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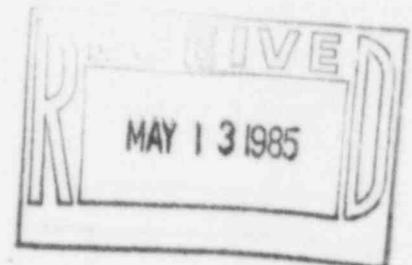
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Mr. Robert D. Martin, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region IV, Office of Inspection and Enforcement  
611 Ryan Plaza, Suite 1000  
Arlington, TX 76011



Dear Mr. Martin:

River Bend Station-Unit 1  
Refer to: Region IV  
Docket No. 50-458/Report 84-35

This response addresses your letter dated March 28, 1985 concerning the appraisal of the River Bend Station (RBS) Emergency Preparedness Program conducted by Mr. J. B. Baird, Inspection Team Leader, during the period December 3-14, 1984. The significant deficiencies and improvement items identified in Appendices A and B, respectively, of Inspection Report 84-35 are addressed in the enclosures. This completes Gulf States Utilities Company's response to Inspection Report 84-35.

Sincerely,

*J. E. Booker*

J. E. Booker  
Manager-Engineering,  
Nuclear Fuels & Licensing  
River Bend Nuclear Group

JEB/WJR/RJK/df  
JGC  
Enclosures

cc: Mr. E. L. Jordan, Director  
Division of Emergency Preparedness & Engineering Response  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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## APPENDIX A

### SIGNIFICANT EMERGENCY PREPAREDNESS DEFICIENCIES

#### 2.0 Emergency Organization

- Revise the Plan and EIPs as necessary to ensure consistency between the two in the structure of the emergency response organization. (458/8435-04)

RESPONSE: The RBS Emergency Plan was revised in Amendment 16 to the FSAR in February 1985 such that the structure of the Emergency Response Organization identified in Section 13.3 is consistent to that in the EIPs. EIP-2-100 and EIP-2-101 require that a review of the Plan and procedures be performed annually.

- Provide reasonable assurance that the RBS augmentation study results can be met for the minimum augmentation staff by conducting an unannounced drill after the radio pager system is implemented. (459/8435-05)

RESPONSE: The staff augmentation drill will be conducted after fuel load and prior to exceeding five percent power. FSAR Table 13.3-17 provides the residential survey results as compared to NUREG-0654, Table B-1.

#### 3.0 Training

- Provide a system to document and distribute information showing persons certified as qualified for and assigned to Emergency Response Organization positions. (458/8435-10)

RESPONSE: A memorandum signed by the Vice President-River Bend Nuclear Group will be distributed on a quarterly basis to delineate those persons who have completed their annual training requirements and are qualified to perform the designated functions for the respective RBS Emergency Response Organization positions. A new procedure EPP-2-202, "Emergency Response Organization", is being developed to specify the quarterly distribution.

- Complete required emergency preparedness training for all persons assigned emergency response positions prior to initial fuel load. (458/8435-16)

RESPONSE: Additional training for the Emergency Response Organization has been conducted. FSAR Table 13.3-5 specifies the key personnel and their alternates assigned

to the Emergency Response Organization. At least two individuals, and in most cases three individuals, have completed training for each of the key positions in the Emergency Response Organization. Sufficient Radiation Protection and Chemistry personnel have completed training to staff at least two full complements in the Emergency Response Organization. As additional personnel are hired, training will be conducted in accordance with EIP-2-102 to qualify them for the Emergency Response Organization.

- Institute procedures to insure instructors teach from approved lesson plans and approved procedures, and that any necessary changes to those plans/procedures are formally approved. (458/8435-17)

RESPONSE: Prior to any training being conducted, all lesson plans are submitted to the RBS Training Department for approval. Per TPM6-003, the instructor must verify that the lesson plan to be used is the approved revision prior to teaching the class.

#### 4.0 Emergency Facilities and Equipment

- Provide an alternate substitute for ERIS and DRMS until installation, testing and turnover have been completed. Provide procedures and training for appropriate personnel. (458/8435-22)

RESPONSE: EIP-2-019, "TSC Support Function" has been revised to include a statement that if ERIS or DRMS is non-functional, information will be transmitted from the Main Control Room to the TSC on a direct telephone line. EOF personnel can obtain this information over the CR-EOF-TSC hotline. FSAR Table 13.3-16 (Amendment 15 dated November 1984) provides a listing of secondary systems.

- Provide necessary facility specific emergency training for control room staff when the control room construction, startup, and turnover is completed. (458/8435-23)

RESPONSE: Main Control Room staff have been given facility specific training and most have participated in drills and exercises; however, the emergency response functions are being rearranged in the Main Control Room so that facility training as noted on Attachment 1 to EIP-2-102 will be necessary upon the completion and turn over of the Main Control Room to GSU. This training will be conducted following Main Control Room completion and turn over as part of the 1985 training cycle, scheduled to be completed

for all emergency response personnel prior to December 1985.

- Verify that all required support documents are in place in the TSC records room. (458/8435-24)

RESPONSE: Using FSAR Section 13.3.6.1.1 and EIP-2-018, an audit of the TSC Records Room documentation has been completed and missing pages or documents will be replaced by fuel load.

