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Ref: 10 CFR 50.54(q)
10CFR50 App. E

CPSES-200301065
Log # TXX-03095

May 27, 2003

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

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

Gentlemen:

Enclosed is one copy of each of the Emergency Plan Procedures (EPP) (Controlled Copy Number 754) listed on the attachment.

If you have any questions regarding these changes, please contact Mr. Robert J. Kidwell at (254) 897-5310.

A045

A member of the **STARS** (Strategic Teaming and Resource Sharing) Alliance

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

TXX-03095

Page 2 of 2

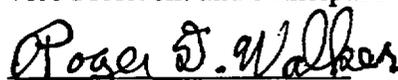
This communication contains no new licensing basis commitments regarding CPSES Units 1 and 2.

Sincerely,

TXU Generation Company LP

By: TXU Generation Management Company LLC,
Its General Partner

C. L. Terry
Senior Vice President and Principal Nuclear Officer

By: 
Roger D. Walker
Regulatory Affairs Manager

GRP
Attachment
Enclosure

- c - Region IV, Division of Reactor Safety, Senior Emergency Preparedness
Inspector (2 copies of enclosures; Control Nos. 754A and 754B)
- W. D. Johnson, Region IV (w/o enclosures)
- Resident Inspectors (1) (Information Only Copy of Enclosure)
- D. H. Jaffe, NRR (1) (Information Only Copy of Enclosure)

Enclosed Emergency Plan Procedures (EPPs)

PCN EPP-100-R5-2 (May 1, 2003)

EPP-121, Revision 8, "Reentry, Recovery & Closeout" (May 2, 2003)

Form EPP-121-1 (Retired) (May 2, 2003)

() denotes effective date

SPARCS201.R00
DATE: 04/30/03

TXU- ELECTRIC
SPARCS

Page 1 of 1
TIME: 12:28:29

DOCUMENT ROUTING CONTROL LIST

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LOCATION : SUPPORT SERVICES
BUILDING

<u>ACTION</u>	<u>STA</u>	<u>TYPE</u>	<u>NUMBER</u>	<u>SHEET</u>	<u>REV</u>	<u>QTY</u>
CH NOTICE	APP	PCN	0002			1
			EFFECTIVE DATE: 05/01/03			
	APP	TPEPP	EPP-100		5	

Note: Copies used to perform fabrication, installation or inspection activities should be verified current in the SPARCS Database or by contacting Document Control prior to use.

CPSES PROCEDURE CHANGE FORM

SECTION I

DATE 4/3/03 PREPARER Robert Kidwell EXT. 5310
(PRINT NAME)
 PCN EPP-100-R5-2 /OTPCN _____ WO# _____
 TITLE Maintaining Emergency Preparedness

CHANGED PAGE NO(s). 8 and 10

CHANGE JUSTIFICATION Address maintenance/submittal of the Squaw Creek Park Emergency Plan

PREPARER (Signature/Date) [Signature] 4/3/03

If change is editorial, THEN circle or mark "YES". YES
 Editorial changes, as limited by STA-205, Attachment 8.B, do not require Technical Review or Safety Evaluation Screen.

TECHNICAL REVIEWER: DAVID BARHAM [Signature]
(Printed Name and Signature)

Date: 04/22/03 EXT. 5984

SECTION II

PROCEDURE CHANGE INTERIM APPROVAL

If the change does not change the intent of the procedure and the change must be incorporated immediately, then complete this section; otherwise, route in accordance with Section III for review and approval.

QUALIFIED REVIEWER: _____
(Printed Name and Signature)

Date: _____ EXT. _____

SHIFT or UNIT SUPERVISOR: _____
(Printed Name and Signature)

Date: _____ EXT. _____

REMARKS _____

SECTION III

PROCEDURE CHANGE APPROVAL

REVIEW ORGANIZATION	APPROVED (Yes/No)	QUALIFIED REVIEW (Init/Date)
<u>NOS</u>	<u>yes</u>	<u>[Signature] 4/22/03</u>

TRAINING/READING RECOMMENDED: YES ___ NO X IF YES, THEN SPECIFY: _____

UPDATE OF PROCEDURES/FORMS USED FOR IN-PROGRESS ACTIVITIES REQUIRED: YES ___ NO X
 IF YES, THEN SPECIFY DATE (effective date or other specified date): _____

SORC Meeting No. and Date (If Applicable) NA EFFECTIVE DATE: 5-1-2003

APPROVED BY: [Signature] DATE: 4-24-03
(Signature) (Print name if not approval authority and change is editorial)

CPSES EMERGENCY PLAN MANUAL		PROCEDURE NO. EPP-100
MAINTAINING EMERGENCY PREPAREDNESS	REVISION NO. 5	PAGE 8 OF 34

ATTACHMENT 1
MAINTENANCE OF THE CPSES EMERGENCY PLAN
AND ASSOCIATED PROCEDURES

PAGE 1 OF 3

1. PURPOSE

This attachment identifies the requirements for preparation and maintenance of the CPSES Emergency Plan, Letters of Agreement, Emergency Plan Procedures (EPPs), Position Assistance Documents (PADs), Severe Accident Management Guidelines (SAMGs), and the EP (Emergency Planning) Staff Guidelines.

