1) when will PORC review be completed? 1/14/03

2) is this plan part of the EP or Sec Cont Plan? (see 03.01)

3) plan does not cover in detail info in 02.08/03.08

4) are all ERO positions filled?

5) are any security plan changes / license changes necessary

LICENSEE STRIKE CONTINGENCY PLANS

PROGRAM APPLICABILITY: 2515, 2545, 2600, 2681

SALP FUNCTIONAL AREA: OPS

92709-01 INSPECTION OBJECTIVES

To evaluate the adequacy of strike contingency plan content and/or plan implementation to:

a. Determine if the minimum number of qualified personnel is available as required for the proper operation and safety of the facility.

b. Determine if reactor operation and facility security are maintained as required.

c. Determine if the plan complies with the requirements in technical specifications and the code of federal regulations.

92709-02 INSPECTION REQUIREMENTS

02.01 Determine the adequacy of the licensee's strike contingency plans and that these plans have been reviewed by the facility's safety review committees. - still draft - no PORC review

02.02 Determine if the licensee is properly implementing the safeguards contingency plan.

02.03 Determine the availability and operability of equipment required by the safeguards contingency plan.

02.04 Determine if the licensee can meet (is meeting) the requirements for minimum onsite shift staffing of the facility.
→ plan meets minimum staffing requirements of TS.

02.05 Determine if the licensee can meet (is meeting) regulatory requirements in the following areas:

a. Plant management. 2 WST sr. mngrs.

b. Operations. 3 crews - 2, 12 hr shifts; (1 SM, 1 SRO, 1 STA/SRO, 2 ROs, 5 NLOs) FB & SS teams filled

B-15

c. Maintenance. 2 crews, 23/shift

→ 2, 12-hr shifts for entire "sequestered period" (1ST two weeks)

(crew) shift A (23): 11 mech, 6 elec, 6 I&C
(crew) shift B (23): 11 mech, 5 elec, 7 I&C

→ 2/shift for FB
2/shift for EP

→ if necessary a 3rd shift of 27 staff w/b provided by ROG (for period beyond 1ST two weeks

d. Security. - Not affected - additional OCA protection/monitoring to be provided by contract service.

e. Chemistry and radiation protection. RP- 4 per shift, 3 crews
chem - 2 per shift, 3 crews

f. Surveillance and calibrations.
→ handled by above

g. Administrative controls.
→ clerical, records management, materials,

TBD (conte)

02.06 Determine if licensed personnel who will be performing (are performing) licensed activities are qualified and proficient in these activities. ① prof. training matrix developed for each position
② all training to be complete by 1/9/03

02.07 If a strike is in progress, perform the following:
③ crew sim training completed 11/22/02 ④ 2 RO's need to stand up to be reactivated

a. Verify that the licensee properly trained non-licensed personnel who are performing functions to which they are not normally assigned.
TB completed by 1/9

b. Verify through observation and discussion with one of each of the following plant personnel that they understand their function under the modified staffing plan as follows:

1. Plant management.

2. Senior reactor operators and reactor operators (at reactor sites), plant operators (at fuel facilities).

3. Maintenance.

4. Health Physics.

5. Other personnel responsible for operational or safety functions.

c. Evaluate the effectiveness of site security.

02.08 Verify that support from local agencies is adequate to ensure the following:

ask Rick Ewart

a. Unimpeded access of personnel to the plant.

b. Unencumbered delivery of support goods to the site and unencumbered offsite shipment of radioactive materials.

c. Mitigation of any possible threat to the site including abusive or violent strikers. VANCE INTERNATIONAL (21 PEOPLE) ON RETAINER

d. Unimpeded access of medical care and ambulance services to treat injured or contaminated persons. (HOLDING OFF FOR NOW) (SOME VOLUNTEERS ARE SITE UNION MEMBERS)

e. Unimpeded access of the local fire department to supplement the site fire fighting unit.

✓ 02.09 Confirm that personnel are sufficient in number and qualifications to implement the site emergency plan.
(see back page)

02.10 Verify that the emergency communication equipment and the Emergency Notification System, where applicable, are available and operable.

92709-03 INSPECTION GUIDANCE

partial complete on 1/7/03

General Guidance. This inspection should be completed prior to the commencement of a strike and at the time of facility turnover to non-striking personnel.

In the event the inspector is not aware that a strike is imminent, then the inspection should be conducted as soon as it is known that a strike has begun.

The general requirements of Title 10 of the Code of Federal Regulations dealing with security, emergency situations, and operator training and qualification apply to the strike situation. The primary guidance available should be located in the licensee's emergency and contingency plans.

Specific Guidance

03.01 The licensee's approved strike provisions are required to be incorporated into the site emergency and safeguards contingency plans. To evaluate the licensee's strike contingency planning, discuss with licensee's management the overall impact of the strike including the number and job classification of potential strikers.

03.02 The inspector should evaluate changes to the licensee's safeguards contingency plan which have not been reviewed by the NRC. Regulatory Guides 5.54, 5.55, and 5.56 provide guidance for evaluating the changes to the strike portion of the licensee's safeguards contingency plan. Ask Ewart if any changes were/are required?

