

December 10, 2002

MEMORANDUM TO: File

FROM: Jack N. Donohew, Senior Project Manager, Section 2 */RA/*
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: CLARIFYING INFORMATION FOR THE RADIOLOGICAL
EMERGENCY RESPONSE PLAN CHANGE SUBMITTED MAY 6, 2002,
FOR CALLAWAY PLANT (TAC NO. MB5157)

By letter dated May 6, 2002 (ULNRC-4517), the licensee submitted a change to the Radiological Emergency Response Plan (RERP) for the Callaway Plant. The change would remove the equipment operators and assistant equipment operators as control room communicators for the on-shift emergency response.

Attachment 1 is the supplemental information provided by the licensee to clarify their application. This information is (1) the e-mail dated July 22, 2002, which agreed to have the clarifying information submitted on the Callaway docket, and (2) the NRC questions (sent to the licensee by e-mail dated June 26, 2002) and the licensee's response to the questions.

Attachment 2 is an e-mail dated June 26, 2002, from me to the licensee, which provided the NRC questions.

Docket No. 50-483

Attachments: 1. E-mail dated July 22, 2002
2. E-mail dated June 6, 2002

December 10, 2002

MEMORANDUM TO: File

FROM: Jack N. Donohew, Senior Project Manager, Section 2 /RA/
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: CLARIFYING INFORMATION FOR THE RADIOLOGICAL
EMERGENCY RESPONSE PLAN CHANGE SUBMITTED MAY 6, 2002,
FOR CALLAWAY PLANT (TAC NO. MB5157)

By letter dated May 6, 2002 (ULNRC-4517), the licensee submitted a change to the Radiological Emergency Response Plan (RERP) for the Callaway Plant. The change would remove the equipment operators and assistant equipment operators as control room communicators for the on-shift emergency response.

Attachment 1 is the supplemental information provided by the licensee to clarify their application. This information is (1) the e-mail dated July 22, 2002, which agreed to have the clarifying information submitted on the Callaway docket, and (2) the NRC questions (sent to the licensee by e-mail dated June 26, 2002) and the licensee's response to the questions.

Attachment 2 is an e-mail dated June 26, 2002, from me to the licensee, which provided the NRC questions.

Docket No. 50-483

Attachments: 1. E-mail dated July 22, 2002
2. E-mail dated June 6, 2002

DISTRIBUTION:

PUBLIC
PDIV-2 Reading
RidsNrrDlpmLpdiv (WRuland)
RidsNrrPMJDonohew
RidsNrrLAEPeyton
KGibson

ADAMS ACCESSION NUMBER: ML023440140

NRR-106

OFFICE	PDIV-2/PM	PDIV-2/LA	PDIV-2/SC
NAME	JDonohew:rkb	EPeyton	SDembek
DATE			

DOCUMENT NAME: C:\ORPCheckout\FileNET\ML023440140.wpd

OFFICIAL RECORD COPY

E-MAIL DATED JULY 22, 2002

From: "Shafer, David E" <DShafer@ameren.com>
To: "Jack Donohew (E-mail)" <jnd@nrc.gov>
Date: 7/22/02 10:28AM
Subject: FW: Questions & Answers on RERP Change Submitted May 6, 2002

Yes, you may docket those answers. Let me know if you need anything more.

Dave Shafer

Phone 314-554-3104
Fax 314-554-3558
Email dshafer@ameren.com

-----Original Message-----

From: Jack Donohew [mailto:JND@nrc.gov]
Sent: Monday, July 22, 2002 8:46 AM
To: david_e_shafer@ameren.com
Subject: Fwd: Questions & Answers on RERP Change Submitted May 6, 2002

I was sent the answers to my questions on the RERP change submitted May 6, 2002. May I docket the answers in a memo to the docket file? <JND>

CC: "Pendergraff, Gary R." <grpendergraff@cal.ameren.com>, "Trokey, Daniel E." <detrokey@cal.ameren.com>

ATTACHMENT 1

**QUESTIONS & ANSWERS ON
RERP CHANGE SUBMITTED MAY 6, 2002**

1.

Question

Discuss if the intent of the proposed RERP change is to remove the RERP requirement that the Equipment Operators and Assistant Equipment Operators are trained to be qualified to perform the Control Room Communicator emergency task. Include in the discussion if this is the basis for the statement toward the bottom of Page 2 of the May 6, 2002, letter that "This change is also an improvement for the ERO in that it will require fewer personnel to be trained, thereby improving proficiency and participation by trained personnel." Identify which of the emergency positions in RERP Table 5-1 for onshift emergency response are trained to perform the Control Room Communicator emergency task.

Answer

Yes the intent of the request was to discontinue training EO on Control Room Communicator duties. The training typically consist of a 4 hour block on a yearly basis which would be used for other ongoing training. The pool of trained communicators is very large at this time. By eliminating EOs from the trained communicator pool, Callaway plant will have the opportunity to increase proficiency and participation opportunities in drills for I&C Technicians. Currently, we are training the EO/AEOs, the I&C Techs, and the SROs.