2. The Emergency Planning Manager is responsible for:

- Annual review and maintenance of the CPSES Emergency Plan. [C-03192]
- Annual review and maintenance of the Letters of Agreement; [C-27153]
- Preparation and maintenance of the Emergency Plan Procedures; [C-03192]
- Ensuring proposed changes to the Emergency Plan do not decrease the effectiveness of the Plan, unless they are approved by the Nuclear Regulatory Commission prior to implementation;
- Preparing, reviewing, revising, approving, controlling, and distributing the Position Assistance Documents (PADs);
- Preparing, reviewing, revising, approving, controlling, and distributing EP Staff Guidelines; and
- Preparing, reviewing, revising, approving, controlling, and distributing Severe Accident Management Guidelines.
- Preparation and maintenance of the Squaw Creek Park (SCP) Emergency Plan.

[2] EPP-100-R5-2 *BC* 4/3/03

[2]
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[2]

ATTACHMENT 1
MAINTENANCE OF THE CPSES EMERGENCY PLAN
AND ASSOCIATED PROCEDURES

PAGE 3 OF 3

- Forms, associated with Emergency Plan Procedures, should be prepared and controlled in accordance with STA-307;
 - CPSES Emergency Plan Procedures shall be distributed as authorized by the Emergency Planning Manager. Distribution should be to those organizations or individuals responsible for implementing or overseeing the Emergency Preparedness Program.
5. Position Assistance Documents (PADs) should be made available to provide the Emergency Response Organization position holders with the materials necessary to perform the tasks assigned to the position.
- PADs should be prepared, reviewed, revised, approved, and distributed in accordance with EP Staff Guidelines;
 - EP Staff Guidelines should direct personnel preparing PADs to review the PAD to ensure human factors engineering has been considered, including such items as tabbing, color coding, different font styles, and the length and layout of the material.
6. EP Staff Guidelines should be used, when required, to accomplish specific emergency preparedness tasks.
- EP Staff Guidelines should be prepared, reviewed, revised, approved, and distributed in accordance with EP Staff Guidelines.
7. Severe Accident Management Guidelines should be prepared, reviewed, revised, approved, and distributed in accordance with EP staff guidelines.
8. **Approved revisions to the Squaw Creek Park (SCP) Emergency Plan should be controlled and distributed by TXU Electric Regulatory Affairs in accordance with their procedures.**

2

EPP-100-R5-2

Ac 4/3/03

2

2

DOCUMENT ROUTING CONTROL LIST

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ISSUE	RET	TFEPP	EPP-121-1 EFFECTIVE DATE: 05/02/03		8	1
REVISED	REV	TPEPP	EPP-121		7	1
ISSUE	APP	TPEPP	EPP-121 EFFECTIVE DATE: 05/02/03		8	1

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EMERGENCY PLAN MANUAL

**REENTRY, RECOVERY
AND CLOSEOUT**

PROCEDURE NO. EPP-121

REVISION NO. 8

EFFECTIVE DATE: 5-2-2003

PREPARED BY (Print): Bill Nix EXT: 5256

TECHNICAL REVIEW BY (Print): Kelly Faver EXT: 5628

APPROVED BY: [Signature] DATE: 4/15/2003
EMERGENCY PLANNING MANAGER

1.0 PURPOSE

This procedure identifies when the CPSES Recovery Organization shall be established, describes its establishment, and describes its closeout. [C-05044]

Additionally, this procedure identifies:

- Criteria to be met for reentry to previously evacuated radiological areas BEFORE establishment of the Recovery Organization and
- Criteria to be met for transition to the Recovery Organization from each Emergency Classification (Notification of Unusual Event, Alert, Site Area Emergency, or General Emergency).
- Criteria to be met for Closeout of the Recovery Organization
- Operations, Technical, and Corporate Support responsibilities during Recovery Organization activities, and
- CPSES ERO Positions selected as Recovery Organization members and their responsibilities.

2.0 APPLICABILITY

2.1 The Emergency Coordinator shall remain in charge of all emergency response activities until relieved by the Recovery Manager. The Recovery Manager shall be a senior CPSES management member. [C-05761]

2.2 The INITIAL Recovery Organization should include the following CPSES ERO positions:

- Emergency Coordinator (Recovery Manager)
- EOF Radiation Protection Coordinator
- TSC Onsite Radiological Assessment Coordinator

- OSC Radiation Protection Coordinator
- TSC or EOF Communications Coordinator

2.3 CPSES ERO members should NOT be dismissed until the initial Recovery Organization has been staffed and approval for their dismissal has been given by the Recovery Manager.

