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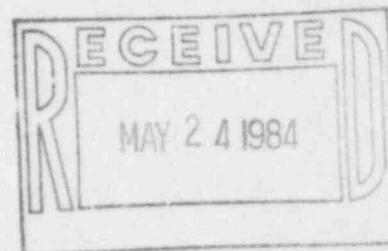
May 23, 1984

*ROTH S. LEDDICK*  
*Senior Vice President*  
*Nuclear Operations*

W3F84-0067  
3-A45  
3-A1.01.04

Mr. E.H. Johnson  
Chief, Reactor Project Branch 1  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

SUBJECT: Louisiana Power & Light Company  
Waterford 3 SES  
Docket No. 50-382  
Response to Emergency Preparedness  
Inspection Report 50-382/84-10



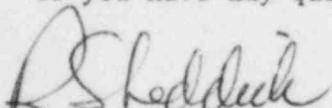
REFERENCE: Louisiana Power & Light Company Letter W3P84-0863 of April 9,  
1984 to J.T. Collins from K.W. Cook

Dear Mr. Johnson:

This letter and its attachment provide Louisiana Power & Light Company's  
response to your letter of April 5, 1984.

Our responses to each item identified in your letter are contained in  
Attachment A of this letter.

If you have any questions, please advise.

  
R.S. Leddick

RSL/JJL/mlm

Attachment

cc with attachment: W.M. Stevenson, E. Blake, B. Churchill, J. Collins,  
L. Constable

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## ATTACHMENT A

1. Control Room

- a. Open Item (382/8410-01): The use of the station alarm should precede the making of announcements for the declaration of each emergency classification. This was not done prior to the announcement of the Site Area Emergency or the General Emergency.

LP&L Response: The implementing instructions providing guidance to the Emergency Coordinator for each emergency classification (EP-1-010, EP-1-020, EP-1-030 and EP-1-040) have been revised to reflect sounding the station alarm prior to the making of these announcements. This revision was completed on April 4, 1984.

- b. Open Item (382/8410-02): The volume of the site announcing system in the control room was too low and should be increased. Several control room personnel were not aware of the declaration of the Site Area Emergency upon being announced from the TSC. Attempts to increase the volume during the exercise were not successful.

LP&L Response: The site announcing system in the control room has been repaired and functions properly.

- c. Open Item (382/8410-03): Controlled copies of emergency procedures should be used by control room personnel in response to facility emergencies. The NRC inspector observed a copy of a superseded nomogram being used for preliminary dose assessment which had been issued to the individual during previous training sessions.

LP&L Response: Response personnel are required to follow controlled procedures. This item will be emphasized in future training drills.

- d. Open Item (382/8410-04): Facility procedures should be revised to clarify the condition of the answer machine tapes upon escalation to higher emergency classifications. The answer machine tape for an Alert was still providing plant status when called even though the emergency had been escalated to a Site Area Emergency and then a General Emergency.

LP&L Response: EP-1-010, EP-1-020, EP-1-030, EP-1-040, and EP-2-010 will be revised to clarify the condition of the answer machine tapes upon escalation to higher emergency classifications. These revisions will be completed by September 1, 1984.

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- e. Open Item (382/8410-05): Methods for providing the control room personnel with the overall status of the actions being taken in response to the emergency by the onsite emergency response organization and offsite agencies should be improved. Discussions with control room personnel revealed very little knowledge as to the recommendations made to offsite agencies and their respective responses during the Site Area Emergency and the General Emergency classifications.

LP&L Response: Methods for providing the control room personnel with the overall status of the action being taken in response to the emergency will be improved through emphasis on this item in future training drills.

2. Technical Support Center

- a. Open Item (382/8410-06): The EC should periodically update his diverse "team" which is somewhat spread out in a disjointed TSC and the control room. To ensure all team members are current on the status of the plant and emergency conditions, the periodic status report on the plant paging system may be effective.

LP&L Response: This item will be emphasized in future training drills to ensure team members are kept current on the status of the plant and emergency conditions including use of the plant paging system for periodic status reports.

- b. Open Item (382/8410-07): Establish the procedure for the announcing station to parallel all paging system announcements on the sound powered phone circuit.

LP&L Response: EP-2-100 will be revised to provide parallel announcements on the sound powered phone circuit of paging system announcements. This revision will be completed by September 1, 1984.

- c. Open Item (382/8410-08): Research and familiarize the TSC technical staff on the relationships between core damage, anticipated coolant activity, and other useful parameters such as containment radiation levels and purge exhaust activity levels.

LP&L Response: Further familiarization and training for the TSC technical assessment staff in this area will be provided using small-group table-top sessions and training drills.