2.

Question

Given that RERP Section 5.1.10 currently states "the Shift Supervisor assigns Equipment Operators, Assistant Equipment Operators, I&C Technicians, **or other qualified personnel** [emphasis added] as Control Room Communicators," explain why the Shift Supervisor can not assign the communicator task to itself or the Operating Supervisor (i.e., other qualified personnel) in place of the Equipment and Assistant Equipment Operators if the event warrants this assignment without having the proposed plan change. The statement "or other qualified personnel" seems to give the Shift Supervisor the ability to assign personnel to the control room communicator emergency task other than the three emergency positions specified in Section 5.1.10. Therefore, in a real emergency, would not the current Section 5.1.10 allow the Shift Supervisor to assign any qualified personnel to the Control Room Communicator task if this was necessary to perform this task and the other tasks needed to be done, and is this not the intent of the proposed RERP change.

Answer

There are no conditions that would prevent the SS from assigning any qualified person to perform Communicator duties. Currently the positions qualified to perform these tasks are those listed in section 5.1.10. In a real event EOs will

be needed for remedial actions within the plant, Callaway Plant has recognized that if I&C Techs were not available, relying on EOs to perform communicator duties would be problematic. Therefore the SS and Operating Supervisors are trained on the use of the SENTRY System for this reason. Currently, the SROs are the other qualified personnel.

3. **Question**

Given the proposed change to the above statement in Section 5.1.10 in the May 6, 2002, letter, explain why the Shift Supervisor would not be able to still assign the Equipment or Assistant Equipment Operators to the task of Control Room Communicator if it decided that this was needed to respond to an event.

Answer

Our desire is to quit training the EOs on this duty. Therefore they will no longer be qualified to perform this task.

4. **Question**

On page 2 of the May 6, 2002, letter, it is stated that the proposed change only affects the designated backup for the Control Room Communicators in the unlikely event that neither of the two on-shift I&C Technicians could respond quickly enough to perform the duties of the task. The letter goes on to state that, if this were to occur, one of the Control Room management staff would complete and send the electronic notification. Discuss if the proposed change only affects the notification duty of the Control Room Communicator task and the other duties would be still be fulfilled by the I&C Technicians, and what is the "management staff" onshift, beside the Shift Supervisor and Operating Supervisor, that would be available to perform the Communicator task. Include in the discussion what are the other duties in the Communicator task, what onshift staff would be qualified to perform the Communicator task, and would not this staff come under the "other qualified personnel" provision in RERP Section 5.1.10.

Answer

The Control Room Management Staff consist of the Shift Supervisor (SS), and two Operating Supervisors, all are SROs. The SS or SRO will make the immediate notification of an event to the counties and state with future notifications performed by I&C Techs on arrival in the Control Room. The Control Room Communicator's job is to make notifications. He/she has no other duties unless assigned by Control Room Management. Our plan and practice is for the TSC ENS Communicator and EOF Communicator to accept turnover from the Control Room Communicator as soon as possible. The Control Room Communicator then reverts to his/her regular job and is assigned as such.

5. **Question**

Even though the computerized notification system eliminates lengthy calls, if the primary Control Room Communicators, the I&C Technicians, can not perform this emergency task in a given situation, discuss how the emergency situation

would dictate that the Shift or Operating Supervisor should perform the function in place of the Equipment or Assistant Equipment Operators. This should take into account the other duties of the Communicator task beside that of notification. Address why this decision should not be made in terms of the overall emergency work needed to be done by onshift emergency personnel available at the time of the decision, and in accordance with Section 5.1.10 which allows the Shift Supervisor to pick "other qualified personnel" to assign as Control Room Communicators.

Answer

This change in no way detracts from the SS's overall responsibilities and flexibility to perform emergency duties. The SS has control of the resources and can assign any qualified personnel to perform the duty. The Communicator duties should not distract from other duties for very long. The form is simple and the user will have been trained on its use. The Emergency Coordinator must review and approve the notification form prior to sending it. Completing the form on the SENTRY system will have little time impact on them. There are no other duties assigned to the communicator. Provisions in the procedures allow for some of the notifications to ANI and INPO for example to be made by a phone talker, who relays the approved notification information

6. **Question**

There is a statement on the bottom of Page 1 of the letter that "The computerized notification system has significantly decreased the amount of time needed to prepare and send notifications," which implies that notification is a duty which takes the most time in the Communicator task. Provide the date when this system was installed and the basis for the statement. Include in this a discussion of the duties, other than notification, in the Control Room Communication task during the on-shift emergency response until this task is transferred to the Technical Support Center and Emergency Offsite Facility, and how these other duties could be performed by the Shift Supervisor or Operating Supervisor without affecting their other tasks, if the primary Control Room Communicators are not available. The duties of the Communicator task other than notification in this response should be consistent with the responses to Questions 3 and 4 on these duties.

