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Group Vice President

September 15, 1997

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
NRC INSPECTION REPORT NOS. 50-445/97-16 AND 50-446/97-16
RESPONSE TO EXERCISE WEAKNESS

Gentlemen:

TU Electric has reviewed the NRC's letter dated August 13, 1997, concerning the inspection conducted by Gail Good, Thomas Andrews, Michael Hay and Rebecca Neese during the period of July 22-25, 1997. The attached inspection report identified an Exercise Weakness.

TU Electric hereby responds to the Exercise Weakness in the attachment to this letter.

Additionally, TU Electric is evaluating and will implement as applicable corrective actions to address the improvement items discussed in the inspection report.

Sincerely,

C. L. Terry

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By: *Roger D. Walker*

Roger D. Walker
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CLW/grp
Attachment

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RESPONSE TO EXERCISE WEAKNESS

RESTATEMENT OF THE EXERCISE WEAKNESS
(445:446/9716-02)

Radiation protection coverage was not sufficient for those teams performing tasks outside the power block. Inspectors observed the following examples:

- o One emergency repair and damage control team was assigned immediate entry status to spray water on the radiological plume escaping from a failed seal on the containment equipment hatch. This team was not dispatched with continuous radiation protection coverage as required by Section 3.3 of Procedure EPP-116, "Emergency Repair & Damage Control and Immediate Entries," Revision 6. The team, which included the fire brigade and one craft person, arrived at the scene and began to combat the emergency prior to radiation protection personnel fully assessing the radiological conditions and determining proper radiological controls and protection. Radiological conditions were initially provided to the team at the scene. Intermittent coverage was provided later by a roving onsite radiological survey team.
- o Following indications of a radiological release to the environment, Team 97-08 was dispatched to perform work in the service water intake structure without assigned radiation protection personnel as required by Section 4.2.1 of Procedure EPP-116. Inspectors also noted that the team's emergency work permit did not specify the type of radiation protection deemed necessary to protect the team from the simulated radiological hazards. The radiation work permit included a section to document the decision to provide continuous or intermittent radiation protection coverage to dispatched teams, but the section was not completed.

The failure to provide sufficient radiation protection coverage for emergency response teams could endanger personnel and degrade emergency response efforts. Accordingly, the issue was identified as an exercise weakness (50-445/9716-02; 50-446/9716-02).

RESPONSE TO WEAKNESS
(445:446/9716-02)

TU Electric agrees that radiation protection coverage was not sufficient for teams performing tasks outside the power block and therefore is an exercise weakness. TU Electric's response and corrective actions for the weakness are as follows:

1. Reason for the Weakness:

Both weakness examples occurred because the OSC Radiation Protection (RP) Supervisor believed that the onsite survey team could provide adequate radiological coverage for the Emergency Response Damage Control (ERDC) teams dispatched outside the power block. The OSC RP Supervisor knew by means of direct verbal, telephone and radio communications that these ERDC

teams were to be met outside at the scene by the onsite survey team and briefed on area conditions. Although the OSC RP Supervisor was correct in his assumption that radiation protection personnel assigned to the onsite survey team would provide the ERDC teams with precautions and limitations related to their job scope, he did not recognize that coverage as expected would not be provided since the onsite survey team would not specifically stay with the teams the entire time they were in the field. In the weakness examples noted above, TU Electric expected a RP technician to be a part of each ERDC team.

Procedural Guidance:

Emergency Plan Procedure EPP-116 (Rev. 6), Section 3.3 -Definition of Immediate Entry- states in part that "ERDC Teams given this priority (immediate entry) are initially provided continuous Radiation Protection coverage"; section 4.2.1 -Prerequisites- states that "initially, each ERDC Team should be composed of at least two (2) individuals, one of which should be a Radiation Protection Technician; section 4.4.8 -Normal Entries- states "while enroute to the work area, the RP Technician, if present, should enter all areas first, evaluating radiological conditions"; section 4.5.1.3 -Immediate Entries- states "the OSC ERDC Supervisor (or the OSC Manager) should inform the OSC Radiation Protection Supervisor of the situation so that they may brief and dispatch a Radiation Protection Technician to accompany the ERDC Team". The instructions (Section 4) of procedure EPP-116 provide flexibility to allow for unplanned situations such as current plant conditions, radiological conditions anticipated at the local area of interest, number of RP technicians available, etc.. However, the inconsistency between the definition and instructions of EPP-116 may have contributed to the weakness.

