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ULNRC-3303

Gentlemen:

**REPLY TO EXERCISE WEAKNESS
INSPECTION REPORT NO. 50-483/95012
CALLAWAY PLANT**

This responds to Mr. Thomas P. Gwynn's letter dated November 27, 1995, which transmitted an Exercise Weakness for events discussed in Inspection Report 50-483/95012. Our response to the weakness is presented in the attachment.

None of the material in the response is considered proprietary by Union Electric.

If you have any questions regarding this response, or if additional information is required, please let me know.

Very truly yours,


Donald F. Schnell

DFS/tmw

Attachment: 1) Response to Exercise Weakness

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Statement of Exercise Weakness

During an NRC inspection conducted October 17-20, 1995, a weakness was identified during the annual emergency preparedness exercise which requires corrective action. In accordance with "Emergency Planning and Preparedness for Production and Utilization Facilities", 10CFR Part 50, Appendix E.IV.F.2.g, the exercise weakness is listed below:

The emergency operations facility did not make a timely protective action recommendation following the 10:16 a.m. failure of the "C" steam generator power operated relief valve (start of the major release). The corresponding change in the protective action recommendations (evacuation of 2-mile radius and affected sectors to 5 miles) was not communicated to offsite officials until 10:38 a.m. (about 22 minutes later). The technical support center had previously issued an automatic shelter protective action recommendation in conjunction with the general emergency declaration.

Several factors contributed to the delay in the protective action recommendation. First, there was a lengthy discussion between the technical support center and emergency operations facility regarding the appropriate protective action recommendation. The discussions were prompted by the difference between the procedurally derived plant condition and dose assessment protective action recommendations. Based on plant conditions, the procedure indicated that evacuation should be recommended for a 5-mile radius and 10 miles downwind (affected sectors). Based on dose assessment, the procedure indicated that evacuation should be recommended for a 2-mile radius and 5 miles downwind. The discussions were further complicated because the plant conditions did not appear to meet the procedural (Emergency Implementing Procedure EIP-ZZ-00212, "Protective Action Recommendations") entry requirements to get to protective action recommendations beyond 5 miles. The procedural entry requirements appeared incomplete. Both recommendations (plant conditions/dose assessment) were discussed with the appropriate state official who was located in the emergency operations facility. A decision was made to issue the latter recommendation. Second, Emergency Implementing Procedure EIP-ZZ-00201, "Notifications," did not specifically state that a change in protective action recommendations should be treated as an initial notification (i.e., required to be made within 15 minutes of recognition). As a result, there did not appear to be an urgency associated with the communication of the expanded recommendation. Third, there appeared to be a reluctance to issue protective action recommendations based on plant conditions when dose projections resulted in less severe recommendations. This response was not consistent with current federal guidance published in the environmental protection agency protective action guides (EPA-400). The failure to make a timely protective action recommendation was identified as an exercise weakness (483/9512-01). The licensee acknowledged these comments and confirmed the need to revise the procedural guidance.

Reason for the Exercise Weakness

Emergency plan implementing procedures did not clearly require personnel to rely on the most severe data available for protective action recommendations. Also, the emergency plan implementing procedures did not specify the same urgency for updating protective action recommendations as an initial notification. Previous exercise scenarios had not uncovered these weaknesses.

Corrective Steps taken:

A Callaway Plant corrective action document (SOS 95-2195) has been initiated to respond to this weakness.

Corrective Steps to enhance performance:

Procedure EIP-ZZ-00212, "Protective Action Recommendations" will be revised to clarify the procedural entry conditions used to initiate protective action recommendations. The procedure will also be revised to implement the protective action recommendations which afford the higher level of protection when dose projections and plant conditions do not result in the same protective action recommendations.

Procedure EIP-ZZ-00201, "Notifications" will be revised to require all notifications that have increased protective action recommendations be made with the same urgency when making offsite protective action recommendations.

Date when full compliance will be achieved:

Procedure revisions and training will be implemented by April 15, 1996.