- Complete installation, test, turnover and procedures for the UPS, portable air monitor, and the ventilation system. (458/8435-25)

RESPONSE: The uninterruptible power supply (UPS) for the Vax computers (ERIS, DRMS) has been installed and is currently undergoing testing. The UPS is scheduled to be completed to support the ERIS/SPDS and DRMS implementation schedules. It should be noted that GSU's response to Generic Letter 82-33 indicates that the ERIS/SPDS and DRMS systems may not be fully functional until February 1986. Secondary systems are noted in FSAR Table 13.3-16. Portable air monitor jacks have been installed in the TSC, and the system will be completed, tested, and turned over to GSU by fuel load. The ventilation system has been installed and turned over. Procedures for operating the TSC ventilation system to isolate the TSC for habitability have been added to EIP-2-018, "TSC Activation".

- The 5 Rem personnel exposure limit in habitability monitoring procedure should be changed to the limits specified in 10 CFR Part 20. (458/8435-26)

RESPONSE: Attachment 1 to EIP-2-012, "Radiation Exposure Controls", has been revised to incorporate limits specified in 10CFR Part 20. The 5 Rem limit has been replaced in Emergency Response Facility procedures by exposure rate and airborne concentration limits for habitability. Any exposures greater than 10CFR20 limits must be approved by the Emergency Director.

- Specification of the alternate OSC location and guidance on relocation of the OSC because of high radiation or airborne levels should be formally incorporated into the Plan and procedures. (458/8435-27)

RESPONSE: EIP-2-016, "OSC Support Functions", has been revised to state that "the OSC shall be declared uninhabitable if

radiation levels are such that OSC personnel receive a radiation exposure of 400 mRem/hour or airborne radioiodine levels are greater than  $4 \times 10^{-6}$  uCi/cc". The TSC may serve as an alternate OSC except for operations personnel who will report to the Main Control Room if the OSC becomes uninhabitable. Sufficient space is available in the TSC to support OSC operations without interfering with TSC operations. The TSC is provided with enhanced habitability design so that it would be unlikely that the TSC would have to be relocated. In addition, Section 13.3.6.1.2 of the Plan was revised in Amendment 16 to the FSAR (February 1985) to include the designation of the TSC as the alternate OSC.

- Correct the EOF layout shown in Plan figure 13.3-22 to reflect actual conditions as documented in EIP-2-020. (458/8435-34)

RESPONSE: The revised layout of the EOF was incorporated into Figure 13.3-22 of the Plan in Amendment 16 to the FSAR dated February 1985.

- Complete the review of sampling and analysis facilities habitability during accident conditions and provide appropriate access procedures when the installation, testing, and turnover is completed. (458/8435-40)

RESPONSE: Sampling of the Radwaste holdup system is not considered an emergency action. Under accident conditions, access to sample points and sampling would be conducted under routine sampling procedures and exposure control (RWP) procedures. Design of the Radwaste system precludes liquid effluents from being released which may constitute an offsite hazard. Analysis of the habitability of the analytical laboratory is being conducted and is scheduled to be completed prior to exceeding 5% power.

- Assembly area emergency equipment and decontamination supplies should be installed and made operational. (458/8435-41)

RESPONSE: Emergency equipment and decontamination supplies have been installed and are operational at the Assembly Area East and the Assembly Area West. See response to Item No. 458/8435-42 for the Alternate Evacuation Point Assembly Area. EIP-2-103 provides a listing of equipment for each area.

- Complete the non-radiation monitoring systems listed in the Plan for emergency detection, classification, and assessment and train appropriate personnel on operation. (458/8435-44)

RESPONSE: The seismic monitors have been installed, tested, and turned over to GSU. The Fire Detection System will be completed prior to fuel load. Meteorological information is currently available in the Main Control Room. Parameter readouts for these instruments have been included in training modules of EIP-2-102 for operations personnel.

- Complete installation and verify operability of the Public Notification System. (458/8435-45)

RESPONSE: The RBS Prompt Notification System (PNS) discussed in FSAR Section 13.3.5.4.1.2.2 consists of a total of 92 sirens. Eighty (80) sirens have been installed and tested to be functional. The remaining 12 sirens will be installed and functionally tested prior to operation above five percent of rated power. The initial 80 sirens will be sounded for operability prior to fuel load, whereas the entire PNS will be sounded during the 1986 RBS Emergency Preparedness Exercise.

- Install and verify the NRC Emergency Notification System (ENS) and Health Physics Network (HPN). (458/8435-46)

RESPONSE: GSU installed dedicated telephones in the Main Control Room, Technical Support Center, and Emergency Operations Facility. This will ensure communications exist between the RBS facilities and the NRC Incident Response Center and the Region IV office prior to the installation of the ENS and HPN by AT&T under the direction of the NRC as discussed in FSAR Section 13.3.6.1.5.4.

- Provide designated vehicles for offsite monitoring and develop procedures for their acquisition and use. (458/8435-51)

RESPONSE: The designated four-wheel drive vehicles will be available prior to fuel load. EIP-2-105 "Control of Radiological Monitoring Vehicles" has been developed for acquisition and use of designated radiological emergency team vehicles.

## 5.0 Procedures

- Revise EIPs-2-002, 003, 004 and 005 to reflect the wording of 10 CFR 50.72(a)(3) regarding notification of the NRC. (458/8435-53)

RESPONSE: The above referenced procedures have been revised to reflect the current wording of 10CFR50.72(a)(3).

- Revise EIPs to remove statements that NRC resident inspector will man the ENS during an emergency. (458/8435-54)

RESPONSE: All references to the statement that the NRC resident inspector will man the ENS during an emergency have been deleted from the EIPs.

- Revise the wording of step 4.1.6 of EIPs-2-003 and 2-004 to conform to the wording of NUREG-0654, App. 1, pp 1-3, and EIP-2-006, step 3.5. (458/8435-55)

RESPONSE: Procedure EIP-2-003, 004, and 006 have been revised to conform to the wording of NUREG-0654, Appendix 1 and to reorder the sequence of steps following the declaration of an Alert and Site Area Emergency.

