TU ELECTRIC

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U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
EMERGENCY PREPAREDNESS - CONTROL ROOM PROTECTIVE ACTION RECOMMENDATIONS BASED ON PLANT CONDITIONS

Gentlemen:

TU Electric plans to revise CPSES emergency preparedness practices, procedures and internal commitments to base Protective Actions Recommendations (PARs) made by personnel in the Control Room strictly on plant conditions. Offsite dose assessment in the Control Room will continue to be available through the use of a flow chart (attached) which effectively links specific plant conditions to PARs that would correspondingly result from exceeding computer dose projection action levels. The flow chart is contained in Emergency Plan Procedure EPP-304, "Protective Action Recommendations." This flow chart contains plant conditions such as containment radiation readings, core exit thermocouple readings, reactor vessel level indicating system status and containment pressure. The number values contained in the flow chart are consistent with existing emergency action levels specified in EPP-201, "Assessment of Emergency Action Levels, Emergency Classification and Plan Activation."

The availablility of the flow chart removes the need for on-shift personnel to perform dose projections as part of the Control Room's PAR formulation process. The Emergency Coordinator would make PARs based on plant conditions, predetermined action levels and instrumentation in the Control Room until the Technical Support Center is activated. This change allows on-shift personnel to more effectively concentrate on determining an event's operational significance and mitigating its consequences, thereby increasing public health and safety. The above change continues to meet the requirements of 10CFR50.47(b)(2), (9) and (10), 10CFR50 Appendix E paragraphs II.H, IV.B and IV.E.2, and the provisions of the current CPSES Emergency Plan.

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The advantages of making the above change are as follows:

- Plant condition based PARs can be developed faster than PARs which include dose projection as an integral part of the process. This is especially important in the Control Room during a rapidly escalating event.

- The chance for introducing human error by using dose projection models is eliminated from Control Room PARs.

- The ability to develop PARs before a radioactive release is enhanced.

- Early PARs produce the highest dose savings to the public.

- The use of complex dose projection models would no longer be needed by the on-shift staff.

- Dose projection personnel/expertise will not be needed on-shift around the clock.

The disadvantage of making the change is:

- Plant condition driven PARs may be overly conservative.

TU Electric has evaluated this change in practice, procedures and internal commitments and determined that there is no reduction in the effectiveness of the CPSES Emergency Plan. This proposed change has been discussed with Hood and Somervell county officials and the State of Texas, Bureau of Radiation Control. These local and state officials agree with this change and believe that it is in the best interest of the public. This change is also believed to reflect the views contained within the references in the attachment to this letter.

TU Electric has provided this description of plans to revise CPSES emergency preparedness practices, procedures and internal commitments to the NRC staff because the NRC staff has expressed interest in activities of this nature in the past. TU Electric is requesting no action or response from the NRC. It is TU Electric's intention to make this change effective August 21, 1995.

If there are any questions, please contact Mr. Norman Hood, Emergency Planning Manager, at (817) 897-5889.

Sincerely,

C. L. Terry

C. L. Terry

By: Roger D. Walker

Roger D. Walker
Regulatory Affairs Manager

CLW/grp
Attachment

c - Mr. L. J. Callan, Region IV
Mr. D. F. Kirsch, Region IV
Ms. Gail Good, Region IV
Mr. Blaine Murray, Region IV
Resident Inspectors
Mr. T. J. Polich, NRR
Mr. Arthur Tate, Texas BRC

Related Information and References
Concerning Control Room PARs based on
Plant Conditions vs. Dose Projection

1. EPA 400-R-92-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents"

   This document indicates a preference for PARs based on indicators other than dose projections when it states on pages 1-2 and 1-3 that early in a nuclear incident, "... immediate decisions for effective use of protective actions are required and must therefore usually be based primarily on the status of the nuclear facility (or other incident site) and the prognosis for worsening conditions." Emergency exercises at CPSES have shown that waiting for the availability of dose projections can actually complicate and possibly delay the making of those "immediate decisions" from the Control Room.

   The document adds on page 2-8, "...parameters other than projected dose may frequently provide a more appropriate basis for decisions to implement protective actions."

2. INPO 86-008, "Dose Assessment Manual"

   The document states on page 1 that in the early-response phase of an emergency "...simple, quick assessments are needed to make the best use of the resources available. As additional staff arrives and emergency response facilities are activated, a more detailed assessment is appropriate."

3. Proceedings of ANS Topical Meeting on Radiological Accidents - Perspectives and Emergency Planning, "Protective Action Guides: Rational, Interpretation and Status" (September 1986)

   The document on page 279, Section II.A.2., states "The urgency of implementing early protective actions based on plant conditions instead of dose calculations at the time of the accident is given greater emphasis."

4. NUREG-1471, "Concept of Operations with Organization Charts"

   The document states on page 7 in the Technical Support section "During an accident with the potential for severe offsite consequences, early protective actions are based on actual plant conditions."

5. IE Information Notice No. 83-28, "Criteria for Protective Action Recommendations for General Emergencies"

The document discusses "...predetermined measurable/observable emergency action levels used to assess the status of core and containment conditions on which the licensee will recommend offsite protective actions for consideration by offsite offices."

6. 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"

The document states in planning standard II.B., Onsite Emergency Organization, evaluation Criteria 5, "For emergency situations, specific assignments shall be made for all shifts and for plant staff members, both onsite and away from the site. These assignments shall cover the emergency functions in Table 5-1 entitled 'Minimum Staffing Requirements for Nuclear Power Plant Emergencies.' The minimum on-shift staffing levels shall be as indicated in Table B-1." A review of Table B-1 guidelines for the offsite dose assessment function show that no on-shift staffing is intended. CPSES Emergency Organization staffing for the Technical Support Center (TSC) at the Alert classification (which includes the offsite dose assessment function) is determined to meet the intent of the Table B-1 guidance for function capability additions in approximately 30 minutes. This determination is believed consistent with the NUREG-0654/FEMA-REP-1 (Revision 1) Appendix 1 definition of events that warrant emergency classification of Notification of Unusual Event (NOUE) and Alert. The definition of NOUE states in part, "No releases of radioactive material requiring offsite response or monitoring are expected unless further degradation of safety systems occurs." The definition of Alert states in part "Any releases expected to be limited to small fractions of the EPA Protective Action Guideline exposure levels." Therefore, by definition, and considering over 10 years of industry experience with actual declared emergency events, it is concluded that the availability of on-shift (24 hour) offsite dose projection expertise is not typically essential to nuclear power reactor Control Room PARs for the NOUE and early Alert (pre TSC staffing) periods. In the unlikely case of a fast breaking, more serious event which may involve a significant potential for or actual radioactive release (prior to TSC staffing), then Control Room PARs would be based on the actual plant conditions, predetermined action levels and Control Room instrumentation.

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ATTACHMENT 1
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PROTECTIVE ACTION RECOMMENDATION
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