

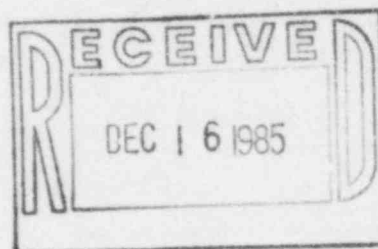
**LOUISIANA**  
**POWER & LIGHT**

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December 13, 1985

W3P85-3296  
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QA

Mr. Robert D. Martin  
Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011



Dear Mr. Martin:

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
Emergency Preparedness Inspection 85-23

Reference: NRC Region IV Inspection Report No. 85-23 transmitted by letter dated November 14, 1985 from L.E. Martin to R.S. Leddick (LP&L).

This letter provides the Louisiana Power & Light Company (LP&L) response to the Notice of Violation in the referenced letter. The cited violation and LP&L response is given below:

VIOLATION NO. 8523-01

Inadequate Training

10 CFR 50.47(b)(15) requires that adequate provisions exist in the emergency plan to ensure that radiological emergency response training is provided to those who may be called on to assist in an emergency.

Section 8.1.1.3 of the Emergency Plan states, "personnel assigned to the W3SES emergency organization with specific Emergency Plan duties and responsibilities receive specialized training for their respective assignments. The Emergency Plan Training Program ensures that station personnel, who will be active participants in the emergency organization, are familiar with the contents of the Emergency Plan and Emergency Plan Implementing Procedure (EPIP's)."

Contrary to the above, certain station personnel assigned to the emergency organization had not received appropriate general and specific emergency plan and procedure training, as evidenced by the following:

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On July 6-8, 1985, NRC inspectors conducted walkthroughs simulating accident conditions with two shift supervisors and control room supervisors. The selected personnel were unable to properly use the EPIP's to formulate protective action recommendations to offsite agencies.

This is a Severity Level IV violation (Supplement VIII) (382/8523-10).

RESPONSE TO VIOLATION

LP&L feels that its actions taken in the training of personnel for their duties and responsibilities within the emergency organization are not in violation of the requirements specified in 10 CFR 50.47(b)(15).

A review of LP&L training records for the shift supervisors and control room supervisors evaluated by NRC inspectors on July 6-8, 1985 shows that they had completed as a minimum the following lectures:

1. Emergency Coordinator/EOF Director Course
2. Radiological Dose Assessment Manual (Part 1)
3. Recognition and Classification of Emergency Conditions
4. SS/CRS Emergency Plan Refresher
5. Review of Dose Assessment and Protective Action Guidelines for Operations Personnel

The only exception to the above listed course completion was Mr. D. A. Schultz. Mr. Schultz was temporarily filling the position of Control Room Supervisor at the time of the inspection. Mr. Schultz had been previously qualified to the level of Shift Supervisor/Control Room Supervisor. At the time he was placed on shift he was filling the position of Engineering/Operations Coordinator in the Emergency Operations Facility organization. Mr. Schultz had also acted as Lead Control Room Controller and as a drill scenario developer for various Waterford 3 drills and exercises. Based on these facts it is felt that Mr. Schultz was an experienced individual qualified to fill the position of Control Room Supervisor.

The "Emergency Coordinator/EOF Director Course", "SS/CRS Emergency Plan Refresher", and "Review of Dose Assessment and Protective Action Guidelines for Operations Personnel" all contain sections designed to familiarize personnel with procedure EP-2-052 "Protective Action Guidelines".

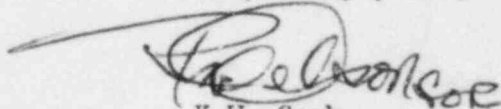
The above described training shows that LP&L did provide training to ensure that station personnel who will be active participants in the emergency organization are familiar with the contents of the Emergency Plan and Emergency Plan Implementing Procedures.

As a result of the walkthroughs, LP&L recognized there was a weakness in the formulation of protective action recommendations to offsite agencies and initiated immediate corrective action as follows:

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- 1) We determined that a major contributing factor to the weakness cited above was the cumbersome format of EP-2-052 Rev. 4 "Protective Action Guidelines". Therefore, we revised the procedure to make it less cumbersome, to provide additional guidance on required protective action recommendations at general emergency and to provide clarification of emergency response areas.
- 2) We revised EP-1-001, Rev. 6, Attachment 7.1 to include a bold face note under general emergency which states: "OFF-SITE PROTECTIVE ACTION RECOMMENDATIONS ARE REQUIRED - SEE EP-2-052".
- 3) We emphasized in SS/CRS Emergency Plan refresher training the hands-on use of EP-2-052, Rev. 5. We have received positive feedback from operations personnel as a result of actions cited above.

Very truly yours,



K.W. Cock  
Nuclear Support & Licensing Manager

KWC:GEW:sms

cc: NRC, Director, Office of I&E  
L.E. Martin, NRC Region IV  
G.W. Knighton, NRC-NRR  
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NRC Resident Inspectors Office  
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