

JAN 22 1988

In Reply Refer To:
Docket: 50-298/87-25

Nebraska Public Power District
ATTN: George A. Trevors
Division Manager - Nuclear Support
P. O. Box 499
Columbus, NE 68601

Gentlemen:

Thank you for your letter of December 10, 1987, in response to our letter dated November 6, 1987. We have reviewed your reply to the six deficiencies identified in our report. The response in your letter was discussed with Mr. R. Hayden of your staff on December 30, 1987. In your response, there is one area that needs additional clarification.

In your response to deficiency number 298/8725-02, you quoted NUREG-0696 and the need for face-to-face communications between Technical Support Center (TSC) and Control Room (CR) personnel. The face-to-face method of communicating is beneficial, but not a substitute for the primary method of information exchange between Emergency Response Facilities (ERF), which should be by direct telephone from the TSC to the Control Room.

The three events observed during the emergency exercise highlighted weaknesses in the exchange of vital information between CR and TSC staffs. We believe that a review of this area is in order. This review should identify kinds of information that need to be exchanged between ERFs, the organizational elements in charge of transmitting and receiving various types of information, and the means used to transmit and receive each type of information. Additionally, procedures should designate responsibilities and describe necessary actions and equipment.

It is requested that within 30 days after the receipt of this letter you provide this office with a schedule for correcting deficiency number 298/8725-02.

Your reply to the other five deficiencies identified was considered adequate. We will review the implementation of your corrective actions during a future inspection.

Sincerely,
Original Signed By:
L. J. CALLAN

L. J. Callan, Director
Division of Reactor Projects

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AC:DRP/C *WLF*
~~GLM~~ Madsen *Holler*
1/14/88

D:DRP *WLF*
LJCallan
1/15/88

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Nebraska Public Power District

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cc:

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Nebraska Radiation Control Program Director

bcc w/ltr from licensee dtd 11/06/87:

DMB - IE35

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Section Chief (DRP/C)

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Inspector(s)

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NMEPB

DRP

R. D. Martin, RA

L. Shea, RM/ALF

MIS System

Project Engineer, DRP/C

W. Long, NRR Project Manager

DRS

W. L. Fisher

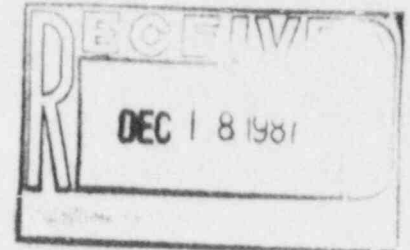
D. B. Matthews, NRR



Nebraska Public Power District

GENERAL OFFICE
P.O. BOX 499, COLUMBUS, NEBRASKA 68601-0499
TELEPHONE (402) 564-8561

NLS8700649
December 10, 1987



U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: NPPD Response to Inspection Report 50-298/87-25

This letter is written in response to your letter (undated), transmitting Inspection Report 50-298/87-25. Therein you identified six (6) deficiencies in our emergency preparedness program observed during the 1987 annual emergency exercise. The following is our response to the deficiencies noted:

Deficiency 1 (285/8725-01)

The NRC inspector noted that not all notifications originating from the Control Room (CR) to offsite authorities were made in a timely or consistent manner. The Emergency Director (ED) declared the Alert at 8:34 a.m.; however:

- ° The authorities of the State of Nebraska were notified of the Alert at 8:51 a.m.
- ° The authorities of the State of Missouri were notified of the Alert at 8:55 a.m.
- ° The ED did not declare a Site Area Emergency until about 26 minutes after plant conditions warranted the same. As a consequence, notifications to offsite authorities pertaining to this escalation in accident severity were delayed.

Response

The Emergency Director was fully aware of simulated plant conditions during the time frame immediately preceding the declaration of a Site Area Emergency. Time was spent in confirming all indications. Regulations do not dictate the amount of time to be used in classification and verification of an emergency. It is felt that an erroneous or premature declaration of a Site Area Emergency would not be prudent.

Notification procedures will be revised to make the exact time of an emergency declaration for an alert or higher classification a part of the plant public address emergency announcement. It will also be reflected in the notification form used by the Control Room Communicator. This will be completed by February 29, 1988.

