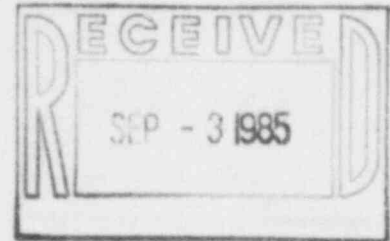


**TEXAS UTILITIES GENERATING COMPANY**  
SKYWAY TOWER · 400 NORTH OLIVE STREET, L.B. 81 · DALLAS, TEXAS 75201

Log # TXX-4539  
File # 10125

August 30, 1985

WILLIAM G. COUNCIL  
EXECUTIVE VICE PRESIDENT



Mr. Richard P. Denise, Director  
Division of Reactor Safety and Projects  
Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
OBJECTIVES AND GUIDELINES FOR THE 1985  
EMERGENCY PREPAREDNESS EXERCISE

Dear Mr. Denise:

Attached for your consideration are the objectives and guidelines for the CPSES Emergency Preparedness Exercise. This exercise is currently scheduled to be conducted on October 30, 1985.

Very truly yours,

A handwritten signature in cursive script that reads "W. G. Council".

W. G. Council

RWH/grr  
Attachment

c - J. B. Baird  
D. L. Kelley

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The following objectives and guidelines for Texas Utilities Generating Company (TUGCO) have been developed for the 1985 Emergency Preparedness Exercise. Part A includes general and specific exercise objectives. Part B contains the guidelines which have been developed for the conduct of the exercise.

A. EXERCISE OBJECTIVES

General Objectives:

1. Demonstrate the ability of emergency response personnel to implement and execute the CPSES Emergency Plan and appropriate Emergency Plan Procedures.
2. Demonstrate the ability to alert, mobilize and augment TUGCO emergency response personnel.
3. Demonstrate the ability to alert federal, state and local authorities within the specified time constraints.
4. Demonstrate the ability to activate the Technical Support Center (TSC), the Operations Support Center (OSC), the Emergency Operations Facility (EOF), the News Center and the Corporate Office Support Center (COSC) within the specified time constraints.
5. Demonstrate the functional and operational adequacy of the TSC, OSC, EOF, News Center and COSC.
6. Demonstrate the adequacy, operability and effective use of emergency communications equipment, and the adequacy of communications procedures and methods.
7. Demonstrate the ability to communicate and interface with the NRC Headquarters Incident Response Center, the NRC Region IV Incident Response Center, and the NRC response team at the site in an emergency situation.
8. Demonstrate the ability to adequately perform post-exercise critiques.

Direction and Control

1. Demonstrate the ability of each emergency response facility manager to maintain command control over all emergency response activities conducted from his facility throughout the exercise.
2. Demonstrate the ability to initiate and coordinate emergency response activities in an efficient and timely manner.

3. Demonstrate the ability to call upon and utilize TUGCO Corporate or outside support organizations if station capabilities are exceeded or if the additional assistance is warranted.
4. Demonstrate the ability of the CPSES Security Organization to respond to an emergency situation.
5. Demonstrate the transfer of responsibilities from the Control Room staff to the TSC staff.
6. Demonstrate the transfer of responsibilities from the TSC staff to the EOF staff.
7. Demonstrate the ability of the TUGCO Corporate Emergency Organization to support the CPSES Emergency Organization.
8. Demonstrate the ability of the Facility Manager to periodically brief personnel within his facility concerning the status of the emergency.
9. Demonstrate the ability to plan for long term emergency response.

#### Accident Assessment

1. Demonstrate the ability of the Emergency Organization to evaluate the causes of incidents, and perform mitigating actions to place the affected unit(s) in a safe, stable condition.
2. Demonstrate the ability of the appropriate Emergency Response Facility personnel to classify an emergency condition.
3. Demonstrate the ability of the TSC and EOF Engineering Teams to analyze current plant conditions, identify projected trends and potential consequences, and provide recommendations for mitigating actions.

