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TUELECTRIC

June 15, 1990

W. J. Cahill
Executive Vice President

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
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
ON EMERGENCY PREPAREDNESS FOR CPSES

REF: NRC Letter from C. I. Grimes to W. J. Cahill, Jr.
dated May 15, 1990

Gentlemen:

Enclosed with the referenced letter was a copy of a letter from Citizens for Fair Utility Regulation (CFUR) to the Commission dated April 12, 1990. In the CFUR letter, a number of concerns were raised based upon a survey of local residents regarding the public education and information program and the Alert and Notification System for CPSES. As requested in the referenced letter, TU Electric has assessed these concerns and herein provides the results of that assessment.

The enclosed response, which has been reviewed with officials of the local governments and the State of Texas, contains TU Electric's assessment of eight (8) concerns identified in CFUR's letter. In each instance, the existing and ongoing emergency preparedness programs of TU Electric, the State of Texas and the local governments address the concerns raised by CFUR. The principal source of the responses to CFUR's concerns is the CPSES Emergency Plan which satisfies the requirements specified by regulation in 10CFR50.47(b) and 10CFR50, Appendix E, IV. To assure that the requirements were addressed, the guidance provided in NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," (1980) was used to develop the CPSES, State and local emergency response plans and programs.

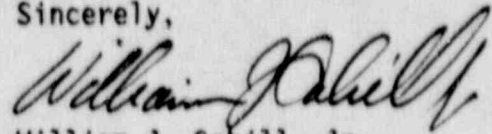
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As shown in the enclosure, these programs, which have been reviewed and accepted by the NRC and FEMA, and which have been demonstrated to be effective in periodic exercises, provide assurance that appropriate protective measures will be taken in the event of an emergency. TU Electric has not identified any additional actions that should be taken with respect to the public education and information program or the Alert and Notification System for CPSES. However, TU Electric is always open for constructive suggestions to improve these programs and encourages local residents and other interested parties to contact the company for additional information or to express concerns.

Sincerely,



William J. Cahill, Jr.

GLB/grp
Enclosure

c - Mr. C. I. Grimes, NRR
Mr. M. Fields, NRR
Mr. R. D. Martin, Region IV
Mr. R. A. Lansford, State of Texas
Honorable G. R. Crump, Somervell County
Honorable M. Meyer, Hood County
Resident Inspectors, CPSES (3)

RESPONSES TO CONCERNS IN
CFUR'S LETTER OF APRIL 12, 1990

Mailing of Publication Containing Emergency Information

CFUR Concern

CFUR states that 147 out of 219 respondents polled by the Hood County Taxpayers Association of Texas ("Association") responded that they had not received TU Electric's instruction booklet mailed out in 1989 (Letter, pp. 2-3). CFUR characterizes the booklet as "the only piece of information TU is required to provide to the citizens..." (Letter, p. 3), and is concerned that the "mailing may be seriously flawed" (Letter, p. 3).

Applicable NRC-FEMA Guidance

With respect to this concern, the applicable planning standard is 11.G. of NUREG-0654/FEMA REP-1, Rev. 1, which specifies that information be "made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors)..." Under this standard, Criterion 1 states that each organization is to provide coordinated dissemination of information to the public, at least annually, concerning how they will be notified and what their actions should be in an emergency. Means for accomplishing this dissemination may include publications distributed on an annual basis. Similarly, Criterion 2 states that the public information program shall provide the permanent and transient adult population within the plume exposure Emergency Planning Zone (EPZ) an adequate opportunity to become aware of the information annually.

TU Electric Response

Section 3.8 of the CPSES Emergency Plan addresses this requirement and states that a publication containing the appropriate information will be distributed annually.

Such a publication has been mailed out six times. The first mailing was in 1982; the latest was in May 1990. During the years 1986, 1987, and 1988, mailing of the publication was suspended, with the approval of the Federal Emergency Management Agency (FEMA), to allow the CPSES emergency planning staff to concentrate on plant activities.

The 1989 mailing was sent to approximately 14,500 addressees, using a mailing list selected by names and addresses within Hood and Somervell counties. This list was purchased from a company which pays the U. S. Postal Service to update the information regularly. Accordingly, reasonable steps were taken to assure that the publication was received by residences within the plume exposure EPZ.

In 1990, the mailing was expanded to 17,500 by using a list of all addressees within the zip codes in Hood and Somervell counties. This resulted in mailing the information to some locations outside the EPZ, but provided additional assurance that the publication was received by residences within the EPZ. In addition, this publication was provided to public offices, such as post offices, tax offices, utility offices, etc.