N/A

Non-power reactors having formula quantities of special nuclear material (SNM) have to implement 10 CFR Part 73 safeguards contingency strike provisions only when the SNM (i.e. fuel) becomes nonself-protecting.

03.03 No inspection guidance.

2, 12 hr shifts max of 5 days on in 7 day period

03.04 Staffing requirements for power reactors are discussed in 10 CFR 50.54 and include the minimum staffing of nuclear power units by operators and senior operators. The inspector should consider the amount of overtime needed to maintain shift coverage and ensure it is within the guidelines in the facility's technical specifications. Non-power reactor staffing requirements are contained in the facility's technical specifications. No inspection guidance for fuel facilities other than that contained in the approved license application.

03.05 Specific licensee requirements may be found in the facility's technical specifications, license, and the code of federal regulations. Licensee commitments for power reactors may be found in the final safety analysis report (FSAR) while non-power reactor commitments are contained in safety analysis report.

03.06 The portion of the licensee's strike contingency plans addressing the pre-strike stage should allow sufficient time for licensed and non-licensed personnel to become proficient in the positions they will perform during the strike. The inspector should limit the length of any discussions held with shift personnel working at new positions so as not to distract them from their duties..

all pre-strike proficiency training is to be complete NLT 1/9/03

TBD (Conte)

a. Licensed reactor operators must maintain their license in an active status as specified in 10 CFR 55.53, "Conditions of Licenses" and licensed activities as addressed in 10 CFR 50.54, (i) through (m) must be performed by operators licensed under 10 CFR Part 55.

N/A

b. Fuel facility personnel should be proficient in conversion processes, recovery processes, criticality controls, and other operations applicable to the facility.

03.07.a-b No inspection guidance.

03.07.c To determine the effectiveness of site security, the inspector should conduct inspections of the site to evaluate manning of security stations and the proper implementation of any security compensatory measures. The inspector should review Regulatory Guides 5.54, 5.55, or 5.56, and then discuss with plant management any previous and potential safeguards threats by strikers and the plans to counter these threats.

ask Event

03.08 The principal offsite support agencies to be contacted by the licensee
to confirm arrangements should include the following:

a. State police.

b. Local police.

c. Local fire department and ambulance service (if separate).

d. Local hospitals.

e. State radiological health agency. (1/22 NOT YET)

f. Fuel oil suppliers.

g. All other suppliers.

h. NAT'L GUARD - (1/22 NOT YET)

The local law enforcement agencies should be prepared to deal with adverse conditions created by aggressive strikers. Arrangements should have been made between the licensee and the local law enforcement agencies to resolve predictable legal or jurisdictional problems.

03.09 No inspection guidance.

03.10 Emergency communication equipment may include telephones, radios, radiotelephones, and walkie-talkies.

92709-04 RESOURCE ESTIMATE

This inspection procedure requires approximately 4 hours to complete reviews of contingency plans before a strike. If a strike is in progress, an additional 4 hours are required to review the implementation of contingency plans.

92709-05 REFERENCES

10 CFR 40.31

10 CFR 50.34

10 CFR 50.47

10 CFR 50.54

10 CFR 50, Appendix E

10 CFR 55.31

10 CFR 55.53

10 CFR 60.160

10 CFR 70.22

10 CFR 73, Appendix C

Regulatory Guide 5.54, "Standards Format and Content of Safeguards Contingency Plans for Nuclear Power Plants," March 1978

Regulatory Guide 5.55, "Standards Format and Context of Safeguards Contingency Plans for Fuel Cycle Facilities," March 1978

Regulatory Guide 5.56, "Standard Format and Content of Safeguards Contingency Plans for Transportation," March 1978

Technical Specifications

END

Regarding Ops TS Minimum Manning:

✓ – Which person is fire brigade leader qualified?
(see pgs 10 & 11)

Regarding EP staffing requirements:

↳ they have identified 2 crews for 12-hr shift ERO responsibilities

ECC (4) / crew
TSC (11) / crew
OSC (14) / crew
EOF/JIC (23) / crew

★★ need to confirm this is same as normal ERO staffing!

Regarding Key Engineering:

↳ 2 crews (2 managers, 5 sys eng, 5 design eng, 2 prog eng)

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(1) ALREADY DAY-DAY AGREEMENT BEYOND 1/31
(2) 24 HRS (MORE THAN 8 HRS) NOTIFICATION ON STRIKE – UNION NEGOTIATOR → COMPANY
WE WILL GET IMMEDIATE NOTIFICATION
(3) CONTRACT ONLY AFFECTS OYSTER CREEK PERSONNEL
(4) JCP&L MGT WILL BE AVAILABLE FOR CT'S, SWYD (IF NEEDED)

(5) CHIEF NEGOTIATOR → BOB CASTLE
(AMERGEN)
UNION → ED STROUP

(6) PREPARED TO SEQUESTER ≈130 INITIALLY
(7) ≈220 B.U. MEMBERS / ≈240 MGT