanently cease power operation of the HNP.

In Inspection Report No. 50-213/96-07,⁽¹⁾ two weaknesses were observed:

- 1) Failure to recognize the need for an Alert declaration early in the exercise (which consequently was prompted by the controller) and confusion with the use of emergency level action tables prior to the declaration of the General Emergency; and

(1) NRC letter from J. T. Wiggins to T. C. Feigenbaum, "NRC-Evaluated Emergency Preparedness Exercise - Haddam Neck Plant; NRC Inspection Report No. 50-213/96-07," dated October 23, 1996.

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- 2) Failure to implement protective actions for the SERO [site emergency response organization] at the Emergency Operations Facility and site personnel, and consider protective action recommendations beyond the 10 mile emergency planning zone, based upon the dose projections used in support of those protective actions.

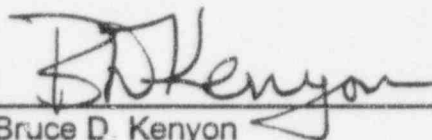
A description of the additional corrective measures taken or planned and a schedule for completing those actions is provided in Attachment 1. These additional corrective measures will also be discussed at the pre-decisional enforcement conference scheduled for December 4, 1996.

An extension to submit the letter by November 25, 1996 was granted by the NRC Staff in a teleconference on November 22, 1996.

If you should have any questions, please contact Mr. G. P. van Noordennen at (860) 267-3938.

Very truly yours,

CONNECTICUT YANKEE ATOMIC POWER COMPANY



Bruce D. Kenyon
President and Chief Executive Officer

cc: H. J. Miller, Region I Administrator
S. Dembek, NRC Project Manager, Haddam Neck Plant
W. J. Raymond, Senior Resident Inspector, Haddam Neck Plant

Mr. Kevin T. A. McCarthy, Director
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Department of Environmental Protection
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Attachment 1

Haddam Neck Plant

NRC-Evaluated Emergency Preparedness Exercise

NRC Inspection Report No. 50-213/96-07

Corrective Actions

November 1996

Haddam Neck Plant
NRC-Evaluated Emergency Preparedness Exercise
NRC Inspection Report No. 50-213/96-07
Corrective Actions

ITEM 1

Restatement Of Weakness:

The facilities were staffed and activated in a prompt manner. Adequate direction and control were observed at all of the facilities. The initial classification of the simulated event was not recognized by the SCR SM [Simulator Control Room Shift Manager] who had to be prompted by the lead controller at that facility. The SAE [Site Area Emergency] and GE [General Emergency] classifications were correct and timely. However, missing the Alert classification and the discussions on the SAE and GE declarations are considered an Exercise Weakness.

(NRC Inspection Report No. 50-213/96-07, EEI 50-213/96-007-01, Section P4.c, Page 10)

Reason For The Weakness

The emergency planning change management process did not ensure familiarity with the SERO (site emergency response organization) classification methodology. Emergency responders involved in making classifications have not received the training necessary to consistently classify postulated events. The use of the EAL (emergency action level) clarification process has been weak and ineffective. Non-existent self assessment and an ineffective corrective action process allowed this condition to exist.

Corrective Steps That Have Been Taken And The Results Achieved

In order to clarify the current EALs, a review of industry experience with the NUMARC EALs was undertaken to determine how the EAL classification process should be revised. The results of this review will be used in CYAPCO's SERO training program and in the corrective actions discussed below.

Corrective Steps That Will Be Taken To Avoid Further Deviations

The following corrective steps (and their completion dates) are being implemented:

1. Conduct a SERO job task analysis to determine the most capable and effective positions in the organization to make EAL classifications.
(January 1997)

2. Conduct an analysis of simulator utilization as a training and evaluation tool to improve EAL classification skills. (January 1997)
3. Train those members of the SERO that classify events using the EAL tables. Include bases information and clarifications in the lesson plans. (January 1997)
4. Periodically review the EAL tables to incorporate clarifications and future enhancements. (Annually)
5. Establish an emergency planning self assessment program and evaluate the effectiveness of the self assessment program approximately six months after its implementation. (January 1997 and July 1997)

Date When Corrective Action Will Be Completed

The corrective actions will be completed by July 1997.

ITEM 2

Restatement Of Weakness:

The PAR [Protective Action Recommendation] was given to the State of Connecticut within 15 minutes of the GE [General Emergency]. However, the basis for the PAR and the fact that there was not any consideration of protective actions beyond the 10 mile EPZ [Emergency Planning Zone] is considered an Exercise Weakness.

(NRC Inspection Report No. 50-213/96-07, EEI 50-213/96-007-02, Section P4.c, Page 10)

Reason For The Weakness

The existing PAR process, unlike industry norm was: overly complex, open to individual interpretation and judgment, not clearly linked to plant conditions, and confusing to State of Connecticut decision makers. As a result, CYAPCO was unable to effect good training. Non-existent self assessment and an ineffective corrective action process allowed this condition to exist.

Corrective Steps That Have Been Taken And The Results Achieved

Corrective actions are still in the process of being implemented, as discussed below.

Corrective Steps That Will Be Taken To Avoid Further Deviations

The following corrective steps (and their completion dates) are being implemented:

1. Include the Connecticut Department of Environmental Protection (DEP) personnel in the redesign of the PAR process. (December 1996)
2. Redesign the communication interfaces with State of Connecticut DEP personnel. (December 1996)
3. Design appropriate training materials. (January 1997)
4. Verify effective SERO (site emergency response organization) expectations regarding procedure utilization and compliance. (January 1997)
5. Establish an emergency planning self assessment program and evaluate the effectiveness of the self assessment program approximately six months after its implementation. (January 1997 and July 1997)

Date When Corrective Action Will Be Completed

The corrective actions will be completed by July 1997.