



TU ELECTRIC

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Ref. # 10CFR50.54(q)

February 2, 1995

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Group Vice President, Nuclear

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
TRANSMITTAL OF CPSES EMERGENCY PLAN, REVISION 20

Gentlemen:

In accordance with 10CFR50.54(q), TU Electric herewith submits Revision 20 of the CPSES Emergency Plan (EP). The changes comprising Revision 20 were evaluated and determined to not decrease the effectiveness of the existing plan. The changes were made effective at CPSES on January 6, 1995.

Changes are indicated by a Revision 20 change bar. A detailed description, provided as Attachment 1, discusses individual changes indicated by the change bar. The following is a general summary of the changes included in this revision to the CPSES Emergency Plan:

1. Deletes unnecessary detailed and dated information regarding emergency medical services/medical support. Some descriptive information in Section 1.3 "Emergency Response Support Organization and Resources" is deleted and a replacement reference is given to Section 10.0 "Medical and Public Health Support"; local hospital care facilities and ambulance transport providers are identified by reference to Appendix H "Letters of Agreement"; Radiation Management Consultants Inc. (RMC) is deleted as a specific vendor of medical support and follow-up/extended care.
2. Adds administrative controls related to the Emergency Plan and Emergency Plan Implementing Procedures to Section 14 "Responsibility for Planning Effort"; the controls are being relocated from the CPSES Technical Specifications, Section 6.0 "Administrative Controls". This change simply relocates the subject controls as allowed by NRC Generic Letter 93-07.
3. Revises Section 5.0 "Public Education and Information" regarding annual information/training to be made available to the local news media. This change revises wording to allow greater flexibility on the practices conducted for maintaining media education with respect to nuclear power and declared emergencies at CPSES.

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4. Revises Section 6.13.2 "Emergency Response Facility Computer System" to delete words referring to Emergency Plan Procedures for instructions on system use; adds replacement wording that refers to a User Guide that is available to emergency organization personnel. This change is made for consistency with a previous change (Emergency Plan Revision 16) that retired Emergency Plan Procedure EPP-311 "Assessment of Plant Conditions During Declared Emergencies Using the ERFCS".
5. Replaces Figure 6.7 showing location of the Logistical Support Center (LSC). The LSC was relocated from the CPE Building to the NOSF in order to place it closer to the EOF staff and increase the efficiency of using the available RP technician resources.
6. Revises Section 11.2 "Estimating Total Population Exposure" to clarify discussion regarding methods available for estimating dose to the general population both during and post-accident. Also deletes reference to the Emergency Dose Assessment Model (EDAM) which is no longer in use at CPSES (deleted in Emergency Plan Revision 15).
7. Revises Section 15.0, Appendix A, "CPSES Shift Crew Chart" to delete all information regarding minimum shift crew staffing; a replacement reference is given to corresponding FSAR Section 13.1.2.3 "Shift Crew Composition" and FSAR Table 13.1-2 "Minimum Shift Crew Composition". The FSAR is the principal Licensing Basis Document for maintaining this information.
8. Revises Section 15.0, Appendix K, "List of Emergency Plan Procedures" to correct the title of EPP-303 "Operation of Computer Based, Emergency Dose Assessment System" and delete EPP-906 "Management of Emergency Preparedness Computer System". The title of EPP-303 was inadvertently listed without the word "system"; procedure EPP-906 has been retired as its provisions are covered by STA-170 "Software Quality Assurance for Application Software".
9. Updates Section 15.0, Appendix Q "Acronyms and Definitions" to reflect current emergency preparedness program and station terminology, practices, etc..

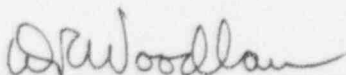
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Enclosed is the following as prescribed in 10CFR50.4(b)(5):

CPSES EMERGENCY PLAN - 1 Original (REVISION 20)

Sincerely,

C. L. Terry

By: 
D. R. Woodlan
Docket Licensing Manager

CLW/grp
Attachment
Enclosure

c - Mr. L. J. Callan, Region IV
Mr. D. D. Chamberlain, Region IV (clo)
Mr. B. Murray, Region IV
Ms. G. Good, Region IV
Resident Inspectors, CPSES (1) (clo)
Mr. T. J. Polich, NRR (clo)

CPSES - EMERGENCY PLAN (EP)
AMENDMENT / REVISION 20
DETAILED DESCRIPTION

EP Page
(as amended)

