

TUELECTRIC[®]

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April 14, 1997

C. Lance Terry
Group Vice President

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
NRC INSPECTION REPORT NOS. 50-445/97-04 AND 50-446/97-04
RESPONSE TO NOTICE OF VIOLATION AND EXERCISE WEAKNESS

Gentlemen:

TU Electric has reviewed the NRC's letter dated March 5, 1997, concerning the inspection conducted by Gail Good and Thomas Andrews of Region IV during the week of February 10-14, 1997. Attached to the letter was a Notice of Violation. Additionally, the attached inspection report identified an Exercise Weakness.

The response to the subject inspection report was due on April 4, 1997; however, TU Electric requested an extension until April 14, 1997. The extension was discussed with Mr. Larry Yandell of the NRC Region IV staff. TU Electric hereby responds to the Notice of Violation and Exercise Weakness in the attachment to this letter.

Additionally, TU Electric is evaluating and will implement as necessary corrective actions to address the improvement items discussed in the inspection report.

Sincerely,

C. L. Terry

C. L. Terry

By: *Roger D. Walker*
Roger D. Walker
Regulatory Affairs Manager

CLW/grp
Attachment

c - Mr. E. W. Merschoff, Region IV
Mr. J. I. Tapia, Region IV
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RESPONSE TO THE NOTICE OF VIOLATION

RESTATEMENT OF THE VIOLATION
(445;446/9704-03)

10 CFR Part 50, Appendix E.IV.2.g, states that any weaknesses or deficiencies that are identified during training, including exercises, shall be corrected.

Contrary to the above, as of February 12, 1997, the licensee had not corrected a weakness involving implementation of site evacuation procedures that was identified during an emergency preparedness inspection conducted during the period September 25-29, 1995. During the September 1995 inspection, the emergency coordinator did not consider wind direction when evacuating personnel from the site; personnel were instructed to evacuate through the simulated plume. During this inspection, a site evacuation was not ordered in a timely manner. Both failures were attributed to procedural adherence.

RESPONSE TO THE VIOLATION
445;446/9704-03

TU Electric accepts the violation; a response as requested is provided below. Included in the "reason for the violation" TU Electric provides additional information, not discussed in the inspection report or notice of violation, which is relevant to the response actions of the Emergency Coordinator (Shift Manager) as observed in this inspection.

1. Reason for the violation.

Additional information provided by TU Electric:

TU Electric believes that the Shift Manager was completing all required and higher priority tasks in a deliberate, controlled manner; however, TU Electric acknowledges that the Shift Manager's order to evacuate could have been more timely. It is TU Electric's expectation that the site evacuation order occur as soon as practicable after declaration of a Site Area Emergency (SAE).

With respect to the inspection report reference to the time estimate for a site evacuation given in Appendix M of the CPSES Emergency Plan, a 15 minute time is assumed for detection of accident, data analysis and decision to evacuate, and then an additional 16 minute time is assumed to notify personnel to evacuate (i.e., up to 31 minutes from event indication/recognition (e.g. SAE) to evacuation notification). These time estimates do not specifically state that the time of declaration of a SAE is the time of the decision to evacuate the site and the start of a clock for the evacuation order. The time estimates do imply, however, that evacuation notification occur within 31 minutes of SAE event indication/recognition. In the subject walkthrough, the control room had

first indication of SAE events at 1213, a SAE was declared at 1217, and the site evacuation was ordered at 1243 which is within the assumptions made in Appendix M. Appendix M is an assumption of how an evacuation sequence should occur; it does not take into account the extent of any adverse activities that can occur which would require the Shift Manager's immediate attention. Under the challenge of the scenario in this inspection, the Shift Manager methodically went through his tasks and checked himself with self verification to ensure all tasks were accomplished correctly.

TU Electric recognizes that performance by operators, especially when the operating crew is on backshift with limited personnel resources onsite, is very important; therefore, TU Electric accepts the violation and is proceeding with corrective actions.

