

TNO-84720

TEXAS UTILITIES GENERATING COMPANY

P. O. BOX 2300 • GLEN ROSE, TEXAS 76043

May 3, 1984

J. C. KUYKENDALL
MANAGER NUCLEAR OPERATIONS

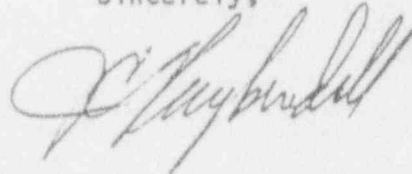
Mr. J. L. Montgomery
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Subject: Scheduled Completion Dates for Emergency Preparedness NRC
Appraisal, Appendix B Items

Dear Mr. Montgomery:

Attached is a current status list (May 3, 1984) of Emergency Preparedness
NRC Appraisal Appendix B Items. If you have any questions or require
additional information, please contact Mr. Jay Laughlin at (817) 897-4856,
extension 3756.

Sincerely,



JCK;jg

Attachment

bcc: Messrs. B. R. Clements
T. L. Gosdin
G. J. Laughlin
E. Johnson
ARMS (w/o attach)

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EMERGENCY PREPAREDNESS NRC APPRAISAL APPENDIX B ITEMS

<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-1	Designate a single individual within the Texas Utilities Generating Company organization as the emergency planning coordinator with direct working level responsibility for, and authority over, all aspects of the development and maintenance of the emergency preparedness program. (455/8333-02; 446/8317-02)	Complete	
B-2	Develop and implement specific functional responsibilities and authorities for the various emergency preparedness planning and coordination functions. (455/8333-03; 446/8317-03)	CJP	6/29/84
B-3	Develop and implement a training program which ensures that emergency planning staff maintains a state-of-the-art knowledge in their field. (455/8333-04; 446/8317-04)	CJP	9/28/84
B-4	Evaluate the relationship of the emergency planning coordinator position to other members of the applicant's normal organization structure to ensure that emergency preparedness continues to receive adequate attention by plant management to maintain an effective and adequate emergency preparedness program. (445/8333-05; 446/8317-05)	Complete	
B-5	Develop and implement formalized methods to assure continued close coordination among the various site organizational elements with respect to emergency response planning. (445/8333-07; 446/8317-07)	Complete	
B-6	Develop and implement a policy which provides substantive input from plant staff, down to the working level, to improve emergency preparedness plans and procedures. (445/8333-07; 446/8317-07)	Complete	
B-7	Develop and implement selection and qualification criteria for individual's performing emergency preparedness activities. (445/8333-07; 446/8317-07)	CJP	6/19/84
B-8	Correct the emergency plan and emergency plan procedures by unambiguously defining the authorities of all individuals assigned to the onsite emergency organization and recovery organization. (445/8333-10; 446/8317-10)	Complete	
B-9	Provide documentation that formal assignments of all persons assigned to the onsite emergency organization and recovery organization have been made. (445/8333-11; 446/8317-11)	Complete	

EMERGENCY PREPAREDNESS NRC APPRAISAL APPENDIX B ITEMS

<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-10	Develop and implement selection and qualification criteria for individuals assigned to perform emergency actions and decisions making as members of the onsite emergency organization and recovery organization. (445/8333-12; 446/8317-12)	CJP	7/31/84
B-11	Decontamination and related health physics procedures should be included in the emergency preparedness training program and described in the training manual. (445/8333-13; 446/8317-13)	RAB/CLT	6/29/84
B-12	Walk-through training should be described in the training manual for each applicable module. (445/8333-14; 446/8317-14) COMMENT: The mini drill program provides walkthrough training. This is considered adequate.	Not Required	
B-13	Pursuant to 10 CFR 50.47(b)(15) and 10 CFR 50, Appendix E, paragraph IV.F, training in handling a radiation accident patient should be provided to appropriate offsite medical personnel and the training should be described in a training module for offsite agency support personnel. (445/8333-15; 446/8317-15)	Complete	
B-14	Training for offsite fire department, medical and ambulance personnel should be completed. (445/8333-16; 446/8317-16)	GLB	10/31/84
B-15	Training records should be placed on a computer storage and retrieval system. (445/8333-17; 446/8317-17)	CLT	8/31/84
B-16	Provide more than one copy of the emergency plan and the emergency plan procedures in the control room area so that all operators having access requirements may easily accomplish their tasks. (445/8333-20; 446/8317-20)	Complete	
B-17	Include descriptive material about the functional relationship and capability of the control room in the emergency organization in Section 6.0 of the emergency plan. (445/8333-21; 446/8317-21)	Complete	

