



**CONNECTICUT YANKEE ATOMIC POWER COMPANY**

**HADDAM NECK PLANT**  
362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

April 18, 1997  
Docket No. 50-213  
CY-97-002

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  
Change And Status Of Commitments

The purpose of this letter is for the Connecticut Yankee Atomic Power Company (CYAPCO) to revise a commitment and provide a status of the commitments relating to the correction of weaknesses identified during the Haddam Neck Plant (HNP) Emergency Planning Exercise conducted on August 15, 1996 as discussed in Inspection Report No. 50-213/96-07.<sup>(1)</sup>

In a letter dated November 25, 1996,<sup>(2)</sup> CYAPCO provided corrective actions to address these two weaknesses. Subsequently, CYAPCO determined that one of the commitments (i.e., event classification training) required further clarification. The revised commitment was discussed with the NRC Staff during the February 5, 1997 management meeting at the NRC Region I office.

The next evaluation of the HNP Emergency Plan (EP) is tentatively scheduled for the Spring of 1997. Due to the HNP's permanently defueled condition, this evaluation will use the table top method to classify events and develop protective action recommendations.

- (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.
- (2) B. D. Kenyon letter to the U. S. Nuclear Regulatory Commission, "Emergency Preparedness Exercise NRC Inspection Report No. 50-213/96-07," dated November 25, 1996.

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CYAPCO is committed to maintaining an effective emergency preparedness program to adequately protect the public health and safety. It is CYAPCO's intent to submit a proposed defueled Emergency Plan by June 1997, that reflects the substantially reduced risks associated with the HNP's permanent shutdown and defueled status.

CYAPCO will conduct an on-site exercise following approval of the defueled Emergency Plan. Based on the need to develop defueled Emergency Plan Implementing Procedures, train all responsible individuals, and prepare an appropriate exercise scenario, CYAPCO will discuss an appropriate date for an exercise after NRC approval of the defueled Emergency Plan.

Attachment 1 provides the revised corrective action and its status. In addition, the attachment restates the remaining corrective actions and their status.

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



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T. C. Feigenbaum  
Executive Vice President and  
Chief Nuclear Officer

cc: H. J. Miller, NRC Region I Administrator  
M. B. Fairtile, NRC Project Manager, Haddam Neck Plant  
W. J. Raymond, NRC Senior Resident Inspector, Haddam Neck Plant  
K. T. A. McCarthy, Director, CT DEP Monitoring and Radiation Division

Docket Nos. 50-213  
CY-97-002

Attachment 1

Haddam Neck Plant

NRC-Evaluated Emergency Preparedness Exercise

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

Change And Status Of Commitments

April 1997

**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 Simulator Control Room Shift Manager (SCR SM) who had to be prompted by the lead controller at that facility. The Site Area Emergency (SAE) and General Emergency (GE) 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)

**Corrective Actions**

1. Conduct a Station Emergency Response Organization (SERO) job task analysis to determine the most capable and effective positions in the organization to make Emergency Action Level (EAL) classifications.

**Status:**

This analysis is complete. Numerous SERO members were identified as being involved in the EAL classification process. The Nuclear Director, Emergency Planning Services recommended that only the Shift Manager (SM) and the Director of Station Emergency Operations (DSEO) provide EAL classifications. The other SERO members who assess technical data will be familiar with that data's potential impact on classification. They will provide this information to the DSEO. The SERO members that fulfill this role are the Assistant Director Emergency Operations Facility (ADEOF), the Manager Radiological Dose Assessment (MRDA), and the Assistant Manager Radiological Dose Assessment (AMRDA).

2. Conduct an analysis of simulator utilization as a training and evaluation tool to improve EAL classification skills.

Status: The analysis is complete. Use of the simulator as a training and evaluation tool has been determined to improve EAL classification skills. However, due to the permanent defueled and decommissioning status, the Haddam Neck Plant operators no longer use the simulator for requalification training. The Licensed Operator Requalification Training (LORT) curriculum was revised and subsequently approved by the Operator Training Curriculum Advisory Committee to include Emergency Plan Implementing Procedure (EPIP) actions in classroom training. A new cycle of LORT started on March 5, 1997. LORT is effective and will continue.

3. Train those members of the SERO that classify events using the EAL tables. Include bases information and clarifications in the lesson plans.

**Revised Corrective Action:**

The SERO members that classify events using the EAL classification tables are the SM and the DSEO. Other SERO members that assist in the classification of radiological events will also be trained to make them cognizant with the radiological aspects of the EAL classification tables. These other members are the ADEOF, the MRDA, and the AMRDA.

Status: The training lesson plans to address this corrective action were approved by the Emergency Planning Curriculum Advisory Committee (EPCAC) on January 23, 1997. The revised lesson plans include the bases and/or clarification for each EAL classification. For those personnel who were on-call for the ADEOF, MRDA, and AMRDA positions, training was completed by January 31, 1997. For the remainder of SERO personnel who assume these positions, training was completed prior to them assuming their next regularly scheduled on-call duty.

4. Periodically review the EAL classification tables to incorporate clarifications and future enhancements.

Status: The review has been completed. Changes will be implemented by May 1997. An annual review will be

performed and the EAL classification tables will be changed as necessary.

- 5.a Establish an emergency preparedness self assessment evaluation program.

Status: The self assessment program procedure has been developed and is in effect. A schedule has been issued and three self assessment evaluations have been completed. The results of these three self assessment evaluations have been documented and indicate that the procedure is effective. The self assessment evaluations have been submitted to the Nuclear Director, Emergency Planning Services.

- 5.b Evaluate the effectiveness of the self assessment program approximately six months after its implementation.

Status: This corrective action will be completed in July 1997.

## **ITEM 2**

### **Restatement Of Weakness:**

The Protective Action Recommendation (PAR) was given to the State of Connecticut within 15 minutes of the General Emergency (GE). However, the basis for the PAR and the fact that there was not any consideration of protective actions beyond the 10 mile 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)

### **Corrective Steps Taken To Avoid Further Deviations**

1. Include State of Connecticut, Department of Environmental Protection (DEP) personnel in the redesign of the PAR process.

Status: The State of Connecticut, DEP personnel were involved in the root cause evaluation and have been continuously involved in the redesign process. Meetings have been held between Northeast Utilities (NU) personnel and DEP personnel to review and approve PAR changes. The new Emergency Preparedness Operating Procedure uses current plant conditions for generation of the initial PAR. The

redesign of the PAR process is complete. Training on the new procedure will be completed and in effect by the May 1997, implementation date.

2. Redesign the communication interfaces with State of Connecticut, DEP personnel.

Status: PARs will be communicated directly from the DSEO to the DEP via a dedicated telephone line. Procedures for using the telephone will be completed and in effect by the May 1997, implementation date.

Note: The telephone line has been installed and is operational. This corrective action also addresses the open concern of IFI 50-213/96-007-04.

3. Design appropriate training materials.

Status: Course materials and lesson plans have been developed and will be utilized in training prior to the May 1997, implementation date.

4. Verify effective SERO expectations regarding procedure utilization and compliance.

Status: This verification has been included as part of the continuing training that the SERO receives.

- 5.a Establish an emergency preparedness self assessment evaluation program.

Status: The self assessment program procedure has been developed and is in effect. A schedule has been issued and three self assessment evaluations have been completed. The results of these three self assessment evaluations have been documented and indicate that the procedure is effective. The self assessment evaluations have been submitted to the Nuclear Director, Emergency Planning Services.

- 5.b Evaluate the effectiveness of the self assessment program approximately six months after its implementation.

Status: This corrective action will be completed in July 1997.