The publication is not the only method used to provide advance information to the public on how they will be notified and what their initial actions should be in an emergency. Such information is also published in four telephone books utilized within the plume exposure EPZ. In addition, a multicolored poster is provided to more than 30 locations such as post offices, restaurants, public halls, etc. Permanent signs providing information about what actions to take when the sirens sound are installed at public parks and boat ramps within the plume exposure EPZ, and stickers providing information are given to motels and hotels around the plant. To supplement this published information, radio announcements will be made periodically during the next year on public service programs on a local radio station.

Additionally, TU Electric provides a "current events" publication entitled "Neighbor-to-Neighbor," approximately every four months to the residents of Hood and Somervell counties. Although the principal goal has been to inform the neighbors of CPSES about activities and people at CPSES, occasionally, it has carried "what to do in an emergency" type of information.

Thus, TU Electric concludes that appropriate actions have been taken to provide such information to the public, and no remedial actions are required.

Knowledge of Residents

CFUR Concern

CFUR states that 135 out of 209 respondents polled by the Association "did not know where to go if they had to evacuate" and only 5 "knew what evacuation zone they lived in" (Letter, p. 3).

Applicable NRC-FEMA Guidance

Under planning standard II.G. in NUREG-0654 and the relevant criteria discussed in the previous concern, the information to be disseminated to the public at least annually is to include information on "protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, and radioprotective drugs..." The public information program shall provide the adult population "an adequate opportunity to become aware of the information annually." (Emphasis added) The programs should include provision for written material that is likely to be available in a residence during an emergency.

In addition, planning standard II.E. discusses the need to establish means to provide early notification and clear instruction to the populace within the plume exposure EPZ in the event of an emergency. Criteria 3 and 4 provide the licensee, State and local organizations, guidance to establish the content of initial and follow-up messages providing information for use in protecting the public including potentially affected population and areas, and recommended emergency actions. Criterion 5 states that State and local government organizations are to establish a system for disseminating such information to the public, including notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

TU Electric Response

The publication disseminated annually, the four telephone books, and the multicolored posters mentioned in the previous response contain the 10-mile EPZ map which shows each evacuation zone delineated by clear geographical boundaries. Also shown are the routes to use if evacuation is required, where to report, and other special instructions. The signs and stickers, mentioned above, also provide certain information about what actions to take in an emergency. This information will be supplemented by periodic radio announcements. Accordingly, reasonable steps have been taken to provide the adult population "an adequate opportunity to become aware" of such information.

The emergency plans do not rely on every resident knowing, prior to an emergency, in which evacuation zone he/she lives or to what location he/she should report. In accordance with planning standard II.E. and the relevant criteria, Sections 2.0 - 3.7 of the CPSES Emergency Plan and Sections I and VI (as well as attachments F, G, H, L, O and P) of the local governments' Manual of Emergency Procedures address the system for disseminating information to the public in the event of an emergency. These documents provide instructions on the information required to be contained in EBS messages, including clear descriptions of affected evacuation zones, evacuation routes, reporting locations, special instructions, etc. Thus, EBS messages will provide instructions to the residents, even if they have not informed themselves on the basis of previously available documents.

Accordingly, TU Electric has concluded that actions have been taken to assure that the public has been and will be informed of actions to take in the event of an emergency.

Sirens

CFUR Concerns

CFUR states that 34 out of 70 residents who responded said that they could not hear the sirens (Letter, p. 3).

Applicable NRC-FEMA Guidance

Under planning standard II.E., Criterion 5 states that each organization is to establish the means for notifying and providing prompt instructions to the public within the plume exposure EPZ. Specific criteria applicable to sirens used as part of a prompt Alert and Notification System are contained in Appendix 3 of NUREG-0654. In "Standard Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants," FEMA-43/September 1983, FEMA specified the performance level (at least 10 decibels above ambient sound level) and testing frequency required to satisfy these criteria. FEMA-43 was superseded by FEMA-REP-10, November 1985. FEMA-REP-10 clarified some requirements but maintained the 10 decibel sound level.

TU Electric Response

The CPSES Alert System consists of sixty-six (66) Federal Thunderbeam Model RSH10A-240 sirens rated at 128 dBC by the manufacturer. The activation consoles are located in the Sheriff's office (County Warning Point) of both Somervell and Hood County. The dual consoles, one in each county, provide back-up to each other. The Notification System provided to the counties is a closed circuit telephone system which allows direct contact with radio station WBAP (the EBS), with each other, CPSES, and the Texas Department of Public Safety. This allows immediate coordination of information prior to broadcast at the EBS.