EMERGENCY PREPAREDNESS NRC APPRAISAL APPENDIX B ITEMS

<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-18	Train persons in addition to the shift technical advisor to perform dose assessment calculations to enhance the capability of the interim emergency organization to evaluate plant transient analysis and perform accident mitigation and other matters related to operational safety. (445/8333-22; 446/8317-22)	GJI	3/29/85
B-19	Complete installation, testing and make fully operational the portable radio communications between the control room and roving operators for use during normal and emergency operations in accordance with the provisions of Section 4.0 of the emergency plan. (445/8333-23; 446/8317-23)	DEM	6/28/85
B-20	Modify the emergency plan descriptive literature and Figure 4.1 of the emergency plan to reflect portable radio communications to in-plant operators from the control room. (445/8333-24; 446/8317-24)	GLB	6/28/85
B-A-21	Radiation monitoring systems and the safety parameter display system that are used for emergency detection, classification, and assessment must be fully installed, tested and made operational in the control room. (445/8333-25; 446/8317-25)	CJP	6/29/84
B-A-22	Control room data collection and evaluation systems (RM-21) that are used in accident assessment and generation of protective action recommendations must be fully installed, tested and made operational. (445/8333-26; 446/8317-26)	CJP	6/29/84
B-A-23	Emergency notification systems must be fully installed, tested and made operational. (445/8333-27; 446/8317-27)	Complete	
B-24	Provide an inventory control check for the technical support center telephones when in storage to assure sufficient phones are available. (445/8333-33; 446/8317-33)	Complete	
B-25	Upon receipt from the vendor, place the radio monitor headset and the copy machine in the technical support center. (445/8333-34; 446/8317-34)	Complete	
B-26	Label the 10-mile radius emergency planning zone map with compass rose directions. (445/8333-35; 446/8317-35)	Complete	

EMERGENCY PREPAREDNESS NRC APPRAISAL APPENDIX B ITEMS

Item No.	Item Summary	Responsibility	Scheduled Comp. Date
B-27	Evaluate the methods used for obtaining operating parameter information in the technical support center to better utilize key staff personnel for corrective action decision-making and recommendations. (445/8333-36; 446/8317-36)	GJL	10/31/84
B-28	Provide an inventory check for the operations support center annex telephones while in storage to assure that a sufficient number are available. (445/8333-37; 446/8317-37)	Complete	
B-29	The particulate and charcoal cartridge quick disconnect holders used in collecting containment air post-accident samples were too long to be placed in the designated transfer casks and be covered with the shielded lid. The cask should be redesigned or a sample procedure change implemented to correct the problem. (445/8333-41; 446/8317-41)	RAB	7/31/84
B-30	A procedure for preparing high-level samples in the hot laboratory to prevent the spread of contamination prior to forwarding the samples to the counting room should be included in Chemistry Laboratory Instruction Procedure CLI-900, "Sampling, Handling, Preparation and Analysis of Post-Accident or Highly Radioactive Samples." (445/8333-42; 446/8317-42)	RAB	7/31/84
B-31	Provide an improved technique for collecting high-level small volume grab samples from the liquid effluent waste process sampling station. (445/8333-44; 446/8317-44)	DEM	8/31/84
B-32	Sample collection and analysis of a high-level liquid effluent waste sample in a 3-hour period should be confirmed during an exercise or drill. (445/8333-45; 446/8317-45)	GJL	7/31/84
B-33	Demonstrate in a drill or exercise that the assembly area for the Unit 2 the Unit 2 construction workers is adequate. (445/8333-46; 446/8317-46)	Complete	
B-34	Upon completion of the health physics control point first-aid station, equip the facility with communications, a radiation contamination monitor, and appropriate implementing procedures. (445/8333-47; 446/8317-47)	Complete	
B-35	The emergency operations facility medical facility should be equipped with communications. (445/8333-38; 8317-48)	Complete	

