

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

September 20, 1988

APPLICANT:

Texas Utilities Electric Company (TU Electric)

FACILITY:

Comanche Peak Steam Electric Station (CPSES), Units 1 and 2

SUBJECT:

SUMMARY OF MEETING ON SEPTEMBER 8, 1988 - DISCUSSION OF

REVISIONS TO THE CPSES EMERGENCY PLAN

A meeting was held on September 8, 1988 in Rockville, Maryland between the NRC staff and representatives of TU Electric to discuss changes to the Emergency Plan (EP) which have occurred since Revision 8 was reviewed by the staff and the results of that review documented in SSER 12. The meeting notice and list of attendees are provided as Enclosures 1 and 2.

The staff and applicant discussed the changes to the EP which occurred with Revision 10 (current version) and received clarification and background information concerning these changes. Enclosure 3 identifies the substantive changes effected by Revision 10.

The applicant informed the staff that it may be difficult to conduct a full-scale exercise for record prior to CPSES Unit 1 licensing, as the State of Texas only has openings during April. July and November 1989 in which to participate in nuclear plant exercises. The South Texas plant is currently scheduled to conduct their full-participation exercise in April 1989, leaving July and November 1989 as possible dates for CPSES. Because a full-participation exercise demonstrating both on-site and off-site emergency capability is required within two years before a plant receives a full-power license, the staff may need to work with the Feberal Emergency Management Agency to ensure that this requirement is met.

The regional staff will conduct a one or two-week on-site emergency preparedness appraisal within approximately 4 months of the scheduled full-participation exercise to allow the applicant time to effect corrective actions should such a need be identified.

Summary of September 8, 1988 Meeting - 2 -

Between now and the time of license issuance, the applicant will ensure that a complete and up-to-date copy of the EP Implementing Procedures (IP) is available to the staff by providing an information (not a controlled) copy of the EPIP to J. H. Wilson of OSP.

James H. Wilson, Assistant Director for Programs Comanche Peak Project Division Office of Special Projects

Enclosures:

Meeting Notice
 List of Attendees

3. Change Description for EP Revision 10

cc: See next page

Summary of September 8, 1988 Meeting - 2 -

Between now and the time of license issuance, the applicant will ensure that a complete and up-to-date copy of the EP Implementing Procedures (IP) is available to the staff by providing an information (not a controlled) copy of the EPIP to J. H. Wilson of OSP.

(original signed by)

James H. Wilson, Assistant Director for Programs Comanche Peak Project Division Office of Special Projects

Enclosures:

Meeting Notice
 List of Attendees

3. Change Description for EP Revision 10

cc: See next page

DISTRIBUTION

Docket File

NRC PDR Local PDR CPPD Reading OSP Reading JPartlow CGrimes PMcKee JHW ilson JLyons KWarnick MMalloy | DTerao OGC DCrutchfield E.Jordan

CPPD: OSP MMalloy 09/19/88

BGrimes CVan hiel GSimonds ACRS (10)

AD: CPPD ASD JHWilson: cm 09/20/88

W. G. Counsil Texas Utilities Electric Company

cc: Jack R. Newman, Esq. Newman & Holtzinger, P.C. Suite 1000 1615 L Street, N.W. Washington, D.C. 20036

Robert A. Wooldridge, Esq. Worsham, Forsythe, Sampels & Wooldridge 2001 Bryan Tower, Suite 2500 Dallas, Texas 75201

Mr. Homer C. Schmidt Director of Nuclear Services Texas Utilities Electric Company Skyway Tower 400 North Olive Street, L.3. 81 Dallas, Texas 75201

Mr. R. W. Ackley Stone & Webster Comanche Peak Steam Electric Station P. O. Box 1002 Glen Rose, Texas 76043

Mr. J. L. Vota Westinghouse Electric Corporation P. O. Box 365 Pittsburgh, Pennsylvania 15230

Susan M. Theisen
Assistant Attorney General
Environmental Protection Division
F. O. Box 12548, Capitol Station
Austin, Texas 78711-1548

Mrs. Quanita Ellis, President Citizens Association for Sound Energy 1426 South Polk Dallas, Texas 75224

NS. Nancy H. Williams CYGNA Energy Services 2121 N. California Blvd., Suite 390 Walnut Creek, CA 94596 Comanche Peak Steam Electric Station Units 1 and 2

Asst. Director for Inspec. Programs Comanche Peak Project Division U.S. Nuclear Regulatory Commission P. O. Box 1029 Granbury, Texas 76048

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Lanny A. Sinkin Christic Institute 1324 North Capitol Street Washington, D.C. 20002

Ms. Billie Pirner Garde, Esq. Government Accountability Project Midwest Office 104 East Wisconsin Avenue Appleton, Wisconsin 54911

