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O-P1-17

UNITED STATES
NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REACTOR REGULATION
WASHINGTON, D.C. 20555-0001

June 3, 1998

**NRC INFORMATION NOTICE 98-20: PROBLEMS WITH EMERGENCY PREPAREDNESS
RESPIRATORY PROTECTION PROGRAMS**

Addressees

All holders of operating licenses for nuclear power reactors; non-power reactors; all fuel cycle and material licensees required to have an NRC-approved emergency plan.

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this information notice to alert addressees to multiple generic weaknesses in respiratory protection programs supporting emergency preparedness (EP). It is expected that recipients will review the information for applicability to their facilities and consider actions, as appropriate, to avoid similar problems. However, suggestions contained in this information notice are not NRC requirements; therefore, no specific action or written response is required.

Background

NRC Information Notice (IN) 97-66, "Failure To Provide Special Lenses for Operators Using Respirator or Self-Contained Breathing Apparatus (SCBA) During Emergency Operations," was issued on August 20, 1997. That notice alerted licensees to a generic problem in which some licensed operators had not been provided required lenses for vision correction while wearing SCBA. A lack of required vision correction could hamper the control room operator's performance of licensed duties, including timely and effective response to emergencies. Subsequent to the issuance of IN 97-66, follow up by licensees and NRC inspectors identified numerous problems and deficiencies in the respiratory protection programs supporting licensee emergency response programs.

Description of Circumstances

The 12 event summaries (Attachment 1) detail a broad spectrum of EP respirator program weaknesses. The discussion below focuses on these problems in generic functional areas.

During the NRC's review of emergency plan changes made by the licensees of the McGuire and Summer plants under 10 CFR 50.54(q), the staff found that both plants had significantly reduced or eliminated the respiratory protection capability during emergencies. The NRC

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informed licensees of both facilities that these changes had reduced the EP effectiveness. In response to the NRC findings, the plants reinstated effective EP respirator programs. Given the potential radiological hazards and potentially more hazardous immediately dangerous to life or health (IDLH) nonradiological airborne environments (e.g., toxic gases, oxygen deficiency, smoke), the NRC staff found it unacceptable to weaken or remove a vital protective function for emergency response workers (and the plant).

Another important area involved inadequate or incomplete evaluations of emergency situations and their impact on control room operators. The licensee for the Calvert Cliffs facility had not developed or implemented a procedure for handling an onsite spill of ammonia - no plans had been made that specified needed protective actions for workers on the scene or for the control room operators. At the Enrico Fermi plant during a self-initiated engineering review follow up, the licensee identified the need to stage dedicated SCBA in the auxiliary building to ensure that operators could implement the dedicated shutdown (remote) procedure. At San Onofre Nuclear Generating Station, in response to an NRC inspection, the licensee initiated a self-assessment that identified the need to develop a plan to provide for refilling and transporting SCBA air bottles to and from the control room during emergency situations.

Several shortcomings in the training area were noted throughout the industry. Most significant was the failure to provide control room operators with periodic, hands-on training and practice with donning and wearing SCBA. Additionally, operators were not trained to change out bottles, nor, in some cases, did they know where the spare charged bottles were stored for their emergency use.

A number of facilities had allowed on-shift, operating personnel, who would be required to wear a SCBA during certain emergencies, to have beards. When the NRC inspector discussed the problems that a beard could cause to respirator performance (fit degradations, interference with proper operation of the SCBA, shortened period of air supply, degraded operator emergency response), all licensees initiated timely action to meet the technical specification requirements in having sufficient number of clean-shaven operating crew.

Several licensees had no established effective oversight or controls for tracking and maintaining operators', and other workers' required periodic retraining and SCBA fit testing. This programmatic deficiency led to numerous failures to maintain timely emergency worker qualification. At one facility, only 81 of the 235 members of the emergency response organization met the requirements of the station and 10 CFR Part 20 for worker training and fit testing at the time of the inspection.

Discussion

Since the major revision of 10 CFR Part 20, effective in 1993, licensees have significantly reduced the numbers of respirators used by orders of magnitude during normal plant operations and maintenance outages. This significant shift away from the use of respirators is a result of better job planning, more effective use of work area decontamination, and close-capture containments. This shift resulted from the new Part 20 requirement to maintain the total effective dose equivalent as low as reasonably achievable.

Optimization of the internal and external doses often results in the determination that the use of respirators to avoid a small intake can result in a larger external dose as a result of worker inefficiency.

However, it appears that this de-emphasis of respiratory protection for normal operations may have contributed to a potential decrease in the effectiveness of emergency response capabilities involving respiratory protection. Along with this de-emphasis, the ongoing restructuring and downsizing of the electric utility industry places significant emphasis on cost savings efforts. While no area of nuclear plant operation is immune from this cost scrutiny, licensees need to ensure that the effectiveness of EP response capabilities are maintained. As previously discussed, plant operators and emergency response workers can face not only radiological airborne hazards, but, in many cases, are challenged by unknown and potentially IDLH conditions. Maintaining an adequate respiratory program is vital to their safety and, thus, to their ability to respond in a timely fashion to emergencies.