The CPSES Alert and Notification System was designed in accordance with the standards of FEMA-43/September 1983 and Civil Protection Guide (CPG) 1-14, November 1981, and CPG 1-17, March 1980. In 1984, the system, which at that time consisted of 65 sirens was tested in coordination with the State of Texas; with the results exceeding the guidance in FEMA-43. On March 27, 1985, the FEMA test was conducted. FEMA performed a telephone survey, and the system was certified as adequate and a notice was published in the Federal Register (50 F.R. 30011, July 23, 1985). Operability tests required by FEMA are conducted each month and have exceeded FEMA requirements. In 1986, an additional siren was added within the city limits of Glen Rose, Texas, to reinforce the sound level during the spring when foliage is heavy along the Paluxy River, and one siren was shifted to improve coverage within the town of Tolar.

Accordingly, TU Electric concludes that appropriate actions have been taken to assure prompt notification of the public in the event of an emergency.

Evacuation of School Children

CFUR Concern

CFUR states that of the 44 respondents who had children, 10 said that they would not allow the schools to be responsible for the evacuation of their children (Letter, p. 3). CFUR expresses the concern that this small percentage "could create chaos at the schools and disrupt and delay the safe evacuation of the children" (Letter, p. 5).

Applicable NRC-FEMA Guidance

Planning standard II.J. provides that a range of protective actions, including evacuation, be developed for the plume exposure EPZ for the public, including schools. Under Criterion 9, each State and local organization establishes a capability for implementing protective measures based upon protective action guides and other criteria. Under Criterion 10, the organization's plans to implement protective measures for the EPZ includes consideration of projected traffic capacities of evacuation routes and control of access to evacuated areas.

TU Electric Response

The plume exposure EPZ of CPSES includes three independent school districts: Glen Rose, Granbury, and Tolar, with a total student population of approximately 6750. Each school has an emergency plan which covers any type of emergency. Assignments are made for security, traffic control, transportation, accountability, etc. The school staff has been trained in requirements applicable to CPSES emergencies. Buses are provided information packages for student accountability, maps showing routes to relocation centers, etc. At present, one district has radios in all buses. Another has a contract with a radio company and installation should be completed in the near future. The third district is obtaining an FCC license and expects to install its radios during the summer of 1990.

Instructions in local emergency plans provide for early or precautionary evacuation of the schools. The EBS messages provide for instructions to parents as to where to meet their children. This may occur prior to any other announcement being made to the public. Children are evacuated to other schools near the relocation centers, thus providing for a duplication of teachers for control and a student-helping-student situation. Letters of agreement are provided from these schools to the Counties within the plume EPZ.

If parents arrived at a school prior to their children having been evacuated, they would be allowed to take their children, as normally occurs on a daily basis. The traffic plans anticipate that some parents will drive to the schools and provide for control of this type of traffic, which will not create any undue problems.

Accordingly, TU Electric concludes that plans are in place to assure the timely evacuation of children from the local schools in the event of an emergency.

Relocation of Residents

CFUR Concern

CFUR states that 42 out of 79 residents who responded said they would have no place to go if they were told at an "evacuation center" that they could not return home (Letter, p. 3). CFUR expresses a particular concern because many of the residents are older, retired persons, who live alone (Letter, p. 4).

Applicable NRC-FEMA Guidance

Under planning standard II.J., Criterion 10 provides that the plans of State and local organizations include relocation centers in host areas beyond the boundaries of the plume exposure EPZ and means for registering and monitoring of evacuees at relocation centers.

TU Electric Response

Two relocation centers have been established: one operated by the City of Cleburne and one by the City of Stephenville. The publications described above inform residents in the plume exposure EPZ that the relocation centers will provide them with a place to stay if they have nowhere to go after evacuation. Each relocation center has a published plan which provides for care of any person reporting to that center. Hospitals located in each city have plans and are trained to attend to any patient, including any contaminated evacuee. The relocation centers will issue pre-printed vouchers to evacuees, which will be accepted by hotels and motels for lodging, as well as retail stores and food establishments. All persons are instructed to go to the relocation center where they may be monitored if there has been a release at the plant and registration can be completed. Names and other vital information, including their location and a telephone number if available, are recorded in order to allow for quick reference in order to locate an individual or a family and for accountability.

State and local plans also provide for long-term relocation during a recovery period if returning to an area is prohibited.

Accordingly, appropriate plans have been made for the care of all evacuees in the event of an emergency and no additional actions are required.

Nursing Homes

CFUR Concern

CFUR states that there are a number of nursing homes in the area and that "a large nursing home, retirement development is in the planning stage" (Letter, pp. 4-5). Apparently, CFUR may be concerned that these were overlooked in the emergency planning.

Applicable NRC-FEMA Guidance

Under planning standard II.J., Criterion 10 provides that the plans for State and local organizations include means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.

