



Log # TXX-95212  
File # 10013

**TU**ELECTRIC

August 10, 1995

**C. Lance Terry**  
Group Vice President, Nuclear

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

REF: TU Electric letter logged TXX-95164 from C. L. Terry  
to NRC dated June 27, 1995

Dear Sirs:

A phone conversation was held on August 3, 1995, with NRC staff personnel from NRR, AEOD, Region II and Region IV to discuss TU Electric's letter referenced above. The letter described a proposed change to the emergency preparedness program at Comanche Peak Steam Electric Station (CPSES). The change involved the replacement of a detailed post accident dose assessment calculation (using a computer program) in the control room with a dose assessment based on a flow chart. The flow chart was based on an evaluation performed by TU Electric which determined the appropriate Protective Action Recommendations (PARs) based on plant conditions. The application of this flow chart was intended to become the control room's dose assessment capability until the computer program capability in the TSC became staffed and available.

During the conversation, the NRC staff expressed concerns about whether or not the application of the flow chart constituted a dose assessment and whether or not it was in compliance with the regulations. The staff explained that it is acceptable, and in many cases the best course of action, to determine PARs based on plant conditions; however, the staff stated that a dose projection should be performed as soon as possible. It may well be that in some scenarios, the individual in charge may determine that a dose projection should not be performed immediately because higher priority activity requires the attention of the available on shift personnel; and even though there is no required time limit on the performance of the dose projection by the control room, it should be performed as soon as possible based on the decisions of the individual in charge and the specifics of the event. The NRC staff stated that the control room dose projection should be based on real time meteorological and release data.

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Based on these discussions, TU Electric remains convinced that the flow chart is both the best method and also compliant with the regulations; however, TU Electric has chosen to adopt the direction provided by the NRC staff. The capability to perform a dose projection using real time meteorological and release data in the control room will be retained. Selected on-shift personnel will continue to be trained to perform these calculations. The procedure will remain as written to direct that the PAR flow chart be used for initial PARs if the dose projection is not available, and procedure(s), practice(s) and/or training will reflect that the dose projection be performed as soon as possible based on the priority of required actions by the personnel available.

Sincerely,

*C. L. Terry*

C. L. Terry

By: *Roger D. Walker*

Roger D. Walker

Regulatory Affairs Manager

CLW/grp

cc: Mr. L. J. Callan, Region IV  
Mr. D. F. Kirsch, Region IV  
Ms. G. M. Good, Region IV  
Mr. T. J. Polich, NRR  
Resident Inspectors