- EIP-2-029, "Emergency Telephone Book" should be completed, revised into a standard procedure format, approved and reissued. (458/8435-56)

RESPONSE: EIP-2-029, "Emergency Telephone Book", has been completed to include a listing of all persons assigned to the RBS Emergency Response Organization listed in FSAR Table 13.3-5. The Station Support Manual standard format has been used except that introductory and informational sections have not been included so that extraneous information does not inhibit its use.

- Complete installation of the pager system indicated in EIP-2-006, titled "Activation of the Emergency Response Organization (Communicator)". Distribute pagers and complete EIPs with pager numbers. (458/8435-72)

RESPONSE: The pagers have been distributed to the key RBS emergency response personnel and the system installation and operability tests completed. EIP-2-029, "Emergency Telephone Book", has been revised to include the pager numbers for the specific emergency response positions. In

addition, Attachment 4 to EIP-2-006 includes telephone numbers and instructions for activating the pager system during an emergency.

- Complete installation, testing, training, and verifying that the protected area notification system can be heard by personnel. (458/8435-73)

RESPONSE: The RBS Gaitronics System has been installed and tested. Areas within the Protected Area requiring additional speakers have been identified. Corrective actions are scheduled to be completed prior to exceeding five percent power. Personnel receive training on the specific alarms comprising the Gaitronics/Page-Party System in General Employee Training I discussed in FSAR Section 13.3.7.1.1.1. Additional training will be provided during accountability drills prior to the accountability drill to be held after fuel load but prior to exceeding five percent of rated power.

- Verify that Section 13.3.4.2.2.8 of the Plan, EIP-2-027, "Personnel Accountability", and PSP-4-070, "Security During Plant Safety Related Emergencies", conform with the equipment that they address after the installation, testing and turnover of the Security card reader computer system, and badging cards and racks are completed. (458/8435-84)

RESPONSE: RBS Security and Emergency Planning personnel have reviewed EIP-2-027 and Plan Section 13.3.4.2.2.8 against the installed and tested GSU card reader computer system and badging cards and racks. Practice drills prior to the accountability drill will test the adequacy of the system.

- Verify through a drill or exercise that personnel accountability, which includes identification of all personnel, including unaccounted personnel, can be accomplished within 30 minutes. (458/8435-85)

RESPONSE: The personnel accountability drill will be conducted in accordance with EIP-2-027 prior to exceeding five percent power.

- Review procedures for security during emergencies and associated training when protected and vital area access control is established to ensure consistency in security measures. (4588435-87)

RESPONSE: Procedure PSP-4-070 for security during emergencies and associated training has been reviewed and appears to be consistent.

- Modify the plan to address release termination as a prerequisite to entry into recovery. (458/8435-92)

RESPONSE: Section 13.3.8 entitled, "Recovery", has been revised in Amendment 16 to the FSAR dated February 1985 to reflect that the release has been terminated. The prerequisites in the Plan and EIP-2-028 are identical.

#### 6.0 Coordination with Offsite Groups

- Verify completion of the near-site hospital facility and provide training for all emergency team personnel at the hospital. (458/8435-99)

RESPONSE: The Radiation Emergency Area at West Feliciana Parish Hospital (WFPH) was completed prior to and utilized during the January 16, 1985 full-scale emergency preparedness exercise. Training for WFPH emergency team personnel was conducted in accordance with EIP-2-102 and completed during training sessions in January 1985.

- Distribute and maintain the Plan and procedures according to the MOU between GSU and the State. (458/8435-100)

RESPONSE: GSU has provided copies of the RBS Emergency Plan to the State of Louisiana (LNED and LOEP) and the local governments. GSU has also distributed those procedures applicable to the State and local agencies, i.e., notification and protective action recommendations. EIP-2-100 and EIP-2-101 will be revised to govern distribution of the Emergency Plan and EIPs.

- Conduct a communication system survey and correct deficiencies identified between RBS and offsite agencies, and implement periodic communication call checks. (458/8435-101)

RESPONSE: An extensive communications system survey was conducted after the November 20, 1984 practice exercise and

deficiencies corrected for the December 19, 1984 practice and January 16, 1985 full-scale exercise, at which times the systems functioned as designed. Communication tests have and will be conducted as stated in EIP-2-102 on a periodic basis to ensure operability of both the RBS Emergency Hotline and the back-up radio communications network.

- Distribute transient public information within the 10-mile EPZ. (458/8435-102)

RESPONSE: The transient public information program consists of three elements, all of which will be in place prior to exceeding five percent power. The three elements are (1) signs in public areas, (2) decals for use in hotels, motels, and other places transients might stop, and (3) brochures designed for transients. All three program elements are being done cooperatively with State and local officials.

- Disseminate the telephone directory information to members of the general public in the EPZ. (458/8435-103)

RESPONSE: Dissemination of the telephone directory information to members of the general public in the EPZ will not be part of the transient public information program. FSAR Section 13.3.5.4.1.2.2 has been revised accordingly in Amendment 17 to the FSAR dated May 1985. Other elements of the program, notably the transient brochure and decals, were deemed more effective.

#### 7.0 Drills, Exercises and Walk-Throughs

- Retrain control room operators on emergency classification and the use of emergency plan/procedure forms and logs during emergencies. (458/8435-105)

RESPONSE: Retraining of Main Control Room operators on emergency classification and use of the Plan and EIPs has been completed. This training included the use of check lists, procedures, forms, and logs.

