

APPENDIX

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/88-60
50-446/88-56

Construction Permits: CPPR-126
CPPR-127

Dockets: 50-445
50-446

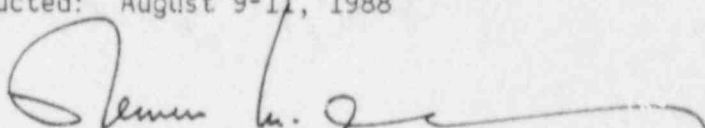
Licensee: Texas Utilities Electric Company (TUEC)
400 North Olive, L.B. 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station

Inspection At: Comanche Peak Site

Inspection Conducted: August 9-11, 1988

Inspector:




N. M. Terc, Emergency Preparedness Analyst
Security and Emergency Preparedness Section

9/6/88

Date

Approved:



R. J. Everett, Chief, Security and Emergency
Preparedness Section

9/7/88

Date

Inspection Summary

Inspection Conducted August 9-11, 1988 (Report: 50-445/88-60; 50-446/88-56)

Areas Inspected: Routine, announced inspection of the operational status of the emergency preparedness program.

Results: Within the areas inspected, no violations or deviations were identified. The NRC inspector concluded that substantial modifications and improvements were necessary to reach a level of operational readiness in the area of emergency response.

DETAILS1. Persons ContactedTUEC

- *M. Riggs, Plant Evaluation Manager
- *T. Gosdin, Administrative Support Manager
- *J. Salsman, Emergency Planning Manager
- *G. Bell, Senior Licensing Engineer
- *G. Davis, Oper. Item Coordinator
- *J. Gallman, Engineering Analysis Supervisor
- *R. Baker, Licensing Compliance Manager

NRC

- *J. Everett, Chief, Security and Emergency Preparedness Section, Region IV
- R. Caldwell, Security Inspector, Region IV
- *J. Wiebe, Senior Lead Inspector, Office of Special Projects, NRC
- S. Bitter, Resident Inspector, Office of Special Projects, NRC

*Denotes those present at exit interview.

The NRC inspector also held discussions with other station and corporate personnel in the areas of security, health physics, operations, training and emergency response.

2. Follow-up on Previous Inspection Findings (92702)

(Closed) Deficiency (445/8515-07); 446/8512-07) Inadequate Sampling - The NRC inspector noted that all radiation protection technicians had been retrained on the techniques for sampling, labeling, and packaging samples. In addition, the NRC inspector noted that the licensee revised Procedure EPP-205, "Activation of the Operations Support Center and Operations Support Center Personnel Duties," to include instructions for access and contamination control of personnel returning from inplant activities during emergency conditions.

(Closed) Improvement Item (445/8333-42; 446/8317-42) Inadequate Procedure - The NRC inspector noted that the licensee revised procedure CLI-900, "Sampling, Handling, Preparation and Analysis of at least or Highly Radioactive Samples," to include instructions for access and contamination control.

(Closed) Improvement Item (445/8333-51; 446/8317-51) Insufficient Number of Telephones - The NRC inspector noted that the licensee had added 15 telephones.

(Closed) Improvement Item (445/8333-55; 446/8317-55) Inadequate Listing of Equipment - The NRC inspector noted that the licensee revised Procedure EPP-107, "Maintenance and Inventory of Emergency Equipment and Supplies," to require an inventory of air bottles.

(Closed) Improvement Item (445/8333-56; 446/8317-56) Inventory Discrepancy - The NRC inspector noted that the licensee increased the number of high-range pocket dosimeters to be consistent with actual emergency needs and procedures.

(Closed) Improvement Item (445/8333-59; 446/8317-59) Inadequate Listing of Equipment - The NRC inspector noted that the licensee revised Procedure EPP-107, "Maintenance and Inventory of Emergency Equipment and Supplies," to require listing of batteries.

(Closed) Improvement Item (445/8333-76; 446/8333-76) Integration of Offsite Monitoring Measurements with Dose Assessment - The NRC inspector noted that the licensee revised the computer software and program documentation for emergency dose assessment to incorporate offsite measurements.

3. Emergency Plan and Implementing Procedures (82701-02.01)

The NRC inspector determined that changes to the emergency plan and procedures were not being implemented at this time, except for training purposes.

The NRC inspector noted that administrative procedures were being revised to provide a means to ensure that changes to the emergency plan and procedures will be sent to the NRC within established deadlines.

No violations or deviations were identified in this area.

4. Emergency Facilities, Equipment, Instrumentation and Supplies (82701-02.02)

The NRC inspector toured the control room and noted that it was being modified. An island was being constructed in order to relocate communications, the Safety Parameter Display System terminal, and dose assessment equipment.

The NRC inspector also noted that the Technical Support Center (TSC) was undergoing extensive rebuilding and reconstruction of the ventilation system. As a consequence of the above changes, equipment related to emergency response in the TSC was temporarily unusable.

The NRC inspector determined that the licensee was planning to move the Operational Support Center to a location adjacent to the health physics access control area.

Finally, the NRC inspector noted that the Emergency Operations Center was undergoing a design modification to provide an uninterruptable power supply consisting of batteries and a back-up power supply consisting of an independent power line.

The NRC inspector concluded that the licensee needed to complete the alterations, repair, and up-grading of Emergency Response Facilities in order to reach an adequate level of emergency preparedness readiness.

No violations or deviations were identified in this area.

5. Organization and Management Control (82701-02.03)

The NRC inspector interviewed several members of the emergency preparedness organization staff who maintain the emergency preparedness program.

The NRC inspector noted that the staff's academic backgrounds and experience were satisfactory. The NRC inspector also noted that there was an ongoing program to attend courses, conferences, and exercises to maintain the staff abreast of new developments.

No violations or deviations were identified in this area.

6. Training (82701-02.04)

The NRC inspector noted that emergency response training had not been completed. Only 40 percent of required training was completed. The licensee is presently developing revised emergency preparedness implementation procedures that will be used in training, but will not be of a didactic nature.

The licensee has the intention of performing retraining according to the new procedures immediately after procedures are reviewed, revised, and approved.

No violations or deviations were identified in this area.

7. Independent Audits (82701-02.05)

The NRC inspector reviewed the 1987 Quality Assurance Audit (QAA), performed on December 1987, and found that auditors identified a number of findings. The severity and diversity indicated that the auditors were objective and thorough. The results and conclusion of the audit is consistent with the results of this inspection.

No violations or deviations were identified in this area.

8. NRC Inspector Observations

The NRC inspector discussed the following observations with the licensee during the exit interview on August 11, 1988. These observations are neither violations nor unresolved items. They were identified for licensee consideration, but they have no specific regulatory requirement. The licensee indicated that these items would be considered.

The NRC inspector concluded that in order to reach an adequate level of emergency response readiness, the following objectives should be met:

- Complete emergency response facilities.
- Ensure that equipment in these facilities is operable.
- Review and revise all procedures pertaining to the emergency preparedness program.
- Conduct training of emergency response personnel.

9. Exit Interview

The NRC inspector met with the NRC resident inspector and licensee representatives denoted in paragraph 1 on August 11, 1988, and summarized the scope and findings of the inspection as presented in this report. Licensee representatives acknowledged their understanding of the inspection findings.