TU Electric Response

Under applicable State and local emergency plans, nursing homes within the plume exposure EPZ have been identified, and the potential needs for specialized transportation have been taken into account in arranging for necessary resources. In the event of an emergency, the plans provide for contacting nursing homes and providing specific transportation, etc., as required. The actual relocation of nursing home occupants and hospital patients will be determined on the basis of recommendations of staff attendants and medical sources.

Accordingly, nursing homes have not been ignored and are covered by appropriate plans. Any new nursing homes or any new retirement centers having transportation dependent residents in the area will be added to the plans.

Added Summer Population

CFUR Concern

CFUR states that there are dozens of summer camps in the region surrounding the plant which house children from churches in Fort Worth, Dallas, and surrounding communities (Letter, p. 5). CFUR expresses the concern that this added summer population "has not been taken into consideration by a carefully worked out evacuation plan." The basis for the concern appears to be that churches in Fort Worth-Dallas have not been brought into the evacuation planning and that the camp staffs are only in the areas during the summer and have no access to any information.

Applicable NRC-FEMA Guidance

As noted in the discussion of nursing homes above, planning standard II.J, Criterion 10 states that plans for State and local organizations include means for protecting persons whose mobility may be impaired or need other special considerations.

TU Electric Response

Within the CPSES plume exposure EPZ, there are presently forty-three (43) special facilities, including five (5) church and scout camps; and a number of day care centers, fishing camps, half-way houses, parks, nursing homes, etc.

Each of these facilities is individually identified in the applicable emergency plan, with its average occupancy by season (winter, spring, summer and fall). Its potential transportation needs have been taken into account in the planning of resources. Each facility has furnished the local government a telephone number for special notification and coordination.

Each facility, including church and scout camps, has been provided with an emergency information poster which identifies the emergency zone in which it is located, the evacuation route, and the telephone number to call if it needs special assistance. In addition, each facility has been visited by a member of the emergency plan staff, was advised on what its plan should include for emergencies, and was offered further assistance, if desired. A limited number of requests for further assistance or information were received, and TU Electric's Emergency Planners are working with these locations at present. Contact with special facilities is a continuing planning process, which adds and subtracts facilities from the list and updates seasonal occupancy figures.

Accordingly, additional summer population has been taken into account in CPSES emergency planning. Although sponsoring churches for summer camps are not necessarily involved in emergency planning, contacts are made directly with the camps, and appropriate information is provided.

Community Education and Involvement

CFUR Concern

CFUR states that the survey "underscores the need for a much greater degree of community education and involvement than has occurred to date" (Letter, p. 5). It suggests that schools should hold parent-teacher meetings with TU Electric personnel, NRC staffers, and county and State officials; and that questions need to be answered about different kinds of accidents, the levels of severity and the importance of adhering to a well understood, disciplined evacuation procedure. CFUR expresses the concern that the survey indicates that residents are not aware of what they are to do and that this "could skew a safe evacuation" (Letter, p. 6).

Applicable NRC-FEMA Guidance

As noted above, planning standard II.G. states that information is to be made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency. Criterion 1 states that such information shall include educational information on radiation, protective measures, and contacts for additional information.

TU Electric Response

The previously discussed publication mailed annually to all residents contains educational information on radiation, protective measures and contacts for additional information. In addition, the information published in the telephone books and all of the posters identifies contacts for additional information.

TU Electric's efforts are not limited to the dissemination of written information. TU Electric has made personnel available to visit with or speak to groups on CPSES, including its emergency plans; TU Electric personnel do so on almost a daily basis. TU Electric employees are members of numerous civic groups and are available to explain or provide information about plant operation, as well as emergency information. TU Electric emergency planning personnel work within the local communities and also provide information to the residents.

TU Electric would be pleased to expand its current public information efforts by providing speakers for meetings with any interested groups, e.g., churches, additional parent-teachers groups, etc. Some of the radio announcements that will be made concerning the CPSES emergency plan will encourage any interested organization to contact TU Electric to have a speaker attend one of its meetings or to obtain additional information it would find helpful. Similar announcements will be included in the "Neighbor-to-Neighbor" publication.

In addition, TU Electric has recently opened a community office in Glen Rose, Texas and will be opening one in Granbury, Texas (approximately July 15, 1990). The Glen Rose office is currently open 3 days a week. The Granbury office will be open 5 days a week. These offices will be used to coordinate the dissemination of information about CPSES operations and TU Electric.

It should be noted, however, that the advance public information program can only provide the residents with general information about what to do in the event of an emergency. The additional information that will be provided if an emergency were to occur, together with other actions taken by TU Electric and State and local organizations, provide additional assurance that appropriate protective measures will be taken. The overall emergency plans applicable to CPSES, which have been reviewed and accepted by NRC and FEMA and which have been demonstrated to be effective in periodic exercises, assure that the public will be protected.