

July 10, 2001

Dr. Robert C. Mecredy
Vice President, Nuclear Operations
Rochester Gas and Electric Corporation
89 East Avenue
Rochester, NY 14649

SUBJECT: NRC-EVALUATED EMERGENCY PREPAREDNESS EXERCISE -
ROBERT E. GINNA NUCLEAR STATION INSPECTION REPORT
NO. 05000244/2001-004

Dear Dr. Mecredy:

The enclosed report documents an inspection at the Robert E. Ginna Nuclear Station which evaluated the performance of your emergency response organization during the June 6, 2001, full-participation exercise, the post-exercise critique, and the emergency preparedness performance indicators as specified in the reactor oversight program. The inspectors discussed the findings of this inspection with Mr. R. Watts and other members of your staff on June 7, 2001.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, two unresolved items were identified. If determined to be violations, these items would be of very low safety significance (Green).

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Dr. Robert C. Mecredy

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Should you have any questions regarding this report, please contact Mr. Richard J. Conte at (610) 337-5183.

Sincerely,

/RA/

Richard J. Conte, Chief
Operational Safety Branch
Division of Reactor Safety

Docket No: 05000244

License No: DPR-18

Enclosure: Inspection Report No. 05000244/2001-004

cc w/encls:

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Dr. Robert C. Mecredy

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U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket No: 05000244

License No: DPR-18

Report No: 05000244/2001-004

Licensee: Rochester Gas and Electric Corporation

Facility: Robert E. Ginna Nuclear Station

Dates: June 5-7, 2001

Inspectors: D. Silk, Senior Emergency Preparedness Inspector, DRS (Lead)
K. Kolaczyk, Reactor Engineer, DRS
C. Welch, Resident Inspector, Ginna, DRP
A. Blamey, Senior Operations Engineer, DRS
J. Noggle, Senior Radiation Specialist, DRS
R. Bores, State Liaison Officer (FEMA RAC Member)
K. Cornely, Student Engineer, DRS

Approved by: Richard J. Conte, Chief
Operational Safety Branch
Division of Reactor Safety

SUMMARY OF FINDINGS

IR 50-244/2001-004, on 06/5-7/2001; Rochester Gas and Electric, Robert E. Ginna Nuclear Station. Emergency Preparedness exercise. Performance Indicators.

This inspection was conducted by region based inspectors and the resident inspector. The significance of issues is indicated by their color (Green, White, Yellow, Red) using IMC 0609 "Significance Determination Process" (SDP). Findings for which the SDP does not apply are indicated by "No Color" or by the severity level of the applicable violation. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described at its Reactor Oversight Process website at <http://www.nrc.gov/NRR/OVERSIGHT/index.html>.

Cornerstone: Emergency Preparedness

- (TBD) An unresolved item pertaining to the licensee's commitment to NUREG-0696, Functional Criteria for Emergency Response Facilities, regarding applicability of criteria for the operational support center (OSC) and OSC satellite. The licensee will conduct an assessment of the OSC and OSC satellite for compliance with the intent of NUREG-0696 and will review their archives for documentation supporting the acceptability of the OSC and the OSC satellite. (Section 1EP1.b)
- (TBD) An unresolved item pertaining to the accuracy of emergency preparedness performance indicator (PI) data submitted to the NRC. The licensee inappropriately had credited drill participation to emergency response organization (ERO) members who made classifications, notifications, and protective action recommendations without counting those efforts in the Drill and Exercise Performance (DEP) PI data. The licensee will review and correlate past drill data between the two PIs to determine if a change of response band color (from Green to White) had occurred. (Section 4OA1.b)

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP1 Exercise Evaluation

a. Inspection Scope

The inspectors reviewed and assessed:

- Exercise objectives and scenario to determine if the exercise would test major elements of the licensee's emergency plan as required by 10 CFR 50.47(b)(14).
- The licensee's overall exercise performance in the following emergency response facilities: simulator control room, the technical support center (TSC), the operations support center (OSC), the emergency operations facility (EOF), and the joint emergency news center.
- The licensee's biennial full-participation exercise performance by primarily focusing on the implementation of the risk-significant planning standards (RSPS) in 10 CFR 50.47 (b) (4), (5), (9) & (10) which are emergency classification, offsite notification, radiological assessment, and protective action recommendations (PARs), respectively.
- Other performance areas besides the RSPS, such as, the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and implementing procedures.
- The post-exercise critique to evaluate the licensee's self-assessment of their ERO performance during the exercise.

b. Findings

While observing activities in the OSC and OSC satellite, the inspectors identified items that were not in literal compliance with NUREG-0696, Functional Criteria for Emergency Response Facilities. This item is unresolved (**UNR 05000247/2001-04-01**) because the licensee's emergency plan, Section 6.15, states that "The OSC meets the criteria of NUREG-0696." Specifically, the OSC and the OSC satellite did not have dedicated telephone lines to the control room or TSC; and there was no operations management presence in either the OSC or OSC satellite. There were communications links available (telephone lines and radios) and operations management was in the TSC (immediately adjacent to the OSC) which had a dedicated telephone line to the control room. There were no significant negative performance issues associated with these items. The licensee generated an action report (AR 2001-1023) and will conduct an assessment of the OSC and OSC satellite for compliance with the intent of NUREG-0696 and will review their archives for documentation supporting the acceptability of the OSC and the OSC satellite.

