APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/84-27 Construction Permit: CPPR-126

Docket: 50-445 Category: A2

Applicant: Texas Utilities Electric Company
Skyway Tower
400 N. Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station, Unit 1

Inspection At: Comanche Peak Steam Electric Station (CPSES)
Glen Rose, Texas

Inspection Conducted: August 6-10, 1984

Inspector: J. L. Montgomery 9/12/84
J. L. Montgomery, Emergency Preparedness Analyst — Date

Accompanying Personnel:

P. Brown, Comex Corporation

Approved: J B Baird 9/12/84
J. B. Baird, Chief, Emergency Preparedness Section — Date

D M Hunnicutt 9/17/84
D. M. Hunnicutt, Team Leader Task Force — Date

Inspection Summary

Inspection Conducted August 6-10, 1984 (Report 50-445/84-27)

Areas Inspected: Announced emergency preparedness appraisal followup inspection of the Appendices A and B items identified during the emergency preparedness appraisal conducted September 26 through October 7, 1983. The inspection involved 73 inspector-hours onsite by two NRC inspectors.

Results: Within the emergency response areas inspected, no violations or deviations were identified. Of the 22 Appendix A items, 12 were closed and 10 remained open. Of the 67 Appendix B items, 11 were closed and 56 remained open.

DETAILS

1. Persons Contacted

Texas Utilities Generating Company

*J. C. Kuykendall, Manager, Nuclear Operations
*R. A. Jones, Manager, Plant Operations
*D. Braswell, Engineering Superintendent
*T. Gosdin, Support Services Superintendent
*D. Deviney, Operations Quality Assurance Supervisor
*J. Laughlin, Emergency Planning Coordinator
*J. Smith, Operations Quality Assurance
M. Deen, Shift Supervisor
G. Lytle, Shift Supervisor
T. Bain, Shift Supervisor
T. Beaudin, Shift Supervisor
T. Miller, Assistant Shift Supervisor
B. Lollar, Assistant Shift Supervisor
M. Smith, Assistant Shift Supervisor
T. Stark, Emergency Communicator
D. Rector, Emergency Communicator
M. Kertz, Emergency Communicator
D. Goodwin, Shift Technical Assistant
D. Palmer, Shift Technical Assistant
J. MacInvale, Shift Technical Assistant

*Denotes those present at the exit interview.

2. Scope of Inspection

The purpose of the inspection was to evaluate the applicant's progress in correcting the Appendices A and B items noted during the emergency preparedness appraisal conducted September 26 through October 7, 1983 (50-445/83-33; 50-446/83-17).

3. Entrance Interview

The entrance interview was conducted on August 6, 1984, with the support services superintendent and the emergency planning coordinator.

4. Appraisal Appendix A - Significant Preparedness Deficiencies Closed

(Closed) Open Item (445/8333-01; 446/8317-01): The applicant has added the Corporate Emergency Management Plan to Section 15.0, Appendix S of the emergency plan.

(Closed) Open Item (445/8333-68; 446/8317-68): The NRC inspector reviewed a copy of a letter dated May 31, 1984, from the plant manager to the National Weather Service in Fort Worth requesting information regarding obtaining meteorological data for Comanche Peak during an emergency. In a July 3, 1984, reply, the National Weather Service stated they would be able to supply 24 hour per day weather forecasts, estimate 15 minute averages for wind direction, and provide assistance in determining atmospheric stability classes.

The National Weather Service constitutes a third source of meteorological data to be used if the primary and secondary onsite meteorological towers are inoperable. The NRC inspector recommended that Emergency Plan Procedure (EPP)-302 state that the National Weather Service tower providing these data is located approximately 30 miles west of the plant in Stephenville, Texas.

(Closed) Open Item (445/8333-69; 446/8317-69): The NRC inspector reviewed a May 7, 1984, memorandum of agreement between Texas Utilities Systems Operations (TUSO) and CPSES for the notification of CPSES by TUSO of severe weather conditions likely to affect the CPSES site.

(Closed) Open Item (445/8333-84; 446/8317-84): The applicant has issued EPP-108, "Control of Emergency Use Vehicles" (approved by the manager, nuclear operations on July 3, 1984). The procedure was reviewed by the inspector and the three designated emergency use four wheel drive vehicles were inspected and should provide protection for all transported emergency equipment and instruments.

(Closed) Open Item (445/8333-89; 446/8317-89): The NRC inspector reviewed the emergency plan, Section 2.0, "Emergency Classification System," and EPP-201, "Assessment of Emergency Action Levels, Emergency Classification, and Plan Activation," and determined that emergency class and emergency action level terminology were correct and consistent.

(Closed) Open Item (445/8333-90; 446/8317-90): The NRC inspector reviewed EPP-201 and determined that all plant sensor readings forming emergency action levels were specified with no missing data.

(Closed) Open Item (445/8333-114; 446/8317-114): Loud speakers were observed to have been installed at various remote locations in the owner-controlled area; e.g., parking lots. A notification speaker system has also been installed in the administration annex building. The NRC senior resident inspector, whose office is located in this building and near parking areas, stated that the speakers, when tested, were audible.

(Closed) Open Item (445/8333-115; 446/8317-115): The NRC inspectors toured the Unit 1 plant and noted numerous white signs with red letters identifying evacuation routes and assembly areas. The emergency planning coordinator stated that approximately two-thirds of the signs had been posted and final posting was scheduled to be completed by September 30, 1984.