- Complete the installation, testing, and turnover of the radio paging and hot line systems; update procedures to incorporate their use; train control room personnel. (458/8435-106)

RESPONSE: The RBS emergency communications systems, including the radio paging and hotline systems, have been installed and

tested. Main Control Room communicators and shift clerks have been trained on the use of the communications systems. Procedures EIP-2-006 and EIP-2-029 have been revised to include use of the pager system and the hotline system.

## APPENDIX B

## EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

1.0 Administration

- Provide a direct interface between the emergency planning group and the Plant Manager. (458/8435-01)

RESPONSE: The Supervisor-Emergency Planning consults the Facility Review Committee (FRC) on the Plan changes and EIP review and approval in accordance with Technical Specification Section 6. The Plant Manager is responsible for approving EIPs and Plan changes as well as reviewing FRC minutes and taking any necessary action. The Plant Manager is responsible for resolution of any disagreements per ADM-0002. If necessary, the Supervisor-Emergency Planning, the Manager-Administration, and the Plant Manager resolve emergency planning items impacting plant operations. Therefore, direct interface between the Emergency Planning Group and the Plant Manager does exist. Both the Manager-Administration and the Plant Manager are included in the review and approval cycle of changes to the Plan and the EIPs. The Vice-President River Bend Nuclear Group gives final approval on all of the EIPs. EIP-2-100 and EIP-2-101 will be revised to include this approval cycle.

- Provide for approval of EIP changes by the Plant Manager. (458/8435-02)

RESPONSE: The Plant Manager has been added to the approval form for each EIP. EIP-2-100 will identify the approval cycle for each EIP revision.

- Describe the makeup, responsibilities and authority of the RBNG emergency planning group and the onsite Emergency Planning Committee in the Plan. (458/8435-03)

RESPONSE: The makeup, responsibilities and authority of the RBNG Emergency Planning Group and the onsite review committee will be described in the Plan prior to fuel load.

## 2.0 Emergency Organization

- Develop and implement selection and qualification criteria for individuals assigned to perform emergency response organizational functions. (458/8435-06)

RESPONSE: Selection and qualification criteria for emergency response personnel have been developed and incorporated into draft procedure, EPP-2-202. EIP-2-102, Attachment 1, specifies organizational functions.

- Provide and implement documentation that formal assignments of all persons assigned to the emergency response organization have been made. (458/8435-07)

RESPONSE: Personnel assignments to the Emergency Organization are formalized in draft procedure, EPP-2-202.

- Provide unambiguous definition of the authority of individuals assigned to the emergency response organization. (458/8435-08)

RESPONSE: Section 13.3.4 of the Plan entitled, "Organizational Control of Emergencies" and Appendix A of the Plan outline the authorities and responsibilities of the emergency response organization. EIP-2-002 through EIP-2-005 specify the actions to be taken by the members of the emergency response organization in the four classes of emergencies.

- Letters of agreement should be reviewed, updated and certified to be current on an annual basis. (459/8435-09)

RESPONSE: Section 13.3.7.2 of the Plan states that the letters of agreement will be reviewed during the annual review of the Plan and verified to be current every two years.

## 3.0 Training

- Make EIP-2-102 effective retroactive to the commencement of formal EP training. (458/8435-11)

RESPONSE: EIP-2-102 was signed on October 2, 1984 and is a formally approved procedure; however, it is inconsistent to implement a portion of the Emergency Plan prior to licensing. All EIPs become effective on the day of licensing as indicated on the approval sheet of each

procedure. All training, drills, and exercises have been conducted in accordance with approved procedure EIP-2-102.

- Provide respiratory training to all essential emergency response organization personnel. (458/8435-12)

RESPONSE: Respiratory protection training (GET III) is being conducted for emergency response personnel likely to be required to need respiratory protection during an emergency. This requirement is included as part of the qualification criteria in draft procedure EPP-2-202 and a general discussion provided in FSAR Section 13.3.7.1.1.1.

- Formally approve lesson plans in use for support organization training. (458/8435-13)

RESPONSE: The lesson plans have been formally approved by GSU and the State of Louisiana.

- Establish a means of verifying that each lesson/module objective is tested in the examination. (458/8435-14)

RESPONSE: Currently the lesson modules are being revised based on training, drill, and exercise comments. As part of that review, the examinations for each module are being reviewed against each module's objectives to ensure that objectives are tested in the examination. This revision is scheduled to be completed prior to fuel load.

- Revise lesson plans for modules 10, 11 and 12 to reflect the walk/talk throughs which are actually being conducted. (458/8435-15)

RESPONSE: Lesson modules 10, 11, and 12 are being reviewed and revised to reflect the walk/talk throughs as part of the revision of all lesson modules currently in progress. A statement concerning the presentation format for these modules will be included. See response to (458/8435-14).

- Correct minor errors noted in training records and in computer training status printout. (458/8435-18)

RESPONSE: Training records have been reviewed against the computer training status printout for Emergency Planning training, and errors corrected.

- Upgrade emphasis on EALs in the lesson plan for Module 3. (458/8435-19)

RESPONSE: Lesson modules are being revised to reflect comments from all sources. (See response to 458/8435-14.) EAL emphasis will be enhanced.

- Increase length and difficulty of the examination for Module 8. (458/8435-20)

RESPONSE: The examination for Module 8 is being revised as part of the overall lesson module revision now in progress. The examination will be revised to increase the length and difficulty as indicated.

- Provide a certification or validation that EP modules 1 - 13 were taught to draft procedures which were essentially unchanged when subsequently approved. (458/8435-21)

RESPONSE: Draft procedures used during training sessions from June to August 1984 were compared to the approved revision of the procedures and were found to be essentially the same. A certification of this review has been entered in the Training Department files.