EMERGENCY PREPAREDNESS NRC APPRAISAL APPENDIX B ITEMS

Item No.	Item Summary	Responsibility	Scheduled Comp. Date
B-36	A statement on the use of potassium iodide should be obtained from the company physician. (445/8333-49; 446/8317-49)	Complete	
B-37	Make provisions for additional telephone service for news media representatives at the nuclear operations support facility. (445/8333-51; 446/8317-51) COMMENT: Currently there are 22 telephones available for news media personnel. Most all news personnel from the surrounding area will have mobile 2-way radios in their vehicles. Provisions are in place for an Alternate News Center in Cleburne.	Not Required	
B-38	Make provisions for an alternate news center large enough to accommodate the expected number of media representatives for a major incident at Comanche Peak Steam Electric Station. (445/8333-52; 446/8317-52)	TLG	9/28/84
B-39	Provide a public address system for use in the cafeteria when needed for emergency functions. (445/8333-53; 446/8317-53)	Complete	
B-40	Emergency equipment storage facilities should be clearly labeled on the exterior as to their contents and function as emergency equipment storage facilities. (445/8333-54; 446/8317-54)	Complete	
B-41	Emergency plan procedures should require the prompt replacement of spare air bottles when used. (445/8333-55; 446-8317-55)	Complete	
B-42	The inventory discrepancy for the number of high range dosimeters in the operations support center should be corrected. (445/8333-56; 446/8317-56)	Complete	
B-43	Upon delivery from the vendor, the iodine monitors should be placed in the appropriate emergency response facility. (445/8333-57; 446/8317-56)	RAB	7/31/84
B-44	Provide appropriate instructions for the proper storage and charging of the portable FM radios. (445/8333-58; 446/8317-58)	Complete	
B-45	Include spare batteries as part of the required inventory for the field team survey kits. (445/8333-59; 446/8317-59)	Complete	

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<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-46	When the area radiation monitors and process radiation monitors become operational, a review of the adequacy of the monitor readouts on the control display console and the input to the RM-21 (dose assessment computer) should be initiated. (445/8333-61; 446/8317-61)	CJP	10/31/84
B-47	When instrument and calibration procedures (4000-7000 series) are completed, confirm that the procedures adequately cover the operation and calibration requirements of the area radiation monitors and process radiation monitors. (445/8333-62; 446/8317-62)	RAB	10/31/84
B-48	Containment high-range radiation monitors, as positioned, could cause an individual geometry variance (i.e., 2π or 4π geometry) which should be considered if the monitors were to be used to provide a reasonable assessment of area radiation conditions inside containment. (445/8333-63; 446/8317-63)	GJL	10/31/84
B-49	When the seismic monitoring system is turned over to the applicant, operational checks of the system should be initiated and appropriate personnel should be trained on its operation, analysis and distribution of data. (445/8333-64; 446/8317-64)	CJP/CLT	10/31/84
B-50	Provide a real-time comparison of 10 meters data from the backup tower with similar data from the primary tower. This comparison should cover a representative sample of meteorological conditions. The results of this comparison should be used to establish uncertainties in the use of backup data and to expand consideration of protective measures to compensate for these uncertainties. (445/8333-70; 446/8317-70)	CJP	6/28/85
B-51	Expand the concept of "affected downwind sectors" to include the $22\frac{1}{2}^\circ$ sector adjacent to the identified downwind sector when using primary data and consider further expansion (at least one additional sector on either side) when using backup or offsite data. (445/8333-71; 446/8317-71)	GWS	7/31/84
B-52	Improve the display of wind speed and direction information in the control room to facilitate the determination of 15-minute average conditions from strip charts. (445/8333-72; 446-8317-72)	Complete	
B-53	Provide readouts of meteorological data in the technical support center and nuclear operations support facility which will be available if the proposed computer system is not functional. (445/8333-73; 446/8317-73)	Complete	

