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September 14, 1989

William J. Cahill, Jr.
Executive Vice President

Mr. Robert Lansford, Chief
Division of Emergency Management
Texas Department of Public Safety
P. O. Box 4087
Austin, TX 78773

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
TRANSMITTAL OF THE OFFSITE PORTION OF THE
ANNUAL EMERGENCY PREPAREDNESS INDEPENDENT REVIEW

Dear Mr. Lansford:

Title 10, Code of Federal Regulations, Part 50, Paragraph 50.54(t), requires that an independent review of the emergency preparedness program be conducted every 12 months. This independent review must include an evaluation for adequacy of interfaces with state and local governments. Additionally, 50.54(t) states that, "The part of the review involving the evaluation for adequacy of interface with state and local governments shall be available to the appropriate state and local governments."

Earlier this year the independent review of Comanche Peak Steam Electric Station Emergency Preparedness was conducted. The portion of the report dealing with offsite interface is provided in Attachment 1. The status of the corrective actions that have been initiated is listed in Attachment 2.

Emergency Preparedness at Comanche Peak Steam Electric Station is of the utmost importance to TU Electric. We have achieved a high level of preparedness and will continually strive in the future to maintain that high level. Consequently, we appreciate the efforts extended by you and your staff in preparing for and participating in the full scale emergency exercise.

If you have any questions concerning this information, please do not hesitate to contact me or Mr. Roger D. Walker at (214) 812-6866.

Sincerely,

A handwritten signature in cursive script, appearing to read 'William J. Cahill, Jr.'.

William J. Cahill, Jr.

GLB/grp
Attachments (2)

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PDR ADCCK 05000445
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5.0 OFFSITE INTERFACE SUMMARY

To satisfy the 10CFR50.54(t) requirement that the annual independent review include an evaluation for adequacy of interfaces with state and local governments, the following interviews were conducted:

February 28, 1989

- 9:00 a.m. Judge Milton Meyer - Hood County
- 9:45 a.m. Chief Deputy Johnson representing Sheriff Edwin Tomlinson - Hood County
- 11:00 a.m. Sheriff Bill Hall - Somervell County
- 1:00 p.m. Judge George Crump - Somervell County

March 14, 1989

- 10:30 a.m. David Lacker, Bureau Chief, and Bob Free and Richard Ratliff, Bureau of Radiation Control - Texas Department of Health
- 1:00 p.m. Tom Millwee, Division of Emergency Management, Department of Public Safety

The following areas were discussed with state and local officials, as appropriate:

1. Agreement with content of public information brochures distributed to the local populace.
2. Routine day-to-day discussions relating to emergency preparedness.
3. Alert and Notification System testing and maintenance.
4. Training offered--content and frequency including the offer to participate in exercises where offsite participation is not required.
5. Availability of copies of the CPSES Emergency Plan and procedures in county and state EOCs.
6. Content and frequency of information flow during drills/exercises.
7. Agreement with selected protective action guides.
8. Consultation and agreement on drill/exercise schedule.
9. Consultation and agreement on exercise objectives.
10. Consultation and agreement on emergency action levels.

11. Dose assessment methodology.

All parties interviewed were well pleased with the day-to-day interactions concerning emergency preparedness. The following items were identified for correction or improvement:

1. While agreeing with the contents of the public information brochures, the Bureau of Radiation Control feels the information could be presented more effectively. (They referenced the South Texas Project's Emergency Planning Calendar.)
2. The Somervell County Judge feels that some areas are not adequately covered by the siren system.
3. Test results from the Alert and Notification System needs to be sent to both counties and to the Bureau of Radiation Control.
4. Most interviewees felt that the information flow during drills and exercises could be improved. Examples:
 - a. Telecopies to the Division of Emergency Management were illegible during past drills.
 - b. Event description is almost always left blank (what is happening in the plant).
 - c. A Standardized Notification Message form was agreed to by CPSES, South Texas Project, and state authorities but CPSES has yet to implement.
 - d. There is a glaring lack of attention to detail in information sent to the Bureau of Radiation Control (see item 7 from the Bureau's critique of the March 7, 1989 drill attached).
 - e. The County Judge generally felt both content and frequency could be improved.
5. The Division of Emergency Management felt that recently instituted quarterly meetings between the two nuclear utilities and state emergency response personnel should clear up scheduling difficulties previously observed.
6. As in previous drills and exercises, there were some problems associated with how the notification message forms were filled out by the players at CPSES. For example, after the March 7, 1989 exercise, the following comments were provided by the State Bureau of Radiation Control:
 - a. On message number 1, no meteorological data was provided.
 - b. On message number 2, the temperature at 60 meters was not provided. Instead, the block was marked N/A. If N/A means not available we must ask why the 60 meter temperature was not available for the second message, but suddenly became available for message number 3? If, on the other hand, N/A was intended to

mean not applicable then we must point out that it is not the prerogative of onsite personnel to make that determination. The content of the message form consists of data elements which we feel we need and which, by incorporation in plant emergency procedures, TU Electric has agreed to provide. Neither your communicators nor your Emergency Director should be allowed to think that they are at liberty to second guess this agreement.