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Attachments:

1. Event Summaries
2. List of Recently Issued NMSS Information Notices
3. List of Recently Issued NRC Information Notices

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EVENT SUMMARIES

McGuire The letter of February 6, 1996, to Duke Power Company.
Accession Number (AN) 9602210358

The licensee made changes to its emergency plan under 10 CFR 50.54(q) and deleted the requirement for members of the emergency response organization (ERO) to be qualified to use respirators. The follow up NRC review found that this change constituted a decrease in EP effectiveness, and the licensee reinstated the respiratory requirements. In its review and justification, the NRC cited 50.47(b)(8), which requires adequate emergency equipment to support EP response, including respirator protection equipment (NUREG-0654, Revision 1 Sections II.H.9 and J.6).

Calvert Cliffs Inspection Report(IR) Nos. 50-317/97-06 and 50-318/97-06
AN 9712170365

The NRC inspectors found numerous weaknesses in the control room operators capability to effectively use self-contained breathing apparatus (SCBA). Following a postulated ammonia spill on site, no procedure had been formalized to direct response activities, including control room ventilation alignment and the need to don SCBA. Some operators had facial hair and some did not know the location of SCBA designated for emergency use. Other than those designated as fire brigade members, operators had had no practical hands-on training with SCBA for 5 years. As a result, the licensee established an improved, practical training plan on SCBA for the operators.

SONGS IR Nos. 50-361/97-20 and 26 and 50-362/97-20 and 26
ANs 9712110162 and 9801070286

The NRC inspectors noted that some shift technical advisors had not kept their respirator qualifications current. In response to Information Notice 97-66, the licensee determined that approximately 25 licensed operators who required corrective lenses either did not have special frames or did not have current lens prescriptions. Some operators had beards despite the need to don and wear SCBA within 2 minutes after the initiation of an emergency. In response, the licensee issued station-wide instructions that required personnel filling minimum staffing requirements to be clean shaven.

Washington Nuclear IR Nos. 50-397/97-014
Project-2 AN 9709190174

NRC inspectors noted that the air cylinder pressure for all SCBA was not in accordance with industry standards which was a final safety analysis report commitment. The required pressure should be at least 90 percent of the rated cylinder pressure. Several air cylinders, staged for service, were found at pressures less than 4000 psig. Instead of the acceptable minimum pressure of about 4000 psig, the licensee's minimum acceptable pressure was only

3500 psig. At this lower pressure, the rated use-time is only about 23 minutes, instead of the rated normal 30-minute air supply. Appendix R of 10 CFR Part 50, requires SCBA rated for at least 30 minutes of air supply. The licensee responded by changing procedures, retraining workers, and ensuring all in-service cylinders were charged to at least 4000 psig.

Fermi 2 Licensee Event Report No. 97-0029, Rev. 1
AN 9705190046

The licensee discovered during an engineering review that, assuming a design-basis fire and loss of offsite power, certain areas in the auxiliary building could become uninhabitable, immediately dangerous to life and health (IDLH) due to loss of power resulting in failed open smoke/CO₂ dampers. Access to these affected areas may be necessary to complete the shutdown procedures during plant accidents. Plant procedures and SCBA are now in place to provide timely worker protection and access and to implement necessary shutdown actions.

D.C.Cook IR Nos. 50-315/97015 & 97018
ANs 9711040026 and 9801210199

During the follow up in response to an industry generic communication, the licensee discovered that a number of operators were not provided corrective lens inserts for respirator use. The licensee broadened its investigation and found that the respirator program contained no provisions for tracking worker qualification. Of the 234 ERO, only 81 of the members had maintained their qualifications (annual fit testing and medical evaluations). The licensee initiated proper short-term corrective actions and the inspectors noted that no respirators had been issued to unqualified ERO members.

Kewaunee IR Nos. 50-305/97015
AN 9801020145

In response to an NRC inspection finding of failure to provide annual fit testing requalification (in two cases, no testing had been performed since 1994), the licensee identified 21 plant staff and 24 security contractors had not received periodic fit testing. In these cases, all staff members had completed their training and medical evaluations. Other than some fire brigade members who wore respirators during required training exercises, no worker with out-of-date fit testing had been required to wear a respirator. As part of the licensee corrective action follow up, the licensee determined that the primary causes of the program weaknesses were (1) program responsibility was not assigned to a single person or group and (2) the plant lacked an administrative control procedure to track qualification.

Waterford IR No. 50-382/98-03
AN 9803230145

The NRC identified that the licensee had not maintained an adequate supply of properly sized SCBA face pieces for the operating staffs for the control room and the technical support center. Aside from being uncomfortable to the user, wearing a grossly mis-sized face piece could reduce the duration of the rated air supply. The licensee promptly corrected this deficiency.

Prairie Island IR Nos. 50-282 & 306/97-018
AN 9711250332

NRC inspectors noted that annual retraining for operators in the donning and use of SCBA did not require each operator to experience hands-on training. As a result, except for fire brigade members, few operators had donned SCBA for several years.

