



**Entergy  
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August 20, 1992

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U. S. Nuclear Regulatory Commission  
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Subject: Arkansas Nuclear One - Units 1 and 2  
Docket Nos. 50-313 & 50-368  
License Nos. DPR-51 & NPF-6  
Response to Items for the 1992  
Radiological Emergency Preparedness Exercise  
Inspection Report 50-313/92-19; 50-368/92-19

Gentlemen:

Entergy Operations has reviewed your correspondence of July 15, 1992 (OCNA0789209), regarding the inspection of activities associated with the Arkansas Nuclear One 1992 radiological emergency preparedness exercise. Timely and effective action will be taken to correct each weakness and to prevent recurrence by addressing the root cause in a comprehensive manner. As evidenced by the conclusions documented in the subject inspection report, Entergy Operations believes that significant progress continues to be made in our efforts to improve our emergency preparedness program.

As requested by your letter, attached is a description of the corrective measures planned and the schedule for completing these actions.

Should you have any questions, please contact me at (501) 964-8501.

Very truly yours,

*James J. Fisicaro*  
James J. Fisicaro  
Director, Licensing

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### Description of Corrective Measures and Schedule for Completion:

1. Discrepancies in the notification process are considered to be an exercise weakness (313/9219-01; 368/9219-01)

#### Response:

The above noted discrepancies (with the exception of the observation regarding the Computerized Notification System) resulted from a lack of comprehensive guidelines for formulation and transmission of notifications to off-site authorities. Accordingly, Procedure 1903.011 "Emergency Response/Notifications" will be revised to incorporate measures which will clarify instructions for:

Mandatory information to be provided in initial notifications to the Nuclear Regulatory Commission Operations Center.

Logging requirements for documentation of notification times as verified by the recipient.

Notifications and updates when both units are affected by the emergency event.

Remedial training for Notifications Communicators and Shift Communicators will be administered. This training will include the following objectives:

Demonstrate knowledge of the required message content and the ability to transmit initial notification of an emergency class to the Nuclear Regulatory Commission.

Demonstrate knowledge of the proper protocol for message content during events which affect both units.

Demonstrate the ability to properly construct messages which convey a significant change in the status of the emergency.

Demonstrate knowledge of the correct logging procedure with respect to the notification times to off-site authorities.

The Computerized Notification System (CNS) was utilized during this exercise to initiate activation of the Emergency Response Organization (ERO). The system program used for exercises is completely separate from and subordinate to the programs resident in CNS for actual emergencies. When the exercise program was prepared in advance, an error was made which caused the notification message to contain the incorrect emergency class (Site Area Emergency rather than Alert). The CNS system operator selected the correct option on the autodialer; however, the drill program itself contained an error. Although this error had no impact on the level of resources to be activated since the activation responses to both emergency classes are identical, it did cause some temporary confusion among responders. The actual emergency class notification options were unaffected by this drill error.



To prevent a recurrence of this error, instructions will be added to the "ANO Emergency Planning Drill/Exercise Manual" which will formally address preparations for the use of CNS during these activities.

The above corrective actions are scheduled for completion by November 18, 1992.

2. The inadequate briefing given by the licensee to the NRC upon their arrival to the site is considered to be an exercise weakness (313/9219-02; 368/9219-02).

Response:

It has been determined that procedures lack formal guidelines for briefing off-site authorities upon their arrival at the Emergency Operations Facility (EOF). Procedure 1903.067 "Emergency Response Facility - Emergency Operations Facility (EOF)" will be revised to provide guidelines for conducting such briefings. The object of the briefings will be to furnish concise and useful information and to identify sources within the Emergency Response Organization for information not immediately available during the briefing. The addition of these guidelines will also promote consistency in the briefing process.

This revision is scheduled for implementation by November 18, 1992.

3. The inspectors noted that the off-site monitoring teams did not take adequate contamination control measures while in the radioactive plume because protective clothing was not used, nor was it readily available to them. The failure to use proper protective clothing is considered to be an exercise weakness (313/9219-03; 368/9219-03).

Response:

This weakness is the result of a past drill practice which did not require Off-site Monitoring Teams to perform in the most realistic manner feasible. Although the use of protective clothing in the field during this exercise was established as a simulated activity prior to the exercise, Entergy Operations acknowledges the negative training aspect of not requiring off-site monitoring teams to carry protective clothing with them in the field. Accordingly, in future drills and exercises which involve off-site monitoring teams, personnel will be expected to locate and carry protective clothing in the vehicles.

This training practice was initiated with the ERO Drill conducted on August 18, 1992.