- c. On message number 2, wind speed was given as 7 miles per hour or 4.47 meters per second. On message number 3, wind speed was again given as 7 miles per hour, but the meters per second rate was given as 3.1 meters per second. Since the meters per second value is calculated by multiplying speed in miles per hour by .447, we question the math used in calculating the 4.47 meters per second speed reported on message number 2. This may seem like a minor issue, but similar math errors in other portions of the message could have very serious consequences.
- d. On a similar vein, wind direction on message number 2 was reported as being from 50 degrees. On message number 3, the wind direction was reported as being from 0.50 degrees. Was this a 49.5 degree error or had the wind actually shifted by 49.5 degrees between message number 2 and message number 3? Don't place us in the position of having to guess when you mean what you say and when you really mean something else.
- e. Except for the notation "same as in previous message" no meteorological data was given on message numbers 4 and 5. This was especially disconcerting because message number 4 presented us with a release in progress and raised the event severity level to Site Area Emergency at a time when we were already unsure of the wind direction.
- f. Another discrepancy which was minor but glaring on message number 4 was the fact that the message said the SITE AREA EMERGENCY was declared at 0955 because of a radiological release which didn't start until 0956.
- g. On the message number 4 form, a time of 0941 or 0947 had previously been entered for the event declaration, but that time was lined through and a new time of 0955 was entered. The disturbing thing about this alteration is that two messages later the start time of the release was changed to 0940. What really happened here? Was the time of event declaration altered on message number 4 so that the notification message approval time of 1001 would be within 15 minutes of the event declaration time? If so, they still missed the 15 minute deadline by 1 minute.
- h. Not once on any of the notification messages were affected sectors (item 5.E) indicated. Where the line wasn't simply left blank, it was marked N/A. Since the only thing necessary to

determine the affected sectors was the wind direction, this use of N/A obviously was to denote "not applicable". Our reaction to this is the same as in comment number 2 above.

- i. On message number 6, the stability class was suddenly changed from D to E. Since there was no change in wind speed, only a 1 degree (we think) change in wind direction, only a 1 degree change in 10 meter temperature, and no data provided for 60 meter temperature, we have no basis for judging whether this was a valid change, a change made in error, or a previous error being finally corrected.
- j. Message number 6 announced the declaration of a General Emergency at 1053. This message was not approved by the Emergency Coordinator until 1117; well outside of the fifteen minute deadline for offsite notification following declaration of an emergency classification.
- k. On message numbers 6, 7 and 8, the declared time of the accident classification was consistently reported as being 1053. Message number 9, however, reported that time as being 1330, with no change in accident classification and no explanation of the switch to a 1330 declaration time.
- l. Temperature at 60 meters was only given once, on message number 3.
- m. We never did receive a message notifying us that the drill was over, or that the event had been terminated.

Such chronic problems with the notification messages should have been detected and corrected before the approval of the Emergency Coordinator was obtained. Many of these errors and omissions might never have occurred if plant personnel better understood that accurate and complete information is essential in formulating and directing offsite protective response.

Status of Corrective Actions

1. CPSES has recently published a new information booklet that more effectively presents emergency related information.
2. As a result of subsequent discussions with county officials, CPSES personnel will continue to ensure that all residents of the 10 mile Emergency Planning Zone can be alerted in the event of an emergency. If areas are discovered that are not adequately covered, additional sirens or other means will be used to notify those residents.
3. The County Sheriffs for Hood and Somervell are already notified when discrepancies are identified during the monthly Alert and Notification System testing. The Texas Division of Emergency Management will be requested to provide the quarterly summary from the Alert and Notification System tests to both counties and the Bureau of Radiation control.
4. Considerable training was devoted to CPSES staff concerning the importance of information flow. Much improvement has been attained as was demonstrated in the Graded Exercise on July 25, 1989.
5. The quarterly planning meetings between State emergency response personnel, CPSES, and the South Texas Project have enabled two year schedules to be developed.
6. All personnel at CPSES involved with the notification message process received additional training on the importance of communication and notification. During the Graded Exercise on July 25, 1989, with the exception of one message form, all messages were legible, complete, and contained accurate information. The problem with the one message was due to the difficult nature of the exercise, and corrective action will be taken to prevent recurrence.