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<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-54	Include consideration of real-time precipitation conditions in the dose assessments for radioiodines, and move the primary rain gauge out of the area of tower interference. (445/8333-74; 446/8317-74)	CJP/GLB	1/31/85
B-55	Provide a complete description of the atmospheric dispersion model used for dose assessments. (445/8333-75; 446/8317-75)	GJL/GLB	1/31/85
B-56	Establish a mechanism for incorporating field radiation measurements to improve assessments and projections of atmospheric transport and diffusion. (445/8333-76; 446/8317-76)	GJL	10/31/84
B-57	Give a complete description of the meteorological aspects of the radiation monitoring system as this capability is developed and implemented to ensure that the radiation monitoring system complies with applicable criteria. (445/8333-77; 446/8317-77)	Complete	
B-58	A few self-contained breathing apparatuses should be stored in the technical support center area to protect technical support center personnel entering potentially airborne areas. (445/8333-78; 446/8417-78)	Complete	
B-59	A written agreement for refilling empty self-contained breathing apparatus bottles in the plant vicinity should be completed with an appropriate supplier. (445/8333-79; 446/8317-79)	Not Required	
	COMMENT: TUGCo has a portable compressor and a cascade system and a 100 bottle reserve. This capability is considered adequate.		
B-60	Test the effectiveness of the radiological, fire and evacuation alarms and make modifications to assure that all personnel onsite can be notified of these situations. (445/8333-80; 446/8317-80)	DEM	6/29/84
B-61	Provide at least one additional frequency for the portable radios. Intra-Plant Radio System should have the capability to handle this frequency. (445/8333-81; 446/8317-81)	GLB	12/31/84
B-62	Include the operations support center telephones on the emergency equipment inventory. (445/8333-82; 446/8317-82)	Complete	

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Item No.	Item Summary	Responsibility	Scheduled Comp. Date
B-63	Indicate in the emergency plan procedures what equipment may be needed to perform damage control/corrective actions in the plant and the location where this equipment will be found. (445/8333-83; 446/8317-83) COMMENT: The equipment used by the emergency repair and damage control personnel is the same equipment used routinely by maintenance personnel; therefore, dedicated emergency equipment is not required.	Not Required	
B-64	Revise the emergency plan procedures to show prerequisites, precautions, limitations and checklists to help ensure all steps have been followed. (445/8333-85; 446/8317-85)	Complete	
B-65	The emergency plan procedures should be corrected to show persons, by title, who have the authority, responsibility and qualifications to complete the procedure. (445/8333-86; 446/8317-86) COMMENT: The applicability section of each procedure is considered adequate to satisfy this comment.	Complete	
B-66	Specific guidelines should be developed which are to be used in exercising judgment in implementing specific actions in the emergency plan procedures such as the development of offsite recommendations for protective action guides. (445/8333-87; 446/8317-87)	GWS	6/29/84
B-67	The emergency plan procedures should be revised to give additional guidance in how to perform required tasks and should include checklists, worksheets and data sheets where appropriate. (445/8333-88; 446/8317-88)	Complete	
B-68	The emergency plan and EPP-109 should be revised to include the responsibility of requesting federal assistance as specified with other emergency coordinator responsibilities in NUREG-0654, paragraph C.1.a. (445/8333-91; 446/8317-91)	Complete	
B-69	Paragraphs 4.1.5 and 4.4.3.3.2 in EPP-109 concerning emergency coordinator responsibilities in initiating activation of the emergency operations facility should be revised to make them consistent; i.e., paragraph 4.1.5 excepts the emergency coordinator from responsibility of activating the emergency operations facility. (445/8333-92; 446/8317-92)	GWS	6/29/84