3.0 DEFINITIONS

3.1 Emergency Termination - an exit from an emergency classification and return to a normal plant operating mode or plant shutdown or transition to the Recovery Organization.

3.2 Recovery - post emergency activities initiated to restore the affected unit(s) to normal plant operating mode or to plant shutdown.

3.3 Recovery Organization - an organization formed, when a significantly large recovery effort is deemed necessary, from existing CPSES Emergency Response Organization (ERO) members and augmented, as necessary, by the Recovery Manager, with onsite and offsite TXU employees, contractors, consultants, construction personnel, security, and any other selected by the Recovery Manager. [C-05796]

3.4 Recovery Organization Closeout - exit from the Recovery Organization and return to a normal plant operating mode or plant shutdown.

3.5 Reentry - entry into an areas previously evacuated for radiological reasons.

4.0 PRECAUTIONS

4.1 Closeout of the Recovery Organization requires that offsite authorities be provided a verbal and written follow-up in accordance with STA-501, "Nonroutine Reporting."

4.2 Emergency Workers' radiological exposure shall not exceed the limits specified in Title 10, Code of Federal Regulations, Part 20 unless planned for and approved as prescribed by EPP-305, "Emergency Exposure Guidelines and Personnel Dosimetry." All efforts shall be made to keep radiological exposure of Emergency Workers As Low As Reasonably Achievable (ALARA). [C-05763]

<p align="center">CPSES EMERGENCY PLAN MANUAL</p>		<p align="right">PROCEDURE NO. EPP-121</p>
<p align="center">REENTRY, RECOVERY AND CLOSEOUT</p>	<p align="center">REVISION NO. 8</p>	<p align="right">PAGE 4 OF 10</p>
<p>4.3 Emergency Work Permits shall be used, as prescribed in EPP-116, "Emergency Repair and Damage Control and Immediate Entries," for conduct of Emergency Worker briefings.</p> <p>4.4 The Emergency Coordinator or Recovery Manager shall authorize all initial reentries into areas previously evacuated for radiological reasons. [C-05763]</p> <p>4.5 The Emergency Coordinator or Recovery Manager are the only TXU personnel authorized to request assistance from the Department of Energy (DOE).</p> <p>5.0 INSTRUCTIONS</p> <p>5.1 The following should be accomplished before establishing the Recovery Organization:</p> <ul style="list-style-type: none"> ● Determine the extent of damage to plant equipment. ● Radiological surveys to identify gross radiological hazards and problems. ● Isolate and/or remove components or systems that significantly contribute to personnel radiation exposure. ● Install temporary shielding, temporary barriers, and warning signs. ● Decontaminate frequently used routes and areas. ● Apply clearance tags. 		

5.2 Emergency Termination and Transition to the Recovery Organization

The Emergency Coordinator, in concert with other TXU members, shall decide whether the emergency classification should be terminated without transition to the Recovery Organization using the following guidance:

IF the emergency classification being terminated is _____ **THEN** _____

Notification of Unusual Event the Emergency Coordinator may independently choose to terminate the emergency. However, Plant Management should be advised by the Emergency Coordinator immediately thereafter and be provided:

- a description of the event
- actions taken to mitigate the event
- details of the emergency termination

Alert or Site Area Emergency or General Emergency the Emergency Coordinator may choose to establish the Recovery Organization but **BEFORE** doing so, he/she

- shall confirm that:
 - in-plant radiation levels are stable and are decreasing with time
 - radioactive material releases to the environs have ceased or have been decreased to permissible levels
 - fire, flooding or other similar emergency conditions no longer constitute a hazard to the plant or to plant personnel
 - equipment malfunctions have been corrected or compensating measures have been adopted
 - plant systems are in stable condition to allow personnel to safely work around them. This is required especially for the reactor core and coolant systems
 - conditions have been discussed with members of CPSES Plant management
 - the local agencies, State and NRC have been notified of the intent to establish the Recovery Organization.

(5.2 Continued)

- shall affirm this decision with the Plant Manager, or in his/her absence, another TXU Company Officer
- shall notify local emergency response organization, the State, and the NRC of intent to transition to the Recovery Organization. [C-05760]

5.3 Initial Recovery Effort

The initial recovery effort shall be focused on limiting the consequences of the incident to effect maximum protection to the general public and plant personnel.

5.4 Initial Reentry

After establishment of the Recovery Organization, initial reentry into areas previously evacuated for radiological reasons shall be approved by the Recovery Manager. Aside from activities deemed necessary by the Recovery Manager, reentry into these previously evacuated areas may be necessary to:

- Provide lifesaving or personnel injury medical aid.
- Evaluate existing and potential plant conditions.
- Perform emergency repair of vital plant equipment.

