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UNITED STATES NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT WASHINGTON, D.C. 20555

October 15, 1985

IE INFORMATION NOTICE NO. 85-80: TIMELY DECLARATION OF AN EMERGENCY CLASS, IMPLEMENTATION OF AN EMERGENCY PLAN, AND **EMERGENCY NOTIFICATIONS**

Addressees:

All nuclear power facilities holding an operating license (OL) or a construction permit (CP).

Purpose:

This information notice is provided to describe an instance when an emergency condition was not classified and declared in a timely manner and to clarify the requirement for licensees to adequately notify the NRC Headquarters Operations Officer of emergencies. The NRC expects that recipients will review this notice for applicability to their facilities. Suggestions contained in this notice do not constitute NRC requirements; therefore, no specific action or written response is required.

Description of Circumstances:

Davis-Besse:

At 1:35 a.m. on June 9, 1985, the Davis-Besse plant experienced a complete loss of main and auxiliary feedwater for nearly 12 minutes. This event is described in more detail in Information Notice 85-50, "Complete Loss of Main and Auxiliary Feedwater at a PWR Designed by Babcock & Wilcox," and NUREG-1154, "Loss of Main and Auxiliary Feedwater Event at the Davis-Besse Plant on June 9, 1985." The emergency plan identified the loss of feedwater event as a Site Area Emergency. However, it appears that all knowledgeable personnel in the control room were occupied with stabilizing the plant and, thus, were not able to classify the event as a Site Area Emergency and activate the emergency plan. It is possible that had the plant not been brought to a stable condition quickly and had plant safety further degraded, the efforts of all knowledgeable personnel in the control room would have been required for recovery efforts, further delaying initiation of appropriate onsite and offsite emergency response.

At 2:11 a.m., the shift technical advisor (STA) called the NRC Operations Center from the control room using the Emergency Notification System to report the event pursuant to 10 CFR 50.72. At the beginning of the event, the STA had been in his quarters in the administration building, which is outside the

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protected area about a half mile from the plant. Although the STA mentioned the trip of the main and auxiliary feedwater pumps, the STA did not describe the length of time that the plant was totally without feedwater or the difficulty the plant had in restoring auxiliary feedwater. No Emergency Class was declared, nor was the fact conveyed to the NRC that plant conditions which warranted the declaration of a Site Area Emergency had existed for nearly 12 minutes.

At 2:26 a.m., the STA informed the NRC that an Unusual Event had been declared at 2:25 a.m. The STA also informed the NRC that although the emergency plan identified the total loss of feedwater event as a Site Area Emergency, the plant was no longer in this emergency action level at this time. At 2:29 a.m., the licensee informed the county that an Unusual Event had been declared. The licensee depended on a procedure that required the county to notify the State of Ohio. However, because the county could not reach the local state representative, the State of Ohio was not notified of the Unusual Event declaration until after the event had been terminated, more than 6 hours after its declaration.

At Davis-Besse, the emergency plan is initially implemented by the shift supervisor, who also has primary responsibility for ensuring that the plant is maintained in a safe condition. Because of the competing priorities of (1) directing attention to necessary recovery actions to obtain a safe and stable plant and (2) reviewing the emergency plan and initiating its actions, there was a substantial delay in declaring an Emergency Class and implementing the emergency plan. If the June 9 event had progressed in severity, valuable time needed to initiate appropriate onsite and offsite response to the emergency would have been lost.

Corrective actions being undertaken by the licensee as a result of this event include a number of operational and procedural changes that include but are not limited to the following: The STA shift schedule will be changed from a 24-hour duty day to rotating 12-hour shifts. The STA will spend the entire shift within the protected area, and the STA office will be located within 1 to 2 minutes of the control room. The STA will be trained as an Interim Emergency Duty Officer to advise the shift supervisor in event classification and protective action. The licensee will make emergency notifications directly to the State of Ohio.

Point Beach:

On July 25, 1985, at 7:25 a.m. (eastern time), Point Beach Unit 1 experienced an event involving loss of offsite power. Point Beach Unit 2 continued to operate normally during this event. Because of the incomplete understanding of the event by those making the notification to the NRC Operations Center, the NRC Operations Center was not made aware of the details of the event. At 7:37 a.m., a security guard called the NRC Operations Center to notify the NRC that Point Beach Unit 1 had declared an Unusual Event. The explanation for the Unusual Event was that the plant had a turbine runback. When the NRC Headquarters Operations Officer asked questions, the security guard was unable to provide additional information because of his limited technical knowledge of the plant and because the call was made from a location outside the control room where the security guard could not obtain additional information from the operators involved.

The NRC Headquarters Operations Officer called the control room, and as a result of asking questions learned that a station transformer had been lost. However, not until $2\frac{1}{2}$ hours later, when the plant notified the NRC Headquarters Operations Officer that the Unusual Event was terminated, did the NRC Headquarters Operations Officer learn that there had actually been a loss of offsite power.

Discussion:

Licensees should not delay the declaration of an Emergency Class when conditions warrant such a declaration. Delaying the declaration can defeat the appropriate response to an emergency. It is the licensee's responsibility to ensure that adequate personnel, knowledgeable about plant conditions and emergency plan implementing procedures, are available on shift to assist the shift supervisor to classify an emergency and activate the emergency plan, including making appropriate notifications, without interfering with plant operation.

When 10 CFR 50.72 was published in the Federal Register (48 FR 39039), the NRC made clear its intent that notifications on the Emergency Notification System to the NRC Operations Center should be made by those knowledgeable of the event. If the description of an emergency is to be sufficiently accurate and timely to meet the intent of the NRC's regulations, the personnel responsible for notification must be properly trained and sufficiently knowledgeable of the event to report it correctly. The NRC did not intend that notifications made pursuant to 10 CFR 50.72 would be made by those who do not understand the event that they are reporting.

No written response to this information notice is required. If you need additional information about this matter, please contact the Regional Administrator of the appropriate NRC regional office or the technical contact listed below.

Edward L Jordan, Director Division of Emergency Preparedness

and Engineering Response

Office of Inspection and Enforcement

Technical Contact: Eric W. Weiss, IE

(301) 492-9005

Attachment: List of Recently Issued IE Information Notices

LIST OF RECENTLY ISSUED IE INFORMATION NOTICES

Information Notice No.	Subject	Date of Issue	Issued to
85-17 Sup. 1	Possible Sticking Of ASCO Solenoid Valves	10/1/85	All power reactor facilities holding an OL or CP
85-79	Inadequate Communications Between Maintenance, Operations, And Security Personnel	9/30/85	All power reactor facilities holding an OL or CP; research and nonpower reactor facilities; fuel fabrication and processing facilities
85-78	Event Notification	9/23/85	All power reactor facilities holding an OL or CP
85-77	Possible Loss Of Emergency Notification System Due To Loss Of AC Power	9/20/85	All power reactor facilities holding an OL or CP
85-76	Recent Water Hammer Events	9/19/85	All power reactor facilities holding an OL or CP
85-75	Improperly Installed Instru- mentation, Inadequate Quality Control And Inadequate Post- modification Testing	8/30/85	All power reactor facilities holding an OL or CP
85-74	Station Battery Problems	8/29/85	All power reactor facilities holding an OL or CP
84-70 Sup. 1	Reliance On Water Level Instrumentation With A Common Reference Leg	8/26/85	All power reactor facilities holding an OL or CP
85-73	Emergency Diesel Generator Control Circuit Logic Design Error	8/23/85	All power reactor facilities holding an OL or CP

OL = Operating License CP = Construction Permit