Answer

The new system was installed in September of 2001. The new system is very user friendly and time efficient in filling out the notification information. It has been considered a strength by peer evaluators and INPO. Other than notifying the state and counties via the computerized system or backup means (Backup radio or commercial phone lines); the communicator notifies one of the resident inspectors, NRC Headquarters, ANI, and INPO. If an I&C Tech is not available, notifications other than the computerized system (State and Local response organizations) can be performed by any phone talker assigned by the SS. Reliability of the computerized system has been excellent. A monthly surveillance is performed to track reliability of the system. Reliability is a measure

of the percentage of time that the system is available. Reliability for the past three calendar quarters is 99.26%.

7. **Question**

Explain why Section 5.1.10 should not have the statement given in the May 6, 2002, letter that the I&C Technicians are the primary Control Room Communicators.

Answer

This could be added. However, our intent and desire is to eliminate the EOs as communicators. As stated earlier, the smaller pool of communicators will allow for more efficient training, better proficiency in skills, and additional participation opportunities in drills.

E-MAIL DATED JUNE 26, 2002

From: Jack Donohew
To: Dave Shafer
Date: 6/26/02 12:43PM
Subject: Questions on the RERP change submitted May 6, 2002

Attached is the file with my 7 questions. I am available to explain the basis for and the intent of the questions. <JND>

ATTACHMENT 2

QUESTIONS ON RERP CHANGE SUBMITTED MAY 6, 2002

1. Discuss if the intent of the proposed RERP change is to remove the RERP requirement that the Equipment Operators and Assistant Equipment Operators are trained to be qualified to perform the Control Room Communicator emergency task. Include in the discussion if this is the basis for the statement toward the bottom of Page 2 of the May 6, 2002, letter that "This change is also an improvement for the ERO in that it will require fewer personnel to be trained, thereby improving proficiency and participation by trained personnel." Identify which of the emergency positions in RERP Table 5-1 for onshift emergency response are trained to perform the Control Room Communicator emergency task.
2. Given that RERP Section 5.1.10 currently states "the Shift Supervisor assigns Equipment Operators, Assistant Equipment Operators, I&C Technicians, **or other qualified personnel** [emphasis added] as Control Room Communicators," explain why the Shift Supervisor can not assign the communicator task to itself or the Operating Supervisor (i.e., other qualified personnel) in place of the Equipment and Assistant Equipment Operators if the event warrants this assignment without having the proposed plan change. The statement "or other qualified personnel" seems to give the Shift Supervisor the ability to assign personnel to the control room communicator emergency task other than the three emergency positions specified in Section 5.1.10. Therefore, in a real emergency, would not the current Section 5.1.10 allow the Shift Supervisor to assign any qualified personnel to the Control Room Communicator task if this was necessary to perform this task and the other tasks needed to be done, and is this not the intent of the proposed RERP change.
3. Given the proposed change to the above statement in Section 5.1.10 in the May 6, 2002, letter, explain why the Shift Supervisor would not be able to still assign the Equipment or Assistant Equipment Operators to the task of Control Room Communicator if it decided that this was needed to respond to an event.
4. On page 2 of the May 6, 2002, letter, it is stated that the proposed change only affects the designated backup for the Control Room Communicators in the unlikely event that neither of the two on-shift I&C Technicians could not respond quickly enough to perform the duties of the task. The letter goes on to state that, if this were to occur, one of the Control Room management staff would complete and send the electronic notification. Discuss if the proposed change only affects the notification duty of the Control Room Communicator task and the other duties would be still be fulfilled by the I&C Technicians, and what is the "management staff" onshift, beside the Shift Supervisor and Operating Supervisor, that would be available to perform the Communicator task. Include in the discussion what are the other duties in the Communicator task, what onshift staff would be qualified to perform the Communicator task, and would not

this staff come under the "other qualified personnel" provision in RERP Section 5.1.10.

5. Even though the computerized notification system eliminates lengthy calls, if the primary Control Room Communicators, the I&C Technicians, can not perform this emergency task in a given situation, discuss how the emergency situation would dictate that the Shift or Operating Supervisor should perform the function in place of the Equipment or Assistant Equipment Operators. This should take into account the other duties of the Communicator task beside that of notification. Address why this decision should not be made in terms of the overall emergency work needed to be done by onshift emergency personnel available at the time of the decision, and in accordance with Section 5.1.10 which allows the Shift Supervisor to pick "other qualified personnel" to assign as Control Room Communicators.
6. There is a statement on the bottom of Page 1 of the letter that "The computerized notification system has significantly decreased the amount of time needed to prepare and send notifications," which implies that notification is a duty which takes the most time in the Communicator task. Provide the date when this system was installed and the basis for the statement. Include in this a discussion of the duties, other than notification, in the Control Room Communication task during the on-shift emergency response until this task is transferred to the Technical Support Center and Emergency Offsite Facility, and how these other duties could be performed by the Shift Supervisor or Operating Supervisor without affecting their other tasks, if the primary Control Room Communicators are not available. The duties of the Communicator task other than notification in this response should be consistent with the responses to Questions 3 and 4 on these duties.
7. Explain why Section 5.1.10 should not have the statement given in the May 6, 2002, letter that the I&C Technicians are the primary Control Room Communicators.