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December 10, 1987

Deficiency 2 (285/8725-02)

Information pertaining to plant status was not conveyed from the CR to the TSC in a timely manner, as follows:

- ° Information about the discharge-volume drain valve being inoperative at 9:15 a.m. was not received in the TSC until 9:27 a.m.
- ° At 10:03 a.m., the CR mandated through the public address system the evacuation of the Reactor Building due to high radiation levels. At 10:09 a.m., the ED called the CR to find out why this evacuation took place, indicating lack of continuous flow of information from the CR to the TSC.
- ° An alarm pertaining to the inoperable scram discharge valve was received by CR operators at 9:30 a.m. This required visual inspection by procedure. The CR operators failed to inform the TSC staff about this situation, and as a consequence the valve inspection team was not dispatched until 9:53 a.m.
- ° Several face-to-face meetings between the CR and TSC staffs were necessary to compensate for the shortcomings of other means of communication throughout the exercise, indicating a possible need for additional communication hardware between these two emergency response facilities.

Response

Section 2.2 (page 9) of NUREG 0696, Functional Criteria for Emergency Response Facilities, supports actions taken by CNS Control Room and TSC staff by stating the need for face-to-face communications between TSC and Control Room personnel.

The next cycle of CNS operator requal training will include a thorough review of this inspection item. In addition, section A of EPIP 5.7.7, Activation of TSC, will be revised to prompt the Emergency Director to review plant status with Control Room and TSC personnel on a periodic basis. This will be completed by April 15, 1988.

Deficiency 3 (285/8725-03)

The NRC inspector noted that the Shift Supervisor (SS) acting as the ED, in the CR, and the Control Room Supervisor (CRS), became involved with administrative details, or failed to delegate functions to the TSC. This detracted from their ability to direct and coordinate emergency response activities in an efficient manner.

Response

The District has embarked on an effort to develop and implement an improved emergency response organization training program. This new program will be position task oriented and will address issues such as those described in the stated deficiency. Improved training should help to increase efficiency in the coordination of the operational and administrative direction of emergency situations. The revised emergency response training programs will be implemented during calendar 1988.

December 10, 1987

Deficiency 4 (285/8725-04)

The NRC inspector noted that Procedure EPIP 5.7.1, "Emergency Classification", listed Emergency Action Level (EAL) 2.6 as the loss of two fission product barriers as a General Emergency. The EAL in some situations would produce minimal offsite consequence that would not justify taking mandatory protective actions as is the case in a General Emergency class. Additionally, the guidance in NUREG 0654, Appendix A, states that a General Emergency requires the loss of 2 out of 3 fission product barriers with a potential loss of the third barrier.

Response

A proposal to change the NPPD Emergency Plan for CNS and the corresponding EIPs to reflect the guidance in NUREG 0654 concerning loss of 2 out of 3 fission product barriers will be presented to the appropriate state agencies for their review and comment. Upon receipt of their comments, the appropriate changes will be incorporated into the Emergency Plan, EIPs, and CNS training cycle. This will be completed before April 15, 1988.

Deficiency 5 (285/8725-05)

The NRC Inspectors noted that the TSC engineering staff used uncontrolled copies of plant system diagrams, that could be out of date, for troubleshooting during the unfolding of the accident scenario.

The status boards in the TSC were deficient in that:

- ° The status boards were not maintained up-to-date (e.g. equipment status was not updated from 10:00 a.m. to 3:00 p.m.).
- ° Parameter trends were not indicated.
- ° Parameters such as valve position for critical systems, like Standby Gas Treatment and Switch Liquid Control, were not indicated.

Response

Parameters, trends and current system lineups are available on PMIS/SPDS in the TSC for access by the TSC organization in the event of an actual emergency. Uncontrolled copies of plant system diagrams have been removed from the TSC and controlled copies made available. The District will be developing enlarged TSC status boards having improved capabilities for status and trending displays for installation in the new TSC currently under construction. These revised displays will be available by the end of June 1988.

Deficiency 6 (285/8725-06)

The NRC inspector determined that the medical team failed to take appropriate first-aid actions to save the life of the injured-contaminated individual, and was unable to establish priorities between medical and radiological concerns.

December 10, 1987

Response

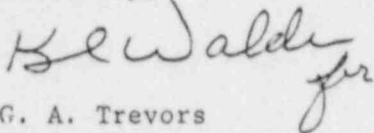
The CNS medical training program will be upgraded to provide for Red Cross Multimedia First-Aid, training for station personnel and the establishment of EMT qualified squads to improve the station's capability to combat medical emergencies.

A procedure is under development for medical response to injured, non-contaminated individuals with renewed emphasis on first aid capabilities. In addition, the revised emergency response training program will address the coordinating of medical emergency actions during plant casualty conditions.

These actions will be completed before the end of June, 1988.

Should you have any questions concerning this matter, please contact my office.

Sincerely,



G. A. Trevors
Division Manager
Nuclear Support

GAT/rkr:jw

cc: U.S. Nuclear Regulatory Commission
Regional Office, Region IV

NRC Resident Inspector
Cooper Nuclear Station