(Closed) Open Items (445/8333-132; 446/8317-132) (445/8333-133; 446/8317-133) (445/8333-137; 446/8317-137) (445/8333-139; 446/8317-139): The applicant's mini-drill program was included in EPP-104, "Emergency Preparedness Drills and Exercises." The NRC inspector reviewed EPP-104 and records of mini-drill training conducted for control room personnel. The drills were conducted with shift supervisors, shift technical assistants, reactor operators, and auxiliary operators. Training records were reviewed for the assessment, classification, and protective action recommendation drills conducted on June 22 and 29 and July 13, 20, 23 and 27, 1984.

The NRC inspectors conducted walk-through drills with four control room staffs to determine emergency preparedness capabilities and training adequacy. The control room personnel appeared to be familiar with emergency procedures and followed them adequately. Both NRC and applicant walk-through drills emphasized emergency classification, dose assessment, and use of procedures.

5. Appraisal Appendix A - Significant Preparedness Deficiencies Open

(Open) Open Item (445/8333-09; 446/8317-09): Table 1.1 in the emergency plan should clarify the assignment of two radiation protection technicians for offsite surveys within 30 minutes as specified in NUREG-0654.

An after-hours augmentation drill was scheduled for September 1984. The applicant will notify NRC Region IV of the exact date and time as soon as it is scheduled.

(Open) Open Item (445/8333-18; 446/8317-18): The applicant was awaiting NRC Office of Nuclear Reactor Regulation approval of Regulatory Guide 1.97 instrumentation requirements. If approval is given, this item will be closed.

(Open) Open Items (445/8333-29; 446/8317-29) (445/8333-30; 446/8317-30) (445/8333-32; 446/8317-32): The RM-21 computer system was not completed and had not been turned over to the applicant by the vendor. Consequently, training on the system had not been completed and no walk-throughs were conducted by the NRC inspectors. The emergency planning coordinator stated that the RM-21 should be fully operational with staff training complete by September 20, 1984.

(Open) Open Items (445/8333-38; 446/8317-38) (445/8333-40; 446/8317-40): Please refer to the status summary for open items (445/8333-29; 446/8317-29) (445/8333-30; 446/8317-30) (445/8333-32, 446/8317-32) in the previous paragraph.

(Open) Open Items (445/8333-19; 446/8317-19) (445/8333-138; 446/8317-138): These items remain open pending completion of the RM-11 and RM-21 systems and associated staff training and NRC inspection.

(Open) Open Item (445/8333-116; 446/8317-116): A personnel accountability drill, using the applicant's access card reader system, was scheduled to be held sometime in September 1984. The applicant is to notify NRC Region IV as soon as the exact date and time are known.

6. Appraisal Appendix B - Emergency Preparedness Improvement Items Closed

(Closed) Open Item (445/8333-03; 446/8317-03): Emergency preparedness functional responsibilities and authorities have been implemented and written in Section 14 of the emergency plan and in EPP-109, "Duties of the Emergency Coordinator," and EPP-112, "Duties of Emergency Response Personnel."

(Closed) Open Item (445/8333-04; 446/8317-04): A review of training records by the NRC inspector indicated that emergency preparedness personnel periodically received training to maintain state-of-the-art knowledge. Typically such training consisted of attending professional meetings, conferences, or symposiums on emergency planning and preparedness.

(Closed) Open Item (445/8333-11; 446/8317-11): The NRC inspector reviewed EPP-203, "Emergency Notification and Communications." Emergency organization assignments had been made.

(Closed) Open Item (445/8333-13; 446/8317-13): Decontamination drills were scheduled semiannually for radiation protection technicians. Emergency health physics procedures were taught in several formal training modules conducted annually. This training was described in the applicant's training manual, "TRA-105" and EPP-104, "Emergency Preparedness Drills and Exercises."

(Closed) Open Item (445/8333-14; 446/8317-14): Walk-through training drills were described in the emergency plan, Section 12, and EPP-104, "Emergency Preparedness Drills and Exercises."

(Closed) Open Item (445/8333-21; 446/8317-21): Revision 8 of the emergency plan had been issued and Section 6 referenced EPP-112, "Duties of Control Room Personnel During Emergencies."

(Closed) Open Item (445/8333-37; 446/8317-37): Attachment 13 of EPP-107, "Maintenance and Inventory of Emergency Equipment and Supplies," contained operational support center telephones on the inventory checklist.

(Closed) Open Item (445/8333-48; 446/8317-48): The emergency operations facility medical treatment room had been equipped with a telephone.

(Closed) Open Item (445/8333-58; 446/8317-58): Instructions regarding proper storage and charging of portable FM radios had been written in EPP-107, "Maintenance and Inventory of Emergency Equipment and Supplies."

(Closed) Open Item (445/8333-82; 446/8317-82): See response to 445/8333-37; 446/8317-37.

(Closed) Open Item (445/8333-88; 446/8317-88): Numerous EPPs had been revised and improved and included checklists, worksheets, and data sheets where appropriate.

7. Exit Interview

The exit interview was conducted with J. C. Kuykendall, Manager Nuclear Operations and members of his staff. A list of attendees is shown in paragraph 1 of this report.

The NRC inspector summarized the status of each Appendix A item and emphasized that seven out of ten remaining open items pertained to the RM-21 computerized dose assessment system. The emergency planning coordinator stated that the RM-21 system was scheduled for completion and turn over to the applicant by the vendor by August 31, 1984, and training of all appropriate emergency response personnel was scheduled for completion by September 20, 1984.

Mr. Kuykendall stated that the applicant and Hood and Somervell Counties were reluctant to activate the emergency notification system sirens during the scheduled November 1984 exercise due to numerous previous tests and a concern for generating public apathy. The NRC inspector stated that 10 CFR 50, Appendix E, IV F, requires a test of the public notification system during annual exercises. The NRC inspector also stated that in the exercise scenario objectives and detailed description of applicant actions submitted to NRC, the applicant should describe how the system would be fully tested, with or without actual siren actuation.