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U. S. Nuclear Regulatory Commission
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Washington, DC 20555

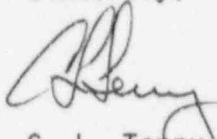
SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/9521; 50-446/9521
RESPONSE TO IDENTIFIED WEAKNESS

Gentlemen:

TU Electric has reviewed the NRC's letter dated November 8, 1995 concerning the inspection conducted by the NRC staff during the period of September 25 through September 29, 1995. Identified in the letter was one Emergency Exercise weakness which required response thereto.

TU Electric hereby responds to the identified weakness (445/9521-01) in the attachment to this letter.

Sincerely,



C. L. Terry

NSH/nsh
Attachment

cc: Mr. L. J. Callan, Region IV
Mr. W. D. Johnson, Region IV
Mr. T. J. Polich, NRR
Resident Inspectors

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Weakness
(445/9521-01; 446/9521-01)

Weakness: Failure of the Control Room to take appropriate actions to protect plant personnel.

The inspectors made the following observations during the walkthroughs. First, prior to announcing the site evacuation, the Crew 2 emergency coordinator (Shift Manager) did not consider wind direction and the potential for evacuating personnel through the plume. Personnel were instructed to use the "normal" site exit routes which caused them to evacuate through the simulated radioactive plume. In addition, the same emergency coordinator did not follow the prescribed method for announcing the site evacuation. The site evacuation alarm was not sounded and the announcement was not repeated. The failure to take appropriate actions to protect plant personnel was identified as an exercise weakness (445/9521-01; 446/9521-01).

Response to Weakness
(445/9521-01; 446/9521-01)

The Shift Manager (acting as emergency coordinator) recognized the error of instructing evacuating personnel to use "normal" site exit routes during the debrief immediately following the scenario.

Contributing causes for the error were:

- 1) Shift Manager did not use Position Assistance Document (PAD) task #398, "Direct site evacuation", to direct evacuation activities.
- 2) Shift Manager did not apply self-checking to ensure that intended actions were correct.

These causes were discussed with the Shift Manager after the scenario. The Shift Manager has participated in two subsequent exercises (dated 11-2-95 and 12-6-95) since the inspection. The Shift Manager has demonstrated proper use of the site evacuation requirements/methodologies noted in the PAD and use of self-checking techniques.

Four individuals responsible for site evacuation assessments were interviewed. Two control room Shift Managers and two TSC Onsite Radiological Assessment Coordinators (ONRACs) were interviewed to determine their ability to formulate plans for evacuation. There were no problems encountered during these interviews with the ONRACs or the other Shift Manager. A table top and two exercises have been conducted since this inspection and the evacuation routes have been determined correctly.

During the discussions and interviews it was determined that Task 398, "Direct site evacuation" contained no guidance for determining evacuation routes. The steps of Task 398 will be revised to provide relevant information in formulating evacuation routes.

TU Electric will have completed actions as identified in this response by January 30, 1996. Corrective action documentation will be available for review by the NRC during subsequent followup inspections.