David R. Pigott, Esq. Orrick, Herrington & Sutcliffe 600 Montgomery Street San Francisco, California 94111

Anthony Z. Roisman, Esq. Suite 600 1401 New York Avenue, NW Washington, D.C. 20005

Robert Jablon Bonnie S. Blair Spiegel & McDiarmid 1350 New York Avenue, NW Washington, D.C. 20005-4798

George A. Parker, Chairman Public Utility Committee Senior Citizens Alliance Of Tarrant County, Inc. 6048 Wonder Drive Fort Worth, Texas 76133 - 2 - Comanche Peak Electric Station Units 1 and 2

cc: Joseph F. Fulbright Fulbright & Jaworski 1301 McKinney Street Houston, Texas 77010

Roger D. Walker
Manager, Nuclear Licensing
Texas Utilities Electric Company
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Texas Utilities Electric Company c/o Bethesda Licensing 3 Metro Center, Suite 610 Bethesda, Maryland 20814

William A. Burchette, Esq.
Counsel for Tex-La Electric Cooperative
of Texas
Heron, Burchette, Ruckert & Rothwell
Suite 700
1025 Thomas Jefferson Street, NW
Washington, D.C. 20007

GDS ASSOCIATES, INC. Suite 720 1850 Parkway Place Marietta, Georgia 30067-8237

ENCLOSURE 1

A STATE OF THE STA

NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20655

August 31, 1988

Docket Nos. 50-445 and 50-446

MEMORANDUM FOR:

Comanche Peak Project Division Office of Special Projects

FROM:

James H. Wilson, Assistant Director

for Projects

Comanche Peak Project Division Office of Special Projects

SUBJECT:

FORTHCOMING MEETING WITH TU ELECTRIC

Date and Time:

Thursday, September 8, 1988

1:00 pm - 4:00 pm

Location:

One White Flint North 11555 Rockville Pike Rockville, MD 20555

Room No. 78-9

Purpose:

Discussion of Revision 10 to the Comanche Peak Emergency Preparedness Plan and related issues

Participants:*

NRC J. H. Wilson

D. Terao M. Malloy R. Van Niel G. Simonds TU Electric R. Walker G. Bell. et al

Jame A Wlin

James H. Wilson, Assistant Director

for Projects

Comanche Peak Project Division Office of Special Projects

cc: See next page

* Meetings between NRC technical staff and applicants for licenses are open for interested members of the public, petitioners, intervenors, or other parties to attend as observers pursuant to "Open Meetings and Statement of NRC Staff Policy," 43 Federal Register 28058, 6/28/78. W. G. Counsil Texas Utilities Electric Company

cc:
Jack R. Newman, Esq.
Newman & Holtzinger, P.C.
Suite 1000
1515 L Street, N.W.
Washington, D.C. 20036

Robert A. Wooldridge, Esq. Worsham, Forsythe, Sampels & Wooldridge 2001 Bryan Tower, Suite 2500 Dallas, Texas 75201

Mr. Homer C. Schmidt
Director of Nuclear Services
Texas Utilities Electric Company
Skyway Tower
400 North Olive Street, L.B. 81
Dallas, Texas 75201

Mr. R. W. Ackley Stone & Webster Comanche Peak Steam Electric Station P. O. Box 1002 Glen Rose, Texas 76043

Mr. J. L. Vota Westinghouse Electric Corporation P. O. Box 355 Pittsburgh, Pennsylvania 15230

Susan M. Theisen
Assistant Attorney General
Environmental Protection Division
P. O. Box 12548, Capitol Station
Austin, Texas 78711-1548

Mrs. Juanita Ellis, President Citizens Association for Sound Energy 1426 South Polk Dallas, Texas 75224

Ms. Nancy H. Williams CYGNA Energy Services 2121 N. California Blvd., Suite 390 Walnut Creek, CA 94596 Comanche Peak Steam Electric Station Units 1 and 2

Asst. Director for Inspec. Programs Comanche Peak Project Division U.S. Nuclear Regulatory Commission P. O. Box 1029 Granbury, Texas 76048

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011

Lanny A. Sinkin Christic Institute 1324 North Capitol Street Washington, D.C. 20002

Ms. Billie Pirner Garde, Esq. Government Accountability Project Midwest Office 104 East Wisconsin Avenue Appleton, Wisconsin 54911

David R. Pigott, Esq. Orrick, Herrington & Sutcliffe 600 Montgomery Street San Francisco, California 94111

Anthony Z. Roisman, Esq. Suite 600 1401 New York Avenue, NW Washington, D.C. 20005

Robert Jablon Bonnie S. Blair Spiegel & McDiarmid 1350 New York Avenue, NW Washington, D.C. 20005-4798

George A. Parker, Chairman Public Utility Committee Senior Citizens Alliance Of Tarrant County, Inc. 6048 Wonder Drive Fort Worth, Texas 76133 cc: Joseph F. Fulbright Fulbright & Jaworski 1301 McKinney Street Houston, Texas 77010