6.0 RESPONSIBILITIES

6.1 Operations Support [C-05766]

- Provide direct support to Shift Operations.
- Analyze instrument and control problems and develop modification and repair plans.
- Analyze conditions and develop guidance for Shift Operations personnel regarding core protection.

- Develop out-of-normal and emergency procedures for operations support.

6.2 Technical Support [C-05767]

- Determine need for and provide engineering and technical specialists in support of other managers as required.
- Assures design activities are adequately staffed and equipped to provide timely support.
- Provides direct interface between CPSES personnel and others on administrative matters.
- Directs, coordinates, and approves all engineering and design activities conducted onsite during recovery.
- Develops any required modifications for radwaste systems in support of recovery.
- Provides expertise for Station repair and modification activities in support of the resolution of mechanical and electrical problems.
- Provides qualified personnel to augment emergency repair and damage control teams.

6.3 Corporate Security

TXU resources and personnel are available upon request by the Recovery Manager.

6.4 Emergency Coordinator/Recovery Manager

Duties and responsibilities of the Emergency Coordinator and Recovery Manager are given in EPP-109, "Duties and Responsibilities of the Emergency Coordinator/Recovery Manager."

6.5 EOF Radiation Protection Coordinator

- Develops plans and procedures for sampling contaminated solids, liquids and gases to determine the volume and estimated curie content of various systems.

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- Develops plans and procedures to process and control liquid, gaseous, and solid wastes to include ensuring that logistical support is provided in the form of equipment, casks and liners, transport vehicles, resin, temporary shielding and manpower.
- Develops modifications and design concepts for waste processing.
- Supports offsite programs for sampling or dose assessment, dose management and radiation protection, and
- Provides As Low As Reasonably Achievable (ALARA) pre-job planning and contingency plans for potential problems such as spills, high airborne and contamination.

6.6 TSC Onsite Radiological Assessment Coordinator

- Prescribes appropriate personal protective measures and dosimetry for reentry personnel to ensure radiological exposure remains As Low As Reasonably Achievable (ALARA).
- Ensures Emergency Worker exposure remains less than 10 CFR 20 limits unless exposure above these limits have been approved by the Emergency Coordinator or Recovery Manager. (Form EPP-305-2, Emergency Exposure Authorization should be used to determine, assign, and document allowable radiological exposures for Emergency Workers.)

6.7 OSC Radiation Protection Coordinator

- Conducts pre-job briefings for Emergency Workers who are reentering areas previously evacuated for radiological reasons.
- Communicates current radiological conditions and respective protective measures to Reentry Team members and keeps them up to date on plant evolutions or actions that could affect radiological conditions in their work areas to ensure their radiological exposure remains As Low As Reasonably Achievable (ALARA).

- Ensures that the TSC Onsite Radiological Assessment Coordinator and the EOF Radiation Protection Coordinator are kept informed of current radiological conditions onsite and in the plant.

6.8 TSC or EOF Communications Coordinator

- Notifies local agencies, State, and NRC of intent to transition from an emergency classification to the Recovery Organization or to Closeout the emergency. [C-05762]

IF the Emergency Coordinator THEN this notification
is in the _____ is made by _____

TSC TSC Communications Coordinator

EOF EOF Communications Coordinator

7.0 CLOSEOUT OF RECOVERY ORGANIZATION

Closeout of the Recovery Organization shall be based on the recommendation of the Recovery Manager and approved by the Plant Manager. Closeout may be based on a number of criteria, such as:

- Completion of all corrective actions or restoration actions,
- Availability of the affected Unit(s) to resume power operation, or
- Reduced need for specialized talents and resources.

8.0 RECORD DOCUMENTATION

All records generated as the result of an actual emergency shall be forwarded to the Emergency Planning Manager.

9.0 REFERENCES

9.1 Title 10, Code of Federal Regulations, Part 20

9.2 NUREG-0654/FEMA-REP1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

- 9.3 CPSES Emergency Plan, Sections 1.2.3.1, 1.2.7, and Section 11.
- 9.4 EPP-109, "Duties and Responsibilities of the Emergency Coordinator/Recovery Manager"
- 9.5 EPP-116, "Emergency Repair and Damage Control and Immediate Entries"
- 9.6 EPP-203, "Notifications"
- 9.7 EPP-204, "Activation and Operation of the Operations Support Center (OSC)"
- 9.8 EPP-205, "Activation and Operation of the Technical Support Center (TSC)"
- 9.9 EPP-206, "Activation and Operation of the Emergency Operations Facility (EOF)"
- 9.10 EPP-305, "Emergency Exposure Guidelines and Personnel Dosimetry"
- 9.11 STA-501, "Non-Routine Reporting"
- 10.0 ATTACHMENTS/FORMS**

None