River Bend IR Nos. 50-458/97-010
AN 9709100212

During an NRC inspection, the inspectors noted that the licensee had failed to develop a formal issue and tracking process to ensure that corrective lenses (of the appropriate type) for SCBA use were provided to licensed operators. Although a procedure had been in place to require either contact lenses or prescription spectacle kits (specific to the SCBA type), this procedure was revised to ensure that personnel will be issued corrective lenses.

South Texas Project IR No. 50-498 and 499/97-13
AN 9110130012

The NRC inspector discovered that control room operators had not been trained to change out SCBA air cylinders while wearing a SCBA in a hostile environment. The inability to effectively change out an air bottle during a toxic gas accident could hamper operator response to the emergency. Although members of the fire brigade were trained on change-out procedures, the licensee initiated an evaluation to identify needed improvements in the respiratory training program.

Grand Gulf Station IR No. 50-416/97-15
AN 9710150118

While observing a full-scale, biennial EP exercise, the NRC inspectors identified a weakness in the plant's ability to monitor and maintain adequate supplies of SCBA (air bottles and face pieces) for the operations support center over the long term. This weakness could jeopardize the licensee's ability to provide continued respiratory protection for the response teams dispatched into the plant. Critical remediation actions related to worker and plant safety could be seriously hampered unless air bottles are recharged on a timely basis.

**LIST OF RECENTLY ISSUED
 NMSS INFORMATION NOTICES**

Information Notice No.	Subject	Date of Issuance	Issued to
98-18	Recent Contamination Incidences Resulting from Failure to Perform Adequate Surveys	5/13/98	Part 35 Medical Licensees
98-17	Federal Bureau of Investigations (FBI) Awareness of National Security Issues and Responses (ANSIR) Program	5/7/98	All U.S. Nuclear Regulatory Commission fuel cycle and power and non-power reactor licensees
98-16	Inadequate Operational Checks of Alarm Ratemeters	4/30/98	All Industrial Radiography Licensees
98-12	Licensees' Responsibilities Regarding Reporting and Follow-up Requirements for Nuclear-Powered Pacemakers	4/3/1998	All U.S. Nuclear Regulatory Commission nuclear pacemaker licensees
98-10	Probable Misadministrations Occurring During Intravascular Brachytherapy With The Novoste Beta-Cath System	4/3/98	All Medical Licensees
98-09	Collapse of an Isocam II, Dual-Headed Nuclear Medicine Gamma Camera	3/5/98	All medical licensees
98-08	Information Likely to be Requested if an Emergency is Declared	3/3/98	All parts 30, 40, 70, 72 and 76 licensees and certificate holders required to have a Nuclear Regulatory Commission approved Emergency plan.
98-06	Unauthorized use of License to Obtain Radioactive Materials, and Its Implications Under The Expanded Title 18 of the <u>U.S. Code</u>	2/19/98	All NRC Licensees authorized to Possess Licensed Materials
98-04	1997 Enforcement Sanctions for Deliberate Violations of NRC Employee Protection Requirements	2/9/98	All U.S. Nuclear Regulatory Commission licensees.

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Information Notice No.	Subject	Date of Issuance	Issued to
98-19	Shaft Binding in General Electric Type SBM Control Switches	6/3/98	All holders of operating licenses for nuclear power reactors
98-18	Recent Contamination Incidences Resulting from Failure to Perform Adequate Surveys	5/13/98	Part 35 Medical Licensees
98-17	Federal Bureau of Investigations (FBI) Awareness of National Security Issues and Responses (ANSIR) Program	5/7/98	All U.S. Nuclear Regulatory Commission fuel cycle and power and non-power reactor licensees
98-16	Inadequate Operational Checks of Alarm Ratemeters	4/30/98	All Industrial Radiography Licensees
98-15	Integrity of Operator Licensing Examinations	4/20/98	All holder of operating licenses for nuclear power reactors except those that have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel
98-14	Undocumented Changes to Non-Power Reactor Safety System Wiring	4/20/98	All holders of operating licenses or construction permits for test research reactors
98-13	Post-Refueling Outage Reactor Pressure Vessel Leak Testing Before Core Criticality	4/20/98	All holders of operating licenses for nuclear power reactors except those that have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel

OL = Operating License
CP = Construction Permit

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However, it appears that this de-emphasis of respiratory protection for normal operations may have contributed to a potential decrease in the effectiveness of emergency response capabilities involving respiratory protection. Along with this de-emphasis, the ongoing restructuring and downsizing of the electric utility industry places significant emphasis on cost savings efforts. While no area of nuclear plant operation is immune from this cost scrutiny, licensees need to ensure that the effectiveness of EP response capabilities are maintained. As previously discussed, plant operators and emergency response workers can face not only radiological airborne hazards, but, in many cases, are challenged by unknown and potentially IDLH conditions. Maintaining an adequate respiratory program is vital to their safety and, thus, to their ability to respond in a timely fashion to emergencies.

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