Group Description

- 1-24 3 Delete discussion in Section 1.3 of ambulance services/medical support but leave reference to Section 10.0, "Medical and Public Health Support".
Revision :
 Information concerning ambulance services/medical support is referenced to and discussed in Emergency Plan Section 10 "Medical and Public Health Support"; Section 10 also references Appendix H "Letters of Agreement and Supporting Emergency Plans".
Change Request Number : EP-94-3.1
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : : No
- 1-27 3 Revise wording describing the support services/assistance available from private organizations.
Revision :
 Support services/assistance are in some cases readily available to TU Electric without being on a contractual basis. Names of example service organizations for contract health physics technicians are deleted as unnecessary information; names of example service organizations for specialized medical treatment are retained but revised to reflect other (closer) resources which are available and may be utilized by TU Electric to provide for any follow-up/extended care of an injured and contaminated individual from CPSES.
Change Request Number : EP-94-3.2
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : : No
- 1-28 3 Delete Section 1.3.4.2, "Radiation Management Consultants" and discussion of contracted support with RMC for medical support services; renumber Section 1.3.4.3 "Institute of Nuclear Power Operations" as new Section 1.3.4.2.
Revision :
 Emergency Plan Sections 1.3, 10.1, 10.2, 10.3 and Appendix H are revised to delete unnecessary detailed description, add references to information described in Sections 10 and Appendix H, and delete Radiation Management Consultants (RMC) as a specific vendor of medical services/medical support and definitive care. Historically, RMC was first contracted by TU Electric during the early

EP Page
(as amended)

Group Description

development of the CPSES Emergency Preparedness Program to provide specialized services and expertise with respect to the transport and treatment of an injured and contaminated person in a local hospital. RMC provided expertise for writing procedures, consulting on needed supplies/handling of an injured and contaminated person, training of local hospital and CPSES staff, emergency drill/exercise scenario development and control, etc.. RMC also provided expertise and facilities for definitive care involving an injured and contaminated individual or individual with extreme radiation overexposure. CPSES now has an experienced Emergency Planning staff that provides the annual training to hospital and CPSES staff, conducts/controls emergency medical drill activities, and inventories emergency medical supplies in the local hospitals. RMC currently only provides a definitive care capability via a "retainer" type service contract. Because TU Electric personnel now conduct the annual hospital training and medical emergency drills, maintain supplies, etc., and because there are other qualified vendors of definitive care closer to the CPSES vicinity, TU Electric has chosen to delete RMC as a specifically listed medical support organization. This deletion allows TU Electric the flexibility to arrange definitive care, if needed, at the time of an event, i.e. "ad hoc". This arrangement may or may not include RMC support depending on the circumstances and availability of other qualified and closer resources. TU Electric has met with DFW area hospitals and has received assurance that medical services similar to RMC capabilities for specialized personnel/treatment would be available to an injured and contaminated individual or individual with extreme radiation overexposure from CPSES.

The CPSES Emergency Plan, as changed, continues to meet the requirements of 10CFR50.47(b)(12) and relevant guidance criteria of NUREG-0654 and the NRC Statement of Policy on Emergency Planning Standard 10CFR50.47(b)(12), i.e., FR 32904 (9/17/86).

Change Request Number : EP-94-3.3
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

5-1

3

Revise Section 5.0 "Public Education and Information" regarding annual information/training made available to the local news media.

Revision :

Change allows greater flexibility on the practices

EP Page
(as amended)

Group Description

conducted for maintaining media education with respect to nuclear power and declared emergencies at CPSES.

Change Request Number : EP-94-5.1
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

6-9

- 3 Revise Section 6.13.2 "Emergency Response Facility Computer System" to delete a reference to Emergency Plan Procedures for instructions on system use; add reference to a User Guide document.

Revision :
This revision corrects the subject reference to be consistent with an earlier change to the CPSES Emergency Plan. Instructions with respect to system use were specified in Emergency Plan Procedures (EPPs); however, the EPP instructions were Unit 1 specific. Following Unit 2 operations and plant computer related design modifications, a new User Guide document providing the subject instructions was developed. Appropriate emergency organization personnel have been trained with this User Guide which is now available to CPSES Emergency Organization personnel in the CPSES emergency response facilities.

Change Request Number : EP-94-6.1
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

Figure 6-7

- 3 Revise Figure 6.7, "Logistical Support Center (LSC)".

Revision :
The LSC was relocated from the Comanche Peak Engineering (CPE) Building to the Nuclear Operations Support Facility (NOSF) in order to place it closer to the EOF staff and available Radiation Protection technician resources. The EOF is located adjacent to the NOSF at CPSES.

Change Request Number : EP-94-7.1
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

10-1

- 3 Revise Section 10 to delete unnecessary detailed information and reference Appendix H.