Specifics for Examples:

In the first example, the OSC RP Supervisor's belief concerning radiological coverage was not consistent with the immediate entry status assigned to this team and the definition of "immediate entry" given in procedure EPP-116 (Rev. 6), Section 3.3, but was consistent with instructions for immediate entries in section 4.5.1.3.

In the second example, instructions for a normal entry were applicable as given in EPP-116, Section 4.4. Normal entries are authorized by the OSC Manager after review with the OSC RP Supervisor. Requirements for entry are documented on an Emergency Work Permit (EWP). This ERDC team was dispatched under a normal entry with radiological coverage to be provided by the onsite survey team. A radiological release to the environment occurred after the ERDC team had been dispatched into the field. At the time that the radiological release was initiated, it was TU Electric's expectation that a RP technician be continually assigned to this team. The OSC RP Supervisor's continued reliance on coverage from the onsite survey team was inappropriate for this situation after the release occurred.

It was also determined that the term "continuous coverage" as used on block 7 of the EWP had a different meaning to the OSC RP Supervisor than was

intended. This was in part caused by the general use of the term "continuous coverage" during routine and plant outage operations. During routine and outage operations, RP personnel are normally assigned an area within the plant and are expected to provide radiological coverage to all jobs within that limited work area. It is the responsibility of the assigned RP technician to gauge the degree of interaction required with each working job team, and to limit the work in the area to that the RP technician feels he can adequately cover. Therefore, a given RP technician may provide "continuous coverage" on more than one job, if the jobs are in the same general area.

During the exercise, the OSC RP Supervisor and onsite survey team believed that the onsite survey team could provide adequate "continuous coverage" for the subject ERDC teams assigned outside the power block since they were in the vicinity and between the point of the radiological release and the teams being covered. While this practice may have merit, the OSC RP Supervisor and the onsite survey team did not demonstrate a full appreciation of the potential for rapidly changing radiological conditions, i.e., as around containment during this accident scenario.

The incomplete EWP described in the second example was caused by less than adequate review by the OSC RP Supervisor. During the exercise there were 16 EWPs issued; two did not fully specify the RP coverage requirements to the ERDC teams. In both of these cases, RP coverage was provided, and coverage was consistent with that believed to be adequate by the OSC RP Supervisor. The RP Supervisor's less than adequate review in completing the EWP had no affect on the adequacy of the RP coverage provided as the coverage was directed by the OSC RP Supervisor.

2. Corrective actions taken:

A meeting was held with RP management to discuss the responsibilities and expectations on use of RP personnel during an emergency. The meeting resulted in verbal feedback being provided to the specific OSC RP Supervisor involved and the meeting results were documented in an Emergency Planning Bulletin dated September 11, 1997, and sent to all OSC management personnel. The verbal feedback and bulletin reemphasized the responsibilities and management expectations in EPP-116 and the importance of attention to detail during all activities at CPSES.

3. Steps to prevent recurrence:

A task will be added to the OSC RP Supervisor's Position Assistance Document (PAD) delineating his responsibilities for the radiological protection of all personnel dispatched from the OSC. This task will clearly express management expectations on the use of OSC RP personnel during an emergency.

Procedure EPP-116 will be changed to provide consistency between the definition and instructions sections.

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A tabletop session will be conducted with all OSC Managers and RP Supervisors to emphasize information documented in the September 11, 1997, bulletin and to determine what other changes need to be made to the PADs to further incorporate these lessons.

A discussion of these preventative measures and the above mentioned bulletin will be added to the Annual Requalification Workbook.

4. Date when corrective actions completed:

All corrective actions will be completed by December 31, 1997.