- d. Open Item (382/8410-09): More definite guidance should be promulgated stressing when to use the plant alarms (plant emergency, fire). On plant emergency condition escalation/deescalations there appeared to be some confusion.

LP&L Response: EP-1-010, EP-1-020, EP-1-030, and EP-1-040 have been revised to provide more definite guidance on when to use the station alarm for plant emergency conditions. These revisions were completed on April 4, 1984.

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- e. Open Item (382/8410-10): Conduct intensive training on technical engineering and health physics related postulated scenarios to task the engineering staff with an eye toward their ability to anticipate the technical needs and requests from the EC.

LP&L Response: Further familiarization and training for the TSC technical assessment staff in this area will be provided using small-group table-top sessions and training drills.

3. Emergency Operations Facility

- a. Open Item (382/8410-11): Ensure all near-site and appropriate onsite emergency organization personnel are entered on the EOF access list.

LP&L Response: The EOF access list will be revised as appropriate by July 1, 1984.

- b. Open Item (382/8410-12): Include the EOF director and alternates on the list of individuals who have the authority to grant access to the EOF.

LP&L Response: The list of individuals who have authority to grant access to the EOF will be revised to include the EOF directors by July 1, 1984.

- c. Open Item (382/8410-13): In the training of the EOF technical support staff, emphasis should be placed on providing an active, rather than passive, support role.

LP&L Response: This will be emphasized in future table-top sessions and training drills for the EOF technical support staff.

- d. Open Item (382/8410-14): Establish and implement a method to immediately apprise the EOF director of any marked change in trend data.

LP&L Response: The method exists to immediately apprise the EOF director of any marked change in trend data through the Operations/ Engineering Coordinator who reports directly to the EOF Director and keeps him informed of plant status. The immediate notification of trend data changes will be emphasized in future training drills.

- e. Open Item (382/8410-15): Provide additional training for dose assessment and TSC personnel on protective action recommendations based on core/containment conditions, as well as offsite dose projections.

LP&L Response: Training on protective action recommendations based on core/containment conditions is included in existing emergency plan training courses. This item will be emphasized further in future training drills.

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- f. Open Item (382/8410-16): The emergency coordinator and the TSC staff should have an input on the protective action recommendations based on their evaluation of plant operational status.

LP&L Response: This item will be included in future training drills for input on protective action recommendations based on TSC evaluation to be provided from the TSC to the EOF when appropriate. EP-2-100 and EP-2-102 will be revised to reflect this. These revisions will be completed by September 1, 1984.

- g. Open Item (382/8410-17): During the training of dose assessment personnel, emphasis should be placed on estimating potential source terms and radiological hazards.

LP&L Response: Estimating potential source terms and radiological hazards will be emphasized in future training drills.

- h. Open Item (382/8410-18): During the training for personnel who are assigned to the EOF, emphasis should be placed upon frequent checking of self-reading dosimeters during emergency conditions.

LP&L Response: The checking of self-reading dosimeters is covered in the General Employee Training (GET) 2 course. This will also be emphasized in future training drills.

- i. Open Item (382/8410-19): Whenever the potential exists for increase in radiation/contamination levels (e.g., when a wind shift occurs), a general announcement should be made in the EOF.

LP&L Response: EP-2-102 will be revised to reflect the making of a general announcement in the EOF when the potential exists for increase in radiation/contamination levels. This revision will be completed by September 1, 1984.

- j. Open Item (382/8410-20): Update the emergency plan and procedures so as to be consistent with the actual interim EOF layout.

LP&L Response: The emergency plan and procedures have been updated to reflect the actual interim EOF layout. This was completed on May 7, 1984.

- k. Open Item (382/8410-21): Provide adequate space for operations/engineering/technical services staff.

LP&L Response: Office space in addition to that designated for technical assessment is available for use by operations/engineering/technical services staff, as necessary. Adequate space is provided for this function.



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1. Open Item (382/8410-22): For general emergencies, establish and maintain protective action recommendations based on core/containment conditions, irrespective of the availability of offsite dose projections.

LP&L Response: Protective action recommendations for general emergencies irrespective of the availability of offsite dose projections are established in EP-2-052. This will also be emphasized in future training drills.

- m. Open Item (382/8410-23): The facility accountability coordinator should be stationed at the entrance/exit to the emergency response facilities (control room, TSC, EOF, OSC, and health physics access control) to maintain accountability according to EP-2-190, Revision 2 (lines 5.3.3 and 5.3.4).

LP&L Response: EP-2-190 has been revised to reflect accountability for each facility at the entrance to the facility. This revision was completed on April 5, 1984.

4. Operational Support Center

- a. Open Item (382/8410-24): Correct the discrepancy between the fire, search, and rescue team assembly point and the assembly point listed in EP-2-101.