#### 4.0 Emergency Facilities and Equipment

- The function of the hotline should be described in Section 13.3.6.2, "Communications Systems", of the emergency plan. (458/8435-28)

RESPONSE: Section 13.3.6.2.2 entitled, "Plant-to-Offsite Communications", Item 4 addresses the function of the RBS Emergency Hotline.

- Contrary to Fig. 13.3-19 of the Plan there was no operable PP/PA connection between the OSC and control room; this should be completed or the Plan amended. (458/8435-29)

RESPONSE: A Page-Party station has been installed in the OSC and is functional. Figure 13.3-19 will be revised to include the Page-Party system.

- EIP-2-016 should be revised to assure accountability is completed as soon as possible and not delayed by briefings of emergency status. (458/8435-30)

RESPONSE: EIP-2-016, "Operations Support Center-Activation", has been revised to specify more clearly the need for rapid accountability if directed. The procedure did not previously advocate a delay for plant status updates; however, the current revision should eliminate any confusion.

- The emergency equipment to be available in the OSC was listed in Attachment 2 to EIP-2-016, "Operations Support Center - Activation" and in EIP-2-103 "Emergency Equipment Inventory". The two lists were not identical. All lists should be revised to show what is presently required in the kits, and all of the equipment obtained. (458/8435-31)

RESPONSE: Emergency equipment inventories have been revised to be consistent. Inventory lists for most EIPs have been deleted, and EIP-2-103 is considered the master inventory listing for all facilities. Some damage control equipment specified in the inventory lists has still not been received but is expected to be placed in the OSC list by fuel load.

- Section 13.3.6.2 and Fig. 13.3-19 of the Plan should be consistent in listing voice communications links between the OSC, control room, and TSC. (458/8435-32)

RESPONSE: Figure 13.3-19 was revised in Amendment 16 to the FSAR (February 1985) to include the Control Room-TSC-OSC-EOF-JIC Hotline. Section 13.3.6.2 will be revised prior to fuel load to describe this communications link.

- Consideration should be given to providing dose rate and air concentration limits for OSC habitability. Such administrative limits would be easier to implement than the present cumulative exposure limits. (458/8435-33)

RESPONSE: Procedure EIP-2-016 has been revised to provide exposure rates and airborne activity concentrations as habitability criteria instead of accumulated dose.

- EOF staff personnel dosimetry, protective clothing, and breathing apparatus should be listed in EOF outfitting shown in Appendix E of the plan. (458/8435-35)

RESPONSE: Dosimetry for the EOF staff has been provided in the EOF emergency lockers and has been added to the inventory and EIP-2-103. Protective clothing is provided as part of the decontamination facility in the EOF but is not specified for EOF personnel use. Due to the location and atmospheric controls in the EOF, breathing apparatus is not provided for EOF personnel.

- Provide position labels for the remotely operated cooler inlet damper in the EOF HVAC room; replace the missing handle on the fan discharge to EOF damper; provide position labeling; make the exhaust fan damper accessible for operation. (458/8435-36)

RESPONSE: GSU has had the EOF ventilation system reviewed and labeled. The system is operated through a switch in Office B in the EOF.

- Evaluate traffic routing through the EOF (south) door to ensure that potentially contaminated persons enroute to the EOF offsite reassembly and decon facility do not cross contaminate EOF using the common hallway. (458/8435-37)

RESPONSE: In accordance with EIP-2-020, following initial activation of the EOF, all personnel enter through the West door. This entrance is controlled for the purpose of limiting contamination spread through the use of a frisking station and step-off-pads. All personnel entering are monitored for contamination.

- Consider addition of an external door bell at the training building main access to alert the guard to off hour entry requirements. The present system is dependent upon the guard being at his desk, not making rounds, or upon a second guard being deployed from RBS to help activate the EOF. (458/8435-38)

RESPONSE: A door bell has been ordered and will be installed prior to exceeding five percent power at the RBS Training Center Main Lobby and the passageways to the EOF and the classroom wings.

- Ensure that keys to the building load center are available to EOF staff. (458/8435-39)

RESPONSE: A key to the building load center has been included in the EOF key cabinet.

- If the alternate assembly area described in the plan is retained, consideration should be given to additional lighting along the evacuation path and emergency supplies at the assembly area. (458/8435-42)

RESPONSE: In EIP-2-026, the alternate assembly area is provided for the unlikely event that neither the east or west assembly points are available for monitoring and decontamination procedures. There are no structures at the alternate assembly area; it is merely a designated location at the intersection of the plant railroad spur and La. Hwy. 964. From this area, evacuating personnel would need to be transported to another location for decontamination.

- Provide a public address system in press briefing room. (458/8435-43)

RESPONSE: A public address system was installed prior to the formal exercise which was held on January 16, 1985.

- Install lights on telephones in the emergency response facilities. (458/8435-47)

RESPONSE: The multiple telephones in the OSC have been replaced with key sets which have lights for each incoming line. Therefore, key sets are available in the TSC, OSC, and EOF.

- Although each communications system operated independently, all telephone systems were either connected to the River Bend PBX or had lines which ran through that room. Consideration should be given to rerouting some lines to provide extra reliability in case of fire or other incidents in the room. (458/8435-48)

RESPONSE: Building design makes rerouting of telephone lines prohibitive. While it is correct that the hotlines would be unusable in case of fire or major catastrophe involving the room, radios are provided in each emergency response facility to provide back-up communications with State and local agencies in the event all telephone lines are lost.