Roger D. Walker Manager, Nuclear Licensing Texas Utilities Electric Company Skyway Tower 400 North Olive Street, L.B. 81 Dallas, Texas 75201

Texas Utilities Electric Company c/o Bethesda Licensing 3 Metro Center, Suite 610 Bethesda, Maryland 20814

William A. Burchette, Esq. Counsel for Tex-La Electric Cooperative of Texas Heron, Burchette, Ruckert & Rothwell Suite 700 1025 Thomas Jefferson Street, NW Washington, D.C. 20007

GDS ASSOCIATES, INC. Suite 720 1850 Parkway Place Marietta, Georgia 30067-8237

LIST OF ATTENDEES AT MEETING HELD IN ROCKVILLE, MD ON SEPTEMBER 8, 1988 - EMERGENCY PREPAREDNESS

NRC
P. McKee,* OSP
J. H. Wilson, OSP
M. Malloy,* OSP
C. Van Niel, DREP/NRR
G. Simonds, DREP/NRR

TU ELECTRIC

D. Woodlan, Nuclear Licensing
G. Bell, Nuclear Licensing
J. Salsman, Emergency Planning

*part-time

Attachment 2 to TXX-88625 August 22, 1988

EP Section		Description
Preface	Revision:	Deletes reference to the specific annex of the Texas State Plan.
1.1.2	Addition:	Adds clarifying statement regarding the Shift Supervisor's period of station.
1.1.2.1	Revision:	Changes "required" notification of support agencies to notification as necessary.
1.2.1	Update:	Change reflects current organization name: "TU Electric Nuclear Engineering and Operations Group." Adds reference to location of complete NEO group discussion.
1.2.2	Revision:	Adds reference to FSAR Chapter 13. Adds reporting responsibility of Manager, Plant Operations and reduces overall MPO responsibilities from station operation to operations and maintenance [departments]. Deletes MPO replacements and adds reference to station procedure.
1.2.3	Update:	Revises discussion to show that personnel from all factions of the NEO group make up the Emergency Organization.
	Revision:	Deletes references to a specific Emergency Plan Procedure and adds a generic reference to Emergency Plan Procedures.
1.2.3.1	Revision:	See Section 1.2.3; "Revision"
1.2.3.2	Revision:	Deletes specific individual assignments and add specific responsibility for EOF activation and control.
1.2.3.4	Update:	Discusses responsibilities of the Public Information Coordinator with respect to information releases issued from the site.
1.2.3.6	Update:	Reassigns selected duties of the Logistical Support Coordinator to the Logistical Support Center Manager.
1.2.3.8	Addition:	Adds responsibility for LSC radiological concerns.

EP Section		Description
1.2.3.14	Update:	Amends the discussion to address the corporate representative member.
1.2.3.18	Addition:	Add the position of Logistical Support Center Manager and related responsibilities.
1.2.3.20	Addition:	Adds reference to a licensed engineer who is qualified to fill the position of STA.
1.2.3.21	Addition:	Adds duties and responsibilities of the Local EOC advisors.
-1.2.5.2	Revision:	Area of responsibility for the Security Organization is reduced from onsite to the protected area.
	Clarificat	ion: Responsibility for evacuation assistance extends to all non-essential personnel (not just TUGCO personnel).
-1.2.9	Revision:	Deletes references to Squaw Creek Park, Inc. as that entity no longer exists. Squaw Creek Park is owned by TU Electric and, 'now,' operated by TU Electric personnel.
V1.3.1.3	Addition:	Adds another "local" ambulance service to list of resources.
~1.3.1.4	Addition:	Adds another "local" hospital to list of resources.
1.3.3	Revision:	Deletes specific quantities of equipment designated for Federal use.
.1.3.4.3	Revision:	Discussion of INPO capabilities and resources are now described in their letter-of-agreement.
Table 1.1	Revision:	Increases augmentation staffing to satisfy CPSES needs.
Figures 1.2 & 1.3	Update:	Updates figures to reflect current NEO group organization.
Figure 1.4	Addition:	Adds LCS structure.