1EP4 Emergency Action Level and Emergency Plan Changes

a. Inspection Scope

The inspector conducted an in-office review of licensee submitted changes for the emergency plan-related documents listed below to determine if the changes decreased the effectiveness of the plan. A thorough review was conducted of documents related to the RSPS whereas a cursory review was conducted for non-RSPS documents. The submitted and reviewed documents follow:

EPIP 1-0, Ginna Station Evaluation and Classification (Rev 26)
 EPIP 1-5, Notifications (Rev 43)
 EPIP 2-1, Protective Action Recommendations (Revs 18 & 19)
 EPIP 2-5, Emergency Dose Projections - Personal Computer Method (Rev 11)
 EPIP 2-17, Hypothetical (Pre-Release) Dose Estimates (Rev 6)
 EPIP 3-1, Emergency Operations Facility (EOF) Activation (Rev 16)
 EPIP 4-7, Public Information Organization Staffing (Rev 17)
 EPIP 5-1, Offsite Emergency Response Facility and Equipment Periodic Inventory Checks and Tests (Revs 20 & 21)
 EPIP 5-2, Offsite Emergency Response Facility and Equipment Periodic Inventory Checks and Tests (Rev 23)
 EPIP 5-7, Emergency Organization (Rev 32)
 EAL Technical Basis Document (Rev 26)

b. Findings

No findings of significance were identified in this area.

4. **OTHER ACTIVITIES**

4OA1 Performance Indicator Verification

a. Inspection Scope

The inspectors reviewed the licensee's process for identifying the data that is utilized to determine the values for the three EP performance indicators (PI):

- Drill and Exercise Performance (DEP)
- ERO Drill Participation, and
- Alert and Notification System Reliability.

Since the EP PIs were last reviewed during an inspection in July 2000, this review assessed data and records from that time which included results from the third and fourth quarters of 2000 and the first quarter of 2001.

b. Findings

While reviewing the licensee's PI data for ERO Drill Participation and DEP, the inspectors identified that the licensee was not following the guidance from NEI 99-02 Revision 1, Regulatory Assessment Performance Indicator Guide, for counting DEP data in conjunction with ERO drill participation for members that are responsible for classifications, notifications, and PARs. The statement from NEI 99-02 (page 84) that was not followed by the licensee is:

“When the functions of key ERO members include classification, notification, or PAR development opportunities, the success rate of these opportunities must contribute to DEP statistics for participation of those key ERO members to contribute to ERO Drill Participation.”

The licensee inappropriately had credited drill participation to ERO members who made classifications, notifications, and PARs without counting those efforts in the DEP PI data. The licensee was unaware that these two PI were linked. The effected ERO positions are shift supervisors, control room communicators, TSC emergency coordinators, TSC communicators, TSC dose assessment managers, EOF recovery manager, EOF communicators, and EOF dose assessment managers.

This issue will be unresolved (**UNR 05000244/2001-04-02**) pending the licensee's review and correlation of past drill data between the ERO Drill Participation and the DEP PI results to determine if a change of response band color (from Green to White) has occurred.

4OA2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed licensee findings (EP drill reports and ARs) for approximately the past year pertaining to drills or actual conditions, and the last licensee biennial exercise critique to determine if significant performance trends exist and to determine the effectiveness of licensee corrective actions based upon ERO performance during the exercise. The inspectors verified that issues identified during the exercise were captured in the following ARs :

<u>AR Number</u>	<u>Title</u>
2001-1018	Staffing Issues from 6/6/01 NERP Exercise
2001-1019	Facility Issues from 6/6/01 NERP Exercise
2001-1020	Procedure Issues from 6/6/01 NERP Exercise
2001-1021	Training Issues from 6/6/01 NERP Exercise
2001-1022	Dose Assessment Computer Program
2001-1023	Perform assessment of OSC
2001-1024	Evaluate contamination control in EOF/JENC/SC
2001-1025	Command and Control of A.O.'s and Repair Teams

b. Findings

No findings of significance were identified.

40A6 Exit Meeting

The inspectors presented the inspection results to Mr. R. Watts, and other members of the licensee's staff at the conclusion of the inspection on June 7, 2001. The licensee had no objections to the NRC findings or observations.

KEY POINTS OF CONTACT

Licensee

F. Cordaro, Onsite Emergency Planner
 P. Polfleit, Corporate Nuclear Emergency Planner
 R. Watts, Manager, Nuclear Training
 J. Willoughby, Administrative Specialist

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

UNR 50-244/2001-04-01 Compliance with NUREG-0696 with respect to OSC communication links and operations management oversight

UNR 50-244/2001-04-01 Inaccurate EP PI data for ERO participation.

Closed

None

Discussed

None

LIST OF ACRONYMS

AR	Action Report
CFR	Code of Federal Regulations
DEP	Drill and Exercise Performance
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
OSC	Operations Support Center
PAR	Protective Action Recommendation
PI	Performance Indicator
TSC	Technical Support Center