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Item No.	Item Summary	Responsibility	Scheduled Comp. Date
B-70	Revise the emergency plan; Emergency Organization Chart, Figure 1.4; and/or EPP-112, "Duties of Emergency Response Personnel" (paragraphs 4.4.3.3.4 and 4.4.2.3.7) concerning chain of command and reporting responsibilities of the chemistry supervisor and the onsite survey teams director to make the emergency plan and the emergency plan procedure consistent. (445/8333-93; 446/8317-93)	GWS	6/29/84
B-71	Incorporate the contents of Attachments 2, 4 and 5 in EPP-201 into the checklists of EPP-109. (445/8333-94; 446/8317-94)	Complete	
B-72	Reference the use of EPP-304, "Protective Action Guides", where applicable in other emergency plan procedures. (445/8333-95; 446/8317-95)	GWS	6/29/84
B-73	Improve the operator usability of Attachment 1 in EPP-304 by adding compass rose directions and enhancing clarity of the chart. (445/8333-96; 446/8317-96)	Complete	
B-74	Incorporate the provisions of the flow chart for general emergency offsite protective decisions of NUREG-0654, Appendix 1 in EPP-304. (445/8333-97; 446/8317-97)	Complete	
B-75	Prioritize emergency coordinator checklists to ensure that required tasks are accomplished in a timely fashion. (445/8333-98; 446/8317-98)	Complete	
B-76	The applicant should evaluate the emergency plan procedures to determine if and where additional human factors engineering aspects of the procedures would improve their usability during stressful situations associated with emergencies. This evaluation should include consideration of tabbing, color coding, different type styles as well as the length, and layout of material within the procedures. (445/8333-99; 446/8317-99)	GWS	7/31/84
B-77	EPP-203 should be revised to provide a means of verification of initial notification messages in accordance with the guidance of NUREG-0654, paragraph II.E.1. (445/8333-100; 446/8317-100)	Complete	
B-78	Missing telephone numbers in EPP-203 should be added. (445/8333-101; 446/8317-101)	Complete	

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<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-79	The requirement of the Note in paragraph 4.4.2.3. of EPP-203, directing the emergency coordinator to perform certain communications with offsite authorities, should be changed to "as desired by the emergency coordinator." (445/8333-102; 446/8317-102)	Complete	
B-80	The requirement of paragraph 4.4.2.1 of EPP-203, directing plant status updates every 15 minutes to offsite authorities, should be changed to "a reasonable and achievable interval." (445/8333-103; 446/8317-103)	Complete	
B-81	The requirements of paragraphs 4.3.1.1.1, 4.3.2.1.1 and 4.3.3.1.1 of EPP-203 for the shift supervisor to complete the initial notification forms should be changed to reflect that "the shift supervisor is the releasing authority for messages." (445/8333-104; 446/8317-104)	Complete	
B-82	The requirements of paragraphs 4.3.1.1.2, 4.3.2.1.2 and 4.3.3.1.2 of EPP-203 for the shift supervisor to contact offsite authorities should be changed to reflect that "the shift supervisor may delegate communication authority to the control room communicator as desired." (445/8333-105; 446/8317-105)	Complete	
B-83	A procedure or checklist should be developed to guide the user to the appropriate specific emergency plan procedures in the accident assessment scheme. (445/8333-106; 446/8317-106)	Complete	
B-84	Provide a reliable method of determining which is the upstream side of a particulate filter following use by offsite survey teams. (445/8333-107; 446/8317-107)	Complete	
B-85	Provide guidance for defining a plume boundary. (445/8333-108; 446/8317-108)	Complete	
B-86	Provide a reliable method of determining which is the upstream side of a particulate filter following use by onsite survey teams. (445/8333-109; 446/8317-109)	Complete	
B-87	Provide a reliable method of determining which is the upstream side of a particulate filter following use by in-plant survey teams. (445/8333-110; 446/8317-110)	Complete	

