

October 2, 1997

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-3648

Gentlemen:

**REPLY TO EXERCISE WEAKNESSES
INSPECTION REPORT NO. 50-483/97013
CALLAWAY PLANT**

This responds to Mr. Howell's letter dated September 4, 1997, which transmitted two Exercise Weaknesses for events discussed in Inspection Report 50-483/97013. Our response to these weaknesses are presented in the attachment.

None of the material in the response is considered proprietary by Union Electric.

If you have any questions regarding this response, or if additional information is required, please let me know.

Very truly yours,

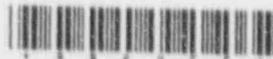
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JVL/MAR/tmw

Attachment: 1) Response to Exercise Weaknesses

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During an NRC inspection conducted on August 11-15, 1997, two exercise weaknesses were identified.

A. Statement of Weakness

The inspectors observed several programmatic complications associated with offsite agency notifications following the alert declaration. The combined effect inappropriately and unnecessarily delayed offsite agency notifications. Inspectors made the following observations:

- The alert declaration time was logged when the control room announcement was made (7:43 a.m.) rather than when the shift supervisor made the decision to declare the alert (7:41 a.m.). The shift supervisor was distracted by other activities for 2 minutes.

Pertinent to this observation, Appendix 1 to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, states that, "The time {prompt notification} is measured from the time at which operators recognize that events have occurred which make declaration of an emergency class appropriate." Accordingly, the inspectors determined that the alert was declared at 7:41 a.m. when the shift supervisor recognized that the conditions for an alert were met.

- Control room personnel did not begin offsite notification form preparation until a communicator arrived (about 10 minutes after the announcement). The licensee stated that the communicator was "pre-positioned" within the training center, near the control room simulator. The communicator's arrival was delayed to account for the normal travel time to the control room from the individual's normal work location.
- The communicator was not familiar with the SENTRY software (a new electronic system for making offsite notifications) and did not know where to obtain information needed to complete the form (meteorological conditions and emergency action level text). As a result, several more minutes elapsed before the notifications were transmitted electronically at 7:58 a.m.

The inspectors determined that the above programmatic factors caused a delay in making timely offsite agency notifications (i.e., within the 15-minute regulatory limit). In response, the licensee considered the notification timely based on the alert

declaration log entry (15 minutes versus 17 minutes). The inspectors concluded that there were programmatic reasons for the delays: (1) a lack of clear understanding about when the notification period starts, (2) the use of communicators who were not stationed in the control room, and (3) a lack of familiarity with the new electronic notification system. Due to the programmatic factors, the inspectors identified the failure to make timely offsite agency notifications as an exercise weakness (50-483/9713-01).

Reason for the Weakness

Union Electric concurs with the reasons for the notification delays as stated in the inspection report.

Corrective Steps Taken and Results Achieved:

A corrective action document was initiated to track completion of corrective actions.

Corrective Steps to Avoid Further Weaknesses:

Each reason is listed below followed by the action to be taken to address the concern.

- “(1) a lack of clear understanding about when the notification period starts”
Training regarding declaration and notification time requirements will be included in Operations requalification cycle 97-5.
- “(2) the use of communicators who were not stationed in the control room”
Shift Supervisors are being trained on use of the Sentry Notification system during the current training cycle. This will allow the Control Room to complete the initial notification, if necessary, prior to personnel designated as Communicators arriving at the Control Room.
- “(3) a lack of familiarity with the new electronic notification system”
An operator aid will be developed for use of the Sentry Notification system to assist Communicators in collecting the necessary information and completing the on-line form.

Date when Full Compliance will be Achieved;

The operator aid will be available for use by Communicators by October 15, 1997. Full compliance will be achieved upon completion of training by December 22, 1997.

B. Statement of Weakness

Technical support center access controls were established but were periodically ineffective in maintaining positive control of those who exited. A security officer was assigned to control center access and ensure that all personnel who entered the center walked through the portal monitor. Personnel who exited the center were logged out by the security officer.

Although the process worked most of the time, when the security officer interfaced with the administrative group or the security coordinator, opportunities occurred for personnel to exit the center without being noticed by the security officer. During the exercise, at least three individuals left the technical support center without logging out with the security officer. As a result, continuous accountability was not maintained.

In addition, there was no process to establish and communicate radiological precautions to those who exited the center once the radiological release started (except inplant response team members). As a result, the three individuals who left the center were not informed of areas to avoid, routes to take, or personal protective measures. In a related matter, the inspectors observed limited coordination with security personnel concerning radiological precautions; however, the licensee informed the inspectors that radiological precautions were taken for security personnel. Due to the impact on personnel safety, the failure to establish effective technical support center access controls was identified as an exercise weakness (50-483/9713-02).

Reason for the Weakness

Controls for dispatch and tracking of emergency teams from the Technical Support Center are adequate to ensure continuous accountability and proper radiological controls for emergency team members. However, existing programmatic controls are inadequate to ensure others leaving the facility will be adequately briefed and accounted for.

Corrective Steps Taken and Results Achieved:

A corrective action document was initiated to address the weakness identified in the exercise. Exits from the Technical Support Center have been clearly posted with appropriate signs to remind personnel to establish radiological precautions with Health Physics personnel and maintain accountability with Security prior to departing from the Technical Support Center. Expectations for radiological controls and continuous accountability in the Technical Support Center have been communicated to all emergency response personnel.

Corrective Steps to Avoid Further Weaknesses:

Specific programmatic requirements for all personnel leaving the Technical Support Center will be established to strengthen continuous accountability and radiological controls for personnel who are not assigned to emergency teams.

Date when Full Compliance will be Achieved:

Changes to affected emergency response procedures to implement programmatic changes will be completed by November 10, 1997.