LP&L Response: EP-2-101 will be revised to indicate the correct assembly point for the fire and search and rescue teams. This will be completed by September 1, 1984.

- b. Open Item (382/8410-25): Provide assurance that the fire, search, and rescue teams will have health physics coverage at the RAB assembly area.

LP&L Response: Health Physics coverage will be provided at the RAB assembly area for the fire, search and rescue teams to the extent necessary based on plant conditions. As a minimum, initial surveys will be performed. This will be emphasized in future drills.

- c. Open Item (382/8410-26): Provide a drawing of the +7' level of the RAB so that the radiation environment in that area can be tracked in the OSC.

LP&L Response: A drawing of the +7 level of the RAB will be provided in the OSC so that the radiation environment in the area can be tracked. This will be completed by September 1, 1984.

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- d. Open Item (382/8410-27): Instruments and equipment accounted for during a kit inventory should be physically checked off the inventory sheet prior to departing offsite.

LP&L Response: EP-2-060 will be revised to include physically checking off on the inventory sheet instruments and equipment that are accounted for prior to departing offsite. This revision will be completed by September 1, 1984.

- e. Open Item (382/8410-28): Consider moving the security/accountability desk to the entrance of the OSC.

LP&L Response: The security/accountability desk will be moved to the entrance of the OSC. This will be addressed in future training drills.

- f. Open Item (382/8410-29): Consider the possibility of dividing the OSC roster board into craft segments; e.g., electrical, mechanical, etc.

LP&L Response: The OSC roster board will be divided into craft segments. This will be completed by September 1, 1984.

- g. Open Item (382/8410-30): Provide equipment and procedures for determining habitability of the OSC by including air sampling and analysis.

LP&L Response: Equipment and procedures for determining habitability of the OSC (including air sampling and analysis) are provided. OSC habitability surveys will be emphasized in future training drills.

5. Offsite Monitoring

- a. Open Item (382/8410-31): Correct the emergency kit inventories to include the backup hand-held radios.

LP&L Response: The emergency kit inventory in EP-2-060 will be revised to include the backup hand-held radios. This revision will be completed by September 1, 1984.

- b. Open Item (382/8410-32): Provide guidance to the field monitoring teams on when to use protective devices; e.g., protective clothing, respiratory protection, and KI.

LP&L Response: EP-2-060, EP-2-100 and EP-2-102 will be revised to reflect guidance to the field monitoring teams on when to use protective devices. These revisions will be completed by September 1, 1984.

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- c. Open Item (382/8410-33): Provide a means of distinguishing the upstream side of a particulate filter from the other side for analysis purposes.

LP&L Response: EP-2-060 has been revised to provide a means of distinguishing the upstream side of a particulate filter for analysis purposes. This revision was completed on April 4, 1984.

6. Security/Accountability

- a. Open Item (382/8410-34): Perform an unannounced accountability of the protected area personnel and site verification of personnel evacuation of owner-controlled property of Waterford 3 according to the regulations in 10 CFR 50.47(b)(10) and the guidance criteria in NUREG-0654 J.5.

LP&L Response: Performance of a full accountability demonstration is addressed in LP&L letter W3P84-0863. This will be completed prior to exceeding 5% power.

7. News Center

- a. Open Item (382/8410-35): The system of four separate news release points (LP&L, St. John, St. Charles, and Louisiana emergency operations center) may result in the release of conflicting information to the media.

LP&L Response: St. Charles Parish and St. John the Baptist Parish operate under the "Home Rule" provision of Louisiana State Law. This "Home Rule" provision gives the Parishes ultimate authority and responsibility for most activities within the Parish. The Parishes are responsible for emergency response in their Parish. The State of Louisiana becomes involved in supporting the Parishes and coordinating between Parishes only if the emergency affects more than one Parish. St. Charles Parish, St. John the Baptist Parish and the State each respond to frequent and varied emergencies (flooding, tornadoes, hurricanes, toxic chemical releases). Both of the Parishes and the State have established means of public communications during these emergencies. The present arrangement reflects the normal response actions. LP&L, St. Charles Parish, St. John the Baptist Parish, and the State of Louisiana have worked closely to ensure that information releases to the media are coordinated. We will continue to work closely on this matter. We believe this situation is far superior to creating a unique arrangement for one type of emergency (fixed nuclear).



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8. Medical/First-Aid Team

- a. Open Item (382/8410-36): Brief the health physics technician who may accompany the patient to the hospital as to the circumstances surrounding the patient's injury; e.g., how the injury occurred.

LP&L Response: Briefing of the health physics technician accompanying the patient to the hospital will be incorporated in the lesson plan for First-Aid Team personnel. This will be completed by September 1, 1984.