- The alarm types on the paging system should be explained in the plan. (458/8435-49)

RESPONSE: The various alarms available in the plant are currently being disseminated in GET training and will be explained in the Plan (Section 13.3.7.1.1.1) and appropriate procedures (EIP-2-026 and EIP-2-006) prior to fuel load.

- Revise procedures to specify the minimum stocking level of operational supplies which will be available and maintained at RBS. (458/8435-50)

RESPONSE: Minimum and maximum stocking levels are currently being identified by the Maintenance and Radiation Protection Departments. These stocking levels will be maintained on a computer program which includes periodic evaluation of adequate stocking levels.

- List the Jackson Rescue Unit as a backup for the West Feliciana Parish Hospital Ambulance Service in Section 13.3.5.5.3 of the Plan. (458/8435-52)

RESPONSE: Section 13.3.5.5.3 of the Plan has been revised in Amendment 16 to the FSAR dated February 1985 to include the Jackson Rescue Unit as a back-up for the WFPH Ambulance Service.

## 5.0 Procedures

- Provide human factors review of EIPs and revise as necessary to improve factors related to more effective use of procedures. (458/8435-57)

RESPONSE: Human factors review of the EIPs is planned; however, with current revisions in progress due to drill, exercise and NRC comments, this review will be done after revisions are complete. A human factors review of EIPs is scheduled to be done and appropriate changes made prior to the next annual exercise.

- Revise EIP-2-002 to emphasize the need for state and local notifications "within approximately 15 minutes". (458/8435-58)

RESPONSE: EIP-2-002 has been revised to emphasize notification time criteria and reference EIP-2-006, "Notifications", which

reiterates the wording of NUREG-0654 concerning notifications to State and local agencies and 10CFR50.72 concerning notification to the NRC.

- Revise the affected EIPs as appropriate to reflect the actual procedure to be followed by the Parishes in verifying a notification of emergency classification. (458/8435-59)

RESPONSE: The verification (authentication) procedure for determining the validity of a notification of an emergency has been agreed upon among RBS, the State, and the local parishes. Parish procedures require that the State authenticate notifications by calling RBS on a predesignated telephone number, each parish will then call the State (LNED) for authentication. This process is reflected in Attachments 1 and 3 of EIP-2-006.

- Revise EIP-2-011, Attachment 1, items 2 and 3.f, to direct the party being called to call back using a number previously provided or known to be an RBS number. (458/8435-60)

RESPONSE: RBS telephone numbers are provided to the St. Francisville Volunteer Fire Department (SFVFD) which may be used by the SFVFD for verification.

- Revise EIP-2-009 to provide additional information to the discoverer of an injured person, and to the first aid personnel directed to the scene. (458/8435-61)

RESPONSE: First aid training provided to designated first aid personnel onsite consists of training equivalent to Red Cross multi-media first aid and CPR. Although this level of training is considered adequate, it is not extensive enough to require first aid personnel to make in-depth diagnoses such as heart attack, etc. Assuming the "discoverer" has no training in first aid, his "diagnosis" would not be valid. First aid is intended to be symptomatic treatment until transport to the hospital or EMT personnel arrive. Asking First Aid personnel to quantitate vital signs, etc., is beyond their assumed capability based solely on the training provided.

- Revise EIP-2-017 to provide amplifying information regarding radiological monitoring in the OSC. (458/8435-62)

RESPONSE: EIP-2-017 has been revised to include radiological monitoring and habitability criteria in the OSC.

- Provide an up-to-date listing of all fully trained and qualified persons for each position in the TSC and EOF (also applies to OSC and JIC). (458/8435-63)

RESPONSE: Provisions for periodically distributing an up-to-date listing of qualified emergency response personnel is provided in draft procedure EPP-2-202. (See response to 458/8435-10.)

- Revise EIP-2-018 and 020, Attachment 1, step 2 (of each EIP) to remind the relieved and relieving Emergency Director, and Recovery Manager to clearly announce such reliefs to all concerned. (458/8435-64)

RESPONSE: EIP's-2-018 and 020 have been revised to include a reminder to announce reliefs and turnovers in both the TSC and EOF.

- Revise EIP-2-023 to provide a summary of JIC staffing requirements. (458/8435-65)

RESPONSE: EIP-2-023 will be revised to provide a summary of key JIC staff. Detailed staffing requirements will be included in JIC procedures (EPP-2-301). These procedures will be completed prior to fuel load.

- Review EIP review and approval process to assure that sign-off procedure reflects substantive reviews prior to approval of EIPs. (458/8435-66)

RESPONSE: Draft EIP changes are distributed for review to each discipline of the Emergency Response Organization in accordance with SSP-1-001. A review period is allowed for comments to be received (usually two weeks) after which the procedure originator is required to resolve comments and make final changes to the procedure(s). After the final draft is completed, the disciplines meet, and if no further comments are pertinent, sign approval for the procedure. Due to this process, many procedures may have the same signatory date for all disciplines; however, comment control forms are retained in administrative files to document the review and comment process which precedes approval. Comment control forms will be kept on file for a minimum of five years. Upon receipt of EIP approval/signature from each Emergency Response Organization discipline, the Supervisor-Emergency Planning

will present the subject EIPs for FRC approval. Upon receipt of the FRC signature, the signatures of the Manager-Administration, Plant Manager, and Vice-President River Bend Nuclear Group are received. This process will be implemented at fuel load assures that a substantive review for each EIP has occurred.

- Revise paragraph 4.1 of procedure EIP-2-001 to add EIP-2-005 as a reference. Without it, the shift supervisor's authority is limited to classifications of Site Area Emergency or below. (458/8435-67)

RESPONSE: EIP-2-005 was added to paragraph 4.1 of EIP-2-001.

