



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE
WALNUT CREEK, CALIFORNIA 94596-5368

SEP 30 1992

Docket Nos. 50-275 and 50-323

Nuclear Power Generation, B14A
77 Beale Street, Room 1451
P. O. Box 770000
San Francisco, CA 94177

Attention: Gregory M. Rueger
Senior Vice President and General Manager

SUBJECT: RESPONSE TO REQUEST FOR INFORMATION IN NRC INSPECTION REPORTS 50-275/92-15 AND 50-323/92-15

Gentlemen:

Thank you for your letter of September 4, 1992, File: PG&E Letter No. DCL-92-192, pertaining to the above subject and informing us of the steps you have taken to address the items we brought to your attention. In response to a telephone call between Tom Deuriarte of your staff and Art McQueen of Region V, an enclosure hereto provides comments based on a review of your response by members of our operator licensing staff and emergency preparedness staff.

Sincerely,

for *M. D. Selvester*
Robert J. Pate, Chief

Safeguards, Emergency Preparedness
and Non-Power Reactor Branch

Enclosure:
As stated

CC:
J. A. Sexton
J. D. Townsend
C. J. Warner
D. A. Taggart
B. Thomas
T. L. Grebel
Bob Hendrix

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PDR ADOCK 05000275
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IEO4



REGION V REVIEW COMMENTS

Regarding: PG&E Letter No. DCL-92-192, Subject: Response to Request for Information in NRC Inspection Reports 50-275/92-15 and 50-323/92-15, dated September 4, 1992.

1. PG&E responses to the first three items, failure to properly verify reactor shutdown, ineffective communication in Control Room, and failure to follow procedures, appear appropriate. These areas will be reviewed by our operator licensing personnel in future examinations at the site.
2. The fourth issue, the problem regarding use of a taped scenario, will remain an inspection follow-up item in review and inspection of future emergency exercises. We agree with the PG&E understanding that taped scenarios are not unacceptable per se. PG&E properly indicates that the problem appears to be that the taped response mode as used in this exercise does not allow sufficient opportunity to evaluate the control room (simulator) operators in the performance of their duties in mitigating a major emergency event.

The exercise facility objective for the Control Room (Simulator) was to "Demonstrate the ability of the Control Room (Simulator) to appropriately respond to a security event that results in a significant radiological release to the environment." This appeared, and still appears, to have been an appropriate objective. The simulator had been in an interactive mode until about 12:19 p.m. Until then, the licensee controllers and the NRC inspector had been able to observe Control Room response actions to meet the licensee objective and the NRC inspection requirement. At about 12:19 p.m., and prior to a "significant release to the environment," the simulator was placed in the playback mode (or taped response mode). In effect, this obviated the licensee capability to continue to accomplish the above stated objective. The NRC inspector assigned to evaluate the Control Room (Simulator) felt that the taped response mode portion of the scenario also to a great extent obviated the NRC capability to fulfill its inspection requirement to "assess the performance of the control room staff as it conducts the task of analysis of plant conditions and corrective actions."

In summary, the licensee intent to apply additional attention in future exercises to ensure that the scenario fully supports all exercise objectives; and the evaluation of methods to actively involve the control room in later phases of an exercise while still maintaining tight control over plant parameters affecting offsite release data appear appropriate. Emphasis should not be on deleting or changing effective exercise objectives to accommodate the scenario, but rather the reverse.



Docket Nos. 50-275 and 50-323
Pacific Gas and Electric Company

bcc w/enclosure:
Docket File
Project Inspector
Resident Inspector
G. Cook
B. Faulkenberry
J. Martin
State of California

bcc w/o enclosure:
M. Smith
J. Zollicoffer

AMcQueen
AMcQueen
9/29/92

TMeadows
TMeadows
9/29/92

LMiller
LMiller
9/30/92

RPate
RPate
9/30/92

REQUEST COPY	REQUEST COPY	REQUEST COPY	REQUEST COPY
YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>

SEND TO DCS	SEND TO PDR
YES <input type="checkbox"/> NO <input type="checkbox"/>	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>