TU Electric's reason for the violation:

During reviews and interviews, it was determined that the Shift Managers were not as familiar with their Position Assistance Document (PAD) as expected. It was also determined that conflicting instructions may have been provided to the Shift Manager. The Emergency Plan stated that a site evacuation should be ordered when a SAE is declared. The Emergency Plan Procedure stated that a site evacuation shall be ordered with the declaration of a SAE. The PAD only required the Emergency Coordinator to consider site evacuation when the SAE was declared. However, the actual PAD task noted that at the SAE or General Emergency a site evacuation should be ordered unless it would put the evacuees in more danger. Also, the PAD guidance provided was written in a vague manner. (Emphasis added to highlight the confusing instructions.) Finally, none of the above documents identified expected timing criteria for ordering a site evacuation following declaration of a SAE.

2. Corrective actions taken.

A change has been initiated to Emergency Plan Procedure (EPP-314) to revise site evacuation instructions to be consistent with the Emergency Plan and to include criteria that reflects management's expectations for the timeliness of ordering a site evacuation. Changes have been initiated to revise the PADs to provide guidance that is consistent with procedure EPP-314 and is clear to the reader.

3. Steps to prevent recurrence.

Additional training for all persons qualified as Emergency Coordinators will be provided. The extent of this training is aimed at providing the Shift Manager, as Emergency Coordinator, with a better understanding of the requirements and expectations for all of the emergency classifications. In addition, each Shift Manager is receiving more frequent practice time in the control room simulator performing the required tasks as the Emergency Coordinator, i.e., making decisions during emergency situations and initiating actions associated with those decisions. The more frequent control room simulator training for Shift

Managers will be conducted in 1997; subsequently, this training will be evaluated by management in order to assign the proper frequency to its occurrence. In addition to the training given to the Shift Managers, Emergency Coordinators in the TSC and EOF are being provided similar training to enhance their performance and the performance within these facilities.

4. Date when full compliance will be achieved.

The additional training for persons qualified as Shift Managers is complete. The procedure change to EPP-314 and the PAD revisions will be effective April 25, 1997. The additional training for Emergency Coordinators in the TSC and EOF will be completed by April 30, 1997.

RESPONSE TO THE EXERCISE WEAKNESS

RESTATEMENT OF THE EXERCISE WEAKNESS

(445;446/9704-02)

During the inspector's observation of operating crew 1 during a control room simulator walkthrough, the inspectors concluded that the Emergency Coordinator (Shift Manager) did not demonstrate confidence or full familiarity with established processes or procedures for determining protective action recommendations to the extent that it resulted in an untimely notification and protective action recommendation. Moreover, had this been a real emergency, the licensee's credibility with the offsite agencies could have been diminished given the display of indecisiveness.

The failure to make a timely notification and protective action recommendation was identified as an exercise weakness due to the potential for offsite impact.

RESPONSE TO WEAKNESS

(445;446/9704-02)

The actions to prevent recurrence put in place in response to the violation (445;446/9704-03) also address this weakness.

During investigation of the weakness it was determined that the Shift Manager was not fully familiar with the plant condition Protective Action Recommendations (PARs) for the General Emergency classification. In reviewing the training of the Shift Manager and the frequency that Shift Managers (as Emergency Coordinators) receive emergency response simulator walkthrough training for events through a General Emergency classification, it was determined that the relative infrequency of such training was a contributor to the unfamiliarity. Currently the Shift Managers receive annual requalification and a simulator practical drill.

To prevent recurrence additional training for all persons qualified as Emergency Coordinators will be provided. A discussion of the plant

condition PAR for the General Emergency classification is included in the training being provided. The extent of this training is aimed at providing the Shift Manager, as Emergency Coordinator, with a better understanding of the requirements and expectations for all of the emergency classifications. In addition, each Shift Manager is receiving more frequent practice time in the control room simulator performing the required tasks as the Emergency Coordinator, i.e., making decisions during emergency situations and initiating actions associated with those decisions. The more frequent control room simulator training for Shift Managers will be conducted in 1997; subsequently, this training will be evaluated by management in order to assign the proper frequency to its occurrence. In addition to the training given to the Shift Managers, Emergency Coordinators in the TSC and EOF are being provided similar training to enhance their performance and the performance within these facilities.

The additional training for persons qualified as Shift Managers is complete. The additional training for Emergency Coordinators in the TSC and EOF will be completed by April 30, 1997.