- Correct EIP-2-001 pages 40 & 41 (identical); page 1 is incorrectly labeled as EIP-2-026. (458/8435-68)

RESPONSE: EIP-2-001 pagination and label were corrected.

- Resolve inconsistencies concerning responsibility for classification and declassification. Inconsistencies exist between the plan Sections 13.3.8 and 13.3.4.2.1 (which assigns the Recovery Manager classification and de-escalation responsibility) and procedures -004, -005, -019, -021 (which assigns classification responsibility to the Emergency Director). (458/8435-69)

RESPONSE: The Emergency Plan, Sections 13.3.8 and 13.3.4.2.1 have been revised to clarify the Emergency Director's responsibility in classifications and the Recovery Manager's responsibility in terminating an emergency.

- Revise EIP-2-004, -005, and -014 to be consistent regarding the deployment of offsite monitoring teams. (458/8435-70)

RESPONSE: Procedures EIP-2-004, 005, and 014 have been revised to be consistent with respect to offsite monitoring teams; however, the Emergency Director retains the prerogative of dispatching offsite monitoring teams at any time, regardless of the classification or release status.

- Revise EIP-2-001 through -005 to address the shift supervisor assuming the Recovery Manager and/or Emergency Director functions until properly relieved. (458/8435-71)

RESPONSE: EIP-2-001 through 005 have been revised to include Recovery Manager as well as Emergency Director responsibilities being assumed by the Shift Supervisor.

- Obtain the NRC initial information form and incorporate required information into EIP-2-006. (458/8435-74)

RESPONSE: The NRC initial notification form was added to EIP-2-006, and the NRC follow-up form was removed. The follow-up form is not needed since the NRC may require an open continuous line with the utility until notification.

- Develop a telephone authentication scheme for initial notifications to offsite authorities. (458/8435-75)

RESPONSE: An authentication scheme is established in Attachment 1 to EIP-2-006 for offsite authorities. Parish procedures require each parish to authenticate notifications not made over the dedicated hotline system with the State LNED. The State has been given the RBS Main Control Room number for this purpose.

- Provide instructions on the collection of environmental TLDs from the permanent monitoring sites for use during radiological assessment. (458/8435-76)

RESPONSE: Radiological assessment at RBS is based on monitors, calculated values, and field team data and does not include environmental TLD data. Instructions for collection of TLDs are available at the environmental laboratory. Should a severe emergency occur at RBS, the environmental TLDs will be left in place for the duration of the release in order to more accurately reconstruct actual environmental total dose levels for the entire accident period. Collection will be done by routine Environmental Services Procedures (ESP).

- Only trained personnel should be assigned to the offsite radiological monitoring team. (458/8435-77)

RESPONSE: The offsite monitoring procedure (EIP-2-014) is written to provide flexibility during the early phases of a severe accident prior to augmentation of the Emergency Response Organization. This allows the Emergency Director greater flexibility in utilizing available personnel. The wording has been changed to require at least one team member be a Radiation Protection Technician trained in offsite monitoring procedures.

- The instrument check sources are missing from the Offsite Monitoring kits. (458/8435-78)

RESPONSE: Check sources have been procured and will be placed in the offsite team kits prior to exceeding five percent power.

- The term "surveyor" which is used in both the plan and procedure should be defined. (458/8435-79)

RESPONSE: The term surveyor was a remnant of early emergency planning. Currently there is no one in the Emergency Organization or normal plant organization having that title. The term will be deleted from the Plan and procedures.

- The proper title of the person coordinating offsite monitoring team actions should be determined and used uniformly throughout the plan and procedures. (458/8435-80)

RESPONSE: The emergency organization has evolved over the past several months. Following drills and exercises, it was found that additional assistance in this area was required. Currently, a Dose Assessment Advisor and an Assistant Dose Assessment Advisor are assigned as discussed in EIP-2-014. The Plan will be changed accordingly.

- The procedure should include instructions on how to determine if the plume is touching the ground at the location on the survey (open window/closed window). (458/8435-81)

RESPONSE: EIP-2-014 is written exclusively for the use of the offsite team. The decision concerning the appropriate location for air samples is dictated by the Dose Assessment Advisor. Guidance on determining whether or not the team is actually in the plume is provided in training for these personnel and on their offsite team data worksheet.

- The procedure should specify that the particulate filter is placed upstream of the silver zeolite cartridge. (458/8435-82)

RESPONSE: The step-by-step procedure, EIP-2-014, for loading the air sampler filter holder ensures that the particulate filter is placed upstream of the silver zeolite cartridge.

- Post markings for the primary and secondary evacuation routes. (458/8435-83)

RESPONSE: The alternate evacuation point through the gate at the south side of the Protected Area is used only if the Primary Access Point is within the hazard area. Evacuating personnel simply follow the railroad spur, a readily recognizable route, to the assembly area. For evacuations through the Primary Access Point, personnel must exit the Protected Area and then turn right or left depending on the assembly area stipulated by the Emergency Director. The Training Center and the Energy Center are well known landmarks and would not be confusing to evacuating personnel. To mark both the right turn to the Training Center and the left turn to the Energy Center as evacuation routes would only serve to confuse personnel during an emergency.

- A statement should be added in EIP-2-027, "Personnel Accountability", to insure that personnel accountability is maintained throughout the duration of the emergency condition in the protected area, to include the control room, OSC and TSC. (458/8435-86)

RESPONSE: EIP-2-027 has been revised to include continuous accountability in the Emergency Response Facilities throughout an emergency.