EP Section		Description
Table 2.1 Sheets 1-6	Addition:	Adds follow-up written reports within specified periods of time.
Table 2.2 Sheet 15	Addition:	Adds loss of all onsite meteorological capabilities.
3.0	Addition:	Adds telecopier to list of communication equipment resources.
3.5	Revision:	Deletes radiological information from basic follow-up message format/content.
3.6	Addition:	Adds this section to provide radiological data to the Texas Dept. of Health, Bureau of Radiation Control.
3.7	Revision:	Deleter design characteristics of the CPSES Alert and Notification system.
4.1.4	Update:	Discussion consolidates previous text and incorporates text from Section 4.1.6 (Rev. 9)
4.2	Update:	Revises discussion to reflect current locations of the ENS and KPN Telephones.
4.4	Update:	Expands discussion to include the current locations of telecopiers used for emergency communications.
4.5	Addition:	Adds the discussion about the autodial calling system.
4.6	Addition:	Adds the discussion about the microwave communications system.
Figures 4.1 through 4.6	Addition:	Adds current communication paths to these illustrations.
5.2	Revision:	Deletes spec.fic quantities of rumor control telephones.
6.1	Addition:	Adds Security to the TSC staff.
6.2	Addition:	Adds description of the new OSC location. Addresses the old location as an alternate facility.
	Revision:	Relocates OSC equipment storage from the maintenance annex building to the OSC location.

EP Section		Description
6.3	Addition:	EOF is staffed at the Alert classification (still activated at the Site Area or greater classification). Previously, the EOF was staffed and activated at the site area (or greater) classification.
	Revision:	TLD processing and radio isotopic analysis equipment no longer maintained in the EOF.
6.5	Addition:	Adds description of the Logistical Support Center.
6.7	Addition:	Adds discussion regarding the lab facilities being used for training and therefore are not maintained in a constant state of readiness.
6.8	Revision:	Deletes the reference to Oak Ridge National Laboratory as a backup facility. Other arrangements, demonstrated by current letters of agreement, have been made.
6.9	Revision:	Reduces the commitment to retain water (used for decontamination purposes) to a statement of the ability to retain water used for decontamination.
6.11	Revision:	Deletes reference to the procedure relating to equipment and supplies lists and deletes identification of emergency vehicle location.
6.13	Revision:	Deletes the detailed discussion of the Radiation Monitoring System with respect to dose assessment capabilities due to the system's inability to support timely decisions based on radiological conditions. The EDAM software on microcomputer satisfies this need.
6.13.5	Revision:	Deletes the System Dispatcher as a source of meteorological information.
6.13.6.1	Update:	Changes the location of some of the accelerometers.
6.13.9	Revision:	Defers discussion of the fire detection instrumentation to the Fire Protection Report and the FSAR.

EP Section		Description
Table 6.1	Revision:	Changes the meteorological parameters to be consistent with the FSAR.
Table 6.3	Addition:	Table of Environmental Sampling Locations replaces figure 6.4, "Environmental Monitoring Locations".
igures 6	Update:	Changes reflect the current meteorological monitoring capabilities.
Fig.	Update:	Revised drawing shows complete EOF and surrounding rooms.
W	Revision:	Reduces the detailed discussion of the RM-21 as it is no longer the principal means of evaluating radiological conditions.
8.1.2 & 8.2	Update:	Change: the discussion regarding Squaw Creek Park, Inc. to address the responsibilities of Squaw Creek Park management personnel with respect to notifying SCP patrons in the event of an emergency at CPSES.
8.3	Revision:	Deletes the commitment to radiologically monitor all evacuees prior to their leaving the station. Now being addressed in the appropriate procedure(s).
8.5.3	Update:	Increases the supply of radioprotective drugs from 400 persons to 450 persons.
8.6.2	Addition:	Adds reference to local county plans with respect to the responsibility of local government for executing the evacuation plan.
9.1	Revision:	Changes maximum guideline value from 100 Rem. (wholebody dose) to 75 Rem and changes reference to EPA guidelines from NCRP-39 report.
Figure 9.1	Update:	Revises the figure to illustrate the current access control layout.
Figure 9.2	Update:	Revises the figure to illustrate the current capabilities located at the NOSF.
10.1	Addition:	Lists additional medical resources and updates facility names.

EP Section		Description
11.2	Revision:	Deletes reference to the computerized technique for total dose evaluation in favor of using actual measured values.
12.0	Revision:	Plant Evaluation personnel are now responsible for developing and planning drill and exercise programs and scenarios.
12.2.2	Update:	Fire drill frequency specified by procedure not Technical Specifications.
12.2.3	Revision:	Changes the discussion to Radiation Protection and First Aid and Rescue Teams from Emergency Repair and Damaga Control Teams regarding requirements toward first aid instruction.
12.3	Revision:	Emergency Planning section is responsible for developing drill and exercise objectives.
13.0	Addition:	Student input to training is to be solicited and fed back to training development.
13.2	Addition:	Emergency Plan training includes practical drills to evaluate individual abilities to perform assigned emergency response functions.
14.0	Addition:	The report on the independent review to be sent to all parties involved in the review.
App. E Figure E.2	Update:	Reflects new structures within the CPSES property lines.
App. R	Revision:	Deletes the Westinghouse Emergency Response Plan which is now maintained as an independent reference document.
App. S	Update:	Incorporates the revised Corporate Emergency Management Plan which reflects current NEO group relationships and functions.