#### Radiological Assessment

1. Demonstrate the ability to coordinate and conduct onsite, in-plant and offsite radiological monitoring activities.
2. Demonstrate the ability to assess and provide projections of offsite radiological conditions to support the formulation of protective action recommendations (regardless of the system used).
3. Demonstrate the ability to coordinate radiological data between the TSC and EOF.

4. Demonstrate the ability to coordinate TUGCO offsite radiological assessment activities with those conducted by the State.
5. Demonstrate the ability to direct and coordinate the deployment of onsite and offsite radiological monitoring teams.
6. Demonstrate the ability of survey personnel to perform dose rate surveys, collect and analyze radiological samples, and other prescribed onsite, in-plant and offsite radiological monitoring activities.
7. Demonstrate the ability to obtain and analyze samples from the in-plant normal or post-accident sampling systems, and assess the resultant data.

Protective Response

1. Demonstrate the ability to inform and update TUGCO, state and local emergency response personnel regarding the status of the emergency.
2. Demonstrate the ability to control the spread of contamination and emergency workers exposures.
3. Demonstrate the ability to formulate and implement onsite protective action measures.
4. Demonstrate the ability to account for non-essential personnel.
5. Demonstrate the ability to formulate protective action recommendations for the general public and emergency workers within the Plume Exposure Emergency Planning Zone (EPZ).
6. Demonstrate the ability to communicate protective action recommendations to state and local authorities.
7. Demonstrate the ability to continuously account for personnel assigned and operating out of each emergency response facility.

Public Information

1. Demonstrate the capability to coordinate the preparation, review and release of information with Corporate personnel and federal, state and local government agencies; and provide information releases to the media.
2. Demonstrate the capability of rumor control personnel to address questions concerning the status of emergency situations.

3. Demonstrate the ability of the company spokesman and his assistants to moderate media conferences conducted by TUGCO.

Reentry and Recovery

1. Demonstrate the ability to identify and discuss appropriate onsite reentry and recovery activities.
2. Demonstrate the ability to identify and discuss recommendations concerning offsite recovery activities and methods for developing recommendations for de-escalating the general public's response to the emergency condition.

B. EXERCISE GUIDELINES

To define the extent of "play" by the exercise participants and meet the above exercise objectives, the following exercise guidelines have been established.

1. Prior to the exercise, personnel should follow their normal routines for that day.
2. Upon establishing the initial conditions, the Field Exercise will commence with a postulated plant condition necessitating the declaration of an emergency.
3. The postulated conditions may result in a simulated radiological release which necessitates the consideration of protective actions for the general public. Meteorological conditions may be varied throughout the exercise.
4. The use of Media Centers may be required; however, no exercise press release will be made to the public.
5. Exercise participants will perform, as appropriate, radiological monitoring and dose assessment activities.
6. Each radiological monitoring team, if utilized, will be accompanied by controller/evaluator personnel and will rendezvous with these personnel at the Operations Support Center (OSC).
7. CPSES onsite personnel participating in the exercise shall react/respond to the fullest extent possible, including deployment of radiological monitoring teams, the use protective clothing and respiratory protection equipment, etc.

NOTE: Use of protective clothing and respiratory protection equipment may be simulated by



personnel assigned to the offsite TUGCO  
radiological monitoring teams.

8. The Outdoor Warning System (OWS) shall be activated.
9. If required by the exercise scenario, the onsite evacuation sirens will be activated and onsite assembly and accountability procedures should be completed. Non-participating personnel will be allowed to return to their routine functions unless their activities would interfere with the exercise.
10. If required by the exercise scenario, onsite security personnel should exercise their procedures for restricting normal access to the CPSES site without actually redirecting incoming and outgoing personnel. Priority for access shall be given to drill participants, controllers and evaluators.
11. Exercise participants will be identified by armbands. Evaluators, observers and controllers will be identified by badges.