- Establish protected area access procedures for relocation of the function to an alternate isolation zone gate; perform periodic relocation drills. (458/8435-88)

RESPONSE: PSP-4-070 defines the relocation of security functions during an emergency. The use of the Alternate Evacuation Point will be tested periodically during scheduled exercises.

- Correct Figure 1 of procedure EIP-2-026 to show the protected area fence. (458/8435-89)

RESPONSE: Figure 1 of EIP-2-026 has been corrected.

- A statement should be added to EIP-2-017, "OSC Support Functions", Section 3.7 to include the availability of specialized equipment from the GSU warehouse, GSU transmission and distribution center and assistance provided by the mutual assistance plan agreement with other utilities. (458/8435-90)

RESPONSE: The OSC contains some damage control equipment with additional equipment available from normal maintenance areas. No specialized equipment is contained in the warehouse nor is any expected to be provided by other utilities under the mutual aid agreement. Should any specialized equipment be required beyond that which is onsite, it would be procured by Admin/Logistics using the "INPO Nuclear Power Plant Emergency Response Voluntary Assistance Agreement Letter", provided in Appendix B of FSAR Section 13.3.

- A statement should be added to EIP-2-017, "OSC Support Functions", to address follow-up debriefing of damage control team(s) on completion of repair/corrective assignments. (458/8435-91)

RESPONSE: A debriefing reminder has been added to EIP-2-017.

- Make corrections on bottom of pages 1, 2, 3 of 5 in EIP-2-104. EIP-2-014 was mistakenly used and should be corrected to read EIP-2-104. (458/8435-93)

RESPONSE: Page numbers for EIP-2-104 have been corrected.

- Resolve the administrative problem for breaking out the Plan section of Chapter 13 of the FSAR to provide control copies which would be distributed to offsite agencies involved in Emergency Planning. (458/8435-94)

RESPONSE: EIP-2-101 will be revised such that the River Bend Station Emergency Planning Department will distribute revisions to the Plan to offsite agencies.

- EIP-2-101, Section 4.3 should identify the organization or group that would initiate the independent audit of the River Bend Station emergency preparedness program to be conducted at least every 12 months. (458/8435-95)

RESPONSE: EIP-2-101 states that the Nuclear Review Board (NRB) is responsible for initiating the independent audit of the emergency preparedness program as stated in Technical Specification Section 6.

- EIP-2-101, Section 4.3, should be changed to read that an independent audit should be conducted at least every 12 months in place of the word "annual". (458/8435-96)

RESPONSE: EIP-2-101 will be revised accordingly.

- EIP-2-101, Section 4.3, should address the need for an independent audit to include the observation of emergency drills, inspection of equipment and discussions with personnel rather than to just perform a paper review. (458/8435-97)

RESPONSE: In accordance with QA procedures, each audit conducted is governed by an audit plan and checklist which is prepared and approved in advance. This audit plan may include drill or exercise observation and other actions to ensure an in-depth assessment of the program. EIP-2-101 cannot dictate QA requirements in conflict with QA procedures. In addition, the audit "window" may preclude emergency drill observation in some cases.

- The audit team should include an individual with technical expertise in emergency preparedness. (458/8435-98)

RESPONSE: QA procedures for conducting audits requires that auditors assigned have technical expertise in the area to be audited. This requirement ensures that if the QA department does not have the technical expertise required, they must provide outside assistance. This assistance may be from another utility, contractor or other source.

#### 6.0 Coordination with Offsite Groups

- Include a rumor control number in the brochure/calendar. (458/8435-104)

RESPONSE: Two phone numbers for GSU will be included in the next edition of the calendar/brochure. One will be a general information number which is staffed during normal working hours. The other will be a rumor control number which is staffed during emergencies only.

## 7.0 Drills, Exercises and Walk-Throughs

- Verify that training includes failure modes on loss of power to motor-operated containment isolation valves and power supplies for radiation monitoring equipment. (458/8435-107)

RESPONSE: The training provided to operations personnel in these areas is not part of the Emergency Preparedness training program. These are covered in Operator training classes.

- Revise EIP-2-001 to be consistent in the use of the terms milliliter (ml) and gram of water. (458/8435-108)

RESPONSE: While the terms milliliter and gram may be nearly equivalent at STP, there is a significant difference when referring to a non-degassed reactor coolant sample or to circulating activity in the Reactor Coolant System. Volumetric activity concentrations need various parameters defined in order to be meaningful while concentrations based on mass are more definitive in reporting activities from circulating water during a severe accident. EIP-2-001 is correct as written.

- Revise EIPs to provide the Emergency Director or Recovery Manager, as appropriate, the option to delegate notifications. (458/8435-109)

RESPONSE: The EIPs clearly state that the decision to notify and make protective action recommendations may not be delegated. Recovery Managers and Emergency Directors understand that actual notifications are performed by communicators following their approval of the information to be passed to offsite agencies. This has been demonstrated in drills and exercises and is included in EIP-2-006, "Notifications", as well as in training. No further revision to procedures is warranted.

- Review sources defining shift manning and revise as necessary for consistency. (458/8435-110)

RESPONSE: Shift staffing is specified in the Technical Specifications, Station Administrative Procedures, and FSAR Sections 13.1 and 13.3. Currently, the exact shift complement is still under consideration; however, staffing will include those personnel specified in the Emergency Plan and EIPs and will meet minimum shift staffing requirements of Generic Letter 82-33, even though these

are identified as goals and not strict requirements. When the exact shift complement is established, EIPs and the Plan will be revised to reflect the actual staff augmentation as applicable.