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<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-88	Provide a method for labeling syringe type high-level post-accident samples and document the labeling technique in CHM-516 and CHM-517 and in other procedures as appropriate. (445/8333-111; 446/8317-111)	RAB	6/29/84
B-89	Techniques for sampling and collecting high-level liquid and effluent samples should be developed and placed in the appropriate procedure. (445/8333-112; 446/8317-112)	RAB	7/31/84
B-90	Provide equipment, supplies and procedures for the radiation protection of security personnel. (445/8333-113; 446/8317-113)	RAB	7/31/84
B-91	Provide clarification of the valve position (by procedure) to the nuclear operations support facility holding tank. Also provide assurance that, once the waste water is diverted to the tank, the valves are physically controlled (e.g., locks or tags) to prevent tampering. (445/8333-117; 446/8317-117)	GWS	6/29/84
B-92	Provide a method for health physics technicians to read contamination levels directly from a meter. (445/8333-118; 446/8317-118)	RAB	6/29/84
B-93	Section 4.2.4.2 of EPP-307 should reference specific health physics and emergency procedures. (445/8333-119; 446/8317-119)	GWS	7/31/84
B-94	EPP-116 should be referenced in EPP-308 and Section 10.0 of the emergency plan. (445/8333-120; 446/8317-120)	Complete	
B-95	A debriefing statement should be added to EPP-116, "Emergency Repair and Damage Control", paragraph 4.3.1.1, which would clarify paragraph 4.3.1.2 as to where part of the information was obtained for documentation of emergency repair and damage control activities. (445/8333-121; 446/8317-121)	GWS	6/29/84
B-96	Correct Section 4.3.2.7 of EPP-121 to read "normal operation" instead of "the Reentry and Recovery Phase". (445-8333-122; 446/8317-122)	GWS	6/29/84
B-97	Revise EPP-115 to assure that the news media personnel telephone numbers and other pertinent information are provided for the Dallas/Fort Worth metroplex news media and provide the mechanism for internal dissemination of news to the metroplex news media. (445/8333-123; 446/8317-123)	TLG	7/31/84

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<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-98	A formal plan for documenting and evaluating all observer and participant comments should be addressed in EPP-104. (445/8333-124; 446/8317-124)	Complete	
B-99	A formal plan for assigning responsibility for corrective actions, followup and identifying and resolving deficiencies should be addressed in EPP-104. (445/8333-125; 446/8317-125)	Complete	
B-100	EPP-104 should address drills to be conducted on backshifts. (445/8333-126; 446/8317-126)	DEM	6/29/84
B-101	A policy for news media coverage of drills and exercises should be resolved by management and formalized in EPP-104. (445/8333-127; 446/8317-127)	DEM	6/29/84
B-102	A method for documenting the quarterly review of the call lists needed to be incorporated into EPP-203, "Emergency Notification and Communication." (445/8333-128; 446/8317-128)	Complete	
B-103	The applicant should take the necessary steps to ensure that up-to-date controlled copies of appropriate emergency response plans and procedures are provided to those local response organizations and individuals which may need them to adequately and accurately interface with the Comanche Peak Steam Electric Station/Texas Utilities Generating Company organization during an emergency. (445/8333-129; 446/8317-129)	Not Required	
	COMMENT: The NRC, State and County offices shall have controlled copies. All local organizations have their own procedures that describe their response actions. These procedures were coordinated with CPSES procedures.		
B-104	Include in EPP-115, or another appropriate emergency plan procedure, the procedure for and the conduct of an annual news media seminar. (445/8333-131; 446/8317-131)	GWS	6/29/84
B-105	Conduct additional training for control room personnel concerning notification, message preparation, release, communication and practical training with the communication equipment that will be used during an emergency. (445/8333-134; 446/8317-134)	DEM	5/31/84

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<u>Item No.</u>	<u>Item Summary</u>	<u>Responsibility</u>	<u>Scheduled Comp. Date</u>
B-106	Conduct additional training for appropriate offsite authorities to ensure their capability to receive and verify/authenticate notification messages transmitted by Comanche Peak Steam Electric Station. (445/8333-135; 446/8317-135)	DEM	5/31/84
B-107	Conduct additional training for control room personnel concerning their responsibilities of promptly notifying offsite authorities of the "Site Area Emergency" and "General Emergency" classification and methods of accomplishing prompt notification as related to emergency broadcast system. (445/8333-136; 446/8317-136)	DEM	5/31/84