Revision :
The specific identification of local hospital facilities and ambulance transport providers is deleted from Section 10 and replaced with a reference to Appendix H which identifies these organizations in the letters of support

EP Page
(as amended)

Group Description

agreement. This change maintains the identification of these organizations and reduces administration burden with respect to future Plan maintenance if one or more of the local organizations is changed. For additional justification, see explanation for revised page 1-28.

Change Request Number : EP-94-3.4
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

11-3

3 Revise Section 11.2 "Estimating Total Population Exposure".

Revision :

Section 11.2 was revised to clarify that evaluation of total dose to the general population during recovery operations is determined by methods specified by the State of Texas. Also, reference to the Emergency Dose Assessment Model (EDAM) is deleted as EDAM is no longer in use at CPSES (deleted from the CPSES Emergency Plan in Revision 15).

Change Request Number : EP-94-8.1
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

14-1

3 Revise Section to add administrative controls.

Revision :

NRC Generic Letter 93-07 allows power reactor licensees to relocate administrative controls related to emergency preparedness from the Technical Specifications (TS) to the Emergency Plan (thereafter deleting the controls from the TS after obtaining license amendment approval from NRC). Relocation from TS is allowed because controls are already general requirements of other federal regulations. For this change, existing TS administrative controls are relocated without change to the Emergency Plan.

Change Request Number : EP-94-4.1
Commitment Register Number :
Related SER : SSER : APP G
SER/SSER Impact : No

Append A-

3 See Sheet No(s) :A-2

Delete information in Appendix A "CPSES Shift Crew Chart" and add reference to FSAR.

Revision :

Appendix A information (minimum shift crew staffing) is redundant to similar information maintained current in the CPSES FSAR. A reference to FSAR Section 13.1.2.3 and FSAR Table 13.1-2 "Minimum

EP Page (as amended)	Group Description
Append H-	<p>Shift Crew Composition" is added. Change Request Number : EP-94-9.1 Commitment Register Number : Related SER : SSER : APP G SER/SSER Impact : No</p> <p>3 See Sheet No(s) :H-2,30,31,32 Delete letter of agreement for Radiation Management Consultants (RMC). Revision : See justification for revised page 1-28. Change Request Number : EP-94-3.5 Commitment Register Number : Related SER : SSEF : APP G SER/SSER Impact : No</p>
Append K-	<p>3 See Sheet No(s) :K-3,4 Revise list of Emergency Plan Procedures. Revision : The title of EPP-303 "Operation of Computer Based, Emergency Dose Assessment System" was corrected; EPP-906 "Management of Emergency Preparedness Computer System" was deleted from the list of procedures as EPP-906 was retired. The provisions of EPP-906 were a duplication of the computer software control process described by another station procedure (STA-170 "Software Quality Assurance for Application Software"). EPP-906 did not contain any provisions that are related to implementation of the CFSES Emergency Organization responsibilities/duties. Change Request Number : EP-94-10.1 Commitment Register Number : Related SER : SSER : APP G SER/SSER Impact : No</p>
Append Q-	<p>3 See Sheet No(s) :Q-2,4,5,6,10,15,19,22 Update Appendix Q "Acronyms and Definitions". Update : Appendix updated to reflect current emergency preparedness program and station terminology, practices, etc.. Change Request Number : EP-94-11.1 Commitment Register Number : Related SER : SSER : APP G SER/SSER Impact : No</p>

ENCLOSURE TO TXX-95033

COMANCHE PEAK STEAM ELECTRIC STATION
EMERGENCY PLAN REVISION
INSTRUCTION SHEET

The following instructional information and check list is furnished to help insert Revision 20 into the Comanche Peak Steam Electric Station Emergency Plan (EP).

Discard the old sheets and insert the new sheets, as listed below.

<u>Remove</u>	<u>Insert</u>
Emergency Plan Title Page	Emergency Plan Title Page
1-24 thru 1-29	1-24 thru 1-28
5-1	5-1
6-9 Figure 6.7	6-9 Figure 6.7
10-1 and 10-2	10-1
11-3	11-3
14-1	14-1
<u>TAB A:</u> A-1 thru A-4	<u>TAB A:</u> A-1 and A-2
<u>TAB H:</u> H-2 H-30 H-31 H-32	<u>TAB H:</u> H-2 H-30 H-31 H-32
<u>TAB K:</u> K-3 K-4	<u>TAB K:</u> K-3 K-4

TAB Q:

Q-2
Q-4
Q-5
Q-6
Q-10
Q-15
Q-19
Q-22

EPL-1
thru
EPL-8

TAB Q:

Q-2
Q-4
Q-5
Q-6
Q-10
Q-15
Q-19
Q-22

EPL-1
thru
EPL-8